

Application by Awel y Môr Offshore Wind Farm Limited for an Order Granting Development Consent for the Awel y Mor Offshore Wind Farm project.

Planning Inspectorate Reference: EN010112.

Written Representation by National Trust EN010112-000627-AYMO

October 2022

1.BACKGROUND

1.1 National Trust welcome the opportunity to input to the consideration of the Awel y Mor (AyM) Examination.

1.2 The National Trust owns a diverse range of property along the North Wales coast that will have views to the proposed wind farm.

1.3 The Trust has a statutory duty to promote the permanent preservation of these properties for benefit of the nation-for ever for everyone.

2. EXAMINATION

2.1 NT interests in the consideration of the scheme are specifically related to SLVIA issues and the implications for tourism at our properties.

2.2 NT has submitted a Relevant Representation outlining its position with regards to the submitted scheme [RR-0029].

2.3 We welcome the early approach by the Examining Authority (ExA) to written questions in the ExQ1 deadline [PD-009].

2.4 Our WR is focussed on specific areas of interest to NT. We will, however, reflect on the submissions of the key Interested Parties (IP) in particular CADW [RR-0028] and the North Wales Local Authorities in relation to SLVIA and Heritage.

2.5 We note the request by the ExA within Annex H of the Rule 6 letter [PD-007] identifying NT as "Party N" relating to the request for a Statement of Common Ground (SoCG). Initial discussion with the applicants has taken place by email.

3. ISSUES FOR NATIONAL TRUST

3.1 PRINCIPLE OF SCHEME

3.1.1 NT does not object to the principle of Awel y Mor. Climate change is one of our key priorities, and we recognise the need to bring forward renewable energy generation at larger scale: including that at Awel y Mor.

3.1.2 We welcome the opportunity for critical examination and scrutiny of the proposals. Our staff, visitors, and tenants will see the proposed scheme from our properties and future visitor experience will include this significant new feature of the landscape and seascape. Our tenant at Great Orme is one of the nearest residential properties to the proposed scheme.

3.1.3 The key element for NT is the significance of change to the landscape and seascape. Our properties at Great Orme and Penrhyn Castle will be impacted most

by the scheme-the most significant change in view for our visitors to consider. The nature of change and harm to the wider setting of the Great Orme Heritage Coast is a factor in our deliberations. Night lighting adds further to our consideration of landscape and seascape change from National Trust property.

3.1.4 The identified residual effect during operation of the windfarm is the key concern from NT land ownership but given the length of construction our considerations also include the timelines relating to the latter end of construction and the decommissioning impacts. As the nearest elevated viewing point for the construction of Awel y Mor, this may create opportunities for visitor engagement at the Orme on climate, energy use, and renewable generation issues.

3.2 PENRHYN CASTLE

3.2.1 Penrhyn Castle is identified within the submission as a Grade I Listed Building. Paragraphs 206 to 215 of the application [APP-069] consider the effect of the proposed array upon the property. NT supports the inclusion of the terrace viewpoint from Penrhyn Castle [APP-246] but would note this is illustrative and partially screened by existing vegetation. It is only partially correct to state that the view is glimpsed from the fixed viewpoint due to intervening vegetation. Visitor views are not fixed and will encompass a variety of views out to the proposed array including those from various points around the Castle and from a large number of points within the adjoining Grade II* registered park and garden. NT has historically used a picture frame within the park and garden to illustrate the outstanding landscape and framing with long distance views out to sea as part of engagement and interpretation.

3.2.2 We note the ExA observed during their Unaccompanied Site Visit [EV-001], [EV-002] the extensive views from the terrace of the Castle and Parkland, and through Question 8.13 [PD-009] requested further justification that the effect of the Proposed Development upon Penrhyn Castle and the impact on the registered park and garden would be negligible.

3.2.3 We await further consideration of this issue, and conclusions within the SLVIA.

3.3 GREAT ORME

3.3.1 NT owns Parc Farm on Great Orme (GO), one of the closest land areas to the offshore array. AyM lies affects the setting of GO (Heritage Coast and part of a Special Landscape Area and Historic Landscape). The project will extend the current cluster of offshore wind farms further west and turbines will be significantly larger than existing. The windfarms will become the dominant landscape feature from a large area of land in National Trust ownership at GO.

3.3.2 The SLVIA [AS-027] acknowledges the importance of the Great Orme, para 1140 confirms the “expansive views out across the sea, coastline and inland hills are available from the Great Orme” Para 1144 also confirms the content of the Nature Reserve Management Plan that “many visitors to the Great Orme come to the summit particularly to enjoy the view” [AS-027]. The combination of expansive

views, large visitor numbers and a “view” based visit provide the particular sensitivity in relation to impacts at GO.

3.3.3 NT has supported the inclusion of viewpoints from GO and additional viewpoints that show the view towards the Orme. The totality of viewpoints includes 13, 15, 52 and 62 which demonstrate the scale of change that will be brought forward by AyM.

