



## **North Wales Local Authorities Expert Topic Group's response to the SLVIA and LVIA submitted with the DCO application at the Deadline 1 stage of the Awel y Mor Offshore Wind Farm Proposal October 24 2022**

Please find below our collective response to the SLVIA and LVIA submitted with the DCO application for the proposed Awel y Môr Offshore Wind Farm (AyM OWF). Following an extension of a funding opportunity presented by RWE, the LUC was appointed once again by a group of seven North Wales Local Planning Authorities in August 2022 to undertake an updated review of SLVIA/LVIA matters with regards to the Awel y Môr Offshore Wind Farm (AyM OWF). The LUC had previously been appointed by the group in July 2021 to undertake a review during the PEIR stage, which was submitted alongside LPA comments during that time. The proposed wind farm comprises of onshore and offshore elements and potential effects resulting from these are reported separately. A copy of this report is included with this letter.

### **LUC Review Summary**

In their report the LUC concluded that both assessments (SLVIA and LVIA) are thorough, detailed and rounded in good practice. They do however provide the following summary and comments within the document.

The array area, and the maximum design scenario (MDS) have been further reduced since PEIR, although the turbine height remains the same. Although now outside the area of 'high sensitivity' seascape around Anglesey, the reduced MDS has not resulted in any effects being reduced from significant at PEIR to non-significant at DCO.

We do not support the approach taken to moderate effects, where these may be considered significant or not based on the assessor's judgement. There are a number of instances where effects of the same level (moderate) are assigned different significance. While we accept the importance of professional judgement in SLVIA, and the importance of reading the detailed assessment text, we consider this to be a potential source of confusion and unhelpful to the non-specialist reader. The approach lacks a clear distinction between significant and non-significant and leaves those findings of 'moderate but not significant' open to question.

There are some viewpoints and visual receptors where non-significant effects are found in the SLVIA, that we have suggested could be significant. We accept that these are all borderline cases and do not represent areas of substantive disagreement. The viewpoints we have noted are;

- VP44 Beaumaris Castle, Anglesey;
- VP 36 Tal y Fan, Snowdonia National Park (this may be due to an inconsistency in the sensitivity assessment);
- VP23 Rhyl Aquarium.

LUC take a more ‘in the round’ approach to assessing views on people within settlements. The SLVIA authors have focused on views from properties, rather than views experienced as people move around their communities. We consider that effects may therefore be slightly more widespread than is set out in the SLVIA. However, we accept that the SLVIA has recorded some significant effects in all the settlements where we consider this would be anticipated. As such, we consider that the SLVIA does not substantively under-report significant effects on settlements.

We agree with the assessments of effects on views from the Wales Coast Path and other routes, noting that some of these have been revisited.

We have identified some differences in interpretation of the extent of effects on landscape character. At the northern edge of the National Park, we suggest effects would be significant across part of LCA 01 Northern Uplands. We do not agree that existing development reduces the magnitude of change, as this is of different scale and character to the proposed turbines. Elsewhere the SLVIA offers quite precise statements of how far inland effects will extend, and while these distances may be queried, it is clear that the main areas where significant effects would occur have been correctly identified.

We agree with the assessment of effects on special qualities of the AONBs and National Park as set out in the SLVIA

Night time effects have been assessed for a 200 candela scenario, in contrast to the 2000 candela maximum brightness scenario considered at PEIR. A such, significant night time effects are only identified at the Great Orme. We agree with these conclusions, assuming that the mitigation through reduced brightness is fully secured in the DCO. We note that the dimming of aviation lighting to 200 candela is not listed in Document 8.11 Mitigation Schedule. The Applicant should be asked to confirm how this mitigation is secured in the DCO.

Our observations in relation to the LVIA of the onshore works can be summarised as follows;

- As with the SLVIA, we do not support the approach to ‘moderate’ effects in the LVIA
- The LVIA includes an an additional viewpoint and further assessment to confirm that there would be no effects on the landscape of or views from the AONB. We agree with this finding
- Further detail of both the proposed OnSS and the landscape mitigation are provided, and shown in visualisations. Year 15 visualisations are included to show maturing planting. We consider the visuals are helpful and appear

accurate. Mitigation planting is shown at an appropriate size, but it is depicted in full leaf when the photographs have been taken in winter.

