

Awel y Môr Offshore Wind Farm

Planning Inspectorate reference:
EN010112

Summary of Written Representation
for Examination Deadline 1 by
Gwynedd Archaeological Planning Service

Interested Party - Unique Reference: 20031626

24th October 2022

1 Introduction

- 1.1 Gwynedd Archaeological Planning Service (GAPS) is an autonomous section of the Gwynedd Archaeological Trust. Through service level agreements, GAPS provides impartial, specialist archaeological advice on planning and development management matters for Isle of Anglesey County Council, Gwynedd County Council, Snowdonia National Park Authority and the part of Conwy County Borough Council west of Penrhyn Bay.
- 1.2 The geographical limit of GAPS' curatorial remit is the Mean Low Water Mark of Ordinary Tides. All construction elements and ancillary works for the proposed scheme are located either offshore or in Denbighshire. GAPS therefore has no role in relation to physical impacts on the marine or terrestrial historic environment that may arise from the proposed development.
- 1.3 Our written representation provides comment on the effects on the onshore historic environment, specifically through change to the setting of registered and designated assets, within north-west Wales.

2 Review of Environmental Statement

- 2.1 The relevant section of the Environmental Statement is Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage (Revision B, April 2022; application reference 6.3.8).
- 2.2 The statutory and policy context, consultation log, and scope and methodology for assessment are agreed.
- 2.3 Assessment of indirect impacts on onshore historic assets from the offshore array has been undertaken for sixteen assets or groups of assets within north-west Wales. Our comments are summarised in Table 2-1 below.
- 2.4 It is unlikely to be possible to alter the design or layout sufficiently to allay concerns about the effects on Penrhyn Castle Registered Historic Park and Garden, Llandudno Conservation Area and Llandudno Pier whilst remaining economically viable.
- 2.5 Further reduction of the array area could reduce the impact on the Tower and Remains of Church and Monastic Settlement on Puffin Island to a non-significant level and may reduce the impact on the setting of Bangor Pier, Beaumaris Castle and Menai Suspension Bridge.

Table 2-1:

<i>Asset</i>	<i>Assessed Impact</i>	<i>GAPS Comments</i>	<i>Explanation</i>
Beaumaris Castle	Negligible	Minor/Moderate adverse (not significant)	Intrusive within significant arc of view
Conwy Castle and Town Walls	Negligible	Minor adverse (not significant)	Slight intrusion within significant arc of view
Penrhyn Castle	Negligible	Agreed	N/A
Penrhyn Castle Registered Historic Park and Garden	Not assessed	Moderate adverse (significant)	Intrusive within designed view
Slate Landscape of Northwest Wales	Negligible	Agreed	N/A
Trwyn Du (Penmon) Lighthouse	Negligible	Agreed	N/A
Tower and Remains of Church and Monastic Settlement on Puffin Island	Negligible	Moderate adverse (significant)	Impact on key characteristics
Puffin Island Telegraph Station (former)	Negligible	Agreed	N/A
Pen y Dinas Camp	Negligible	Agreed	N/A
Llandudno Conservation Area	Minor adverse	Moderate adverse (significant)	Impact on character affecting appreciation
Llandudno Pier	Moderate adverse (significant)	Agreed	N/A
Bangor Pier	Negligible	Minor adverse (not significant)	Slight impact on views affecting appreciation
Menai Suspension Bridge	Negligible	Agreed	N/A
Creuddyn and Conwy Registered Historic Landscape	Negligible	Minor adverse (not significant)	Impact on key characteristics affecting appreciation
Dyffryn Ogwen Registered Historic Landscape	Negligible	Agreed	N/A
North Arllechwedd Registered Historic Landscape	Negligible	Agreed	N/A
Penmon Registered Historic Landscape	Negligible	Minor adverse (not significant)	Impact on key components affecting appreciation

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1 Introduction

- 1.1 Gwynedd Archaeological Planning Service (GAPS) is an autonomous section of the Gwynedd Archaeological Trust. It is part of the regional curatorial service that maintains the Historic Environment Record and provides heritage management advice to a variety of stakeholders. Through service level agreements, GAPS provides impartial, specialist archaeological advice on planning and development management matters for the local planning authorities of north-west Wales (that is, Isle of Anglesey County Council, Gwynedd County Council, Snowdonia National Park Authority and the part of Conwy County Borough Council west of Penrhyn Bay).
- 1.2 Gwynedd Archaeological Trust is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA). The advice provided by GAPS accords with all CIfA regulations including the Code of Conduct¹ and relevant standard and guidance documents²
- 1.3 The geographical limit of GAPS¹ curatorial remit is the Mean Low Water Mark of Ordinary Tides. All construction elements and ancillary works for the proposed scheme are located either offshore or in Denbighshire. GAPS therefore has no role in relation to physical impacts on the marine or terrestrial historic environment that may arise from the proposed development.
- 1.4 The Rule 6 letter Annex C (Examination document EN0110112-000627-AYMO, 23rd August 2022) identifies the following in the Initial Assessment of Principal Issues for the Historic Environment:
- (i) Effects on the onshore historic environment, including archaeology and setting of designated assets (including but not limited to listed buildings and world heritage sites)
 - (ii) Effects on the intertidal and offshore historic environment
 - (iii) Future archaeological investigation, monitoring and supervision
 - (iv) Adequacy of archaeological surveys undertaken (including interpretation of survey results)
 - (v) Adequacy of mitigation measures and monitoring
- 1.5 This written representation provides comment on item (i), insofar as it concerns the historic environment of north-west Wales.

2 Review of Environmental Statement

- 2.1 Assessment of the indirect impact of the offshore array on onshore historic assets is contained in Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage (Revision B, April 2022; application reference 6.3.8).