3.3.4 Paras 1155 through to 1158 of the submission [AS-027] seek to minimise the magnitude of change at GO. During periods of peak summer visitors (when visibility is likely to be greatest), large areas of the GO will undergo a fundamental change in character as a consequence of visibility of AyM as part of its seascape setting.

3.3.5 The project submission identifies the significance of the Great Orme in its impact on tourism and recreation. Para 301 within Chapter 10 (Tourism and Recreation) [AP-065] of the Environmental Statement states “there are opportunities for AyM to manage the risks of a negative short-term impact on tourism due to construction activity and to potentially deliver a positive benefit to the tourism sector within Llandudno and Great Orme area, which will be explored with local stakeholders”. No specific implementation mechanisms appear to be brought forward within the submission, nor the extension of this commitment to operational impacts, nor detailed exploration of this potential benefit. We note the ExA has raised this specific issue within Question 19.7 of the applicant [PD-009].

3.3.6 Lighting remains a concern of NT in the context of the totality of landscape and visual harm. We note Table 16 of [AS-027] sets out further options for mitigation of night-time visual effect. We also note the proposed scheme seeks to bring forward mitigation for night-time effects that include reducing aviation lights [AS-027]. NT remain concerned about how the mitigation will be secured and monitored, eg how will a 5km visibility change activate power change to lighting? No monitoring is proposed within the current submission (Schedule of Monitoring) [APP-311]. If this cannot be secured adequately or monitored the residual harm needs consideration with the planning balance of the scheme. We note further information has been requested of the applicants via Questions 17.26-29 [PD-009] by the ExA.

3.4 ANGLESEY AND SNOWDONIA

3.4.1 NT has significant land ownership in North Anglesey and Snowdonia that will have new views out to AyM. NT remains concerned about the implications of the scheme on the Special Qualities of Snowdonia National Park including the potential to affect diverse landscapes, tranquility and solitude. NT ownership across the Carneddau including Viewpoint 10 (Carnedd Llewelyn) [APP-239] lie at the heart of our concerns.

3.4.2 We await consideration of Local Authorities in relation to the significance of the residual landscape harm and the combined SoCG.

3.4.3 In relation to SNP, we await consideration of Questions 17.6 and 17.7 [PD-009] and whether the viewpoint at Carnedd Llewelyn is considered representative of the northern area of the Carneddau range. Large areas of NT owned open access land

in the Northern Carneddau will bring forward significant change for all northern views. Foel Fras (also within NT ownership) [APP-0267] is closer to the array, and further land to the north including the summits of Llwytmor, Berra Bach and Drosfyl will have 29-34 visible turbines and perhaps result in more significant landscape effects on the National Park than that assessed within the submission. We look forward to further consideration of this northern area of the Carneddau.

3.4.4 We welcome Question 17.24 [PD-009] in relation to Viewpoint VP 43 (Mynydd y Garn) [APP-272]. NT has supported its inclusion as a representative viewpoint but note the lack of further assessment within the submitted documentation. Mynydd y Garn is owned by NT and the viewpoint is a very popular walk in North Anglesey with a spectacular and diverse panorama that is difficult to match across the whole of North Wales.

3.5 MITIGATION

3.5.1 We recognise the change made to the application at pre application in reducing the westerly extent of the array. NT supported the reduced scale of development brought forward prior to the submission of the subject application.

3.5.2 We would, however, question whether this is considered as mitigation for the submitted scheme. NT note the very limited approach to offshore landscape mitigation, with one line given to the issue. NT consider that further mitigation from the scheme can be achieved to reduce the identified harm.

3.5.3 NT consider there are opportunities to enhance designated landscapes as offset mitigation. NT response to this specific issue is provided to Question 17.9 [PD-009]. The submitted Outline Landscape and Ecology Management Plan should be examined in the wider context of offshore residual effects, rather than its current scope and definition with a limitation to onshore construction and operation.

3.5.4 Question 17.21 [PD-009] raises the issue of offsite planting. This is particularly relevant for offshore elements at distance to the scheme. NT considers that a Section 106 Agreement could be brought forward as a flexible mechanism to mitigate adverse effects from distant vistas. This would be consistent with the requirements of paragraph 5.9.23 of NPS EN-1.

3.5.5 Landmap and further NRW datasets including the recent development Tranquility Assessments

could be used to scope appropriate intervention in the landscape using interested third party land ownership, alongside the scheme theoretical ZTV mapping.

3.5.6 No enhancement or landscape/visual compensation programme is identified with the submitted scheme.

3.5.7 NT await the Local Authority WR and whether a wider offsite landscape scheme through a Section 106 Agreement could be brought forward.

3.6 PLANNING BALANCE CONCLUSIONS

3.6.1 The project submission recognises in its Planning Balance conclusion (para 888) [APP-298] the significance of the landscape and seascape impact. Para 890 of the Planning Statement indicates “It is also noted that all predicted significant effects have been mitigated as far as practicable”.

3.6.2 NT consider that the Planning Balance needs the further consideration of offshore landscape with a redefined Landscape Management Plan including a wider and specific package of offset mitigation and enhancement measures. A Section 106 Agreement to secure the wider landscape enhancement alongside the management of tourism risk should be brought forward.

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