

**North Wales Local Planning  
Authorities**

# **Awel y Môr Offshore Wind Farm Examination Review of SLVIA Documents**

**Final report**  
Prepared by LUC  
October 2022



## North Wales Local Planning Authorities

### Awel y Môr Offshore Wind Farm Examination Review of SLVIA Documents

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# Chapter 1

## Introduction

### Introduction

**1.1** LUC was appointed by a group of seven North Wales Local Planning Authorities (LPAs) in September 2022 to review a number of documents submitted alongside the Development Consent Order (DCO) of the proposed Awel y Môr Offshore Wind Farm (the proposed development).

### Summary of comments on the PEIR

**1.2** LUC undertook a review of the submitted landscape and visual documents at PEIR stage, and our comments were presented to the LPA group in our report dated September 2021. This review of the DCO stage documents focuses on changes made since DCO, and any areas for clarification that were identified at the time.

**1.3** The key findings of the review of the PEIR documents can be summarised as follows:

- The SLVIA and LVIA used a robust methodology based on established good practice. The scope of both assessments was considered sufficient to capture all potentially significant effects. A clear record of consultation was included.
- The assessments included a comprehensive review of the baseline, identifying all relevant receptors.
- The reduction in the size of the offshore wind farm was noted in relation to offshore mitigation. Mitigation proposals for the onshore works were at an early stage, but the principles were considered sound.
- The SLVIA and LVIA were supported by good quality visualisations, produced and presented in line with the relevant good practice guidance.
- The effects of the proposed development were reviewed and reported by LPA, and a number of judgements were queried.

### Scope of the DCO Review

**1.4** This report sets out our observations on the following documents submitted with the DCO application:

- Environmental Statement (ES) Volume 2 Chapter 10, Seascape, Landscape and Visual Impact Assessment (SLVIA), alongside relevant Annexes contained in ES Volume 4 and Figures contained in Volume 6; and
- ES Volume 3 Chapter 2, Landscape and Visual Impact Assessment (LVIA), alongside relevant Annexes and Figures.

**1.5** In addition, we have reviewed documents relating to the onshore works, and our observations on the following are included in Appendix C:

- Document 8.4 Outline Landscape and Ecological Management Plan;
- Document 8.11 Schedule of Mitigation;
- Document 8.13 Outline Code of Construction Practice, including Appendix 1, Outline Construction Method Statement, and Appendix 4, Outline Soil Management Plan; and
- Document 2.12 Hedgerow and Protected Tree Plan.

**1.6** On the basis of the previous review, the methodology and baseline within the DCO documents have not been reviewed in detail. The review focuses on changes between the PEIR and ES, and revisits the summary table of reported effects. As with the PEIR review, no field work was carried out.

## Chapter 2

# Review of SLVIA Methodology, Scope, Baseline, Mitigation and Visualisations

### Methodology, Scope and Process

**2.1** Our review of the PEIR judged that the methodology employed by the SLVIA authors was grounded in good practice guidance and was fit for purpose. The basis of the SLVIA has not changed substantively since PEIR. This section briefly reviews minor changes that have been applied.

**2.2** The scope of the SLVIA has not changed since PEIR, and no further scoping-out of non-significant effects has taken place. The DCO assessment therefore revisits all the PEIR assessments.

**2.3** The responses of stakeholders to the PEIR are summarised in Annex 10.2, and this includes points taken from the LUC review of the PEIR. The SLVIA authors have responded positively to each point, and in many cases have reviewed their assessment as a result. In some but not all cases this has resulted in a change to the assessment finding. In other cases, further justification for the original finding has been added. We welcome this positive approach.

**2.4** In response to comments on the PEIR, the SLVIA authors have clarified their approach to assessing effects on views from settlements. The methodology has been amended “*to reflect that the assessment of the effects on settlements relates to people in properties*”. In our view the assessment of effects on settlements should consider views experienced by the community in the round, rather than a focus on views from properties. We note that the authors have clarified significant effects from particular properties within some settlements, and that effects on views from sea front areas are considered separately, but we maintain this represents a narrow focus of assessment of effects on settlements. In our view, this difference in approach is unlikely to lead to substantive under-reporting of significant effects.

**2.5** The SLVIA at PEIR judged all effects as either ‘significant’ or ‘non-significant’. The SLVIA in the ES includes judgements of level of effect, from negligible through to major. This is a more familiar approach and offers a clearer view of where the greatest effects are likely to be found. The methodology uses intermediate levels (e.g. moderate-major), giving six possible levels of effect, guided by a matrix provided in Table 4. At para 109 of the methodology (Annex 10.1), it is stated that all moderate-major or major effects are considered significant. However, moderate effects “*have the potential, subject to the assessor’s professional judgement, to be considered as significant or not significant, depending on the factors evaluated*”. While this is not an uncommon approach, we consider that it does not enhance the clarity or accessibility of the assessment. We accept there will always be borderline cases, but this approach lacks a clear distinction between significant and non-significant, and leaves those findings of ‘moderate but not significant’ open to question.

### Baseline information

**2.6** We have not noted any substantive changes in the assessment baseline since PEIR.

### Mitigation and Design

**2.7** Since submission of the PEIR, the proposed development has been amended. The offshore array area has been reduced again, as shown on SLVIA Figure 2c. A further section has been removed from its westward extent. Section 10.9 of the ES states that the distance between the array area and Viewpoint 2 Point Lynas on Anglesey has increased from 20.2 km at scoping, to 28.7 km in the ES. The array area remains the same distance from the Great Orme. Figure 2c shows that the array area is now well outside the area of ‘high sensitivity’ seascape around Anglesey.

**2.8** Following the decrease in array area, the turbine numbers are also reduced. The maximum design scenarios (MDS) assessed within the SLVIA are now defined as follows:

- MDS A comprises 34 turbines to 332m tip height (306m rotor diameter). 19 perimeter turbines have aviation lighting, 12 turbines have marine lighting.

- MDS B comprises 50 turbines to 282m tip height (250m rotor diameter). 26 perimeter turbines have aviation lighting, 15 turbines have marine lighting.

**2.9** The SLVIA confirms that “*it is not possible for the Applicant to reduce the WTG heights from those assessed in the ES*”, despite stakeholders raising this as an issue.

**2.10** Section 10.9 of the SLVIA committed mitigation that will reduce the brightness of aviation lighting from 2000 candela to 200 candela (10%) during periods where visibility is over 5 km. It is stated that, on the basis that all coastal areas are over 5 km from the turbines, then 2000 candela lighting would never be seen at maximum brightness. This would only apply during poor visibility, which would restrict views of the lighting.

**2.11** On this basis, the night time visualisations included within the ES show the appearance of 200 candela lights. This is in contrast to the PEIR visualisations which depicted 2000 candela lights.

**2.12** We agree that the 2000 candela scenario is unlikely to be seen. The approach that LUC usually takes is to depict both the 2000 candela maximum brightness scenario, and the more likely 200 candela scenario. On the basis that the mitigation is committed, we accept the approach taken. Comparison may be made with the PEIR visuals to show how 2000 candela lighting might appear. All mitigation measures are intended to be listed in Document 8.11 Mitigation Schedule, which sets out how the measures are secured in the DCO. We note that the dimming of aviation lighting to 200 candela is not listed in the Mitigation Schedule. The Applicant should be asked to confirm how this mitigation is secured in the DCO.

## Visualisations

**2.13** Other than the revised approach to illustrating aviation lighting noted above, the SLVIA includes the same photography and approach to visualisation as at PEIR. Our earlier review found these to be of good quality, produced and presented in line with the relevant good practice guidance.

# Chapter 3

## Review of the Offshore SLVIA Assessments

### Introduction

**3.1** This section summarises our review of the SLVIA findings (Volume 2, Chapter 10 and its supporting annexes and figures).

**3.2** The focus of the SLVIA is on MDS A, and our review reflects this. Where an effect is cited, this is a reference to the operational effect of MDS A. As at PEIR, there are no receptors which would experience a different level of effect as a result of MDS B.

**3.3** The focus of this review is on the operational effects of the offshore development, as there are no instances where the construction or decommissioning effects of the wind turbines would exceed the operational effects. Our previous review of PEIR considered construction effects and did not identify any concerns.

**3.4** In relation to the reduced array area and MDS, it is stated in Section 10.9 of the SLVIA chapter that increased distance and reduced horizontal spread of turbines has reduced the scale of the turbines in views, and leads to a reduction in impacts on the Isle of Anglesey AONB and on the National Park. However, this has not resulted in any reductions from significant in the PEIR to non-significant in the DCO submission.

**3.5** Our review of the SLVIA findings is presented in detail in Appendix A. This follows the format used in our review of the PEIR, and for each SLVIA receptor sets out:

- The operational effect at PEIR, and our comment (agreement/disagreement); and
- The operational effect at DCO submission, and any further comments.

**3.6** The following sections of this review summarises the findings of the SLVIA, and our observations noted in Appendix A, separated out for each of the following areas:

- Isle of Anglesey (including the AONB);
- Gwynedd;
- Snowdonia National Park;
- Conwy;
- Denbighshire; and
- Flintshire.

**3.7** This review focuses on areas of difference between the PEIR and DCO submissions.

### Isle of Anglesey

**3.8** Based on the updated array area, the north-east Anglesey coast is between 19km and 28km from the turbines. The closest point, Puffin Island, is just over 17km from the nearest turbine.

### Viewpoints

**3.9** There are 13 assessment viewpoints on Anglesey, and the SLVIA finds significant effects at eight of these locations. This is the same result as in the PEIR. All the identified significant effects are 'moderate', with the exception of VP7 Penmon Point and VP8 Beaumaris, which are 'major-moderate'. These findings are agreed.

**3.10** We previously queried the finding of non-significant effects at VP44 Beaumaris Castle, where the turbines will be seen in combination with Great Orme headland. The ES conclusion for VP44 is 'moderate (non-significant)'. Although VP44 is close to

VP8 where significant (major-moderate) effects are found, we acknowledge the different focus of views from the castle, and the lower magnitude of change at this location therefore appears justified. However, with a finding of 'moderate', we consider that this would have been classed as a significant effect, although it is a borderline case.

### Settlements

**3.11** Where non-significant effects were found at all settlements in PEIR, the ES acknowledges that there would be localised significant effects within Moelfre and Benllech. These moderate significant effects are restricted to "a small number of properties along the coastal edge" in each case. At Beaumaris, further justification is included for the finding of moderate and not significant. We accept that the SLVIA authors have clarified their approach, and their revised conclusions are therefore consistent.

**3.12** Our view on the narrow approach taken to assessing effects on views from settlements is noted above. We maintain that a more 'in the round' approach, also considering views experienced by the community as they move around, would have indicated a slightly wider extent of significant effects. However, this is a point of detail, and the overall conclusion that there would be significant effects from parts of these settlements with views of the sea is clear from reading the settlement and viewpoint assessments together.

### Routes

**3.13** As in the PEIR, significant effects are identified for users of the Wales Coastal Path in sections C-F, covering Dulas Bay to Penmon Point. Effects on sections C, D and part of E are classed as moderate, while effects on the eastern part of section E and section F are moderate-major. This reflects the closer views from around Penmon Point, and is consistent with the findings relating to the viewpoints.

