

Planning Inspectorate Ref:
EN010112

Conwy County Borough Council Ref:
ENQ/31314



Planning Act 2008

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

Written Representation by Conwy County Borough Council

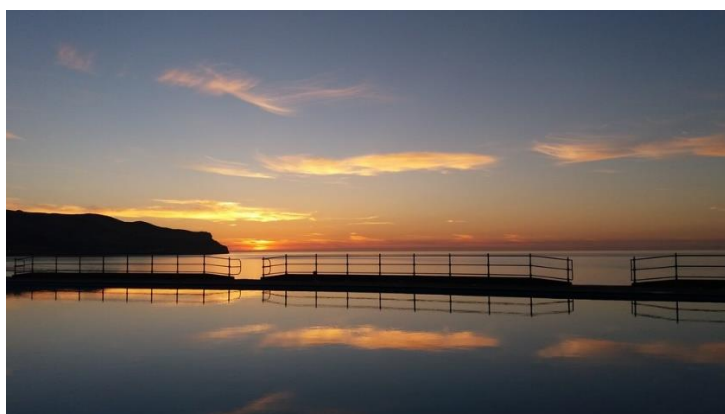
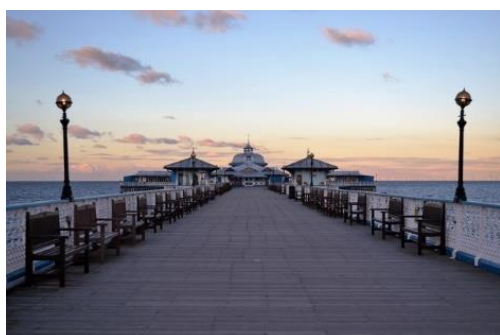



Table of contents

Section	Page
1. Summary	3
2. Context	4
3. Previous representations	5
4. Seascape, landscape and visual impacts	6
5. Tourism	10
6. Built environment	13
7. Other matters and Conclusion	15

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1. Summary

- 1.1 This page provides a summary of the Council's Written Representation, as requested in the Examining Authority's Rule 8 letter.
- 1.2 This representation by Conwy County Borough Council (the Council) relates to the application for Development Consent Order (DCO) by Awel-y-Mor Offshore Windfarm Ltd (the Applicant) to construct the Awel-y-Mor Offshore Windfarm (AMOWF).
- 1.3 The Council fully supports the principle of developing renewable energy, and has worked with developers in securing the delivery of renewable energy generation projects which are proportionate to their context. However, the Council considers that the AMOWF would generate disproportionate adverse impacts, and therefore objects to AMOWF for the following reasons:
 - i) The scale and extent of the AMOWF, in itself and in combination with other windfarms, would have significant detrimental and harmful effects on seascape, landscape and visual impacts, including effects on the setting of the Great Orme Heritage Coast and other coastal landscape features;
 - ii) Tourism forms an important feature of the local economy, which contributed £996.18m to the local economy in 2019. The seascape, landscape and visual impacts identified above could potentially harm the attractiveness and viability of coastal destinations, including Llandudno, which relies to a significant degree on its character as a traditional Victorian resort;
 - iii) The seascape, landscape and visual impacts would also harm the character and appearance of the Llandudno Town Centre and Seafront Conservation Area, including the setting of numerous listed buildings. Most of the buildings fronting onto Llandudno's North Shore consist of hotels and guest houses. Any adverse impact on tourism expenditure could result in less frequent maintenance of those buildings, thereby resulting in a gradual deterioration to the built fabric, and thereby causing further detriment to the character and appearance of the Conservation Area and to the features of special architectural and historic interest of the listed building.
- 1.4 Whilst the Council does not object to the AMOWF on the basis of construction impacts, it considers that the draft DCO does not contain adequate provision for the protection of residents' amenity during offshore piling works, and is engaging in dialogue with the Applicant on this matter.