- We agree with the assessment of effects on the physical landscape, although the extent of 'tall hedgerows' could be clarified further, as well as the assessment of effects on landscape character
- We agree with the assessments of short term and localised significant effects on a small number of receptors, as a result of construction of the ESS and landfall
- There is no detailed consideration of the operational effects of the OnSS on the residents at Faenol Bropor, or visitors to the Glascoed Nature Reserve. We agree with the assessment of effects at other viewpoints and visual receptors
- The LVIA has scoped out consideration of cumulative effects, and we accept the reasoning given.

## **Conclusions**

The SLVIA authors have taken on board the contents of our PEIR review and have made changes in response. The remaining areas of disagreement set out above are points of detail and do not represent substantive differences in terms of the likely level of effects. We consider that the SLVIA and LVIA make clear the overall extent of likely significant effects.

Appendix B (of the LUC report) includes the LVIA and SLVIA queries from the Examining Authority's first round of questions (ExQ1). We have included relevant points from our review which may be useful in informing the LPAs' responses to the ExQ1.

Appendix C includes our commentary on the documents relevant to securing mitigation of the onshore works.

## Specific Comments by the LPA's

The North Wales Local Planning Authorities Expert Topic Group each have their own specific impacts from this scheme, and as such the next section is so that each Local Authority can set out their specific comments and views on the proposed development.

### Isle of Anglesey County Council

The ES assessment of Seascape, Landscape and Visual Effects (SLVIA) identifies significant effects on seascape, the designated landscape (Ynys Môn AONB) and visual receptors. The significant effects identified include harm to natural beauty, seascape as a setting to the AONB and three AONB special qualities.

IOACC broadly agree with the nature and level of effect predicted in the SLVIA. The LUC Review of SLVIA documents (October 2022) questions a minor number of points from the SLVIA as summarised in Appendix 2 of that report. IOACC concur with LUC's assessment of effects.

Despite design refinements since the PEIR, which it is acknowledged have reduced the extent of the horizontal and vertical fields of view and perceptible changes to the visualisations, there has been no reduction in the number or range of predicted significant effects between the PEIR and ES. As noted in our response to the PEIR consultation in 2021, and as informed by the LUC report reviewing the PEIR, effective reduction in effects would require substantial changes to the height and spread of the array. Changes of this magnitude have not occurred, with the height under MDS B actually increasing.

In essence, within an area extending from Moelfre to Beaumaris, significant visual effects would be experienced to visual receptors such as users of the Wales Coast Path and settlements. Significant effects are predicted on landscape character within landscape character areas distinguished by their close relationship to the coast, much of it designated as AONB. Significant seascape effects would affect the AONB's setting, important to its designation on the coast.

Draft and current National Policy Statements for Energy (EN-1 and EN-3) note that for development outside but affecting designated landscape, *'the aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints'*.

The ES questions in paragraph 560 of the SLVIA *'Would AyM cause such 'harm' to the IoA AONB that its overall integrity would be diminished such that it could no longer be considered to qualify as an area of outstanding natural beauty'*. IOACC opine that the question is one of whether the purpose of the designation would be compromised, and find that this would be the case over a substantial area.

Paragraph 560 quotes from the AONB management plan stating that *'There is a focus on Anglesey becoming an energy development Island both in Nuclear and*

*Alternative Energy which may include large scale offshore wind farms, marine turbines and solar farms. The proximity of these industries to the AONB and the need to bring the energy ashore highlights their influence on both the landscape and the seascape of the AONB, and also the pressure from development in close proximity to the countryside and coast.'*

This needs to be balanced against Section 4.6 of the Management Plan (not quoted in the SLVIA) which states that *'from an AONB's perspective all proposed development as part of the Energy Island Programme should have regard to the AONB designation in terms of the AONB's primary purpose of conserving and enhancing natural beauty.'*

It is not considered by IOACC that this proposal would conserve or enhance natural beauty and would detract from the purpose of the designation in the extensive area affected.