### Landscape character

**3.14** Our review of the PEIR queried findings of 'locally significant' effects on LCAs 8, 9 and 10. In response, the SLVIA authors have clarified the extent of significant effects in each case, while maintaining that parts of the LCAs will be unaffected. While the distances stated in the revised assessments may be considered overly precise, and could be disputed, the revised assessments present a justified account of where significant effects are most likely. This is at the coastal edge, running inland up to 1km in places, along the majority of the coast between Dulas Bay and the Menai Strait. Effects are moderate, rising to moderate-major along the coast north of Beaumaris. We consider that the effect could extend slightly into LCA 6 to the north, where it is east-facing and continuous with LCA 8. However, overall we concur with the revised findings of the SLVIA as presented in the ES.

### Seascape character

**3.15** The PEIR noted 'locally significant' effects on three SCAs. This was accepted in two cases, but not for SCA 5 and 6, where our review suggested that significant effects would occur more widely. The SLVIA authors have amended their assessments for these SCAs and clarified the extent of significant effects. We accept that these assessments are now consistent. Locally moderate effects on the coastal edge are found for SCA 5 Penmon and SCA 7 Dulas Bay, with moderate effects overall on SCA 6 Red Wharf Bay to Moelfre.

### Isle of Anglesey AONB

**3.16** Three of the special qualities of the AONB have been considered. Effects at PEIR were found to be 'locally significant' in each case, and our review queried these findings in relation to 'expansive views' and 'islands around Anglesey'. The SLVIA authors have amended their assessments and clarified the extent of significant effects. We concur with these revised findings, which state that there will be moderate or major-moderate effects, leading to 'perceived diminishment' of these special qualities in the same areas where significant landscape and visual effects are recorded. The SLVIA goes on to conclude that this perceived diminishment is not judged to be "so great that it would affect the overall integrity or its inherent natural beauty". We do not comment on this judgement, which approaches the question of the 'acceptability' of the effects.

### Night-time effects

**3.17** The SLVIA only considers the visibility of 200 candela aviation lighting, and therefore no significant effects are identified. This is agreed, noting the PEIR conclusion of significant effects in the 2000 candela scenario.

## Gwynedd

### Viewpoints

**3.18** We queried the finding of non-significant effects at VP17 Penrhyn Castle Terrace. The SLVIA authors have revisited this in light of stakeholder comments, and a moderate (significant) effect is now recorded. Moderate (significant) effects are also confirmed for VP9 Bangor Pier.

### Settlements

**3.19** We agree with the finding of non-significant effects on the settlement of Bangor, as we did at PEIR.

### Routes

**3.20** Locally significant PEIR effects on section H of the Wales Coast Path have been clarified as 'moderate' between Penrhyn Castle and Llanfairfechan. This is an example of the confusing relationship between levels of effect and significance in the SLVIA, as effects on the path users west of Penrhyn Castle are also assessed as 'moderate' but non-significant. However, we accept that there is a different experience west of Penrhyn Castle.

### Landscape and seascape character

**3.21** Within Gwynedd, LCA G01 and SCA 3 largely overlap, and locally significant effects are identified. It is not clear why a slightly different extent of effects is identified for each, but we agree that moderate effects are likely along the coastal edge here.

### Night-time effects

**3.22** No 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.

## Snowdonia National Park

### Viewpoints

**3.23** 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.

**3.24** 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.

### Routes

**3.25** The finding of major-moderate (significant) effects on Wales Coast Path section I, "*across the side slopes of Foel Lus and along the ridge of Conwy Mountain*", with moderate-minor (non-significant) elsewhere, is agreed.

### Landscape character

**3.26** We 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.

### Seascape character

**3.27** 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.

### Special qualities

**3.28** 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.

### Night-time effects

**3.29** No 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.

## Conwy

### Viewpoints

**3.30** Ten viewpoints are assessed within the SLVIA, including VP15 Great Orme Café which was not assessed at PEIR. We agreed with all the judgements made at PEIR. The SLVIA reports moderate-major (significant) effects at four viewpoints: two on the Great Orme, one at Llandudno and one at Colwyn Bay. Moderate (significant) effects are reported at five viewpoints, with only one viewpoint considered to experience a non-significant effect (though still 'moderate'). This is the furthest east viewpoint, VP22 Abergele Promenade, where the proposed development appears behind the existing offshore turbines. We agree with the findings of significant effects on views, from locations between the Great Orme and Colwyn Bay.

### Settlements

**3.31** We disagreed with the PEIR findings in relation to number of settlements, particularly those where 'locally significant' effects were reported. These have been clarified by the SLVIA authors in each case. The SLVIA reports:

- 'Moderate or moderate-major' (significant) effects on locations within Llandudno, Penrhyn Bay, Rhos on Sea and Colwyn Bay;
- Moderate (significant) effects generally at Penmaenmawr and Dwygyfylchi;
- Moderate (significant) effects on locations within Llanfairfechan and Llandulas; and
- Non-significant effects on settlements west of Llandulas.

**3.32** Our view on the narrow approach taken to assessing effects on views from settlements is noted above. We maintain that a more 'in the round' approach, also considering views experienced by the community as they move around, would have indicated a slightly wider extent of significant effects in some cases, and our detailed comments are contained in Appendix A. However, this is a point of detail, and the overall conclusion is clear that there would be significant effects on views from parts of a number of settlements between Llanfairfechan and Llandulas.

### Routes

**3.33** We disagreed with some of the PEIR judgements relating to the Wales Coast Path. These have been revisited and clarified by the SLVIA authors, and we agree with the revised findings. This includes moderate-major (significant) effects on views from sections L, M, N and O, from the Great Orme to Llandulas. This is consistent with the assessments of effects on other visual receptors. A similar extent of significant effects is recorded for users of the National Cycle Route 5. Effects on road users of the A55 are not found to be significant.

### Landscape character

**3.34** We agree with the findings of effects on landscape character areas, with significant effects occurring along the coastal edge from the Great Orme to the Little Orme within LCA C10.

### Seascape character

**3.35** The SLVIA records moderate (significant) effects on SCA A Llandudno Bay. For SCA B and C, moderate (non-significant) effects are recorded. We queried these non-significant findings at PEIR and additional justification has been added by the SLVIA authors. We accept that the magnitude of change reduces towards the east, but consider that significant effects could occur within SCA B, given the contrast in scale between the proposed and existing development.

### Great Orme Heritage Coast

**3.36** A section has been added to consider effects on the 'character and qualities' of the heritage coast. In the absence of any published special qualities for heritage coasts, this does not seek to draw out what these qualities are, but relies on a summary of landscape and seascape effects on the area. It concludes a moderate (significant) effect, which is consistent with the findings of the SLVIA in relation to landscape and seascape effects. The assessment does not reference visual effects on receptors within the heritage coast, which are generally found to be major-moderate (significant), for example Viewpoints 13 and 15, and Wales Coast Path Section L.

### Night-time effects

**3.37** The SLVIA identifies a moderate (significant) effect on night time views at VP 13 Great Orme, for the reduced 200 candela scenario. Effects are non-significant at VP22 Abergele Promenade. More generally, the SLVIA concludes moderate (significant) effects on night-time views from the Great Orme. The SLVIA identifies this as an area with low light levels which is also accessible at night, and we agree that this is a key consideration.

## Denbighshire

### Viewpoints

**3.38** Three viewpoints have been assessed. We disagreed with the PEIR findings of non-significant at VP23 Rhyl Aquarium. This has been revisited by the SLVIA authors, and is recorded as moderate-minor (non significant), the same as at the other two viewpoints. The proposed development will appear behind the existing offshore turbines in these views, and the SLVIA records a 'low' magnitude of change in each case. We consider that, at Rhyl, the contrast in scale would lead to a magnitude of change greater than 'low' and therefore a potentially significant effect. We agree with the non-significant findings at the other two viewpoints.

### Settlements

**3.39** We agree with the SLVIA findings of minor (non-significant) effects on views from the settlements of Rhyl and Prestatyn. In the case of Rhyl we accept that there are few locations within the settlement itself which have clear sea views.

### Routes

**3.40** No significant effects are recorded on users of the Wales Coast Path or other assessed routes. We agree with these assessments.

### Landscape and seascape character

**3.41** We agree with the findings of the SLVIA, that there will be no significant effects on LCTs or SCAs within Denbighshire as a result of the offshore wind farm.

## Flintshire

**3.42** No significant landscape or visual effects are recorded within Flintshire. We agree with the assessments made.

## Cumulative effects

**3.43** Section 10.13 sets out the assessment of cumulative effects. Offshore developments are either operational, in which case they are considered within the SLVIA, or are at an early stage (Tier 3) where insufficient information is available. The latter applies to the Round 4 projects north of AyM. This is an appropriate approach.

**3.44** A number of onshore wind farms and other developments are also considered, although most are operational and therefore covered in the SLVIA. A small number of proposals are identified for assessment, and non-significant cumulative effects are identified. Future development within the identified Priority Areas for Energy, as set out in the National Development Framework, are considered Tier 3 development as insufficient information is available to make an assessment. This is considered appropriate.

**3.45** Other forms of development are also considered, and a detailed assessment of the Morlais tidal energy proposal is included. This concludes that there would be a moderate and non-significant effect on users of the Wales Coast Path within the Isle of Anglesey AONB. This appears to be reasonable and proportionate.

**3.46** No significant effects are identified to arise from the interaction of the onshore and offshore elements of the proposed development (Section 10.14). Again this appears to be reasonable and proportionate.

# Chapter 4

## Review of the Onshore LVIA

### Introduction

**4.1** The LVIA is set out in Volume 3, Chapter 2 and its supporting annex and figures. As with the SLVIA review, the focus is on changes since PEIR. The

### Methodology, Scope and Process

**4.2** The approach to the LVIA has not changed substantively since PEIR, and the methodology has not been reviewed in detail. The LVIA methodology does differ from PEIR in that levels of effect are introduced (previously effects were simply stated as significant or non-significant). As with the SLVIA, the LVIA allows 'moderate' effects to be judged as either significant or non-significant. We find this approach unhelpful as the difference it is not always clear to the reader.

**4.3** Section 2.3 of the LVIA summarises consultation inputs including section 42 responses relating to the PEIR. The comments put forward by LUC are incorporated and addressed by the LVIA authors. The LVIA authors have responded to several of LUC's recommendations in order to clarify their approach. Where there is no further comment on these matters in the following review, we accept the response given and the point can be considered closed.

### Baseline information

**4.4** There do not appear to have been any substantive changes in the landscape and visual baseline that would alter the findings of the LVIA.

**4.5** In response to consultee comments, an additional assessment viewpoint and visualisation has been included at Y Foel to represent views from within the Clwydian Range and Dee Valley AONB.

**4.6** We accept the LVIA authors' comments in relation to LUC's suggestions about viewpoints within St Asaph and Bodelwyddan Gardens. These viewpoints have not been changed.

### Mitigation and Design

**4.7** Further refinement of the substation design has taken place, and there is now a clearer picture of what is proposed to be built on the site. Two options are being progressed, within an overall 'maximum parameter extents'. These are defined in Table 6 of the SLVIA. The maximum parameters are defined by the larger footprint size (50,000m<sup>2</sup> for the AIS option), and by the maximum height, which is given as 15.8m above the finished platform level of 34.175m. The maximum height of the largest building is therefore just under 50m above Ordnance Datum.

**4.8** Mitigation measures have been developed further see Section 2.9. Around the substation, this includes proposed woodland planting, ecological mitigation areas and SuDS. Figure 2.16 shows the indicative landscape plan, which is described in more detail in the outline Landscape and Ecology Management Plan (OLEMP) (application reference 8.4). The landscape proposals as briefly outlined in Section 2.9 include suggested species, and strategies such as advance planting to speed up the effectiveness of the screen planting. The potential for earth bunding is also mentioned. The DCO application is also supported by a Design Principles Document (application reference 8.8). These and other supporting documents are considered in Appendix C.

