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Morlais Project

Document MOR/RHDHV/DOC/0071: Statement of Common Ground – NRW and IoACC – Seascape, Landscape and Visual Impact

Applicant: Menter Môn Morlais Limited

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Document MOR/RHDHV/DOC/0071: Statement of Common Ground – NRW
and IoACC– Seascape, Landscape and Visual Impact

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Revision History			
Date	Rev.	Summary of Changes	Issue Purpose
17/05/19	0.1	First draft for review by Menter Môn	For comment
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22/07/19	1.0	Second draft for review by Menter Môn	For comment
30/07/19	1.1	Second draft for approval by Menter Môn	For approval



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1. INTRODUCTION

1.1. THE PROJECT

1. The Project is being developed by Menter Môn, the applicant, a not for profit social enterprise company. When consented, the Project will have a generating capacity of up to 240 MW of tidal generating capacity.
2. The Project is located within one of several marine energy demonstration zones located around the United Kingdom (UK) coast, which have been leased out by The Crown Estate in a bid to encourage and accelerate the marine energy industry. The Project is located within the West Anglesey Demonstration Zone (WADZ), a zone primarily selected for its tidal resource. Menter Môn has been appointed as the manager of the WADZ by The Crown Estate. In this ES, the WADZ is referred to as the Morlais Demonstration Zone (MDZ).
3. The development of the Project will provide a consented tidal technology demonstration zone, specifically designed for the installation and commercial demonstration of multiple arrays of tidal energy devices. The Project will include permanent communal infrastructure for tidal technology developers which provides a shared route to a local grid connection via nine export cable tails, an onshore landfall substation, and an onshore electrical cable route to a grid connection via a grid connection substation.
4. The Project will be authorised via the following principal consents:
 - A Transport and Works Act Order under the Transport and Works Act 1992; and
 - A Marine Licence under the Marine and Coastal Access Act 2009 (MCAA).

1.2. THE DEVELOPER

5. Development of the MDZ is being led by Menter Môn who have been allocated funding from European Union (EU) Structural Funds prioritised for marine energy in Wales. Menter Môn is a not for profit, third sector social enterprise, delivering socioeconomic development projects across North Wales. Menter Môn's motivation for the Project is to position itself as a community organisation at the centre of renewable innovation, and to establish Anglesey as a marine energy hub, thereby securing maximum added value for the local economy and community.

1.3. THE NEED FOR THE PROJECT

6. Tidal energy is a clean, renewable and highly predictable source of energy. The EU has identified tidal energy, and more widely ocean energy (tidal and wave combined), as having the potential to contribute significantly to climate change reduction, socio-economic and energy security objectives. The Project would present a significant proportion of the Welsh carbon budgets.
7. In allowing long-term commercial demonstration of different technologies and small arrays of tidal devices, the Project is an important step in developing the tidal energy industry within the UK and internationally, with significant potential socio-economic benefits as well as contributing towards the reduction of greenhouse gas emissions and greater security of energy supply.

8. Development of the Project will support those objectives of the 2017 Anglesey and Gwynedd Joint Local Development Plan, aimed at promoting the development of renewable or low carbon energy technologies (Isle of Anglesey County Council and Gwynedd Council, 2017). The Project will prioritise maximising opportunities for local communities directly via employment and indirectly via the establishment of a local supply chain.

1.4. ROLE OF POLICY AND LEGISLATION IN THE DECISION MAKING PROCESS

9. The ES identifies the key National and European legislative and policy drivers and commitments in areas of climate change and renewable energy which are relevant to the Project. Each technical topic within the ES outlines how the development of the Project will comply with the requirements of national legislation and policy, local plans and technical guidance.
10. The ES provides consideration of the key legislation, including the Well Being of Future Generations (Wales) Act 2015, which promotes improvement of the social, economic, environmental and cultural well-being of Wales. The developers of the Project also have a desire to increase and diversify employment and economic development opportunities across the communities. The Project will have no significant negative impact on health and wellbeing and is expected to have a minor beneficial impact to a number of receptors.
11. National Policy Statements (NPS) are produced by Government and comprise the Government's objectives for the development of projects in a particular sector. Those relevant to the Project give reasons for the policy set out in the statement and include an explanation of how the policy takes account of Government policy relating to the mitigation of, and adaptation to, climate change.
12. The Marine Policy Statement (MPS) supports marine renewable developments and suggests that adaptation and mitigation methods for these technologies may be supported by detailed monitoring programmes and co-ordinated research initiatives, including post deployment of devices. This approach is being followed by Menter Môn, with the intention to supply a detailed environmental monitoring and mitigation plan.
13. Planning Policy Wales (PPW) outlines the Welsh Government's approach to ensuring that the planning system contributes to the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.
14. The draft Welsh National Marine Plan (WNMP) outlines the following aspects that Menter Môn should be undertaking to ensure that the Project is in accordance with the plan:
 - Engage early across and between relevant stakeholders;
 - Apply the general cross-cutting and sector-specific policies set out in this plan to guide proposals;
 - Consider the potential beneficial and adverse impacts of their proposed activity on the economy, society and the environment; minimise adverse effects and maximise opportunities for coexistence and securing multiple benefits;
 - Supply the information required for the relevant public authorities to assess their proposal(s) including fit with relevant planning policy; and

- Ensure that evidence provided is sound and proportionate given the development in question and its associated risks.

1.5. PURPOSE OF THIS DOCUMENT

15. Drawing upon experience from Development Consent Order (DCO) applications for major offshore wind farms, Menter Môn is applying a technical working group (TWG) and “statement of common ground” (SoCG) approach to management of key environmental issues for the Morlais Project (hereafter referred to as ‘the Project’) and associated Transport and Works Act Order (TWAO) application. A small number of TWGs have been established to enable technical discussions with experts from relevant stakeholders.
16. The main participants of the TWGs are technical experts drawn from Natural Resources Wales (NRW) and the local planning authority Isle of Anglesey County Council (IoACC). This Statement of Common Ground (SoCG) is a ‘live’ document that has been prepared by Royal HaskoningDHV on behalf of Menter Môn to record the outcomes of technical discussions with NRW and IoACC regarding Seascape, Landscape and Visual Assessment (SLVIA). It has been prepared in accordance with guidance published by the Planning Inspectorate and available from the Assembly Government’s website (Welsh Government, 2019).
17. Paragraph 1 of the Guidance states that SoCG: *are joint statements made by the appellant/applicant and other parties such as the local planning/relevant authority. The aim of the document is to agree factual information and to provide a commonly understood basis for the appellant/applicant; the local planning / relevant authority and/or other parties.*
18. Although not required as statutory documents under Schedule 5 and 6 of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006, Menter Môn is submitting SoCG on key technical issues, including ornithology, marine mammals and seascape and landscape visual impact assessment (SLVIA). Although there is no statutory requirement, SoCG are useful tools and their submission is encouraged where a SoCG contributes to an improvement in the quality of the evidence and a reduction in the quantity of material which needs to be considered (Welsh Government, 2019).
19. The purpose of this SoCG is to set out matters which are agreed and not agreed about the application for consent to be made by Menter Môn for the construction and operation of the Project.
20. The aim of this SoCG is therefore to provide a clear position of the state and extent of agreement between Menter Môn and NRW on matters relating to the Project at the time of writing and the SoCG will continue to evolve in the lead up to and during the post application period.
21. The contents of this document and NRW and IoACC’s views are based on pre-application discussions/submissions which are subject to the submission of the formal application and detailed supporting documents, and NRW and IoACC’s views and position are therefore subject to change (at least on some aspects).
22. This first draft of the SoCG for SLVIA was provided to NRW and IoACC by Menter Môn on 28th May 2019 for review and comment.