2. Context

- 2.1 Conwy County Borough covers an extensive area within the central part of North Wales. The resident population in June 2020 was estimated to be 118,200 people, which was the fourth highest among the six unitary authorities in North Wales. The population is heavily concentrated along the coast, including both of its largest Colwyn Bay (25,650 residents) and Llandudno (20,600 residents). Other coastal towns include Conwy (18,050 residents), Abergele (11,100 residents), Towyn and Kinmel Bay (8,350 residents). Inland, the area is rural in character, with strong agricultural and tourism sectors.
- 2.2 Around a third of the County Borough's area is in the Snowdonia National Park. Outside the National Park, the Great Orme forms a distinctive headland designated as a Heritage Coast, which complements the varied pattern of headlands and bays that continue to the east and west, and which contributes to the setting of the Anglesey and Clwydian Hills Areas of Outstanding Natural Beauty further afield.
- 2.3 The Council is an unitary authority, and is the local planning authority for the whole of its area outside the National Park. The Conwy Local Development Plan was adopted in 2013, and covers the whole of the area for which the Council has planning jurisdiction.
- 2.4 At a national level, the development plan consists of Future Wales. This document identifies two extensive areas in Conwy as 'Pre Assessed Areas for Wind Energy' (PAWE) on a fairly broad scale, with Area 1 extending close to the coastal settlements.
- 2.5 Over the years, Conwy has experienced significant investment in renewable energy, including the Clocaenog Forest wind farm (96MW), Kinmel Solar Farm (24MW permitted capacity), Teyrdan Solar Farm (12MW), and a replacement pipeline to serve Dolgarrog Hydro-Electric Power Station (27MW). The Council is fully committed to facilitating an expansion of renewable energy generation from a range of resources, whilst also safeguarding its landscape, heritage, biodiversity and tourism economy.

3. Previous representations

Section 42 consultation response

- 3.1 On 27th August 2021, the Council was consulted on the proposal and Preliminary Environmental Information Report (PEIR) pursuant to Section 42 of the Planning Act 2008 ("the PEIR Scheme"). The Council and other North Wales local planning authorities appointed LUC as its landscape advisor on the applicant's Seascape, Landscape and Visual Impact Assessment (SLVIA) comprised in the PEIR. The Council's response of the 8th October 2021 focused on four main areas of concern:
- i) Seascape, landscape and visual receptors;
 - ii) Impacts on tourism and recreation;
 - iii) Impacts on the built environment, including indirect impacts resulting from reduced tourism investment;
 - iv) Construction impacts from noise relating to the offshore wind turbines.

Other engagement

- 3.2 The Council's Officers have actively contributed to meetings of the SLVIA Expert Topic Group, including the identification of additional viewpoint locations to address concerns identified in its Section 42 consultation response in relation to cumulative effects on the A55.
- 3.3 The Council's Officers have been in discussions with the applicant's noise consultant regarding the identification of suitable noise monitoring locations.

Relevant Representation

- 3.4 On 9th June 2022, the Council submitted a Relevant Representation outlining its concerns raised in its Section 42 consultation response, and noting that the Council would be reviewing that representation in the light of the submitted application and ES.
- 3.5 The Council has now reviewed the submitted application and ES. The Council continues to raise concerns on the following matters and objects to the Application on that basis.

4. Seascape, landscape and visual impacts

- 4.1 The Council's response to the Section 42 consultation raised four broad areas of concern:
- i) The scale of the individual Wind Turbine Generators (WTGs) and the extent of the array as a whole;
 - ii) impacts on the setting of coastal features including the Great Orme Heritage Coast;
 - iii) sequential and in-combination cumulative effects with other offshore wind farms;
 - iv) inadequate cumulative assessment in respect of future onshore wind farms.
- 4.2 The following paragraphs provide an amplification of the Council's concerns on these matters, including an updated assessment following changes to the PEIR Scheme:

Scale and extent

- 4.3 The Council welcomes the reduction in the extent of the turbine array and in the number of turbines proposed under both Maximum Design Scenarios (MDS) since the PEIR Scheme. However, it notes that the extent of the turbine array is still very extensive, representing 88.6% of the area identified in the PEIR Scheme. The AMOWF would occupy an area similar to that of the Gwynt-y-Mor Offshore Windfarm, effectively doubling the area occupied as a continuous block of WTGs.
- 4.4 Furthermore, the applicant has not revised either the height or the rotor diameters under MDS A since the PEIR. The Awel-y-Mor WTGs would each have a height of 2.4 times that of the Gwynt-y-Mor WTGs.
- 4.5 Under MDS B, both the height and rotor diameters have actually increased since the PEIR Scheme. The Awel-y-Mor WTGs would each have a height of roughly double that of the Gwynt-y-Mor WTGs.
- 4.6 The submitted visualisations in the SLVIA illustrate the comparative scale of both the WTGs and the arrays of the Gwynt-y-Mor Offshore Windfarm and AMOWF, and how the latter would form a significantly more dominant feature of seascapes and coastal landscapes.

