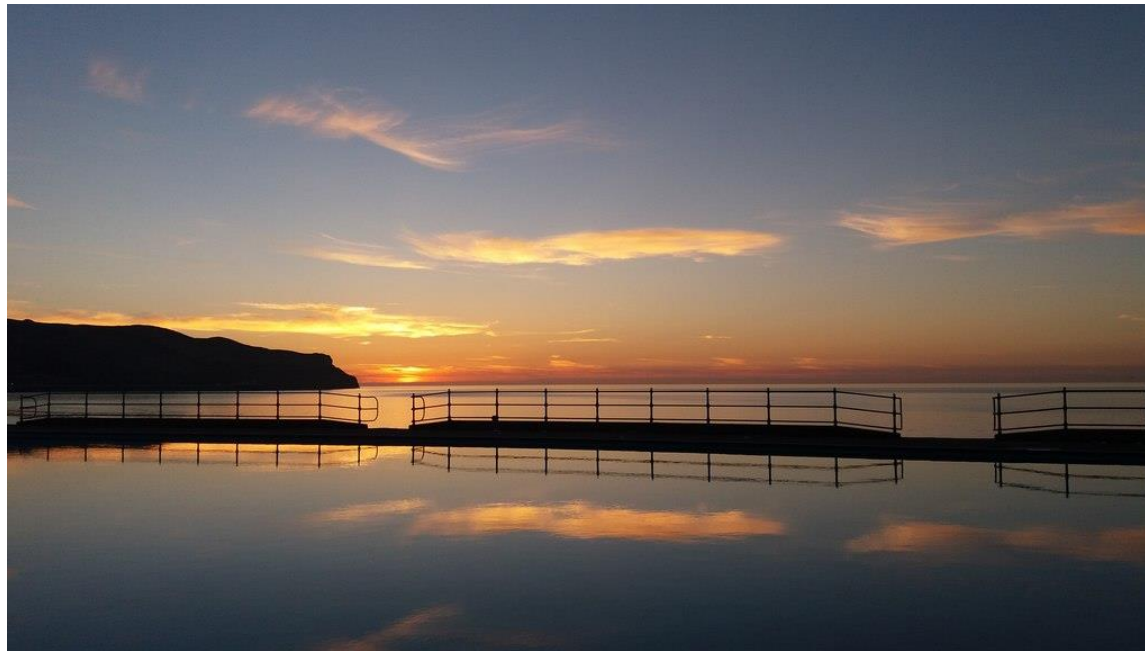


Awel y Môr Offshore Wind Farm Project
Conwy County Borough Council's response to the Examiners' first set of written questions



October 2022

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No.	Question	Response
0.2	<p>The Development Plan Please provide full copies of any relevant Development Plan policies (or other documents e.g. management plans, supplementary guidance) that you have referred to in any of your submissions. Should you refer to any additional Development Plan policies at any time in your future submissions (for example in a Local Impact Report) then, if they have not already been provided, please also submit copies of these into the Examination.</p> <p>a) Have there been any relevant updates to the statutory Development Plan since the compilation of the application documents? b) Are local planning authorities content with the Applicant's policy analysis?</p>	<p>The Development Plan consists of the Conwy Local Development Plan (adopted 2013) Adopted Local Development Plan (LDP) - Conwy County Borough Council</p> <p>There have not been any relevant updates to the statutory development plan since the compilation of the application documents.</p> <p>The Council is content with the Applicant's policy analysis of the Conwy LDP included in paragraph 126 of its Planning Statement.</p>
0.4	<p>Planning applications Please provide an update on any planning applications that have been submitted, or consents that have been granted, since the Application was submitted that could either affect the Proposed Development or be affected by the Proposed Development and whether these would affect the conclusions reached in the ES (e.g. Rhyl and Prestatyn sea defence schemes)</p>	<p>There have not been any relevant applications or consents within the area of Conwy County Borough Council.</p>
0.16	<p>Code of Construction Practice (CoCP) The CoCP would be an important part of the mitigation strategy for dealing with and controlling potentially adverse effects from the various construction activities. Do you consider that as drafted it is sufficiently robust and precise and consequently enforceable?</p>	<p>The CoCP relates to the onshore aspects of the development, and is therefore outside Conwy County Borough. The Council is currently in discussions with the Applicant with a view to seeking mitigation measures for residents within its area arising from offshore construction works.</p>