23. The document will be updated as more information becomes available and as a result of ongoing discussions between Menter Môn, NRW and IoACC. Updates are recorded in the “Revision History” table provided on the front page of this document.
24. Once finalised, the SoCG will be submitted to the Welsh Government in relation to the application by Menter Môn under the Transport and Works Act 1992 for an order granting development consent for the construction of the Project.
25. This document should be read in conjunction with the relevant technical chapter in the ES; **Chapter 24, Seascape Landscape and Visual Assessment (Volume I of the ES).**

2. PROJECT DESCRIPTION

2.1. OVERVIEW

26. The Project will provide the supporting electrical infrastructure to connect tidal energy converters (TECs) within the MDZ and export the electricity generated to grid. The Project aims to secure a broad consent envelope, which will encompass a range of tidal device types and technologies with the potential to be installed and operated as part of the Project. The final details of all equipment to be installed, including tidal devices, will be confirmed following consent.
27. The Project comprises two development areas, as follows:
- Offshore Development Area: including all intertidal and offshore areas where offshore infrastructure may be placed and encompassing the MDZ (covering an area of 35 km²), and the export cable corridor (covering an area of 4.75 km²).
 - Onshore Development Area: including all intertidal and onshore areas where infrastructure may be placed (covering an area of 1 km²).
28. As a pre-consented and grid connected commercial demonstration zone, a number of different tidal devices and array configurations may be deployed at the Project over its 37-year lifetime. Tidal devices will be deployed in multiple arrays within the MDZ, to a maximum installed capacity of 240 MW.
29. The key components of the offshore works associated with the include:
- Tidal Devices, TECs and inter-array cables within the MDZ;
 - Up to nine export cable tails (shared with onshore components);
 - Navigation and environmental monitoring equipment;
 - Mooring and foundation structures; and
 - Offshore electrical infrastructure, including submerged, floating or surface emergent hubs.
30. The key components of the onshore works associated with the Project include:
- Cable landfall works, including;
 - Up to nine HDD ducts or trenched equivalents,
 - Up to nine transition pits or bays, and
 - Up to nine export cable tails (shared with offshore components).
 - A landfall substation at Ty-Mawr (hereafter referred to as Landfall Substation);
 - A switchgear building at Parc Cybi (hereafter referred to as Switchgear Building);
 - A grid connection substation at the existing Orthios Eco-Park to the east of Holyhead (the site of the former Anglesey Aluminium works) (hereafter referred to as Grid Connection Substation); and,
 - Onshore cable route between Landfall Substation, Switchgear Building and Grid Connection Substation).

2.2. OFFSHORE WORKS

2.2.1. Tidal Devices

31. Tidal devices comprise of the TEC, the supporting structure, and the anchor or foundation. Several representative tidal technologies have been considered in order to capture the likely range of TECs that may be demonstrated within the MDZ.
32. Using three generic types of tidal device as exemplars shown in **Plate 2-1**, **Plate 2-2** and **Plate 2-3**, the TEC support structure may be seabed mounted and submerged, buoyant and mid-water column or floating. The TECs to be installed will fall into one of two main types as shown in **Plate 2-4** horizontal axis (axial flow) rotors; or vertical axis (cross flow) rotors.
33. Note that the actual form of tidal devices and numbers of TECs supported will differ between the technologies deployed. Following consent award, tidal device developers will be allocated “berths” within the MDZ, within which they will be able to deploy anything from one device to arrays of multiple tidal devices. Repowering is the replacement of one array of tidal devices with another array of tidal devices, normally with a different, newer or / and updated technology. Array deployments will vary in duration; therefore, the allocation of berths will be repeated throughout the life of the Project, as berths become available and are repowered.

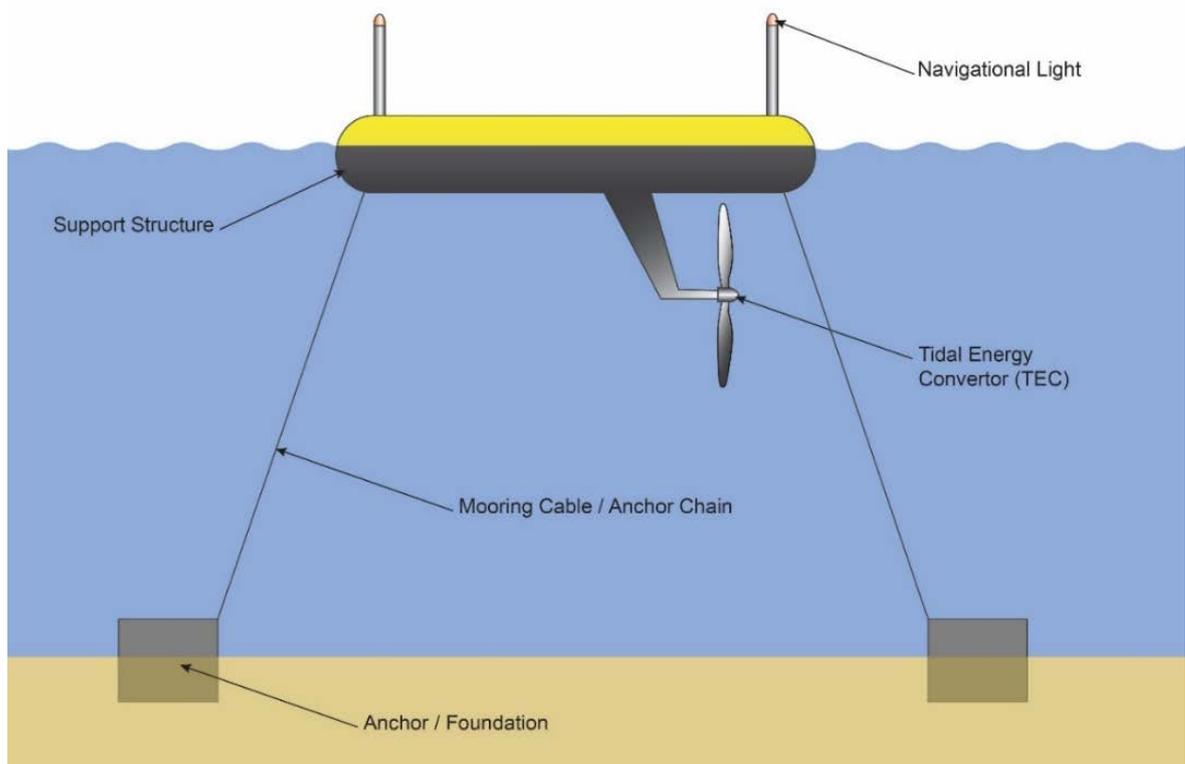


Plate 2-1 Generic Tidal Device Exemplar 1 – Floating or Surface Emergent Tidal Device, Comprised of TEC, Support Structure, Mooring Cables / Anchor Chains and Anchors / Foundations