### Visualisations

**4.9** ZTVs have been updated to reflect the maximum parameters of both the AIS and GIS options, as set out in Section 2.5.7.

**4.10** Visualisations for viewpoints 1-5 have been produced to Accurate Visual Representation (AVR) Level 4 in line with Landscape Institute guidance. Both the AIS and GIS options are depicted in each view; these are described as "example 3D

*block models*" in Section 2.5.8, indicating that they do not necessarily represent the final design. As well as the example block model, each visual also shows the outline of the maximum parameters, within which the final design would be contained. Year 15 views are included, showing the addition of maturing mitigation planting at an appropriate height.

**4.11** Visualisations for viewpoints 6-9 are shown with the maximum parameter outline only, due to distance or lack of visibility.

**4.12** In reviewing the visualisations, we consider that the combination of the worst-case maximum parameters outline with the indicative 3D models provides a helpful illustration of the likely appearance of development at the substation. While the mitigation planting is shown at an appropriate size, it is depicted in full leaf when the photographs have been taken in winter. This is notable in viewpoint 1, for example, where bare existing trees stand alongside the proposed trees in full leaf. We accept the difficulties of accurately depicting planting in this type of illustration.

**4.13** We note that the maximum parameter outline is not clearly visible on Figure 2.18j (Viewpoint 1) although the label indicates its extent (and it is clearly depicted on Figure 2.18h).

## Assessment of effects

### Effects on Physical Landscape

**4.14** An assessment of effects on elements of the physical landscape is presented in Section 2.10. Effects on agricultural land and hedgerows generally are found to be non-significant, due to the lower value placed on these elements. A separate assessment of 'taller hedgerows and hedgerow trees' finds a moderate (significant) effect. A list of hedges is provided, but it is not clear what proportion of hedges this represents. Reference to the Hedgerow and Protected Tree Plan (application reference 2.12) may have been useful here. It is not clear if there is a relationship between the 'taller hedgerows and trees' in the LVIA and the 'important hedgerows' shown on the Hedgerow and Protected Tree Plan.

**4.15** Effects on 'trees within the OnSS site area' are also found to be significant, as 'around 20-26 mature trees' would be lost. It is noted that hedges can be replanted over the ECC. This committed mitigation should be carefully secured through the DCO requirements. We accept that trees cannot be planted over the ECC for operational reasons, though woodland planting is proposed at the OnSS.

### Effects on Landscape Character and Designations

**4.16** Landscape effects are set out in Section 2.11. We agree with the scoping of receptors as set out in the preliminary assessment (Table 9). It is agreed that there would be significant effects on LCA A1 (the host landscape) during construction and operation at Year 1. It is also agreed that effects would reduce to non-significant at Year 15. However, we note that effects at Year 1 and Year 15 are both assessed as 'moderate'. This is an example of how the methodology can be unclear, as it appears that the level of effect is unchanged at Year 15, whereas the significance is reduced. As noted elsewhere, we do not consider this to be a helpful approach. The LVIA finds that there would be no significant effects on LCA C4 during construction or operation, and this is agreed.

**4.17** Effects on Bodelwyddan designed landscape are found to be moderate and non-significant during construction and operation. Effects are considered to be localised in the south-east area of the parkland. It is not clearly stated whether effects on the designed landscape as a whole would be less. We note that the viewpoint from Bodelwyddan shows no visibility of the OnSS from the core area close to the house. The ZTV does indicate visibility across the southern edge of the designed landscape, but we agree that this is unlikely to alter the character of the designated landscape.

### Effects on Visual Receptors

**4.18** Visual effects are assessed in Section 2.12. Tables 11 and 12 present the preliminary assessments and appear to include all relevant receptors. For the OnSS, reference is made to the AONB, and the new viewpoint 9 (Figure 2.26). We agree that there is no potential for significant effects on the AONB.

**4.19** Effects on visual receptors as a result of the ECC and landfall (Table 13) are found to be limited and localised. All effects of the ECC and landfall will be short term and reversible. We agree with the assessments made.

**4.20** Table 14 presents the assessment of effects of the OnSS on visual receptors. In general we agree with the assessments made, which include a number of significant but localised effects. We note the following:

- Our PEIR review suggested that Faenol Bropor farmhouse should be included as a receptor for the OnSS. Although assessed for the ECC and Landfall, residents at Faenol Bropor are not considered in the OnSS assessment (operation and construction), either preliminary or detailed. We note that a major effect is assessed here for the ECC and Landfall, during construction.
- Our PEIR review suggested that visitors to Glascoed Nature Reserve should be included as a receptor for the OnSS. This is included in the preliminary assessment (Table 12), and said to be “assessed *in detail from viewpoint 2*”. Although there is mention of visitors to the reserve in the evaluation of susceptibility, it is not clear how their views would differ as they enter or move around the nature reserve, in comparison with the static location of VP2.
- Visitors to the Denbighshire Memorial Park and Crematorium are additionally considered as a discrete receptor, in response to consultee comments. Significant effects at year 1 are assessed, reducing to non-significant by year 15.
- Significant effects at VP2, VP5 and the Memorial Park are stated to reduce to non-significant by year 15. This is reliant on the agreement of a detailed landscape plan prior to construction, early establishment of planting where possible, and reliable maintenance to ensure successful screening.
- At VP5, we again note that effects at Year 1 and Year 15 are both assessed as ‘moderate’, though the significance is reduced at Year 15.

#### Cumulative Effects

**4.21** The cumulative assessment reviews a number of nearby developments and proposals, and concludes that there is no potential for cumulative landscape and visual effects as a result of the interaction between the proposed development and any one of these. Based on the findings that significant effects of the proposed development will be localised we agree with the conclusions reached.

# Chapter 5

## Conclusions

### Summary of the Review

**5.1** This review has examined the SLVIA and LVIA submitted with the DCO application for the proposed development. Overall, we find that both assessments are thorough, detailed and grounded in good practice.

**5.2** Our observations in relation to the SLVIA of the offshore wind farm can be summarised as follows:

- The array area, and the MDS, has been further reduced since PEIR, although 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;
  - VP36 Tal-y-Fan, Snowdonia National Park (this may be due to an inconsistency in the sensitivity assessment); and
  - 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 a 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. As 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.

**5.3** 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 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

**5.4** 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.

**5.5** Appendix B 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.

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

# Appendix A

## Review of the SLVIA Assessments

**A.1** This appendix presents a review of all the assessments made within the SLVIA. It includes the assessments made at PEIR and our comments from our earlier review of that document. Effects are set out by Local Planning Authority from west to east, as in the SLVIA.

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Reported SLVIA Effects for Isle of Anglesey

Viewpoints (SLVIA Pages 92 to 114)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
1. Bull Bay near Amlwch – Wales Coast Path	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
2. Point Lynas - PRoW to north of lighthouse	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
3. Mynydd Eilian - near trig point	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
4. Moelfre Headland at sculpture (daytime)	Significant	Agreed	Moderate (significant)	Agreed
5. Red Wharf Bay	Significant	Agreed	Moderate (significant)	Agreed
6. Bwrdd Arthur - north of trig point	Significant	Agreed	Moderate (significant)	Agreed
7. Penmon Point - north-east of parking	Significant	Agreed	Major-moderate (significant)	Agreed
8. Beaumaris - Wales Coast Path	Significant	Agreed	Major-moderate (significant)	Agreed
14. Wales Coast Path near Penrhyn (Traeth yr Ora)	Significant	Agreed	Moderate (significant)	Agreed
16. Benlech Bay View Road	Significant	Agreed	Moderate (significant)	Agreed
28. Trwyn y Penrhyn parking layby	Significant	Agreed	Moderate (significant)	Agreed

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42. Mynydd Bodafon – Trig Point	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
44. Beaumaris Castle	Non-significant	Not agreed: given the perceived scale of proposed WTGs relative to Great Orme, and proposed WTGs 'emerging from behind' the landform across the car park, the magnitude of change is considered to be medium. This would suggest a significant effect at this viewpoint.	Moderate (non-significant)	Although VP44 is close to VP8 where significant (major-moderate) effects are found, we acknowledge the different focus of views from the castle, and the lower magnitude of change at this location therefore appears justified. However, with a finding of 'moderate', we consider that this would have been classed as a significant effect, although it is a borderline case.  We note elsewhere the approach to 'moderate' effects. All other 'moderate' effects on Anglesey are considered significant in the SLVIA.
Settlements (SLVIA Pages 115 to 125)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Amlwch	Non-significant	Agreed	Minor (non-significant)	Agreed
Moelfre	Non-significant	Not agreed: the SLVIA acknowledges the screening effect of buildings, but also states that much of <i>“Moelfre’s appeal is due to the combination its picturesque quality, its maritime history, beaches, coastline and countryside. The village’s attractions include the active Moelfre Lifeboat Station and popular Moelfre Seawatch Centre”</i> . Given the significant visual effect assessed at Viewpoint 4 nearby, and the settlement’s association with such open, surrounding features, effects on the visual resource associated with Moelfre would be significant (or locally significant).	Moderate (significant) “from a small number of properties along the coastal edge”. Otherwise moderate-minor (non-significant)	Potential for significant effects on views experienced by the community at Moelfre are acknowledged in the ES. Consideration of views from properties represents a narrow focus of assessment.

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Benllech	Non-significant	Not agreed: the SLVIA acknowledges the screening effect of buildings, but also states that <i>“Benllech is a popular holiday destination due to its sandy beach that looks out towards Penmon Point and the Great Orme”</i> . Given the significant visual effect assessed at Viewpoint 16 nearby, and the settlement’s association with open, surrounding features, effects on the visual resource associated with Benllech would be significant (or locally significant).	Moderate (significant) “from a small number of properties along the coastal edge”. Otherwise moderate-minor (non-significant)	As for Moelfre above.
Llanddona	Non-significant	Agreed	Moderate (non-significant)	Agreed
Beaumaris	Non-significant	Questioned: the SLVIA acknowledges the screening effects of buildings and topography and states that <i>“(whilst) views out to sea to the north-east are possible from (the) frontage area and the pier, views in that direction from the settlement’s properties are largely obscured by the intervening buildings and landform that rises to the north of the Castle. The main focus for the properties is to the south-east to the panoramic views containing a foreground of water and the mountainous backdrop of the mountains of SNP”</i> . A representative viewpoint may be required to illustrate this.	Moderate or lower (non-significant)	The authors have provided additional justification for the finding of non-significant effects. No additional viewpoint has been included.  As with Moelfre and Benllech, the potential for moderate effects is reported, but in this case these are not judged significant.  As with Viewpoint 44, we acknowledge that effects are at the borderline of significance at this location and distance.
Routes (SLVIA Pages 125 to 143)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Wales Coast Path – Section A Llanlleiana Head	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Wales Coast Path – Section B Amlwch	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed

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Wales Coast Path – Section C Dulas Bay	Significant	Agreed	Moderate (significant)	Agreed
Wales Coast Path – Section D Moelfre	Significant	Agreed	Moderate (significant)	Agreed. Reflects the findings at Viewpoint 4 Moelfre.
Wales Coast Path – Section E Red Wharf Bay / Penmon	Significant	Agreed	Moderate (significant) west of Bwrdd Arthur, and major-moderate (significant) east of Bwrdd Arthur	Agreed. This recognises the greater effect likely to be experienced on the north coast of the Penmon Peninsula.
Wales Coast Path – Section F Penmon Point	Significant	Agreed	Major-moderate (significant)	Agreed. Reflects the findings at Viewpoint 7 Penmon Point and Viewpoint 8 Wales Coast Path at Beaumaris.
Wales Coast Path – Section G	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
National Cycle Route 5	Non-significant	Agreed	Minor (non-significant)	Agreed
Landscape Character Areas (SLVIA Pages 143 to 160)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
LCA 6 – Amlwch and Environs	Non-significant	Agreed	Minor-moderate (non-significant)	Comment. We note that the eastern coast of this area, while a small part of the LCA, lies adjacent to LCA 8, where significant effects are found at the coastal edge, and has a similar relationship to the offshore wind farm.