The Welsh National Marine Plan (November 2019) in Policy SOC\_06 for Designated Landscapes notes: *Designated landscapes Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference: a. avoid adverse impacts on designated landscapes; and/or b. minimise impacts where they cannot be avoided; and/or mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance designated landscapes are encouraged.*

IOACC acknowledge that with a project of this scale and location, some significant adverse effects are highly likely. Again, it is noted that the imbedded design mitigation which has resulted in some perceptible changes in visualisations has not reduced predicted significant effects from the PEIR to the ES for IOACC receptors. It is not clear that effects have been minimised and only changes to turbine lighting specifications have effectively mitigated predicted effects.

Additionally, the Welsh National Marine Plan (November 2019) in Policy SOC\_07 for Seascapes notes: *Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference: a. avoid adverse impacts on seascapes; and/or b. minimise impacts where they cannot be avoided; and/or mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance seascapes are encouraged.*

The significant effects on Seascapes predicted will affect the setting of the Ynys Môn AONB. It is not clear that effects on Seascapes have been minimised or design mitigation effective in avoiding significant adverse impacts.

IOACC has been party to discussions for a Landscape Conservation and Enhancement Contribution. It is not considered that this will offset effects as predicted but presents an opportunity for landscape enhancements related to natural

beauty, features and special qualities of the baseline landscape resource and compatible with Marine Plan policy. It would not make the predicted seascape, landscape and visual effects acceptable or less harmful, but is considered essential in consideration of the adverse effects predicted and likely, should the DCO be consented.

### **Conwy County Borough Council**

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.

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**

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.

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.

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.

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**

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.

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 Area<sup>1</sup>:

*“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 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.”*

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.

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”.

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”.

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.

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<sup>1</sup> [REDACTED]

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 description<sup>2</sup>:

*“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-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.”*

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.

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)**

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.

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)**

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.

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.

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.

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.

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.

### **Denbighshire County Council**

Denbighshire County Council fully endorse the findings and recommendations set out in the LUC Review, and would request the Examining Authority gives significant weight to it in the assessment of seascape, landscape and visual effects.

With respect to Denbighshire interests, the Council disagrees with the assessment of significant effects for the following receptors:

#### **Viewpoint 23. Rhyl Aquarium**

Assessment of effects on this receptor is not agreed. The SLVIA compares the perceived scale of proposed AyM OWF turbines with those of the existing GyM and Rhyl Flats developments, stating that "*The GyM WTGs are both smaller in scale than the AyM WTGs and are further away from this viewpoint than Rhyl Flats OWF so the scale comparison is greater. They are also more densely spaced*". The baseline view shows a gap between GyM and Rhyl Flats, resulting in them being seen as distinct turbine groups. Differences in intervening distance and perceived scale are less noticeable as a result of this gap. The addition of AyM OWF turbines on the horizon will fill in gaps, accentuate the differences between existing and proposed developments and result in greater incidence of stacking and visual clutter. This change would be noticeable and would result in significant effects.

#### **Settlement of Rhyl**

Assessment of effects on this receptor is not agreed. The SLVIA assesses a non-significant effect for Viewpoint 23 (Rhyl Aquarium), but the LUC Review disputes that finding. The aquarium, along with the wider promenade area, is a key location within Rhyl and the SLVIA acknowledges that the viewpoint "*provides an indication of the visibility that would be gained from properties close to the coast but also some of the visitor amenities along the seafront, which are an important component of the*

*settlement*". Although "*The majority of the settlement will have no or limited views of the AyM OWF due to the low-lying nature of the town and the visual screen created by the seafront properties*", there is potential for significant visual effects to result locally.