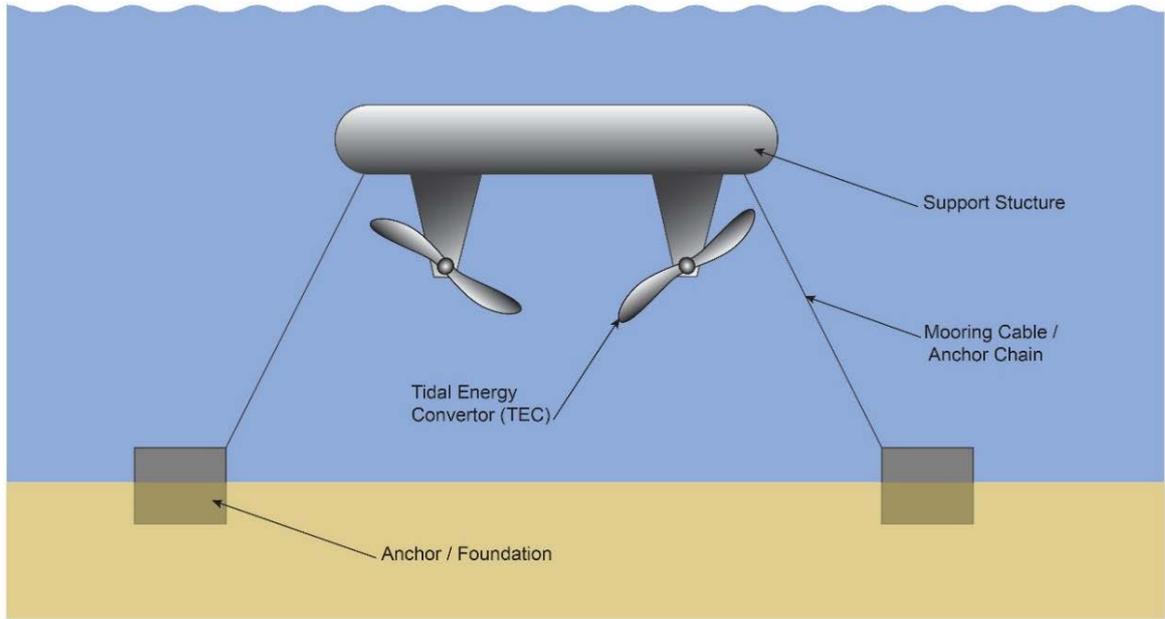


Plate 2-2 Generic Tidal Device Exemplar 2 – Mid Water Column Tidal Device, Comprised of TEC, Support Structure, Mooring Cables / Anchor Chain, and Anchor / Foundation. Note this device is shown facing into direction of current flow

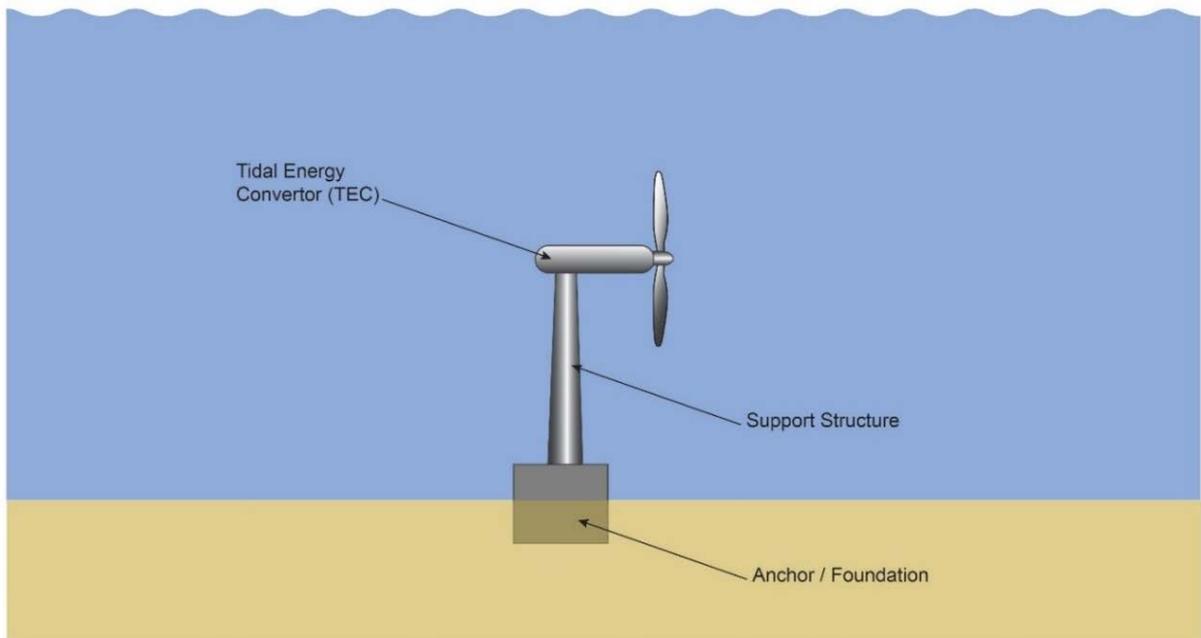


Plate 2-3 Generic Tidal Device Exemplar 3 – Seabed Mounted Sub Surface Tidal Device with TEC Supporting Structure and Foundation

34. **Plate 2-4** shows the two generic forms of TEC that may be mounted on the generic tidal device exemplars shown in **Plate 2-1** to **Plate 2-3**. These may be either horizontal axis or vertical axis TECs.

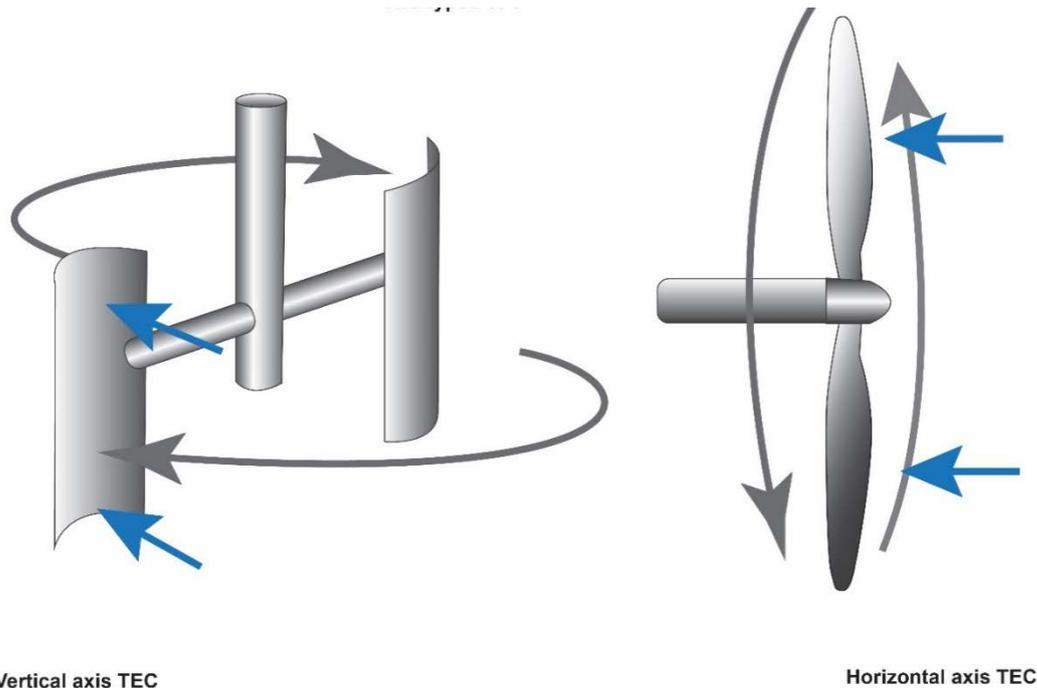


Plate 2-4 Illustration of Horizontal and Vertical Axis TEC Types

2.2.2. Export Cables

35. From the arrays of tidal devices, electricity will be transmitted via subsea inter-array cables to an offshore hub or other connection point(s), from which subsea export cables will connect to export cable tails in the nearshore, with the export cable tails continuing to landfall.
36. On reaching shore the export cable tails will be joined to underground onshore cables via an underground transition pit or bay, near to the point of landfall.