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LCA 8 – Dulas Bay Hinterland	Locally significant, but otherwise non-significant	Agreed, in part: the SLVIA assesses significant effects <i>“along the immediate coastal edge where there is a direct association with the seascape to the north and north-east”</i> and non-significant effects elsewhere. ZTV coverage suggests there may be potential for significant effects to be more widespread than indicated.	Moderate effect (significant) along the coastal edge, moderate-minor (non-significant) elsewhere	Agreed. The area where significant effects could occur has been clarified as <i>“along the coastal edge extending to a maximum of approximately 1 km where there may be a direct association with the seascape”</i> . While the 1 km distance may be disputed, it is clear there are non-coastal areas of this LCA that would not be affected.
LCA 9 – Red Wharf Bay	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects <i>“along the immediate coastline between Moelfre headland and Benllech and south of Benllech and round Red Wharfe Bay to a point level with Ty-mawr north of Pentraeth Forest”</i> , and non-significant effects elsewhere. ZTV coverage suggests that potential visibility is widespread in this LCA and, given its strong coastal focus, suggests there is potential for significant effects to occur across the whole of the LCA.	Moderate (significant) along the coastal edge, moderate-minor (non-significant) elsewhere	Agreed. As above, the 1 km distance may be disputed. However, in this case 1 km would include most of the narrow LCA. There are inland areas in the south-west that may have a lesser relationship with the coast.
LCA 10 – Penmon and Puffin Island	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects <i>“in the coastal, northerly exposed areas of the LCA, extending inland by 0.5 to 0.75km”</i> , and non-significant effects <i>“to the west of Bwrdd Arthur and in the settled inland and former quarry area to the east”</i> . Given ZTV coverage, assessed viewpoints (with significant effects for each) and the strong coastal character of the LCA, significant effects would occur across the whole of the LCA.	Moderate (significant) in “coastal, northerly exposed areas of the LCA, extending inland to a maximum of 0.5 to 0.75 km”, moderate-minor (non-significant) elsewhere	Agreed. On examination the distribution of significant effects seems reasonable, noting that this is a narrow LCA that is little more than 0.75 km across.

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LCA 11 – Eastern Menai Strait	Locally significant, but generally non-significant	Agreed	Moderate-major (significant) at the coastal edge north of Beaumaris, minor (non-significant) elsewhere	Agreed.
Seascape Character Areas (SLVIA Pages 160 to 174)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
SCA 3 – Traeth Lafan	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) north of Beaumaris, moderate (non-significant) elsewhere	Comment. The area where significant effects is predicted is the same as for LCA 11, though effects on the SCA are moderate rather than moderate-major. The same magnitude of effect is predicted.
SCA 5 – Penmon	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects <i>“in the coastal, northerly exposed areas of the LCA (sic), extending inland by 0.5 to 0.75km”</i> . This is similar to the assessment of effects on LCA 10 – Penmon and Puffin Island – and, given the extensive ZTV coverage and assessed viewpoints, it is considered that significant effects would occur for the whole of the SCA.	Moderate (significant) along the coastal edge, moderate-minor (non-significant) elsewhere	Agreed, consistent with assessment of LCA 10.

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SCA 6 – Red Wharf Bay to Moelfre	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects “along the immediate landward coastline between Moelfre headland and Benllech and south of Benllech and round Red Wharfe Bay to a point level with Ty-mawr north of Pentraeth Forest and within the contained areas of sea located between Moelfre headland and level with Bwrdd Arthur to the east where there is a strong association with the wider seascape to the north-east”. Given the extent of the SCA which is covered by this assessment, the reported effects should apply to the SCA a whole.	Moderate (significant)	Agreed. The ES reports significant effects ‘overall’ within the SCA.
SCA 7 – Dulas Bay	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) along the coastal edge, minor (non-significant) elsewhere	Agreed, consistent with assessment of LCA 8.
Isle of Anglesey AONB (SLVIA Pages 174 to 200)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
IoA LCA 8: Dulas Bay Hinterland	Significant	Agreed	Moderate (significant)	Agreed. These reflect the findings for the coastal edge of each LCA
IoA LCA 9: Red Wharf Bay	Significant	Agreed	Moderate (significant)	
IoA LCA 10: Penmon and Puffin Island	Significant	Agreed	Moderate (significant)	
IoA LCA 11: Eastern Menai Strait	Significant	Agreed	Moderate-major (significant)	

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<p>Special Quality: Expansive Views</p>	<p>Locally significant, but otherwise non-significant</p>	<p>Not agreed: the SLVIA assesses significant effects <i>“on relative wilderness and the feeling of isolation (from human intervention) would apply in views from the sections of the coast between Moelfre and Point Llynas and along the coast between Penmon Point and Bwrdd Arthur. There would be no change to the perception of exposure as a result of the introduction of AyM OWF to views”</i>. The SLVIA also assesses that there would be significant visual effects at viewpoints which are in the AONB but outside of these areas (VP8, VP14 and VP28). Significant effects on the expansive views associated with the AONB would therefore occur more widely than reported. Although some of the affected views are already impacted by offshore wind turbines, the change in scale resulting from AyM OWF would be very noticeable.</p>	<p>Moderate to Major-Moderate (significant) in certain areas, non-significant elsewhere.</p>	<p>Comment. This special quality is divided into effects on ‘expansive views’ and effects on ‘relative wildness and the feeling of isolation’. These are reported separately in the same table row on pp.177-182.</p> <p>The extent of significant effects on ‘expansive views’ is related to those viewpoints where significant effects are reported. This is appropriate.</p> <p>The extent of significant effects on wildness is as reported at PEIR. Given the separation between this and ‘expansive views’, the extent includes the ‘wildest’ coasts and is an appropriate conclusion.</p>
<p>Special Quality: Peace and Tranquillity</p>	<p>Locally significant, but otherwise non-significant</p>	<p>Agreed</p>	<p>Moderate to moderate-major (significant) in limited locations, minor (non-significant) elsewhere.</p>	<p>Agreed. The significant effects relate to the visual component of tranquillity. The extent is similar to that identified for significant effects on ‘wildness’ above, which is appropriate given the strong overlap between tranquillity and ‘wildness’.</p>

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Special Quality: Islands Around Anglesey	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects <i>“on the visual interaction between the landscape/ seascape where the AyM OWF would form part of the backdrop to the islands of Ynys Moelfre, Ynys Dulas and Puffin Island in views from limited locations along the coast”</i> . While this may be true, it is likely to occur in the majority of locations where these islands are part of views along the coast. A special quality which occurs locally can only be affected locally, but it remains important to the designation.	Moderate to Major-Moderate (significant) in locations close to three offshore islands, non-significant elsewhere.	Agreed. Additional explanation is included that justifies the stated extent of the significant effect on this location-specific special quality.
Night-time Effects (SLVIA Pages 423 and 429 to 431)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Viewpoint 4. Moelfre Headland at sculpture (night-time)	Significant	Agreed	Minor (non-significant)	Agreed. At PEIR the magnitude of change for 2000 candela lights was medium-low. This has reduced to negligible for 200 candela lights.
<p>Across Isle of Anglesey, with reference to:</p> <ul style="list-style-type: none"> <li>■ Figure 10a – Baseline Light Pollution;</li> <li>■ Figures 21a-c – Hub Height Aviation Lighting ZTV (MDS A);</li> <li>■ Figures 22a-c – Hub Height Aviation Lighting ZTV (MDS B); and,</li> <li>■ Figures 31i-n – Viewpoint 4, Night-time Visualisations (Moelfre).</li> </ul>	Locally significant, but otherwise non-significant	<p>Agreed: the SLVIA assesses significant night-time effects <i>“in the vicinity of the following coastal locations:</i></p> <ul style="list-style-type: none"> <li>■ Point Lynas (Viewpoint 2);</li> <li>■ Moelfre (sic) Headland (Viewpoint 4);</li> <li>■ The beach and parking areas around Traeth Lligwy to the north-east of Rhôs Lligwy;</li> <li>■ Traeth Bychan and Penrhyn;</li> <li>■ Red Wharf Bay (Viewpoint 5);</li> <li>■ Penmon Point (Viewpoint 7); and</li> <li>■ Trwyn y Penrhyn parking (Viewpoint 28)”.</li> </ul>	Moderate-minor (non-significant) in the vicinity of Penmon Point (VP7) and Trwyn y Penrhyn (VP28), minor (non-significant) elsewhere	Agreed for the 200 candela scenario.

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Reported SLVIA Effects for Gwynedd (Snowdonia National Park in Table A.3 below)

Viewpoints (SLVIA Pages 201 to 206)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
9. Bangor Pier (Southern End)	Significant	Agreed	Moderate (significant)	Agreed
17. Penrhyn Castle Terrace	Non-significant	Not agreed: the SLVIA acknowledges that (for MDS A) “(movement) and structures of 48 WTGs theoretically visible as prominent elements on the horizon although some (approximately one third) of these are screened by intervening trees” and that these would be seen “in the vicinity of existing, but apparently smaller and more densely spaced, operational WTGs of GyM. The WTGs appear slightly separate from the most scenic parts of the view which include the Great Orme and the high ground of the edge of the SNP”. Although mature trees are visible, the open vista across Conwy Bay and out to sea is a key part of this view, and the surrounding context, and the introduction of prominent turbines of the scale shown would foreshorten this. This would suggest a significant effect at this viewpoint.	Moderate (significant)	Agreed. Although a medium-low magnitude of change, the high sensitivity leads to a finding of significant effect.
Settlements (SLVIA Pages 207 to 209)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Bangor	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Routes (SLVIA Pages 209 to 216)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment

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Wales Coast Path – Section H	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) between Penrhyn Castle and Llanfairfechan, moderate (non-significant) west of Penrhyn Castle	Comment: the finding in relation to significance is agreed, though we query why both significant and non-significant effects are 'moderate'. Magnitude of change is not clearly stated in relation to this division of the route.
National Cycle Route 5	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
A55 (North Wales Expressway)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Landscape Character Areas (SLVIA Pages 216 to 220)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
LCA G01 – Bangor Coastal Plain	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) " <i>in the coastal, exposed areas to the north-east of Bangor, extending inland by 0.3-1 km</i> ", and minor (non-significant) elsewhere.	Agreed
Seascape Character Areas (SLVIA Pages 160 to 164)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment

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SCA 3 – Traeth Lafan	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) in “ <i>the immediate coastal area between a point north of Aber Farm, to the west of Llanfairfechan.</i> ”	Comment: it is not clear why the finding is not consistent with the more extensive significant effects noted for LCA G01 which covers much of the same area.
Night-time Effects (SLVIA Page 431)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
<p>Across Gwynedd, with reference to:</p> <ul style="list-style-type: none"> <li>■ Figure 10a – Baseline Light Pollution;</li> <li>■ Figures 21a-c – Hub Height Aviation Lighting ZTV (MDS A); and</li> <li>■ Figures 22a-c – Hub Height Aviation Lighting ZTV (MDS B).</li> </ul>	Non-significant	Agreed: the SLVIA assesses non-significant effects “ <i>at locations within Gwynedd, largely as a result of the baseline light influence within and around the coastal edge and around Conwy Bay.</i> ”	Minor (non-significant)	Agreed