Impacts on the settings of coastal features

- 4.7 The Council has significant concerns over the proximity of the Awel-y-Mor array to significant coastal features, in particular, to the Great Orme and the Little Orme.
- 4.8. The Great Orme forms a discrete Aspect Area in NRW's Landmap Visual and Sensory evaluation. Landmap provides the following summary description for the Great Orme Aspect Area¹:

"Dramatic, steeply rising rugged whale backed peninsula with rocky slopes, rising to 207m AOD, with a highly prominent skyline which encloses the sweep of Llandudno Bay to the east and the Conwy estuary to the south. The hill is covered in an open mosaic of limestone moorland/coastal heath, gorse, rough grassland & scrub, with some small scale pasture fields in places. Settlement is limited to the south eastern

¹ [REDACTED]

slopes and south western coastal fringe- the houses enjoying a spectacular view of Snowdonia across the bay. A large cemetery at St Tudno on the northern slopes has a distinctive character. There is a substantial amount of tourist infrastructure indicating the popularity of the area including mountain railway, overhead cable car, country park, carpark and associated facilities from which there are views. There is also a one way toll road around the edge of the landform which also allows scenic views in all directions. Some areas are degraded by former quarries. The Great Orme forms a distinctive landmark and a backcloth to the coast and natural limits to the otherwise sprawling settlement of Llandudno. The offshore wind farms to the north east and east are apparent in clear weather conditions.”

- 4.9 Landmap evaluates the Great Orme as being Outstanding in respect of Character, on the basis of its very strong sense of place, and High in respect of Scenic Quality, Rarity and Overall Evaluation. The Aspect Area is evaluated as being Moderate in respect of Integrity.
- 4.10 In respect of Q28 (Trend), Landmap assesses the Great Orme Aspect Area as being Declining and notes that “the offshore wind farms may be seen to reduce attractiveness of sea views”.
- 4.11 In respect of Q32, one of the recommendations in the Landmap assessment is to “discourage further wind development in the sea and remove when operational period is complete”.
- 4.12 The SLVIA considers that the operational impacts of the AMOWF from Viewpoints 13 and 15 on the Great Orme would be moderate-major. A similar effect is recorded in relation to Section L of the Wales Coast Path, which runs along the north coast of the Great Orme. The Council suggests that the impact on the character and qualities of the Great Orme Heritage Coast should also 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 qualities of the Heritage Coast.
- 4.13 The Little Orme is situated on the eastern end of Llandudno’s North Shore and forms a distinctive break along the coastline. Landmap includes the Little Orme and other hills within the Creuddyn Peninsula within the Coastal Hills Aspect Area, and provides the following summary description²:

“Dramatic, steeply rising rugged coastal hills with rocky summits, rising to 360m AOD, with prominent skylines which enclose the surrounding gently sloping lower land and coastal edge . They are covered in an open mosaic of moorland/coastal heath, gorse, rough grassland & scrub, with some small scale pasture fields in places. Mature deciduous woodland is found on the more sheltered inland facing slopes. Settlement is small scale and scattered and includes highlights like Bodysgallen Hall. Some areas are degraded by former quarries. The hills form the backcloth to the coast and natural limits to the otherwise sprawling settlements of Llandudno, Llandudno Junction, Rhos-

² [REDACTED]

on-Sea and Deganwy, although housing is encroaching in parts. Public access allows views over the coastal area and the areas form important local landscapes.”

- 4.14 Landmap evaluates the Coastal Hills Aspect Area as being High in terms of Scenic Quality, Character, Rarity and Overall Evaluation and Moderate in respect of Integrity.
- 4.15 The impact of the AMOWF on the setting of views towards, and from, the Great Orme and Little Orme is illustrated in particular in the following images in the SLVIA:

Figures 38c, 38d and 38e: Llanfairfechan (22.353km)
Figure 39b: Conwy Mountain (17.3km)
Figures 40c, 40d and 40e: Great Orme summit (11.89km)
Figures 42c, 42d and 42e: Great Orme café (11.294km)
Figures 45c, 45d, and 45e: Llandudno paddling pool (11.878km)
Figures 46b and 46c: Rhos-on-Sea (12.424km)
Figure 47c: Bryn Euryn (13.428km)
Figure 48b: Mynydd Marian (16.246km)
Figure 64b: Cefn Coch stone circle (23.895km)
Figure 67c: Above Capelulo (19.13km)
Figure 75c: Pen Dinas (11.792km)
Figure 78b: Footpath above Cilgwyn Mawr (16.936km)
Figure 81c: Little Orme (11.258km)
Figure 82b, 82c and 82e Llandudno promenade – lifeboat slipway (12.051km)
Figure 83c, 83d and 83f: Foel Lus (19.599km)
Figure 84c and 84h: Llandudno Promenade near Venue Cymru (12.174km)
Figure 85b, 85d and 85e: Great Orme – Marine Drive (11.465km)
Figure 86c: A55 at Penmaenmawr (20.772km)
Figure 87c: A55 at Puffin roundabout, Dwygyfylchi (19.073km)
Figure 88b: A55 Jetty north of Penmaenrhos (15.417km)

Cumulative effects (Offshore)

- 4.16 In its Section 42 consultation response, the Council expressed concerns that the PEIR under-assessed the significance of impacts on the A55. In particular it raised concerns that the addition of the AMOWF could give rise to the possibility of significant sequential (and potentially, in combination) impacts. Similarly, it expressed concerns that westbound receptors on the A55 between Llanddulas and Colwyn Bay would be subject to in-combination effects of the AMOWF with the existing offshore windfarms.
- 4.17 Following that response, the Council entered into discussions with the Applicant's landscape consultants with a view to identifying additional viewpoints. It suggested the inclusion of Viewpoints 6 (Figures 86) and Viewpoint 64 (Figures 87) as being representative for westbound receptors in the Penmaenmawr area, and Viewpoint 65 (Figures 88) as a suitable location for both westbound and eastbound receptors along

the A55 to the east of Colwyn Bay. Whilst seaward views from Viewpoint 65 are partly obscured by Raynes Quarry Jetty, this Viewpoint was suggested on the basis that the North Wales Path and the A55 are almost at identical levels at this point and hence provided a safe place for photographer to capture the images.

Cumulative effects (Onshore)

- 4.18 In its response to the Section 42 Consultation, the Council raised concerns that the PEIR had not assessed cumulative effects with regards to potential windfarm development in the PAWEs identified in Future Wales.
- 4.19 The Planning Inspectorate's Advice Note 17 advises that cumulative effects with other projects should be assessed on a 3-tier system, with projects "identified in the relevant Development Plan ... recognising that there will be limited information available on the relevant proposals" assigned to Tier 3.
- 4.20 Paragraph 1498 notes of the ES notes the uncertainty associated with the potential offshore wind farm development within the PAWE areas (geographical extent and locations of WTGs as well as their height and number). It notes that there is no actual development to consider in the cumulative assessment of AMOWF other than that considered previously.
- 4.21 Whilst the Council acknowledges the uncertainty in relation to the location and nature of development within the PAWE areas, it notes that Policy 17 of Future Wales sets a presumption in favour of large-scale wind energy development in these areas. Furthermore, criterion a) of Policy 18 (relating to unacceptable adverse impacts on landscape) does not apply to sites within the PAWE areas. In combination, Policies 17 and 18 provide a high degree of probability that large-scale wind energy development within PAWE areas will be approved. Given this policy context, and the proximity of PAWE Area 1 to the North Wales coast, the Council considers that cumulative impacts of such development with the AMOWF should be acknowledged as being potentially significant.
- 4.22 Should Development Consent be granted, the North Wales Authorities' therefore consider it necessary to secure a package of landscape contributions secured by legal agreement, in consideration of the harm caused by the significant adverse effects identified.