2.3. ONSHORE WORKS

37. Landfall will be located within the bay on the western coast of Holy Island known as Abraham's Bosom. There are two main methods which could be used for cable installation at landfall; Open cut trenching, or HDD.
38. HDD is the preferred option to achieve landfall. However, if HDD is not found to be feasible, possible alternative methods consist of cutting of shallow trenches with an excavator / rock cutter; installation and pinning of ducting and/or subsea cable with a split-pipe to the cliff face, across the foreshore region, all within a trench where possible.
39. The Landfall Substation will house the connection between the offshore export cables and the onshore cable to a grid connection substation. The landfall substation location is within currently farmed land, in the area of Holy Island known as Penrhos Feilw.
40. The preferred option for the onshore cable route is for it to be excavated into the local road network where possible. Where constraints such as a narrow road or existing services within the road do not allow, the cable will be installed within land/fields adjacent to the road. From the landfall substation location, the majority of the onshore cable route follows the minor road network to towards the A55 and Holyhead to Bangor rail line.



41. At certain locations where specific features need to be crossed or avoided, such as the A55 and Holyhead to Bangor rail line, trenchless techniques such as drilling under the feature would be used to install ducts, minimising environmental impacts and disruption.
42. Menter Môn propose to construct a grid connection substation to convert the electricity produced by the demonstration zone into a format that can be accepted by the existing energy supply. The cable would be routed from the Landfall Substation, via trenching to a 33kV Switchgear Building at Parc Cybi then to the Grid Connection Substation at Orthios Eco-Park to the east of Holyhead (the site of the former Anglesey Aluminium works). Connection to existing electricity network will be through existing infrastructure at the Grid Connection Substation. Although the infrastructure at the Switchgear Building is not sufficient to accommodate the full project capacity, this will offer an additional connection to the local electricity network.

3. RECORD OF CONSULTATION

43. The preparation of this SoCG has been informed by a programme of discussions between Menter Môn, NRW and IoACC. The relevant meetings are summarised in **Table 3-1** and the outline of topics covered relevant to SoCG discussions for seascape, landscape and visual assessment (SLVIA) are shown in **Table 3-2**.

Table 3-1 Technical Working Group Meeting Details

Meeting / Date / Attendees	Agenda	Documents sent to NRW prior to meeting
TWG First Meeting: SLVIA Assessment Approach 30th October 2018 NRW/IoACC	Baseline collation <ul style="list-style-type: none"> ▪ Project background (recap) ▪ Review of Project Design Envelope ▪ Baseline data collection ▪ Assessment methodology ▪ Night time lighting assessment ▪ Offshore Zone of Theoretical Visibility (ZTV) parameters and proposed viewpoints ▪ Onshore ZTV parameters (proposed viewpoints to be confirmed with NRW) ▪ Grid substation ▪ Landfall substation ▪ Cumulative assessment 	SLVIA 1st Tech Meeting 301018
TWG Second Meeting: SLVIA Assessment Approach 12th March 2019 NRW/IoACC	Assessment approach <ul style="list-style-type: none"> ▪ Project background (recap) ▪ Review of Project Design Envelope ▪ Offshore Project Design Envelope: Draft Layout ▪ Draft Visualisations ▪ Viewpoint assessment (update) ▪ Night time lighting assessment (update) ▪ Navigation Lighting update ▪ Onshore Design Review <ul style="list-style-type: none"> ○ Landfall substation ○ Grid substation ▪ Mitigation – colour guide 	SLVIA 2nd Tech Meeting 120319 Presentation
Conference call to discuss landfall Substation 25th March 2019 NRW/IoACC	Focussed conference call, relating to the landfall substation, following on from the second TWG meeting. Two key items for discussion: <ul style="list-style-type: none"> ▪ Present further study on substation site options. Both potential options are in the Area of Outstanding Natural Beauty (AONB) and therefore a landscape that is of national value, with associated sensitivities. ▪ Looking to get a steer that the direction the work is going in is the correct one and that the site is suitable. 	NA

Meeting / Date / Attendees	Agenda	Documents sent to NRW prior to meeting
TWG Third Meeting: SLVIA Assessment Approach 17th April 2019 NRW/loACC	Project Description Updates and Approach to Assessment: <ul style="list-style-type: none"> ▪ Review of Project Design Envelope (offshore elements) <ul style="list-style-type: none"> ○ Mitigated design envelope - careful consideration of NRW/loACC comments ○ Draft visualisations ○ Assessment scope update (viewpoint selection and night time photography) ▪ Landfall substation <ul style="list-style-type: none"> ○ Scheme design work undertaken following 2nd Technical Meeting ○ Draft visualisations ○ Assessment scope considerations (viewpoint selection) ▪ Grid substations <ul style="list-style-type: none"> ○ Scheme proposals ○ Assessment scope considerations (viewpoint selection) 	SLVIA 3rd Tech Meeting 170419 Presentation



Table 3-2 Statement of Common Ground – SLVIA – NRW/loACC

Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
Environmental Impact Assessment (EIA) – Baseline Environment					
1. Onshore study area	30/10/18 TWG First Meeting	Based on recent field work and knowledge of the study area it is proposed that a 3 km radius study area would be used for the proposed landfall substation and grid substation.	NRW: Agreed that 3 km is sufficient.	Agreed	N/A
2. Offshore study area	30/10/18 TWG First Meeting	The offshore assessment of effects will be focussed to a 15 km study area from the perimeter of the development site.	NRW: Agreed that 15 km is sufficient.	Agreed	N/A
3. Data sources	30/10/18 TWG First Meeting	For simplicity, and in order to avoid any duplication of assessment in areas where the Seascape Character Areas (SCA) and Landscape Character Areas (LCA) overlap, we propose that the assessment rationalises the character areas. For much of the study area the SCAs would be used, but for the onshore areas beyond the boundary of the SCAs we propose that the LCAs defined within the Anglesey Landscape Strategy 2011 would be used. Any additional baseline information which is relevant to the characterisation of onshore areas included in the LCA description would be added to the baseline SCA description. Furthermore, any additional information included in LANDMAP will also be used.	loACC: Requested an integrated approach to landscape and seascape assessments.	Agreed	N/A
4. Designations	30/10/18 TWG First Meeting	Statutory Designations include: Anglesey AONB Non-Statutory Designations include: Heritage Coastline; Special Landscape Areas; and Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales Other Designations include:	loACC noted that the Schedule of Ancient Monuments and Historical Landscapes need to be added and mapped as these form part of the landscape character in this area. Furthermore, loACC suggested including a settings assessment for scheduled monuments.	Ongoing	Full details will be present in the assessment submitted in September



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
		<p>Isle of Anglesey Coastal Path; and National Cycle Routes 5 and 8.</p> <p>Potential effects on Scheduled Monuments, including effects on their setting is assessment in Chapter 20 Onshore Archaeology and Cultural Heritage. Scheduled Monuments and other heritage designations are mapped in the figures that support Chapter 20 of the ES.</p>			
	30/10/18 TWG First Meeting	We will only address seascape, landscape and visual effects on the AONB in the SLVIA. Matters affecting tourism will addressed within the Socio Economics Chapter, whilst the Noise Chapter will address aspects of 'peace and tranquillity'.	loACC: Requested the impact of lighting (dawn, dusk and night time - sea and land based) on the Ynys Mon AONB, affecting peace and tranquillity, ecology and tourism to be assessed.	Ongoing	Full details will be present in the assessment submitted in September
	08/11/18 Email communication between MM and loACC/NRW	The assessment will consider effects on the Heritage Coast.	loACC: Assessment should consider the potential impact upon the Heritage Coast.	Ongoing	Full details will be present in the assessment submitted in September
	08/11/18 Email communication between MM and loACC/NRW	The AONB Management Plan 2015-2020, as directed by the CRoW Act 2000 has been referred to.	loACC: Reference needs to be made to the statutory AONB Management Plan 2015-2020 and not just the AONB designation. For information, IACC are in the process of reviewing the AONB Management Plan for the period 2020-2025, as directed by the CRoW Act 2000.	Agreed	N/A
Impact Assessment					
5. Photography methodology	20/11/18 Email communication between MM and loACC/NRW	Photography will meet the specified standard for the main SLVIA viewpoints and also the Night Time Viewpoints. We envisage that the standard set out in Visual Representation of Wind Farms, Version 2.2, 2017, SNH is appropriate.	loACC: Requested high quality images for photomontages, including night-time montages, as part of the night-time lighting assessment.	Ongoing	Night time wireline views presented as part of the assessment as we consider these satisfactorily represent