Reported SLVIA Effects for Snowdonia National Park

Viewpoints (SLVIA Pages 222 to 238)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
10. Carnedd Llewelyn	Significant	Agreed	Moderate (significant)	Agreed
12. Conwy Mountain	Significant	Agreed	Major-moderate (significant)	Agreed
34. Snowdon (Yr Wyddfa) Summit	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
36. Tal y Fan	Non-significant	Not agreed; the SLVIA acknowledges that “(movement) and structures of 48 WTGs visible as prominent elements within the seascape, close to the horizon” and that these would “extend across the seascape behind the Great Orme and to either side of it”. The strong vertical forms of the WTGs would contrast strongly with the landform of Great Orme and both their presence and perceived scale would alter the relationship between land, extending out from SNP, and sea. The contrasting scale between AyM OWF and GyM is very noticeable here. This would all suggest a significant effect at this viewpoint.	Moderate (non-significant)	Not agreed. We note the turbines are described as ‘prominent’. Although a ‘separate entity’ to the Great Orme, the presence of the turbines will alter the perception of this key feature within the view. We accept that the effect is close to the borderline of significance, but given the moderate level of effect we would have anticipated this being identified as significant.  We note that effects at VP38 are moderate (significant), on a very similar but more distant view. The difference would appear to be a lower sensitivity (medium-high) at VP36. The sensitivity is said to be based on the “high value of the viewpoint and the medium susceptibility”. However, medium-high susceptibility is stated, the same as for VP38. It may be that the difference in significance is attributable to this inconsistency.
38. Foel-fras	Significant	Agreed	Moderate (significant)	Agreed, see above for comparison with VP36.

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40. Above Capelulo – North Wales Path	Significant	Agreed	Major-moderate (significant)	Agreed.
Routes (SLVIA Pages 239 to 242)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Wales Coast Path – Section I	Locally significant, but otherwise non-significant	Agreed	Major-moderate (significant) “across the side slopes of Foel Lus and along the ridge of Conwy Mountain”, moderate-minor (non-significant) elsewhere	Agreed, this is consistent.
Landscape Character Areas (SLVIA Pages 243 to 254)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment

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LCA 01 – Northern Uplands (Ucheldir y Gogledd)	Non-significant	Not agreed; the SLVIA suggests that the <i>“northerly areas of the LCA are those that are at closest proximity to the AyM (OWF) array area and the higher levels of magnitude of change in views as a result. These areas generally coincide with areas where there is the strongest existing human influence on character through visibility of existing development which is detrimental to the qualities of tranquillity, remoteness and wildness. The further impact on the characteristics of these areas through the introduction of AyM OWF as part of their setting would not result in a marked change to their character”</i> . However, ZTV coverage and the SLVIA assessment of viewpoints recognises that impacts would be more widespread than the northerly areas of the LCA. Upland areas such as Tal y Fan, Foel-fras and slopes above the Conwy Valley (including Meol Elio and Cefn Cyfarwydd) would be affected by a scale of development not evident in the baseline landscape character and there is potential for significant landscape effects, either locally or generally, to result from the proposed development.	Moderate (non-significant)	Not agreed. We disagree that the ‘visibility of existing development’ within the northern parts of the LCA will limit the magnitude of change (para 718). 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. We suggest that the northern areas referred to at para 723 are likely to experience a change in character as a result.  We consider this should have been classed as significant within the northern part of the LCA. We agree with non-significant effects over the more inland and upland parts of the LCA.
LCA 02 – Carneddau Range (Y Carneddau)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Seascape Character Areas (SLVIA Pages 254 to 259)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment

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SCA 2 – Conwy Bay	Locally significant, but otherwise non-significant	Not agreed; the SLVIA acknowledges that effects would be “ <i>Significant, adverse, short-term temporary on the upper and northerly slopes of the Great Orme</i> ” but suggests that they would be non-significant elsewhere. Proposed turbines would alter the perceived scale of Great Orme from a large proportion of the SCA; this is illustrated by ZTV coverage shown on Figure 15b and Viewpoint 11 (although this viewpoint is outside the SCA, similar views would be available from within it and at closer proximity). Significant effects would occur across a greater proportion of the SCA than reported by the SLVIA.	Moderate (significant) “ <i>on the upper and northerly slopes of the Great Orme</i> ” and moderate (non-significant) elsewhere	Not agreed. Findings for the adjacent SCA 3 conclude significant effects at Llanfairfechan, and it seems likely that similar effects would occur into the east of this SCA where the turbines are seen beside the Great Orme. This is illustrated by Viewpoint 11 (within SCA 3) and Viewpoint 63 (within SCA 2) which show a similar view of the turbines. We accept that significant effects will not extend east of Penmaenmawr where turbines are increasingly screened by the Great Orme.  Both significant and non-significant effects are stated to be moderate, which does not help the reader to understand the difference.
Special Qualities of the SNP (SLVIA Pages 259 to 272)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Diverse Landscapes	Non-significant	Agreed	Moderate-minor to moderate (non-significant)	Agreed.
Tranquillity & Solitude – Peaceful Areas	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed

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Overall integrity of the AONB	N/A	N/A	N/A	<p>A detailed discussion is presented on pp.268-272. This concludes that, while “<i>there may be some perceived diminishment of (harmful effects on) the Special Qualities of Diverse Views and Tranquillity</i>”, overall the effects would not “<i>affect the overall integrity of the SNP or its inherent natural beauty</i>”.</p> <p>We have disagreed above with effects on LCA 01, where we consider significant effects on landscape character could occur across a localised area within the National Park. This differs from the finding of no significant effects on landscape or seascape character presented in the SLVIA (para 793). However, the extent of potentially significant effects is unlikely to alter the overall conclusion set out above.</p> <p>The conclusions in relation to the special qualities and overall integrity of the National Park are therefore reasonable.</p>
Night-time Effects (SLVIA Pages 426 to 428 and 432 to 434)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Viewpoint 60 Foel Lus	Non-significant	[omitted from review]	Moderate-minor (non-significant)	Agreed. The existing lighting at sea and on land reduces the level of effect. The 200 candela lights are clearly dimmer than existing at-sea light sources.

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<p>Snowdonia National Dark Sky Reserve, with reference to:</p> <ul style="list-style-type: none"> <li>■ Figure 10a – Baseline Light Pollution;</li> <li>■ Figures 21a-c – Hub Height Aviation Lighting ZTV (MDS A);</li> <li>■ Figures 22a-c – Hub Height Aviation Lighting ZTV (MDS B); and,</li> <li>■ Figures 83a-g – Viewpoint 60, Night-time Visualisations (Foel Lus).</li> </ul>	<p>Non-significant</p>	<p>Agreed: the SLVIA assesses non-significant effects <i>“at locations within SNP DSR, largely as a result of the baseline light influence within the setting of SNP DSR and in particular and around the coastal edge of Conwy over which the aviation lights of AyM are visible in the context of the aviation lights of the operational OWFs. It is notable in this assessment that the effects differ from the daytime visual effects within these areas. This is largely as a result of the fact that it is not possible to see the complex, coastal features such as the Great Orme, indented bays or prominent hills within the intervening area that interact with the views towards the AyM OWF in the daytime views”</i>.</p>	<p>Minor (non-significant)</p>	<p>Agreed</p>
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Reported SLVIA Effects for Conwy

Viewpoints (SLVIA Pages 274 to 297)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
11. Llanfairfechan	Significant	Agreed	Moderate (significant)	Agreed
13. Great Orme – near summit complex	Significant	Agreed	Moderate-major (significant)	Agreed
15. Great Orme – Café	<i>Not assessed at PEIR</i>	N/A	Moderate-major (significant)	Agreed
18. Llandudno Paddling Pool	Significant	Agreed	Moderate-major (significant)	Agreed
20. Bryn Euryn	Significant	Agreed	Moderate (significant)	Agreed
21. Mynydd Marian	Significant	Agreed	Moderate (significant)	Agreed
22. Abergele Promenade	Non-significant	Agreed	Moderate (non-significant)	Agreed. Although noted as a moderate effect, we agree this is non-significant as the proposed development (although large in scale) is seen behind the existing offshore turbines.
29. Colwyn Bay Promenade	Significant	Agreed	Moderate-major (significant)	Agreed
37. Cefn Coch Stone Circle	Significant	Agreed	Moderate (significant)	Agreed
59. Llandudno Promenade – Lifeboat Slipway	Significant	Agreed	Moderate (significant)	Agreed

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Settlements (SLVIA Pages 298 to 322)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Llanfairfechan	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) for “seaside properties” and non-significant elsewhere	Agreed (noting comments elsewhere about the scope of effects on settlements)
Penmaenmawr	Significant	Agreed	Moderate (significant)	Agreed
Dwygyfylchi	Significant	Agreed	Moderate (significant)	Agreed
Llandudno	Significant	Agreed	Moderate to Moderate-major (significant) “along the bay frontage”, non-significant elsewhere.	Comment. We note that there may be views of the offshore wind farm from more inland locations in the south-east, where the settlement is on rising ground. Properties and streets in this area are set back from the bay frontage and have views towards the array area.
Penrhyn Bay	Locally significant, but otherwise non-significant	Not agreed; the SLVIA recognises that there would be significant effects on seafront properties in Penrhyn Bay but suggests that “ <i>views from other properties would be largely unaffected</i> ”. There are parts of north-west Penrhyn Bay, including the seafront and those immediately inland, feature a high proportion of bungalows and are noted to be low-density. Views of the proposed AyM OWF, and therefore resulting significant effects, would result across a greater extent of the settlement than suggested by the SLVIA. Significant effects are likely to remain local, but their extent should be clarified.	Moderate-major (significant) “along the bay frontage and properties immediately inland”, non-significant elsewhere.	Comment. The extent of ‘immediately inland’ is not defined. It is accepted that the more elevated parts of the settlement to the north-west (around Penrhyn Beach East and West) are more screened by the Little Orme, but effects could potentially extend inland to c.400m.

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Rhos-on-Sea	Locally significant, but otherwise non-significant	Not agreed; the SLVIA recognises that there would be significant effects on north-facing seafront properties in Rhos-on-Sea but suggests that " <i>magnitude would be lower or no change</i> " elsewhere in the settlement. There are parts of Rhos-on-Sea which include flats and taller buildings. Views of the proposed AyM OWF, and therefore resulting significant effects, would result across a greater extent of the settlement than suggested by the SLVIA. Significant effects are likely to remain local, but their extent should be clarified.	Moderate or moderate-major (significant) "along the north facing Rhos-on-Sea frontage and from the properties that gain elevated or open views of the AyM OWF from within the urban area."	Agreed, the finding recognises potential effects from further inland.
Colwyn Bay	Locally significant, but otherwise non-significant	Not agreed; the SLVIA suggests that " <i>The sea front properties would gain visibility of the AyM OWF, however views from other properties would be largely unaffected</i> ". Topography is more varied in parts of Colwyn Bay than the SLVIA suggests and visibility of AyM OWF is likely to significantly affect properties other than those which are on the seafront. Significant effects are likely to remain local, but their extent should be clarified.	Moderate or moderate-major (significant) "from the sea facing properties along the promenades in Colwyn Bay and from the properties that gain elevated or open views of the AyM OWF from within the urban area"	Agreed, the finding recognises potential effects from further inland.