5. Tourism

5.1 The Tourism and Regeneration Project Officer submitted the following response to the Section 42 consultation:

- i) The majority of tourists who come to Conwy County come for the beaches. This is evidenced in the May 2020 and April 2021 visitor surveys which we undertook. In the May 2020 survey, 69% of respondents rated the beaches as their top attraction in Conwy County. In the April 2021 survey, 75% of respondents indicated the beaches were their top attraction. The construction of AMOWF may force these visitors to visit other unspoiled beaches in a different area which would be a huge loss of tourism in Conwy County.
- ii) There is evidence to suggest that smaller wind farms generate a less negative response from tourists. Awel y Môr is due to consist of between 48 – 91 turbines at 250-330m (*subsequently revised*). This is in addition to the existing Gwynt y Môr Wind Farm and Rhyl Flats development, so we would be concerned about the impact the additional AMOWF will have on tourism.
- iii) We would be concerned about the impact of any light pollution from the wind farm affecting dark skies.
- iv) Conwy County Borough Council has submitted its expression of interest to become the UK City of Culture 2025 under the title Conwy 2025. Being connected to communities, culture and a place's heritage are all important aspects of the bid. We would be concerned about whether the AMOWF development would prevent us from acquiring this title.³
- v) The majority of tourists to the area are aged 45+. This is evidenced in both the May 2020 and April 2021 visitor surveys. In Chapter 4: Tourism and Recreation, it states 'There is a need to be cautious in generalising but the evidence base (see for example Devine-Wright, 2007) points towards a tendency for younger people and those in higher socio-economic groups to be more accepting of wind farm development ...'. So the construction of AMOWF is more likely to be viewed negatively by the majority of tourists to our area.
- vi) The presence of wind farms could have an effect on the frequency and duration of visits.
- vii) The evidence base points towards potential for greater impacts to occur where wind farms or other infrastructure are sited in areas of high landscape value. In our May 2020 and April 2021 surveys, the top reason for people visiting Conwy County was because they love visiting and it is a beautiful location. The proposed AMOWF could have a very negative effect on our tourism industry

³ In the event, the Council was unsuccessful in its expression of interest to become UK City of Culture 2025. However, the matter is still relevant to the Council's representation in the event of future applications for City of Culture or similar status.

since visitors may perceive the area as less beautiful. The SLVIA assesses the magnitude of change as being 'Medium High' from the Great Orme, Llandudno Paddling Pool and Colwyn Bay Promenade, and as 'Medium' or 'Medium Low' for the other viewpoints (Llanfairfechan promenade, Bryn Euryn, Mynydd Marian, Abergele promenade and Cefn Coch stone circle).