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
		The publication of the Landscape Institute practice note on "Landscape and Visual Assessment: Artificial Light and Lighting" is anticipated. However, in lieu of any specific standard for night time viewpoint photography we will ensure the completed photomontages meet with the prevailing industry best practice. Night Time Views would be presented as a sequence with photography in Daylight, Low Light, Dusk and Darkness.			the scale and nature of the change.
	30/10/18 TWG First Meeting	Individual viewpoint location plans and baseline view will be provided for each of the agreed viewpoints for NRW/loACC to confirm agreement with the selected viewpoint locations.	loACC: Requested viewpoints with detailed location points to include grid references and photographic imagery that would provide an impression of the available views from each location. Many of the coastal shots should be of unobstructed views and some micro siting based on the photographer's professional judgement will be necessary when the final images are taken.	Agreed	N/A
6. Presentation of results	30/10/18 TWG First Meeting	Presentation of Preliminary ZTV plans for each of the substation and grid station sites.	NRW/loACC: agreed with approach.	Agreed	N/A
7. Construction methods	30/10/18 TWG First Meeting 08/11/18 Email communication between MM and loACC/NRW	The assessment will cover the alternatives of directional drilling and open cut trenching, both during the construction phases and in the assessment of residual effects.	loACC: Visual impact of Horizontal Directional Drilling (HDD) which is the preferred installation method and the alternative of open cut trenching with J tubes down the cliff face should be considered.	Agreed	N/A



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
8. Night time photography	12/03/19 TWG Second Meeting	Night time photography will demonstrate different lighting conditions, from dusk to darkness.	NRW identified that different conditions should be shown in the viewpoint photography.	Agreed	N/A
	17/04/19 TWG Third Meeting	Proposed approach to photograph baseline night time photography at one time and adjust this through post processing to reflect different conditions.	NRW: we are happy with the approach i.e. of using a single daytime photograph and adjusting the light settings to create dusk and night time contexts, due to the technical difficulties and safety issues of night time photography. An accompanying description of the existing dusk and night time visual baseline will be required both generally (the main types and locations of artificial night time lighting that might affect the study area's dark sky/landscape/seascape) and specifically (any lighting that would be evident within each viewpoint), as this won't be captured in the illustrative photos.		
Final offshore viewpoints					
9. Viewpoint 1	30/10/18 TWG First Meeting	Parliament house opposite North Stack Island. Receptor: Recreational walkers (on the Isle of Anglesey Coastal Path/Wales Coast Path), representative of views from the Anglesey AONB and Heritage Coast.	NRW/IoACC: agreed with this viewpoint.	Agreed	N/A
10. Viewpoint 2	30/10/18 TWG First Meeting	Summit of Holyhead Mountain. Receptor: Recreational walkers, representative of views from the Anglesey AONB and Heritage Coast.	NRW/IoACC: agreed with this viewpoint.	Agreed	N/A
11. Viewpoint 3	30/10/18 TWG First Meeting	South Stack Seabird Centre. Receptor: Visitors and recreational walkers (on the Isle of Anglesey Coastal Path/Wales Coast Path),	NRW/IoACC: agreed with this viewpoint.	Agreed	N/A



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
		representative of views from the Anglesey AONB and Heritage Coast.			
12. Viewpoint 4	30/10/18 TWG First Meeting	South Stack Cliffs Nature reserve (above Penrhyn Mawr). Receptor: Recreational walkers(on the Isle of Anglesey Coastal Path/Wales Coast Path), representative of views from the Anglesey AONB and Heritage Coast.	NRW/loACC: agreed with this viewpoint.	Agreed	N/A
13. Viewpoint 5	30/10/18 TWG First Meeting	Ravens Point Road, Trearddur. Receptor: Residential settlement and recreational walkers(on the Isle of Anglesey Coastal Path/Wales Coast Path).	loACC: Ravens Point Road is included as a location for the night-time assessment. Obvious change will be greatest where current light levels are lowest, however they must be accessible/used locations in the evening/darkness. Depending on a detailed analysis of the ZTV (does the location below clearly fall within it?) – the Anglesey/Wales Coast Path above the beach is likely to be used in the evenings at low light by local walkers. However, if it is likely that lighting will be on during hours/conditions when the Anglesey/Wales Coast Path is used elsewhere, other coastal viewpoints should also be included.	Agreed	N/A
	20/11/18 Email communication between MM and loACC/NRW	It is noted that the selected Ravens Point viewpoint, which is adjacent to the Isle of Anglesey Coastal Path/Wales Coast Path, will experience greater visibility to the Proposed Development according to the ZTV, when compared with the promenade at the rear of Trearddur Bay beach. This would therefore present a realistic worst-case scenario for the assessment. The preliminary fieldwork indicates that from this viewpoint the night	loACC: Request that the promenade at the rear of Trearddur Bay beach be included, possibly in addition to the one at Raven's Point, Trearddur Bay. The logic behind the request is that the suggested viewpoint would look at a more enclosed view which we consider would have greater night time use than the viewpoint suggested.		N/A



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
		time lighting conditions present a balance of a dark setting in which the baseline background lighting around Trearddur Bay can be observed. It is therefore requested that you clarify whether you wish to proceed with an alternative position despite the reduction in visibility.			
	28/11/18 Email communication between MM and IoACC/NRW	As requested, we will include the Promenade at Trearddur Bay and Raven's Point to gain a full appreciation of the landscape and visual effects.	NRW/IoACC: agreed with this viewpoint.		N/A
14. Viewpoint 6	30/10/18 TWG First Meeting	Rhoscolyn Head. Recreational walkers (on the Isle of Anglesey Coastal Path/Wales Coast Path), representative of views from the Anglesey AONB and Heritage Coast.	NRW/IoACC: agreed with this viewpoint.	Agreed	N/A
15. Viewpoint 7	30/10/18 TWG First Meeting	High Street, Rhosneigr. Receptor: Residential settlement and recreational walkers (on the Isle of Anglesey Coastal Path/Wales Coast Path).	IoACC: Requested substitution of viewpoint 7 (High Street, Rhosneigr) with a view from the western end of Beach Road, Rhosneigr, which in our opinion would provide a view experienced by many more people visiting Rhosneigr given that it provides direct access to Traeth Crigyll beach.	Agreed	N/A
	20/11/18 Email communication between MM and IoACC/NRW	With regard to your request for the substitution of viewpoint 7 (High Street, Rhosneigr) with a view from the western end of Beach Road, Rhosneigr, it is noted that the former viewpoint will experience greater visibility to the Proposed Development in the ZTV and therefore presents a realistic worst case scenario for the assessment compared to a view from the western end of Beach Road, Rhosneigr. The determination of receptor sensitivity would remain the same for either location.	IoACC: Agreed to withdraw earlier suggestion and adhere to the viewpoint selected originally.		N/A