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Llanddulas	Non-significant	Not agreed; the SLVIA suggests that “ <i>actual visibility from the settlement would not generally follow the pattern of theoretical visibility as some views from within the settlement would be restricted by intervening properties and infrastructure</i> ”. Llanddulas has developed on a north-facing slope and a large proportion of properties have open or channelled coastal views. Significant effects, potentially locally, are likely within the settlement.	Moderate (significant) “from the properties orientated to the north over the seascape on elevated high ground”	Agreed, the finding recognises potential effects from locations across the settlement.
Abergele and Pensarn	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Towyn and Kinmel Bay	Non-significant	Agreed	Minor (non-significant)	Agreed
Routes (SLVIA Pages 322 to 346)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Wales Coast Path – Section J	Non-significant	Agreed	Moderate to moderate-minor (non-significant)	Agreed
Wales Coast Path – Section K	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) “along 0.8 km section at north-western extent of Great Orme”	Agreed

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Wales Coast Path – Section L	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be “ <i>Medium-high for 2.5km section along northern edge of Great Orme. Low magnitude to no change elsewhere along the route</i> ”. Given the extent which would be affected, it is considered that significant effects should be reported for the whole of this section of the route.	Moderate-major (significant)	Agreed, the assessment has been updated with the result that significant effects are identified along this section.
Wales Coast Path – Section M	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be “ <i>Medium-high for 2.5km section along Llandudno Promenade, Colwyn Road and northern edge of Great Orme. Low magnitude to no change elsewhere along the route</i> ”. Given the extent which would be affected, it is considered that significant effects should be reported for the whole of this section of the route.	Moderate-major (significant) “ <i>along 2.5 km section of Llandudno promenade and a 200m section of Colwyn Road</i> ”	Agreed. The assessment has been revisited and clarified, and we agree with the justification provided.
Wales Coast Path – Section N	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be “ <i>Medium-high for 3.5km section where there are open views from along the Penrhyn and Rhos Bays and headland at Rhos Point. Lower magnitude to no change elsewhere along the route</i> ”. Given the extent which would be affected, it is considered that significant effects should be reported for the whole of this section of the route.	Significant “ <i>for 3.5km section where there are open views from along the Penrhyn and Rhos Bays and headland at Rhos Point</i> ”	Agreed. The assessment has been revisited and clarified, and we agree with the justification provided.  We note no level of effect is given but would expect this to be moderate-major to be consistent with the adjacent sections.

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Wales Coast Path – Section O	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be “ <i>Medium-high for the 5km section from Colwyn Bay to 0.5km west of Llandulas. Medium to low from Llandulas to Pensarn</i> ”. Given the extent which would be affected, it is considered that significant effects should be reported for the whole of this section of the route.	Moderate-major (significant) “ <i>from Colwyn Bay to 0.5 km west of Llandulas</i> ”, moderate (significant), “ <i>from 0.5 km west of Llandulas to west of Pensarn and Abergele.</i> ”	Agreed. The assessment has been revisited and clarified, and we agree with the revised conclusion.
Wales Coast Path – Section P	Non-significant	Agreed	Moderate-minor to minor (non-significant)	Agreed
National Cycle Route 5	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) along various sections	Agreed, the extent of significant effects is clearly set out.
A55, North Wales Expressway	Non-significant	Agreed	Moderate-minor (non-significant) or less	Agreed. Effects fall below the threshold of significance due to the lower sensitivity assigned to road users, which is a reasonable approach.
Landscape Character Areas (SLVIA Pages 346 to 357)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
LCA C4 – Limestone Farmlands (Abergele to Denbigh Coastal/ Vale Hills unit)	Non-significant	Agreed	Moderate-minor to minor (non-significant)	Agreed
LCA C9 – Limestone Escarpment and Hills	Non-significant	Agreed	Moderate (non-significant)	Agreed

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LCA C10 – Great Orme and Creuddyn Peninsula	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) “ <i>at the coastal edge between the north-west point of Great Orme and Little Orme and from elevated locations on the Great Orme (extending inland from the north by approximately 1 km) and the north face of Little Orme</i> ”, non-significant elsewhere	Agreed
Seascape Character Areas (SLVIA Pages 358 to 368)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
SCA A – Llandudno Bay	Significant	Agreed	Moderate (significant)	Agreed

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SCA B – Colwyn Bay	Non-significant	Not agreed; the SLVIA acknowledges that <i>“The GyM OWF sits at a greater distance than the more prominent Rhyl Flats in views from this coastline. The scale of the AyM WTGs when compared with the WTGs of the operational OWF is relatively large making them substantially more prominent in views from the coastal parts of the SCA. The generally wide panoramic views from the coast will include a further OWF within their extent as is demonstrated by Viewpoints 119, 20, 21, 29 and 58 (Annex 10.5). This in turn will increase their characterising influence, particularly when viewed in combination with the other OWFs”</i> . This would suggest a significant effect at this SCA.	Moderate (non-significant)	Comment: we note that the authors have provided additional justification. We accept that the SCA is already strongly influenced by offshore wind development, but note that the SLVIA highlights the large size of the proposed turbines, which makes them <i>“substantially more prominent”</i> . We accept that the effect may be at the borderline of significance but given that moderate effects are found, a precautionary stance may have suggested recording a significant effect.
SCA C – Vale of Clwyd	Non-significant	Not agreed; the SLVIA acknowledges that <i>“The scale of the AyM WTGs when compared with the WTGs of the operational OWF is relatively large making them substantially more prominent in views from the coastal parts of the SCA. The generally wide panoramic views from the coast will include a further intensification of OWF within their extent”</i> . This would suggest a significant effect at this SCA.	Moderate (non-significant)	Agreed. We note that the assessment has been revisited and that the proposed turbines are now described as <i>“similarly prominent”</i> as the existing turbines. With reference to the relevant visualisations (e.g. Viewpoint 23), the detail of this may be queried in terms of visual appearance. However, we accept that on balance this does not equate to a significant effect on seascape character.
Heritage Coast (SLVIA Pages 368 to 370)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment

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Character and qualities of the Great Orme Heritage Coast	<i>Not assessed</i>	N/A	Moderate (significant)	<p>Comment: this section reiterates the findings of the assessment of effects on LCAs and SCAs relevant to the heritage coast area.</p> <p>This section does not make reference to the visual effects assessed on receptors within the Heritage Coast, including VP13, VP15 and Wales Coast Path section L, where major-moderate effects are identified.</p> <p>The particular 'character and qualities' of the Great Orme Heritage Coast are not drawn out. We are aware from our own experience of the difficulty in determining the particular qualities for which a given heritage coast is defined.</p>
Night-time Effects (SLVIA Pages 424 to 426 and 434 to 435)	SLVIA Effect	Comment		
Viewpoint 13 Great Orme near summit complex	Significant	[omitted from review]	Moderate (significant)	Agreed
Viewpoint 22 Abergele Promenade	Non-significant	[omitted from review]	Moderate-minor (non-significant)	Agreed

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<p>Across Conwy, with reference to:</p> <ul style="list-style-type: none"> <li>■ Figure 10a – Baseline Light Pollution;</li> <li>■ Figures 21a-c – Hub Height Aviation Lighting ZTV (MDS A);</li> <li>■ Figures 22a-c – Hub Height Aviation Lighting ZTV (MDS B);</li> <li>■ Figures 40i-n – Viewpoint 13, Night-time Visualisations (Great Orme – near summit complex); and,</li> <li>■ Figures 49i-n – Viewpoint 22, Night-time Visualisations (Abergele Promenade).</li> </ul>	<p>Locally significant, but otherwise non-significant</p>	<p>Agreed; the SLVIA assesses significant effects would result on <i>“views from the summit and north-eastern parts of the Great Orme where light levels are lower (than elsewhere in Conwy), but the areas are also relatively accessible during twilight and at night. The magnitude of the change as a result of the close proximity of the lighting and its wide horizontal extent is also a factor”</i>.</p>	<p>Moderate (significant) <i>“from the summit and north-eastern parts of the Great Orme (Viewpoint 13) where light levels are lower, but the areas are also relatively accessible during twilight and at night”, non-significant elsewhere.</i></p>	<p>Agreed. We concur with the finding of localised effects, even in the 200 candela scenario. The SLVIA correctly recognises the important combination of low light levels and accessibility at the Great Orme.</p>
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### Reported SLVIA Effects for Denbighshire

Note: Due to a formatting error there is no section heading for Denbighshire in the SLVIA. The assessment begins on page 370.

Viewpoints (SLVIA Pages 371 to 377)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
23. Rhyl Aquarium	Non-significant	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 <i>“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”</i> . 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.	Moderate-minor (non significant)	Comment. We accept that the authors have reviewed their assessment for Viewpoint 23 and confirm their finding. Likewise we maintain our view that the contrast between the larger, but more distant, AyM turbines and the existing turbines would lead to a magnitude of change greater than ‘low’.
24. Graig Fawr	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed. We concur with the assessment of ‘low’ magnitude of change in this case.
25. Prestatyn Nova Centre	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed. We concur with the assessment of ‘low’ magnitude of change in this case.
Settlements (SLVIA Pages 378 to 383)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Rhyl	Non-significant	Not agreed; the SLVIA assesses a non-significant effect for Viewpoint 23 (Rhyl	Minor (non-significant)	Comment: We note that the authors have clarified their approach to settlements as

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		Aquarium), but this 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 <i>“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”</i> . Although <i>“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”</i> , there is potential for significant visual effects to result locally.		focusing on people within properties. As such this finding is consistent.  As noted above we take a more ‘in the round’ approach to views experienced by people within their communities. However, in this case we accept that the developed sea front separates the settlement from the sea views, and that there are no elevated parts of the settlement. While we might conclude a greater level of effect than ‘minor’ we accept that this is likely to fall below the threshold of significance.
Prestatyn	Non-significant	Agreed	Minor (non-significant)	Agreed
Routes (SLVIA Pages 383 to 384)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Wales Coast Path – Section P	Non-significant	Agreed	Moderate-minor to minor (non-significant)	Agreed (Note: Reported under Conwy in the ES, see p.336)
Offa’s Dyke Long Distance Route	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
National Cycle Route 5	Non-significant	Agreed	Minor (non-significant)	Agreed
A55, North Wales Expressway	Non-significant	Agreed	Minor (non-significant)	Agreed
Landscape Character Areas (SLVIA Pages 384 to 392)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment

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LCA C4 – Limestone Farmlands (Abergele to Denbigh Coastal/ Vale Hills)	Non-significant	Agreed	Moderate-minor to minor (non-significant)	Agreed (Note: Reported under Conwy in the ES, see p.346)
LCT 2 – Hill slopes of the Clwydian Hills and Dee Valley AONB (Denbighshire and Flintshire)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
LCT 5 – Rolling Lowland of the Clwydian Hills and Dee Valley AONB (Denbighshire and Flintshire)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Seascope Character Areas (SLVIA Page 392)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
SCA C – Vale of Clwyd	Non-significant	Not agreed; the SLVIA acknowledges that <i>“The scale of the AyM WTGs when compared with the WTGs of the operational OWF is relatively large making them substantially more prominent in views from the coastal parts of the SCA. The generally wide panoramic views from the coast will include a further intensification of OWF within their extent”</i> . This would suggest a significant effect at this SCA.	Moderate (non-significant)	Agreed. We note that the assessment has been revisited and that the proposed turbines are now described as <i>“similarly prominent”</i> as the existing turbines. With reference to the relevant visualisations (e.g. Viewpoint 23), the detail of this may be queried in terms of visual appearance. However, we accept that on balance this does not equate to a significant effect on seascope character.  (Note: Reported under Conwy in the ES, see p.365)
Special Qualities of the Clwydian Range and Dee Valley AONB (SLVIA Pages 392 to 400)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Landscape Character and Quality – Tranquillity	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Landscape Character and Quality – Remoteness and Wildness	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed

Appendix A  
 Review of the SLVIA Assessments

Awel y Mor Offshore Wind Farm Examination  
 October 2022

Reported SLVIA Effects for Flintshire

Viewpoints (SLVIA Pages 400 to 401)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
27. Point of Ayr	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
Routes (SLVIA Pages 401 to 404)	Operational Effect in PEIR	Comment	Operational Effect in ES	Comment
Wales Coast Path – Section Q	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed
National Cycle Route 5	Non-significant	Agreed	Minor (non-significant)	Agreed
A55, North Wales Expressway	Non-significant	Agreed	Minor (non-significant)	Agreed

# Appendix B

## Responses to ExQ1

**B.1** The following appendix includes LUC’s comments in relation to the Examining Authority’s first round of questions (ExQ1). The tables below include all the ExQs that are directed to the North Wales LPAs. Questions directed to the Applicant or other bodies have not been addressed. LUC cannot respond on all the points raised, but we have included comments summarising our views, based on our review of the SLVIA and LVIA set out in this report.