### **Flintshire County Council**

No additional comments

### **Gwynedd Council**

The Council previously noted concerns with regard the significant effects reported in the SLVIA at the viewpoint at Bangor Pier and Penrhyn Castle Terrace, where there is an open vista across Conwy Bay, the sensitivity of which is now higher due to the recent designation of the surrounding area as a World Heritage Site. This concern reflected the comments of the group as a whole and LUC's previous findings in that significant effects have been underreported due to the application and judgements made. As the SLVIA authors have revisited this in light of comments made, the Council agree with the findings within this LUC report and considers that the SLVIA methodology is sound and comprehensive.

### **Snowdonia National Park Authority**

Snowdonia National Park accept and agree with the findings and recommendations set out in the review undertaken by the LUC and in line with Denbighshire County Council's comment, we would request the Examining Authority gives significant weight to it in the assessment of seascape, landscape and visual effects. The LUC conclude the impact on the National Park to be the following;

- Six viewpoints within the National Park have been assessed. The PEIR found significant effects at four of these, while we queried the finding of non-significant at VP36 Tal-y-Fan. Effects on the closer viewpoints 12 and 40 are recorded as major- moderate in the ES, with the more distant viewpoints 10 and 38 being moderate. A moderate-minor and non-significant effect is recorded at VP34 Snowdon Summit. The assessment for VP36 Tal-y-Fan is stated to be moderate but not significant. We suggest that, although close to the borderline, this should be identified as significant. We note that effects at VP38 Foel-fras are moderate (significant), on a very similar but more distant view. We highlight an inconsistency in the sensitivity assessment for VP36 that may account for this

- Regardless of this disagreement, it is clear that walkers visiting high ground in the northern section of the National Park will experience significant effects on views
- In terms of landscape character, the LUC disagreed with the finding of non-significant effects on LCA 01 Northern Uplands at PEIR. The ES records moderate (non-significant) effects across the LCA. We consider this should have been classed as significant within the northern part of the LCA, though we accept non-significant effects over the more inland and upland parts of the LCA. We disagree that 'visibility of existing development' within the northern parts of the LCA will reduce the impact, since the proposed development is of a different scale and form to existing development, and would introduce a new characteristic rather than adding to an existing one.
- In terms of seascape character, the LUC note that the PEIR stated that significant effects on SCA 2 would be limited to areas on the Great Orme. We suggested effects could be more widespread, but the SLVIA maintains the same position. Both significant and non-significant effects are stated to be moderate, which does not help the reader to understand the difference. We accept that significant effects will not extend east of Penmaenmawr where turbines are increasingly screened by the Great Orme. However, with reference to SCA 3 it seems likely that there would be significant effects west of Penmaenmawr.
- Two special qualities have been considered, and non-significant effects identified at each case. We note that our view of effects on landscape character differs slightly from what is presented in the SLVIA. However, we do not argue that this would lead to additional diminishment of special qualities. The conclusions in relation to effects on the special qualities of the National Park are reasonable. As with the AONB, we do not comment on the judgement of overall integrity, which approaches the question of the 'acceptability' of the effects.
- In terms of night-time effects, significant effects are identified for the 200 candela scenario. This is agreed, noting that the PEIR concluded no significant effects in relation to the brighter 2000 candela scenario.

The review undertaken by the LUC strengthens the National Park's long standing view that the proposed wind farm would have significant effects on areas of the northern part of the National Park and that some impacts have been under reported (e.g. VP36 Tal y Fan and the northern part of LCA 01 in general). Although the array

area has decreased and the turbine numbers reduced, the turbine height is still unchanged which is a concern for the National Park.

We feel the need to once again raise the issue of cumulative effects. The cumulative effect of the new proposed wind farm alongside the current ones seen at Gwynt y Môr and Rhyl Flats would mean that the cone of sight and sea horizon will be disrupted even further by wind turbines, particularly when considering that the proposed turbines would be double the height of those nearby currently. These impacts will include significant adverse effects from certain viewpoints and parts of the landscape in the National Park. Additionally there is also the prospect of another offshore windfarm in the area in the future (Mona) which would further add to the cumulative impact (although at the early stages of its planning).

**Wrexham County Borough Council**

No additional comments