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
16. Viewpoint 8	30/10/18 TWG First Meeting	Route of the Isle of Anglesey Coastal Path/Wales Coast Path, beneath Penbrynyreglwys, Carmel Head. Receptor: Recreational walkers (on the Isle of Anglesey Coastal Path/Wales Coast Path).	NRW/IoACC: agreed with this viewpoint.	Agreed	N/A
17. Viewpoint 9	30/10/18 TWG First Meeting	Route of Holyhead to Dublin Ferry. Receptor: Sea to sea views to represent the experience of travellers using the ferry and catamaran services.	NRW/IoACC: agreed with this viewpoint.	Agreed	N/A
18. Viewpoint 10	30/10/18 TWG First Meeting	Southwestern extent of project area. Receptor: Sea to land views to represent the experience of recreational boaters.	NRW/IoACC: agreed with this viewpoint.	Agreed	N/A
19. Holyhead Breakwater	29/11/18 Email communication between MM and IoACC/NRW	A night time viewpoint from the end of the Holyhead breakwater which is regularly used by anglers may be appropriate. Alternatively, a viewpoint could be taken from the Holyhead to Dublin ferry. Both options will be explored.	Although it would see the edge of the site only, the Breakwater would be better than a ferry view. A cluster of lights in the seas to the right of South Stack seen from the Breakwater could affect natural beauty as perceived by regular visitors to this spot.	Ongoing	NRW to confirm agreement to remove breakwater viewpoint IACC agrees to removal of breakwater as a viewpoint providing that a wireframe from the breakwater is provided and a wireframe is provided from sea users/travellers (ferry/cruise ships). NRW comment: the deletion of visually prominent tidal devices to the north of Gogarth Bay (following our concerns about significant effects on the undeveloped seascape setting of Holyhead
	17/04/19 Third TWG Meeting	Menter Môn have reviewed the inclusion of this viewpoint. Menter Môn consider that the changes to the offshore zones will reduce the changes that would be seen from the breakwater. The reduced level of likely effect resulting from changes to the design envelope, together with the health and safety risks associated with obtaining night time working at this location means it is not intended to photograph this viewpoint and it will be represented using a wireframe visualisations.	IoACC noted that a view from the breakwater would be broadly reflective of people travelling to/from Holyhead on cruise ships as well as on ferries.		



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
					Mountain) means that we don't require this viewpoint to be assessed.
20. Barclodiad y Gawres	08/11/18 Email communication between MM and loACC/NRW	Barclodiad y Gawres Scheduled Monument site will be included as additional viewpoint in the assessment. Final viewpoint location will be confirmed through agreement with the project archaeologist however, the SLVIA viewpoint will reflect the experience of a visitor to the site in the modern-day environment.	loACC: Additional viewpoint from Barclodiad y Gawres (a Scheduled Ancient Monument on elevated ground around 2km to the south of Rhosneigr and immediately north of Porth Tre Castell/Cable Bay) should be included.	Agreed	N/A
21. Cytiau'r Gwyddelod	08/11/18 Email communication between MM and loACC/NRW	Cytiau'r Gwyddelod Scheduled Monument site will be included as additional viewpoint in the assessment. Final viewpoint locations will be confirmed through agreement with the project archaeologist however, the SLVIA viewpoint will reflect the experience of a visitor to the site in the modern-day environment.	loACC: Additional viewpoint from Cytiau'r Gwyddelod (a Scheduled Ancient Monument just to the east of viewpoint 3) should be included as the current selected viewpoints would not consider impacts on this heritage asset.	Agreed	N/A
22. South Stack lighthouse	08/11/18 Email communication between MM and loACC/NRW	We confirm that we will include the additional viewpoint from the steps leading down to South Stack Lighthouse. Photography suitable for the night time lighting assessment has been secured from a nearby position adjacent to Ellin's Tower. This was selected to avoid having the light house in the immediate foreground of the view to enable the other weaker baseline light sources to be clearly seen. Both viewpoints will be used.	NRW: An additional specific viewpoint is required from the path descending the headland towards south stack lighthouse. This is an important visitor destination within the AONB with strong scenic qualities. NRW requested the addition of a night time viewpoint at the steps leading to South Stack. This was requested due to the popularity of this location, including people visiting it at sunset/dusk.	Ongoing	N/A
	16/01/19 Email communication between MM	Wire-frame image will be compiled.	NRW: We welcome the inclusion of the additional viewpoint to the assessment. Given the uncertainty in our minds as to the day-time visual influence of future offshore tidal stream development here,		N/A



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
	and IoACC/NRW		and the iconic nature of headland views of the South Stack lighthouse we do advise that an additional photograph is taken from the headland. If, alternatively, a wire-frame image has been produced and suggests a negligible visual effect, then we would be happy for the existing view - chosen for night-time effects - to be used.		
	17/04/19 Third TWG Meeting	Menter Môn discussed the requested viewpoint location on the steps leading to South Stack, with a proposal that this be positioned in the car park at the top of the steps on the basis that it visited by a greater number of people and foreground elements could be included throughout the photography to increase the accuracy of visualisations. An additional wireframe view has been prepared from the steps to respond to comments from NRW/IoACC in relation to a photographer's view from the steps.	NRW acknowledged this but also expressed that some consideration should be given to people photographing South Stack from the steps.		N/A
23. Porth Dafarch	21/11/18 Email communication between MM and IoACC/NRW	We will also include the Porth Dafarch viewpoint; the viewpoint will be from the Wales Coast path	IoACC: Consider one further viewpoint. The effect on enclosed bays such as Porth Dafarch should be part of the assessment – possibly effects could be addressed through design? Effects may not only be related to the number of structures visible but their likely position in a narrow view. A viewpoint or inclusion in an Anglesey Coastal Path/Wales Coast Path sequential assessment would be useful here.	Agreed	N/A
Final landfall substation viewpoints					
24. Viewpoint 1: South Stack Road nr. Tŷ-mawr Farm	17/04/19	We have selected five viewpoints specifically in relation to the landfall substation, positioned within approximately 1km of this element of the Project.	NRW/IoACC: No objection to the proposed scope or request for additional viewpoints to be considered.	Agreed	N/A



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
25. Viewpoint 2: Junction between South Stack Road and road the Trearddur	Third TWG Meeting				
26. Viewpoint 3: Henborth, South Stack Road					
27. Viewpoint 4: Wales Coast Path/Isle of Anglesey Coast Path, adjacent to road to Trearddur					
28. Viewpoint 5: Southern slopes of Holyhead Mountain					
Final grid connection viewpoints					
29. Viewpoint 1: A55 south of Orthios site	17/04/19 Third TWG Meeting	We have selected six viewpoints specifically in relation to the grid substation elements of the Project, all positioned within 1km of these specific sites. Two of the viewpoints are specific to the Orthios site. Menter Môn are of the view that this is a visually contained site and effects are likely to limited extent. Four of the viewpoints are specific to the Parc Cybi site, recognising that this a more open location.	NRW/IoACC: No objection to the proposed scope. Request to consider the potential visibility of the Orthios site from Trefignath Burial Chamber at Parc Cybi.	Agreed	N/A
30. Viewpoint 2: Industrial access road south west of Orthios site					
31. Viewpoint 3: Parc Cybi Spine Road					
32. Viewpoint 4: Trefignath Burial Chamber Parc Cybi					
33. Viewpoint 5: Parc Cybi employment site, between the A55 and footpath/ cyclepath					