**Table 5.1: ExQ1: Landscape and Visual**

Ref	Respondent	Question	LUC comment
10.1	DCC, NRW	<p>Assessment</p> <p>Please confirm whether you are satisfied with:</p> <p>a) the ECC and OnSS study areas; and</p> <p>b) the OnSS viewpoint locations selected, as identified within ES Chapter 2: Landscape and Visual Impact Assessment (LVIA) [AS-029].</p> <p>If not, please explain the reasons for this.</p>	<p>a) The ECC and OnSS study areas are sufficient to capture all the potentially significant effects of the proposed development.</p> <p>b) The viewpoints are an appropriate and representative selection. The Applicant has considered alternatives and added new viewpoints to the DCO where necessary.</p>
10.2	DCC, NRW	<p>Assessment</p> <p>Please confirm whether you are in agreement with:</p> <p>a) the Applicant’s LVIA methodology; and</p> <p>b) its assessment of effects in respect of landscape features, landscape character and visual amenity.</p> <p>If not, please explain the reasons for this.</p>	<p>a) The Applicant’s LVIA methodology is grounded in good practice and fit for purpose. LUC query the approach to ‘moderate’ (see 10.3).</p> <p>b) LUC’s review of the LVIA assessment has not identified any areas of substantive disagreement.</p>
10.3	DCC, NRW, The Applicant	<p>Assessment</p> <p>The LVIA methodology provides for moderate adverse effects to be classified as either ‘significant’ or ‘not significant’ based on professional judgement.</p> <p>DCC / NRW - Please confirm you are satisfied with this approach?</p> <p>The Applicant - Please further justify the instances where moderate adverse effects are considered ‘not significant’ in Tables 8, 10, 13 and 14, as the precise reasons for this are not clear to the ExA.</p>	<p>LUC find this approach unhelpful. It can result in apparently similar (moderate) effects on two receptors, one of which is significant and one of which is not. The reasons for this are not always clear to the reader, particularly if they are not familiar with the standard approach to LVIA. In our view a clear distinction between significant and non-significant effects enhances the clarity and accessibility of the assessment.</p>
10.4	DCC	<p>Assessment</p> <p>The photograph taken from Viewpoint (VP) 6 (Bodelwyddan Castle) [APP-186] shows</p>	<p>LUC has not undertaken site work and we are therefore not familiar with the Bodelwyddan landscape. However, from looking at mapping and aerial</p>

Ref	Respondent	Question	LUC comment
		summer views towards the OnSS site. Are you satisfied this is sufficient for the purposes of the assessment?	photography the trees in the viewpoint photograph appear to be part of substantive woodlands along the east boundary of the park. It seems unlikely that winter photography would offer any open views to the OnSS site.
10.16	DCC, NRW	Clwydian Range and Dee Valley Area of Outstanding Natural Beauty VP 9 [APP-189] is located within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). Are you satisfied that:  a) the OnSS would give rise to no significant effects from this viewpoint (and the AONB as a whole); and  b) that this would also be the case should the AONB change to National Park status (albeit boundaries might differ)?	a) From our review, LUC are satisfied that there would be no significant effects on views at VP9, or more generally on the AONB.  b) The LVIA makes clear that the effects are judged to be non-significant due to the low magnitude of change. Should the AONB be designated as a National Park the sensitivity would not change substantively, so no additional significant effects would be anticipated.
10.20	DCC	Woodland Planting  Are you satisfied with the suggested growth rates of woodland planting (7-10m over 15 years) as set out in [AS-029] and the 8.5 metres height (as an average) of woodland planting shown on the Year 15 photomontages?	It is very difficult to accurately predict the growth rates for woodland planting. The stated growth rates appear to be reasonable estimates.  We note the Year 15 montages show mitigation planting in full leaf, in the context of a winter view.
10.22	The Applicant, DCC	Onshore Substation  Table 6 of [AS-029] identifies maximum dimensions for buildings associated with the OnSS. Should all these dimensions be reflected in Table 4 of R7 of [AS-014] and if not, how would it be ensured that the dimensions of buildings did not exceed that considered in the assessment?	[No LUC comment]
10.26	DCC	Woodland Species Selection  Please confirm you are satisfied with the suggested woodland species selection as set out in paragraph 168 of [AS-029]? If not, please provide reasoning.	LUC has not undertaken site work, so we are not familiar with prevalent woodland species in the area. The species selection appears to be appropriate. The final species list should be subject to DCC approval as part of the DCO Requirements.
10.36	DCC, NRW	Cumulative Assessment  Are you satisfied with the list of developments for cumulative assessment purposes as shown in Table 15 of ES Chapter 2 [AS-029] and with the conclusions that no significant cumulative landscape and visual effects would arise?	LUC has not checked the list of cumulative developments.  On the basis of the list provided, the findings of the cumulative LVIA appear reasonable.

Ref	Respondent	Question	LUC comment
10.37	DCC, NRW, The Applicant	<p>Cumulative Assessment</p> <p>DCC / NRW - [AS-029] sets out that the cumulative assessment excludes the consideration of the necessary extension to the National Grid substation on the basis of insufficient detail known of it at the time of the assessment. However, it goes on to suggest that the effects of the extension would be localised and would therefore be unlikely to lead to a significant cumulative effect. Are you in agreement with this?</p> <p>The Applicant - Has there been any progression in respect of the National Grid substation extension which might assist with a more detailed consideration of cumulative effects?</p>	<p>We note that the LVIA identifies this potential for a localised, but not significant, cumulative effect (para 192). It goes on to state that there is insufficient information on which to base a meaningful cumulative assessment. This position appears to be reasonable.</p>

Table 5.2: ExQ1: Seascape, Landscape and Visual

Ref	Respondent	Question	LUC comment
17.1	DCC, IoACC, CCBC, GC, FCC, SNP, NRW	<p>Assessment</p> <p>Please confirm whether you are satisfied with:</p> <p>a) the study area;</p> <p>b) the Zone of Theoretical Visibility;</p> <p>c) the viewpoint locations selected; and</p> <p>d) the extent of assessment of these viewpoints, as identified within ES Chapter 10: Seascape, Landscape and Visual Impact Assessment (SLVIA) [AS-027].</p> <p>If not, please explain the reasons for this.</p>	<p>Based on LUC's review of the SLVIA:</p> <p>a) we consider the study area to be sufficient</p> <p>b) we consider the ZTV to be an accurate depiction of theoretical visibility</p> <p>c) the viewpoint locations are appropriate, sufficient in number and agreed with consultees</p> <p>d) the SLVIA includes sufficient assessment of viewpoints to illustrate the pattern of likely significant effects</p>
17.2	DCC, IoACC, CCBC, GC, FCC, SNP, NRW	<p>Assessment</p> <p>Please confirm whether you are satisfied with:</p> <p>a) the Applicant's SLVIA methodology; and</p> <p>b) its assessment of effects on seascape character, landscape character and visual amenity.</p> <p>If not, please explain the reasons for this.</p>	<p>Based on LUC's review of the SLVIA:</p> <p>a) The Applicant's LVIA methodology is grounded in good practice and fit for purpose. LUC query the approach to 'moderate' (see 17.3) and the detailed approach to assessing effects on settlements, but these are not matters of material disagreement.</p> <p>b) LUC's review of the LVIA assessment has not identified any areas of substantive disagreement.</p>
17.3	DCC, IoACC, CCBC, GC, FCC, SNP, NRW	<p>Assessment</p> <p>The SLVIA methodology provides for moderate adverse effects to be classified as</p>	<p>LUC find this approach unhelpful. It can result in apparently similar (moderate) effects on two receptors, one of which is significant and one of which is not. The</p>

		<p>either 'significant' or 'not significant' based on professional judgement.</p> <p>DCC/loACC/CCBC/GC/FCC/SNP/NRW - Please confirm you are satisfied with this approach?</p> <p>The Applicant - Please further justify the instances where moderate adverse effects are considered 'not significant' as the precise reasons for this are not clear to the ExA.</p>	<p>reasons for this are not always clear to the reader, particularly if they are not familiar with the standard approach to SLVIA. In our view a clear distinction between significant and non-significant effects enhances the clarity and accessibility of the assessment.</p>
17.5	SNP, NRW	<p>Assessment</p> <p>SNP [RR-006] and NRW [RR-015] raise concerns around under-reporting of significant effects. Please identify specifically where your concerns lie, with supporting reasons for this.</p>	[Matter for SNP to respond on]
17.6	SNP	<p>Assessment</p> <p>SNP's RR [RR-006] makes reference to visual impacts from specific points within the National Park, such as from Carnedd Llywelyn and the Carneddau as a whole. Noting that VP 10 [APP-239] is from Carnedd Llywelyn and VP 38 [APP-267] is from Foel Fras:</p> <p>a) is SNP satisfied that these viewpoints are representative of this part of the National Park (ie the Carneddau);</p> <p>b) does SNP agree with the Applicant's assessment that residual effects from these viewpoints would be moderate adverse and significant; and</p> <p>c) does SNP agree with the Applicant's assessment that residual effects on the SNP Landscape Character Area (LCA) 02: Carneddau Range would be minor-moderate adverse and not significant?</p>	[Matter for SNP to respond on]
17.7	SNP, NRW, GC (if relevant), CCBC (if relevant)	<p>Assessment</p> <p>Please confirm:</p> <p>a) whether you agree that the relevant special qualities of the National Park are limited to 'Diverse landscapes' and 'Tranquillity and solitude – Peaceful areas' as defined in the Cynllun Eryri The Snowdonia National Park Partnership Plan 2020 (SNPPP);</p> <p>b) the status of the SNPPP, noting [AS-027] indicates it is currently draft and under consultation; and</p>	LUC agree with the findings of the SLVIA in relation to the special qualities of the National Park.

		c) whether you agree with the Applicant's assessment of effects in respect of these special qualities (Table 10) and its overall conclusion that any harm would not be to such a degree as to affect the integrity and inherent natural beauty of the National Park (paragraph 806).	
17.11	NRW, IoACC	<p>Assessment</p> <p>Do you agree that the relevant special qualities of the Ynys Môn (Anglesey) Area of Outstanding Natural Beauty (AONB) include 'Expansive views'; 'Peace and tranquillity'; and 'Islands around Anglesey' as reported in [AS-027]? Following on from this, do you agree with the conclusions in Table 7 relating to these and the overall conclusion in paragraph 562 that harm would not occur to such a degree that it would affect the overall integrity of the Ynys Môn (Anglesey) AONB or its inherent natural beauty? Please provide reasons if there is any disagreement.</p>	LUC agree with the findings of the SLVIA in relation to the special qualities of the AONB.
17.12	DCC, FCC, NRW	<p>Assessment</p> <p>Do you agree that the relevant special qualities of the Clwydian Range and Dee Valley AONB include 'Tranquillity'; and 'Remoteness and Wildness' as reported in [AS-027]? Following on from this, do you agree with the conclusions in Table 13 relating to these? Please provide reasons if there is any disagreement.</p>	LUC agree with the findings of the SLVIA in relation to the special qualities of the AONB.
17.18	DCC, IoACC, CCBC, GC, FCC, SNP, NRW	<p>Assessment</p> <p>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>	Based on our review LUC agree that this is the case.
17.30	DCC, IoACC, CCBC, GC, FCC, SNP, NRW	<p>Cumulative and Inter-Relationship Assessments</p> <p>Are you satisfied with the assessment of cumulative and inter-relationship effects in sections 10.13 and 10.14 of [AS-027]?</p>	Based on LUC's review we consider the approach and conclusions to the assessment of cumulative and inter-relationship effects to be reasonable.