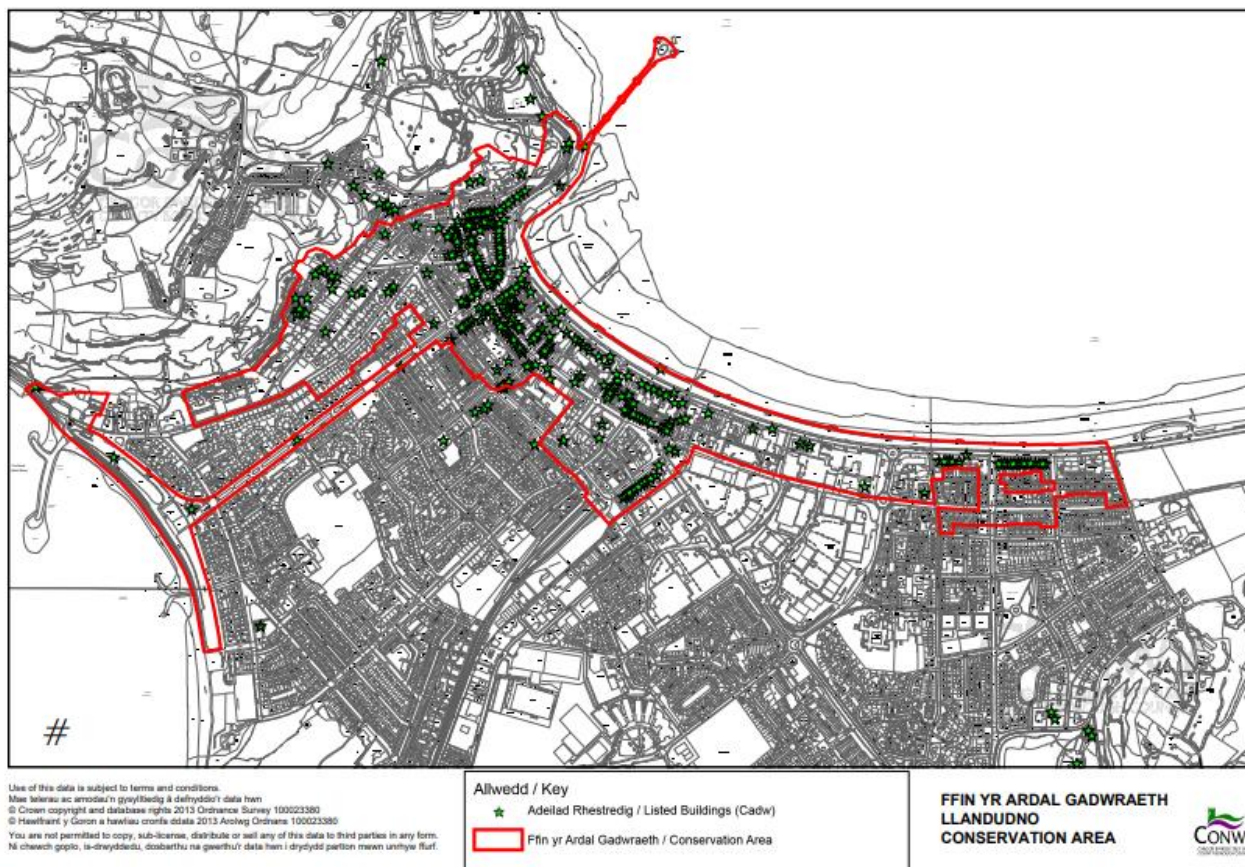
- viii) Regular visitors to an area may be more likely to oppose developments. Frankal and Kunc (2011) found that regular visitors to a particular tourism area may be more likely to oppose wind farm developments (although no conclusions were drawn about the extent to which this might be reflected in their visiting behaviour). This reflects the findings of wider research into reactions to wind farms amongst residents where a theme of people's attachment to a particular place is an important factor which influences their responses to developments (see for example Devine-Wright, 2012). A huge proportion of responses in the visitor survey were from people who regularly visit the area. To put into perspective, in 2019 we had 2.57 million staying visitors who contributed £644.19m to the economy which is a 6.4% increase on 2018. We also had 7.22 million day visitors who contributed a total of £351.99m to the local economy. This is a 7.1% increase on 2018.
 - ix) Llandudno is a key tourist resort in the county with 15,000 bed spaces. It is a holiday accommodation zone meaning that there is a policy protecting holiday accommodation. The change of use of holiday accommodation is not permitted. These businesses could suffer by price reductions as a result of the construction of AMOWF if the wind turbines are deemed an eyesore by visitors. Any perceived reduction in the attractiveness of the landscape or wider effect on the tourism experience could reduce visitor demand to such an extent that it results in reduced prices.
 - x) Tourism is a priority sector in Conwy which contributes £996.18m annually to the local economy. This has increased every year and our aim is to increase this to £1 billion by 2027. If the construction and development of AMOWF discourages visitors then this may prevent us from achieving our target of increasing the economic impact of tourism to £1 billion by 2027 as set out in the Conwy Economic Growth Strategy.
- 5.3 The Applicant has responded to the Council's concerns in Table 4 of Chapter 4, Volume 3 of the ES. Whilst the Applicant maintains its earlier conclusion that the impact on the visitor economy of the Great Orme and Llandudno would be Low in the short-term and Negligible in the longer term, it acknowledges that there is an element of uncertainty in this conclusion. The Council acknowledges that the extent of the array has been reduced since the PEIR stage; however, that reduction has not allayed fears of potential harm to the tourism sector.
- 5.4 Notwithstanding its objection to the proposal, 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. Such a fund could include, for example:

Awel-y-Môr Offshore Wind Farm
Conwy County Borough Council's Written Representation

- i) Improvements to public realm e.g. promenades, shelters, public toilets;
- ii) Works to refurbish/modernise visitor centres;
- iii) Marketing campaigns.

6. Built environment

- 6.1 The seafront extent of Llandudno Town Centre and Seafront Conservation Area extends over most of the built frontage along North Shore, including the Pier at its Western extremity⁴. A large number of buildings, particularly along the Promenade, are listed as being of special historic or architectural interest. These are identified with green stars.



- 6.2 The Landmap Visual and Sensory Evaluation recognises the impacts of existing windfarms on the character of the Llandudno Aspect Area. This is included in the summary description⁵:

“The town is the major coastal resort on the north Wales coast with a promenade and grid iron pattern with a consistency of elegant Victorian built form in its core and seafront. The settlement is orientated towards Ormes Bay with its beach and promenade and pier, both of which have essentially maintained their integrity. There are many hotels and leisure uses. The town expands to the south, east and west in housing estates on gently undulating land but is constrained by the Great Orme and other coastal hills which form a positive backcloth. Superb views are possible out to sea framed by the Ormes. Gwynt y Môr offshore wind farm is apparent on the horizon depending on weather conditions.”