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
34. Viewpoint 6: Ty-Mawr Standing Stone Parc Cybi					
Site Selection Considerations					
35. Design of landfall substation	12/03/19 Second TWG Meeting	SLR, on behalf of Menter Môn, acknowledged the sensitivity of the substation location, particularly due to its position in an open rural landscape within the AONB. Colours/tones such as grey are more likely to be appropriate throughout a greater proportion of the year due to them being more neutral and also more consistent with existing agricultural buildings in the local landscape.	IACC and NRW would expect to see a landscape led approach to the design process for the substation, with this including consideration of the massing/form of the buildings, materials, colours etc. It is also important for the colours to be appropriate through multiple seasons.	Ongoing	Review assessment upon receipt in September. Note the assessment concludes limited effects associated with the landfall substation.
	02/04/19 Letter of advice given following teleconference and Second TWG Meeting	Two landfall substation options presented to IoACC and NRW with massing models producing 6 viewpoints to allow a comparison between option 1 and option 2 sites, in the vicinity of Tŷ Mawr farm.	IACC and NRW: We considered views from Holyhead mountain and the local road network and can confirm that the option 2 site is preferable to the option 1 site. The benefits of the option 2 site over the option 1 site are as follows: <ul style="list-style-type: none"> The site sits lower in the landscape and makes better use of landform to reduce the development's visibility from a number of angles of view. The option 1 site would lead to a very large cumulative change at Tŷ Mawr, which would be industrial in character.	Ongoing	N/A
	02/04/19 Letter of advice given following teleconference and Second TWG Meeting	SLR's/Menter Môn's view is that it would not be possible to avoid visibility of a landfall substation in this general area. However, considerable effort has been made to respond to the comments made by NRW and Isle of Anglesey County Council in a positive and proactive way.	NRW: Residual issues: <ul style="list-style-type: none"> The development would remain visible from the footpath network on Holyhead Mountain and from South Stack Road. The scale of the development would be greater than that at Tŷ Mawr farm both in elevated views over the development 	Agreed	A comprehensive design has now been provided for the landfall substation and is provided in full detail in the ES, to be submitted in September.



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
		<p>This has included the selection of option 2, located towards the base of the valley. Meaning that the substation would occupy a relatively discreet position in the landscape.</p> <p>Efforts are also being made to create a visually contained development to ensure the substation has a recessive and relatively simple appearance e.g. through arrangement of the buildings, choice of materials and minimising ancillary elements such as fencing.</p>	<p>and when passing the site (the site's close proximity to South Stack Road would allow close views and the scale of the proposed buildings would be particularly apparent).</p> <ul style="list-style-type: none"> The use of a twin roof instead of a single span roof, or other building configurations needs to be looked at. <p>Additional tree planting to the south-western elevation of the building and a new field boundary along the site's north-eastern edge, in addition to SLR's suggestions would be required.</p>		
	<p>02/04/19 Letter of advice given following teleconference and Second TWG Meeting</p>	<p>The main building has been rotated 90 degrees which has altered the overall footprint of this substation. However, note that the layouts that were initially presented were preliminary and it is likely that design evolution would have altered the overall footprint of these too. Therefore, it is not possible to draw direct comparisons.</p> <p>Menter Môn consider that rotating the building has allowed an enclosed compound arrangement to be created which will help to simplify the appearance of the substation, thereby also helping to mitigate potential effects.</p> <p>The land to the north east of option 2 has been considered in response to the comments from NRW. However, a specific proposal on this land has not been advanced due to a combination of factors. The field pattern is smaller and there is a greater likelihood that field boundaries would be disrupted or displaced by proposals. A small ditch/watercourse crosses this land, with a high probability that this would need to be rerouted. It is expected that a longer access road would be required (with associated</p>	<p>NRW: The applicant mentioned that, for operational reasons, rotating the main building by 90 degrees would make cable runs from the offshore development easier to install. From site evaluation our view is that this reconfiguration would require greater landscape disturbance from cut and fill operations and introduce a new pattern at odds with the prevailing development pattern, which follows the contour line.</p> <p>The western elevation of the development would also present a greater mass within views from South Stack Road. If this arrangement is to be pursued, we advise that the field to the northeast of the option 2 site would be a better location for the development. This site nestles closer to the landform behind, with greater set-back from South Stack Road and would fit the established field pattern without the need for additional field enclosure, which option 2</p>	Ongoing	<p>Please review upon receipt of the ES in September, further detail provided</p>



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
		<p>effects). There is also potential that this land may be crossed by underground pipes from the nearby reservoir.</p> <p>In addition, the increased distance to both the MDZ and the grid substation would result in higher project costs. Whilst this was not a determining factor it is relevant to the choices made.</p>	<p>would require. We consider this would be an improvement on the option 2 site and recommend this third option be evaluated by SLR and the applicant.</p>		
	<p>02/04/19 Letter of advice given following teleconference and Second TWG Meeting</p>	<p>A planning statement will be prepared as part of the application and this will describe the approach taken and the measures that are incorporated in the Project. This will also note that these measure/considerations have influenced the design envelope, acknowledging that the detailed design of the substation will take place at a later date and it is expected that this will form the basis of a condition in the permission.</p>	<p>IACC and NRW : Irrespective of the siting options pursued, we recommend that the following further information is provided to us for review prior to planning submission to explain the development requirements and demonstrate that the applicant's final proposal has been fully informed by landscape siting, design and mitigation to minimise adverse effects on the Anglesey AONB and bring some enhancement to landscape features:</p> <ul style="list-style-type: none"> ▪ A planning statement that describes the development, its component parts, their dimensions and appearance. <p>Evidence that the building form, orientation, location of development components, location of security fencing, use of external spaces, colour, lighting, new boundaries and additional planting (within this wind exposed location) have been collectively considered. This is to ensure good design, placemaking and landscape integration are fully addressed.</p>	<p>Ongoing</p>	<p>Planning statement to be prepared by Menter Môn. Timescales will not allow the full review and revision of the Planning Statement , however a draft for information may be submitted to IoACC.</p>



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			Design/mitigation for landscape integration: <ul style="list-style-type: none"> ▪ Matt/ non-reflective finishes to the building roof and elevations ▪ Specify the colour palette for landscape integration (BS or Ral references). ▪ No night time lighting, except for PIR sensors at building entrances; lighting to be designed to dark sky standards ▪ Avoid industrial security fencing along prominent sections of the site boundary 		
	17/04/19 Third TWG Meeting	Menter Môn confirm that the quarry has been considered but discounted on the basis of potential habitat sensitivity is lying within the Glannau Ynys Gybi / Holy Island Site of Special Scientific Interest, Special Protection Area and Special Area of Conservation designation.	loACC questioned whether the disused quarry at the base of Holyhead Mountain (to the north of the proposed location) had been considered. IACC has confirmed that it expects the submission to include detail about the consideration given to the disused quarry at the base Holyhead Mountain.	Ongoing	N/A
	17/04/19 Third TWG Meeting	Menter Môn presented the integration between the EIA processes and substation design.	loACC/NRW were positive about the approach that had been taken in relation to the landfall substation, noting that the proposals had taken account of the advice they provided.	Ongoing	This is provided within Chapter 3, Site Selection and Consideration of Alternatives, included within Volume I of the ES to be submitted in September. Note that this site was removed to minimise impacts to Holy