# Appendix C

## Review of Documents Securing Onshore Mitigation

### Introduction

**C.1** This Appendix presents a review of the following documents which play an important role in securing mitigation measures related to the onshore works:

- Document 8.4 Outline Landscape and Ecological Management Plan;
- Document 8.11 Schedule of Mitigation;
- Document 8.13 Outline Code of Construction Practice, including:
  - Appendix 1, Outline Construction Method Statement; and
  - Appendix 4, Outline Soil Management Plan; and
- Document 2.12 Hedgerow and Protected Tree Plan.

### Securing Mitigation

**C.2** Mitigation is secured through the DCO, with landscape elements covered under Requirements 8 and 9. Requirement 8 refers to a 'written landscaping scheme', which is to be approved by Denbighshire Council, and which must be 'in accordance with the outline landscape and ecological management plan'. Requirement 13 states that the final 'written landscape and ecological management plan' must be approved by the Council. Mitigation through construction good practice is secured under Requirement 10, which refers to a 'code of construction practice' and various subsidiary plans which again are to be approved by Denbighshire Council. Requirements 10 and 13 are therefore the overarching means of securing landscape mitigation.

**C.3** Mitigation measures are described in the ES, and are drawn together in Document 8.11 Schedule of Mitigation. This schedule sets out how mitigation identified in the ES is secured in the DCO documents. Mitigation measures from the onshore LVIA chapter are listed on page 1 of the document. These mitigation measures are secured under DCO Requirements 10 and 13, through the provision of a Landscape and Ecological Management Plan (LEMP) and a Code of Construction Practice (CoCP). These two documents are reviewed below.

### Outline Landscape and Ecological Management Plan

**C.4** The Outline Landscape and Ecological Management Plan (OLEMP) sets out 'in-principle' mitigation, from which the detailed Landscape and Ecological Mitigation Plan will be developed post-consent. This 'Final LEMP' will be submitted to Denbighshire Council for approval in line with Requirement 13. It combines mitigation measures derived from the LVIA with those arising from the Biodiversity and Nature Conservation chapter of the ES. This review focuses on measures deriving from the LVIA; we have not reviewed the biodiversity sections in detail.

**C.5** Section 2 of the OLEMP sets out landscape mitigation. Reference is made to mitigation embedded in site selection, as well as cross references to the CoCP for construction-stage mitigation.

**C.6** At paragraph 16, reference is made to "*existing woodland to the west and north of the OnSS*" as providing screening. It is not made clear if this woodland is within the Order Limits or not. If the woodland is within or at the edge of the Order Limits then it should be clearly stated that protection measures will be installed at the outset of construction. It is stated within Section 5 of the OLEMP that "*all retained trees located directly adjacent to working areas will be protected by fencing around Root Protection Areas*". We would expect the OLEMP to make clear that this applies in particular to woodland along the west edge of the Order Limits at the OnSS, as the adjacent woodland is within Bodelwyddan designed landscape.

**C.7** We note that there is a woodland area near the OnSS within the Order Limits, centred approximately on grid reference SJ 01011 74597. The woodland is adjacent to the bridle path to the north of the OnSS. Figure 2 does not confirm whether the

woodland will be retained. Given the importance of the woodland and its proximity to the construction compound, we would expect the OLEMP to include clear statements that protection will be applied to this woodland.

**C.8** Although general statements on protection of trees are included in Section 5, as noted above, there is no detail on how this will be applied. This is of particular relevance to the OnSS. We note that a number of hedgerows and two ponds are identified for retention in Figure 2. Notes on this Figure also refer to 'retained trees'. We would expect the OLEMP to clearly state how retained features shown on Figure 2, including ponds and hedges, will be protected during the works.

**C.9** We note further areas of uncertainty on Figure 2. As well as the woodland noted above, there is an area of farmland between the OnSS and the construction compound with no hatching. Section 4.4 states that the land used for the construction compound "will be reinstated to its previous state". This suggests the land will then be returned to agricultural use. If the strip of land between the OnSS and the construction compound is also to be returned to agriculture, this should be made clear.

**C.10** Paragraph 17 introduces the types of landscape treatment proposed around the OnSS, including woodland, hedgerow and native grassland. This is cross-referenced to Figure 2 and the Year 15 visualisations that show maturing woodland (see review of the LVIA in Chapter 4 of this report).

**C.11** The extent of proposed planting shown in Figure 2 appears appropriate to achieve the aims listed in paragraph 19. Species are discussed at paragraph 20. Having not undertaken site visits we are not familiar with the prevalent species in the local area, but the native species listed appear to be appropriate. The approach of using 'nurse species' and 'core species' is also appropriate.

**C.12** Spacing is mentioned at paragraph 21, though it is stated that this will be agreed in the Final OLEMP, and it is agreed that this does not need to be set out in detail at this stage. Paragraph 23 states early establishment will be carried out 'where it is practical to do so'. Accepting that there are unknowns, the Applicant could be asked to specify areas where advance planting can be committed at this stage. The area north of the Crematorium may be an example of a location that is removed from the focus of construction, and where advance planting could be committed.

**C.13** Paragraphs 26 and 27 discuss the onshore cable corridor. Mitigation measures include the reinstatement of ground cover or agricultural use and reinstatement or replacement of removed hedges. Details of the nature of the replanted hedges are not given. Paragraph 26 refers to "*protection of all retained trees during the construction phase where practicable*". There should be a clear commitment to a) retain all trees not required to be removed for construction, and b) to adequately protect all retained trees.

**C.14** Section 4 sets out mitigation proposals, with particular reference to areas of biodiversity interest, and in all other areas at Section 4.4. This Section provides clearer commitments than are provided in Section 2, and cross-references between the sections would be beneficial. For example, paragraph 58 clearly states that replanted hedgerows "*will comprise a locally appropriate mixture of at least seven woody species and including heavy standard trees at a 3:1 ratio for any lost.*"

**C.15** This section also refers to a three-year aftercare period, which is not mentioned in Section 2. The three-year aftercare period is referred to in other places in the OLEMP (e.g. paragraph 131). We note that DCO Requirement 9 refers to "*a period of five years after planting*", and it follows that the aftercare period should be extended accordingly.

**C.16** Section 5 covers protection of retained habitats. As noted above, this section makes clear that "all retained trees will be protected by Root Protection Orders" (paragraph 76). Again, better cross-referencing would make the document clearer.

**C.17** Section 7 discusses biodiversity enhancements that include measures shown on Figure 2. Again details are presented here that are not included in Section 2, for example "*locally sourced black poplar*" is specified for woodland at the OnSS (paragraph 134).

**C.18** In conclusion, the OLEMP presents a suite of mitigation measures that will benefit both landscape and biodiversity. The OLEMP does not include any measures which in our view are not appropriate, and appears sound as a basis for development of the Final LEMP. However, the document lacks clarity in places. Many of the comments above could be addressed simply by adding further cross referencing and checking for consistency between sections. We recommend seeking further detail from the Applicant with reference to protection of existing features, and advance planting at the OnSS.

## Outline Code of Construction Practice

**C.19** The purpose of the Outline CoCP is given in Section 1.3 of the document. It provides the 'key elements' that will be detailed in the Final CoCP, which will need to be approved by Denbighshire Council. A number of environmental management plans form appendices to the Outline CoCP.

**C.20** Section 2 of the document sets out high level principles. It provides limited detail but includes references to the appendices where appropriate.

**C.21** Section 3 provides more detail on general operation of the construction works. We note that Section 3.4 Screening and Fencing could usefully include reference to protective fencing to be installed around retained trees, woodland and hedgerows. Section 3.17 Clearance of Site on Completion appropriately references the OLEMP in relation to reinstatement works. Otherwise there is no specific reference to landscape mitigation. This appears appropriate given the high level of the document.

## Outline Construction Method Statement

**C.22** The Outline CMS includes further detail in relation to general site management (Section 2). Section 2.12 Ecological Management makes reference to the OLEMP, and provides appropriate commitments on protection of retained habitat, approaches to removal of vegetation, and reinstatement. This Section appears consistent with the OLEMP. Section 2.17 Restoration and Reinstatement refers to ecological reinstatement in line with the Final LEMP, including hedgerow replanting. It is clearly stated that hedgerows will be replanted on the cable route (paragraph 59).

**C.23** Section 3 provides further details in relation to onshore components. Section 3.9 Onshore Substation Platform Earthworks identifies pre-commencement measures that include 'vegetation clearance', but should also include for the identification and protection of all vegetation to be retained. Otherwise, the measures set out are an appropriate basis for development of a detailed CMS that will be submitted for Council approval.

## Outline Soil Management Plan

**C.24** The Outline SMP provides "*details of mitigation measures and best practice handling techniques*" to ensure soil resources can be adequately restored post-construction. In relation to the OnSS area, it is noted that "*there may be a requirement to remove soil off-site*". Other than general good practice measures, specific details of how or where topsoil would be stored are not provided. The measures set out are appropriate basis for development of a detailed SMP that will be submitted for Council approval.

## Hedgerow and Protected Tree Plan

**C.25** Document 2.12 Hedgerow and Protected Tree Plan presents a plan of all the hedgerows and important hedgerows to be removed, alongside woodland areas and Tree Preservation Orders (TPO) within and close to the Order Limits. The sections of hedgerow, including important hedgerows, that are to be removed as part of the works are cross-referenced to Schedule 10 of the DCO. No TPOs are shown within the Order Limits.

**C.26** Without having been on site we are unable to comment on the accuracy of this Plan. However, we note that aerial photos indicate an area of woodland within the Order Limits that is not identified as such on the Plan. This woodland, discussed above, is in the vicinity of the OnSS, centred approximately on grid reference SJ 01011 74597. We note that this woodland is relied on for mitigation in the OLEMP and we comment above on the importance of securing the retention and protection of this woodland. Assuming retention of this woodland can be clearly secured in the OLEMP, there may be no risk in its omission from this Plan.