⁴ [Llandudno \(conwy.gov.uk\)](http://landudno.conwy.gov.uk)

⁵ [REDACTED]

- 6.3 Landmap assesses the Llandudno Aspect Area as being High in respect of Scenic Quality, Integrity, Character, Rarity and Overall Evaluation. It concludes that:

“The promenade allows superb views of the bay and the built form is pleasing in its composition. The promenade and core has a strong character and integrity with coherent and the consistent form of a Victorian seaside resort with fine buildings. The rest of the town has a weak, incoherent character. The resort is rare in its cores coherence and condition. Therefore the core and promenade are high while the rest of the town is low value.”

- 6.4 In respect of Q28 (Trend), Landmap assesses the Llandudno Aspect Area as Declining and notes that “Offshore wind farms including Gwynt y Mor are apparent diminishing the attractiveness of the sea views.”

- 6.5 In respect of Q32, one of the recommendations provided in the Landmap assessment is to “discourage further wind turbine development in the sea and remove when operational period is completed.”

- 6.6 The Council's Conservation Officer (appointed since the Section 42 response) has made the following representation:

“I agree with the council's prior comments, that the assessment of effects presented as minor and not significant are a conservative assessment of the magnitude and significance of the impacts. The numerous ViewPoint Visualisations show that the development will be seen and experienced in numerous heritage assets within the authority. This includes Conwy Castle, Gwrych Castle, and the Llandudno Town Centre and Seafront Conservation Area. It will be especially apparent and experienced in Llandudno. The impact on tourism, which the mentioned heritage assets above, rely on, will be adversely impacted by the proposed development.

“The ES has assessed the magnitude of the indirect impact on the Llandudno Conservation Area as Minor Adverse, with Minor Adverse residual effect. It has assessed the indirect impact on Llandudno Pier as Moderate Adverse, with a Moderate Adverse residual effect. I am unsure how the impact could have been assessed differently. The magnitude of the indirect effect is likely to be the same in the CA as it is for one building (pier) within the CA. It is a conservative assessment of the magnitude and significance of the impacts of the development.”

- 6.7 An additional concern relates to the potential impact of a reduction in tourism expenditure on the maintenance of buildings within the Conservation Area. A high proportion of buildings in the Conservation Area (and especially, those fronting the Promenade) constitute hotels and guest houses. These buildings typically have painted external walls, slate roofs, traditional dormers and timber windows, requiring expensive and frequent maintenance. The Council is concerned that any reduction in visitor numbers or expenditure could have a detrimental impact on such maintenance, which would over time, result in a gradual deterioration of the built fabric and hence the character and appearance of the Conservation Area and its constituent buildings. As previously mentioned, Llandudno has 15,000 bed spaces and is designated in the Conwy Local Development Plan as a holiday accommodation zone meaning that there is a policy protecting holiday accommodation in the town.

7. Other matters and Conclusion

- 7.1 The Council is concerned that the night-time noise limit provided in Requirement 4 of 50dB(A) Leq,T does not provide for a satisfactory level of amenity to residents and visitors from offshore piling works. The Council is in active discussions with the Applicant over the wording of an alternative requirement.
- 7.2 The Council would welcome the provision of an additional requirement in respect of the submission, approval and implementation of an Employment and Skills Plan.
- 7.3 As noted in Section 5 of this response, the Council would welcome the establishment of a tourism fund to ensure fund to ensure that the tourism industry is in a favourable position to attract new visitors to replace any displaced visitors. Such a fund could either operate independently of, or in conjunction with, the fund for landscape works identified in Section 4.
- 7.4 The above contributions and requirements are suggested without prejudice to the Council's objection to the Application.
- 7.5 The Council fully supports the principle of developing renewable energy, and has worked with developers in securing the delivery of renewable energy generation projects which are proportionate to their context. However, the Council considers that the impact of the AMOWF would cause disproportionate impacts on seascape, landscape and visual amenity; to the built heritage; and potentially, to the viability of the tourism industry which is critical to the County Borough's economy. For these reasons, the Council therefore objects to the Application.