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
					Island Coast SAC/SPA/SSSI.
	03/06/19 NRW Comments on Minutes from Third TWG	The design of the landfall substation and grid substation will seek to reflect the local landscape pattern, using landform to mitigate effects.	There is potential for this element to sit within the AONB without unacceptably harming the area's character and visual amenity. Attention to design, colour, materials and planting are important elements that the final submission will need to address.	Agreed	Review proposed substation design upon receipt of the ES in September, further detail provided and impacts considered to be not significant.
36. Cable Route refinement	12/03/19 Second TWG Meeting	The cable route would primarily follow the road corridor and therefore landscape and visual effects are likely to be limited. It is intended that existing field access would be used where possible, and restoration measures used post constructions.	loACC highlighted that the mapping is available from the National Library – may indicate which field boundaries are older and may be of greater value. Where boundaries need to be removed there is an expectation that they would need to be surveyed in advance and restored to a high standard following the construction phase.	Agreed	N/A
37. Offshore project envelope	12/03/19 Second TWG Meeting	<p>Menter Môn provided fundamental points on the importance of positioning of devices and technologies available. This project is different from wind, tidal resource is very localised and small movement can significantly affect the scale of resource available. The location of devices reflects the availability of the tidal resource and movement of these may affect the viability of the project.</p> <p>The best tidal resource was located in the vicinity of South Stack and limited the nature of device types that could be positioned in this part of the overall zone could affect the viability of the project.</p> <p>MM acknowledged the comments made and the need to review the project design envelope.</p>	A regimented pattern of surface piercing tidal units, in yellow and possibly with marker lights within this context, would cause significant visual effects affecting people's experience of the AONB's special qualities contrary to PPW policy. Overall there is general concern about the overall scale of development being proposed and that mitigation that considered the potential seascape/landscape and visual effects should be incorporated. This concern is greatest in relation to the northern sub-zones in the offshore design envelope, particularly sub-zones 1 to 4. We therefore strongly advise that tidal stream proposals in this area be revisited, to find a form of development	Ongoing	Revision of offshore project envelope (see below).



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
			<p>that is compatible with the AONB landscape/seascape context and availability of views.</p> <p>This approach is relevant to the rest of the project area and the visual setting to Abraham's Bosom and Penrhyn Mawr.</p>		
	17/04/19 Third TWG Meeting	<p>The progression in the design envelope was presented with the measures taken in response to comments made by NRW and loACC at the second technical meeting. The specific measures include:</p> <ul style="list-style-type: none"> ▪ The inclusion of no visually prominent devices in sub-zones 1, 2 and 3, together with the northern parts of sub-zones 4 and 8; ▪ Separation distance of 1km between visually prominent tidal devices and the coastline; and <p>Minimising other floating elements within the sub-zones (e.g. buoys).</p> <p>The assessment is based on this design envelope.</p>	<p>IACC and NRW welcomed the adjustments to the project design envelope, recognising that considerable work had been undertaken in response to the comments made at the second technical group meeting.</p>		<p>Please review upon receipt of the ES in September, further detail provided</p>
	03/06/19 NRW Comments on Minutes from Third TWG		<p>The colour coding and layout set out on the Offshore Project Design Envelope Plan was a helpful way of clarifying development parameters which have a bearing of visual impacts i.e. the types of sub-surface and floating units and their potential spatial arrangement. Given a planning approval being sought would allow for a range of devices to be implemented by a future developer, using latest technology and arrangement, the visual aspects of the final operational area are difficult to predict, beyond there being areas with, or without, surface floating devices. We therefore reiterate that planning and</p>		Ongoing



Issue	Date	Menter Môn position	NRW/IoACC position	Status	Actions (if required)
			<p>design parameters for the AONB need to be included for each sub-area of the project envelope.</p> <p>We have worked with the applicant to minimise significant effects upon the most important areas of the AONB and its seascape outlook. This has been achieved from our own contextual analysis in the absence of any draft EIA baseline description, understanding of the landscape/seascape contextual issues, or preliminary assessment of effects. We wish to advise that the current amended Offshore Project Design Envelope is however still likely to have significant adverse effects upon the AONB and its seascape setting.</p> <p>To fully avoid significant effects on the AONB we would advise that the tidal energy devices within 2.5km of the shore would need to be in the mid-water column or seabed-mounted to maintain an open seascape next to the AONB. The proposed use of surface floating devices such as Aquantis, at 3km from the shoreline, could be acceptable given their simple form, wide dispersal pattern and distance from the shore.</p>		<p>The proposed approach for the Project, is for all devices to fall within these parameters, and therefore falling within the worst-case Rochdale Envelope assessed within the Environmental Statement.</p> <p>A statement of confirmation, outlining that each array deployment within each subzone fits within the PDE will be submitted by Menter Môn to the Welsh Government and NRW for approval. If an array deployment is outwith the PDE, additional consenting or amendment to the Project consent will be required before deployment.</p> <p>Please review upon receipt of the ES in September, further detail provided</p>
38. Presentation of visualisations	17/04/19 Third TWG Meeting	Draft visualisations were presented to help illustrate how the revised design envelope differed from the one presented previously.	NRW/IoACC: No specific comments or observations made, other than the recognition of the work that had been done to alter the design envelope.	Ongoing	Please review upon receipt of the ES in September, further detail provided



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
Cumulative impact assessment					
39. Assessment methodology	30/10/18 First TWG Meeting	When we select the viewpoints for the substations we will make sure we capture any important combined effects in the selected viewpoints. We will circulate a suggested viewpoint plan for the landfall substation and grid substation sites once the final location has been confirmed.	loACC: There will possibly be some overlap of the ZTVs for the landfall sites with the ZTV for the offshore element. Where an overlap occurs, we would recommend that the viewpoint selection is revisited to ensure that there are no additional visual effects in relation to the combination of offshore and onshore elements.	Ongoing	The agreed viewpoints have been selected to specifically consider the different components of the Project. The potential for combined effects resulting from different components of the project has been considered in the assessment where considered appropriate e.g. the assessment of the Rhoscolyn SCA.
	30/10/18 First TWG Meeting	The proposed cable landfall component of the works is proposed to the west of Holy Island, within the vicinity of Abraham's Bosom. No cumulative developments are anticipated in this area; however, further clarification will be sought with regard to cumulative onshore effects once the final position for the cable landfall and associated substation works have been confirmed.		Ongoing	Please review upon receipt of the ES in September, further detail provided
40. Projects and Plans	30/10/18 First TWG Meeting	It is anticipated that effects will be limited to in combination effects with the Minesto Deep Green, Holyhead Deep Project, located to the west of the proposed Morlais project. The relationship between these two sites and the resulting cumulative effects will be the focus of the Cumulative LSVIA in relation to the offshore elements of the Project. Potential cumulative effects relevant to the grid substation elements of the Project will be evaluated, with the main consideration likely to be the redevelopment of the Orthios site.		Ongoing	Please review upon receipt of the ES in September, further detail provided



Issue	Date	Menter Môn position	NRW/loACC position	Status	Actions (if required)
Mitigation and Monitoring					
41. Proposed measures	08/11/18 Email communication between MM and loACC/NRW	<p>The mitigation proposals associated with the landfall substation and grid substation will be cognisant of the recommendations of the AONB Management Plan and will be carefully considered to minimise effects upon perceptions of the character and quality of the landscape.</p> <p>The design of the landfall substation and grid substation will seek to reflect the local landscape pattern, using landform and vegetation cover to mitigate effects. The scale, form and materials used will respect the local vernacular. Where possible local field boundaries, cloddiau and hedgerows will be retained and enhanced. Any new lighting associated with the substations will be kept to a minimum. Any lighting installed will be 'cut off' lighting with cowls and shields used to reduce lighting overspill and glare.</p>	loACC: Details of proposed mitigation required on the visual impact and lighting impact with the preferred landfall and Grid substations.	Ongoing	Review assessment upon receipt in September

4. REFERENCES

Welsh Government, 2019. Statement of Common Ground. Available from: <https://gov.wales/sites/default/files/publications/2019-01/statement-of-common-ground.pdf>. Accessed 19/07/19.