No.	Question	Response
9.9	Outline Code of Construction Practice (oCoCP) and Soil Resources - Are you satisfied with the approach and content of the oCoCP [APP-312] and associated appendices (e.g. the outline Soil Management Plan (oSMP) [APP-316]) in respect of the management of potential effects on soil resources? If not, please detail additional methods and/or mitigation measures considered necessary within the oSMP. In addition, please confirm whether you are satisfied that soils would be suitable for the required end use and the appropriateness of the proposed soil restoration methods.	These matters relate to areas outside Conwy County Borough. The Council does not wish to comment on the adequacy of these measures.
9.10	Outline Code of Construction Practice (oCoCP) and Ground Conditions Are you satisfied with the approach and content of the oCoCP [APP-312] and associated appendices (e.g. the Outline Pollution Prevention and Emergency Incident Response Plan (oPPEIRP) [APP-318]) in respect of the management of potential effects on ground conditions? If not, please detail additional methods and/or mitigation measures considered necessary within the oPPEIRP.	These matters relate to areas outside Conwy County Borough. The Council does not wish to comment on the adequacy of these measures.
14.2	Assessment Are you satisfied with the assessment of operational noise from the turbines and its conclusion in Section 10.5.2 of ES Volume 3 Chapter 10: Noise and Vibration [APP-071]?	The Council does not raise concerns with regard to these matters.
14.9	Assessment and Controls Are you satisfied with the assessment of noise from offshore construction provided in [APP[1]071] and the provisions to monitor and control it in Requirement 4 of the dDCO [AS-014]?	The Council considers that the limit proposed in Requirement 4 could result in a detriment to residential amenity. The Council is currently in discussions with the Applicant with a view to seeking agreement on an alternative to Requirement 4.

No.	Question	Response
17.1	<p>Assessment Please confirm whether you are satisfied with:</p> <ul style="list-style-type: none"> a) the study area; b) the Zone of Theoretical Visibility; c) the viewpoint locations selected; and d) the extent of assessment of these viewpoints, as identified within ES Chapter 10: Seascape, Landscape and Visual Impact Assessment (SLVIA) [AS-027]. If not, please explain the reasons for this 	<ul style="list-style-type: none"> a) The Council confirms that it is satisfied with the extent of the study area; b) The Council confirms that it is satisfied with the extent of the Zone of Theoretical Visibility; c) The Council confirms that the additional viewpoints provided to illustrate views from the A55 (nos. 63, 64 and 65) reflect pre-application discussions between the Council and the applicant; d) The Council confirms that it is in agreement with the Applicant's SLVIA, subject to the comments included in the document titled 'Awel y Mor Offshore Wind Farm Examination Review of the SLVIA Documents' prepared by LUC.
17.2	<p>Assessment Please confirm whether you are satisfied with:</p> <ul style="list-style-type: none"> a) the Applicant's SLVIA methodology; and b) its assessment of effects on seascape character, landscape character and visual amenity. If not, please explain the reasons for this. 	<p>The Council confirms that it is in agreement with the Applicant's SLVIA, subject to the comments included in the document titled 'Awel y Mor Offshore Wind Farm Examination Review of the SLVIA Documents' prepared by LUC, and also subject to further consideration in respect of the impact on the character and quality of the Great Orme Heritage Coast. Since the impacts on Viewpoints 13 and 15 and on Section L of the Wales Coast Path are recorded as being moderate-major, the Council suggests that the impact on the character and quality of the Great Orme Heritage Coast should similarly be recorded as moderate-major (rather than moderate), since the views from extensive areas of the Heritage Coast designation would be similar to those from the selected viewpoints and Section L of the Wales Coast Path, and the appreciation of those views is critical to the character and quality of the Heritage Coast.</p>

No.	Question	Response
17.3	<p>Assessment The SLVIA methodology provides for moderate adverse effects to be classified as either 'significant' or 'not significant' based on professional judgement. DCC/loACC/CCBC/GC/FCC/SNP/NRW - Please confirm you are satisfied with this approach?</p>	<p>The Council agrees with the comments in the document titled 'Awel y Mor Offshore Wind Farm Examination Review of the SLVIA Documents' prepared by LUC in respect of this matter.</p>
17.18	<p>Assessment Do you agree that MDS A and MDS B would have similar effects in seascape, landscape and visual terms, as indicated in paragraph 138 of [AS-027]?</p>	<p>Agreed.</p>
17.30	<p>Cumulative and Inter-Relationship Assessments Are you satisfied with the assessment of cumulative and inter-relationship effects in sections 10.13 and 10.14 of [AS-027]?</p>	<p>The Council raised concerns in response to the Section 42 consultation that the PEIR did not assess the cumulative impacts of AYM with future on-shore windfarms, in particular those within Pre-assessed Areas for Wind Energy (PAWE) in Future Wales. Paragraph 1499 of the ES states that it has been determined that policy areas such as this are considered to have Tier 3 level of certainty within the Planning Inspectorate Advice Note Seventeen and as such, no assessment is included within this Chapter. The Council acknowledges the practical difficulties of undertaking such an assessment, but wishes to bring to the Examiners attention the potential for significant cumulative effects.</p>

No.	Question	Response
18.2	<p>Future Wales – The National Plan (FWNP)2040 Are you satisfied that the design of the Proposed Development contributes to the objectives of FWNP in respect of sustaining and developing a vibrant economy and improving the health and well-being of communities? If not, please explain your reasons.</p>	<p>There is uncertainty around the impact the proposed development will have on tourism. Tourism is a priority sector for Conwy, estimated to be worth £887.62million to the local economy. In order to ensure we sustain and develop a vibrant economy then we need to ensure that the tourism sector in Conwy continues to thrive. If the proposed development negatively impacts the tourism sector, then this would have a detrimental effect on our economy. It would also impact the health and well-being of our local community, as a large proportion of jobs in the area are supported by tourism.</p>
18.3	<p>Planning Policy Wales 11 (PPW-11) Are you satisfied that the design of the Proposed Development contributes to the objectives of PPW-11 in respect of improving the social, economic, and cultural wellbeing of North Wales? If not, please explain your reasons.</p>	<p>The Council has concerns that the cumulative effects with other offshore wind farms (including existing offshore wind farms) would increase the dominance and saturation of wind farms as a seascape and landscape feature industrialising the area with potential impacts on tourism.</p>
18.4	<p>Technical Advice Note (TAN) 23: Economic Development Are you satisfied that the design of the Proposed Development contributes to the objectives of TAN 23 in respect of the generation of wealth, jobs, and income? If not, please explain your reasons</p>	<p>We note that the proposed development is due to generate 150 FTE jobs. However, there is uncertainty around whether any of these will be awarded locally and they could instead be awarded to non-North Wales workers. This would cause an increased demand for accommodation which could subsequently result in a displacement of visitors. It would be preferential to focus more emphasis on working with local authorities and colleges to ensure at least a portion of these jobs are awarded locally. The Council has just launched a 10 Year Regeneration Plan for Llandudno and the plan acknowledges that there are emerging sectors in North Wales predominantly in the energy sector which will provide a range of lower skilled, skilled and specialist roles, and this could create future local employment opportunities in Llandudno.</p>

No.	Question	Response
18.12	<p>Community Linguistic Statement</p> <p>Are you satisfied with the content of the Community Linguistic Statement [APP-325] and the conclusion that the Proposed Development would not result in negative impacts on the linguistic, social character and locality? Additionally, are you content that the Proposed Development would not impede the ability to achieve the relevant national and local Welsh language policy objectives? If not, please explain your position in this respect.</p>	Agreed.
18.27	<p>Mitigation Measures</p> <p>Are you satisfied with the proposed embedded and applied mitigation measures in respect of socio-economic effects of the Proposed Development?</p>	<p>The Council would welcome the inclusion of a Requirement to provide a Skills and Employability Plan. In addition, the Council would be willing to enter into discussions with the Applicant for the provision of a tourism fund to ensure that the tourism industry is in a favourable position to attract new visitors to replace any displaced visitors. As previously mentioned, the majority of tourists to the area are aged 45+. This is evidenced in both the May 2020 and April 2021 visitor surveys. There is evidence to suggest that this age group are less accepting of wind farm developments. Whilst it was noted in Chapter 4, Volume 3 of the ES that there is opportunity for these visitors to be displaced by younger visitors, there is no evidence to support this.</p>
19.2	<p>Planning Policy Wales 11 (PPW-11)</p> <p>Are you satisfied that the design of the Proposed Development contributes to the objectives of PPW-11 in respect of improving the cultural wellbeing of North Wales? If not, please explain your reasons</p>	<p>The Council considers that the proposed development would detract from the character and appearance of the Llandudno Town Centre and Seafront Conservation Area and on the setting of listed buildings. In addition, it has concerns that any reduction in tourism numbers / expenditure could impact on the frequency and standard of works to maintain the built fabric.</p>

No.	Question	Response
19.10	Outline Public Access Management Plan (oPAMP) Are you satisfied with the approach and content of the oPAMP [APP-320]? If not, please details what additional measures are required to supplement the oPAMP.	Not a matter for CCBC.

End of response