1 *Code of Conduct: professional ethics in archaeology*, Chartered Institute for Archaeologists, Reading, 2014, rev. October 2022

2 *Standard and guidance for archaeological advice by historic environment services*, Chartered Institute for Archaeologists, Reading, 2014, rev. October 2020

Statutory and policy context

- 2.2 Section 8.2 and Table 1 set out the relevant national legislation and policy context for this topic. This is agreed to be correct.

Consultation

- 2.3 We have been a member of the Seascape, Landscape and Visual Impact and Cultural Heritage Expert Topic Group (SLVIA/CH ETG) since its inception. We have previously commented on the proposed development at Scoping and PEIR stages, as well as during discussion on, for example, viewpoint selection. These consultations are included in the consultation record set out in Volume 3, Chapter 8, section 8.3 Table 2 and Volume 4, Annex 10.2. We confirm these to be a faithful record of the comments previously made and related discussions.

Scope and methodology

- 2.4 Section 8.4 (introduction), Section 8.4.3, Section 8.5, Tables 3, 4, 5 and 8, and Volume 5, Annex 8.2 application reference 6.5.8.2) explain the methodology for assessment of significance of assets, for assessment of significance of impacts, and for selection of assets for detailed assessment in relation to indirect impacts. The scope and methodology are agreed to be appropriate.

Assessment of Impacts

- 2.5 Assessment of indirect impacts on onshore historic assets from the offshore array is set out in Sections 8.7-8.10 and 8.12. Assessment has been undertaken for sixteen assets or groups of assets within north-west Wales. These are discussed below in the order in which they appear in the text.

Beaumaris Castle World Heritage Site (Scheduled Monument AN001, Grade I Listed Building 5574)

- 2.6 The impact upon Beaumaris Castle is assessed as negligible in magnitude and significance because its setting is not considered to extend as far as the development (paragraph 198), and its architectural, historic and archaeological values and the ability to appreciate them are considered to be unaffected. This is not agreed.
- 2.7 Cadw's guidance publication³ provides a broad definition of setting, reiterated in the chapter glossary, as 'the surroundings in which [the asset] is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape'. The response to Cadw's Section 42 response in Table 2 (p.54) attempts to refine this, stating that "Setting, as it contributes to heritage significance and the ability to appreciate that heritage significance, does not always extend as far as can be seen".
- 2.8 The World Heritage Site Management Plan⁴ states that where a significant view or arc of view is identified, "the entire view enclosed within the 'arc' is considered to be significant" (paragraph 2.4.2). In this case, as the application site is visible within an identified significant arc of view, it clearly forms part of the setting of the site.

3 *Setting of Historic Assets in Wales*, Cadw: Welsh Government, Cardiff, 2017

4 *World Heritage Site Management Plan 2018–28, Castles and Town Walls of King Edward in Gwynedd World Heritage Site*, Cadw: Welsh Government, Cardiff, 2018

- 2.9 Throughout the chapter, in responses to consultee comments and in the main text, the assessment repeatedly make the argument that mere intervisibility does not necessarily result in an impact on significance. This is true, but a narrow approach is taken as to when and how visibility is relevant. It would have been helpful for the assessment to have included an analysis of the extent to which this part of the view contributes to the castle's significance.
- 2.10 In relation to significant views, the World Heritage Site Management Plan states that “Inappropriate development or change is considered to be that which would obstruct or interfere with or distract from these views” (paragraph 2.4.2).
- 2.11 VP44 (Volume 6, Annex 10.5, Fig.71) illustrates the view from the castle with maximum visibility of the proposed development. Volume 2, Chapter 10 SLVIA Table 6 notes that the proposed development would occupy approximately 12 degrees of the view. The impact is assessed as moderate (non-significant), taking account of factors including other aspects of the castle's setting and the opinion that this segment of view is not a specific focus. This is the same as at PEIR.
- 2.12 Chapter 8 considers that the visibility of turbines in this view does not affect the functional relationship of the castle with the sea or the ability to appreciate this relationship. At PEIR, the proposed Awel y Môr wind turbines extended across the width of the sea horizon, creating a 'fenced in' effect that detracted from the sense of dominance of the castle in this view and thereby reduced the contribution made to its significance by its landscape setting. This was highlighted by consultees as a significant concern.
- 2.13 The reduction in the array area has lessened this effect, so that while offshore wind farms are present across the sea horizon, the immediate perception is of a gap between Awel y Môr and the Great Orme, as existing turbines appear distant, considerably smaller and recessive. It is considered that this has reduced the significance of the impact such that it does not unacceptably impair the appreciation of the past and present relationship of the castle with the sea.
- 2.14 However, the turbines will be a conspicuous intrusion of modern infrastructure within an identified significant view of a World Heritage Site. Having regard to the very high significance of the monument and the scale and nature of the development, it is difficult to see how this can be regarded as a negligible change, and it is considered that the impact would be more appropriately graded as of low magnitude, minor to moderate significance, and not significant in EIA terms.
- Conwy Castle and Town Walls World Heritage Site (Scheduled Monuments CN004 and CN014, Grade I Listed Buildings 3250 and 3233)*
- 2.15 The impact upon Conwy Castle and Town Walls is assessed as negligible in magnitude and significance because its setting is not considered to extend as far as the development (paragraph 203), and its architectural, historic and archaeological values and the ability to appreciate them are considered to be unaffected. This is partly agreed.
- 2.16 As with Beaumaris Castle, because the development is partly visible within an identified significant arc of view, it does fall within the setting of the monument, and an explanation

of why the arc of view is significant and what, if anything, this section contributes, would have been helpful.

- 2.17 The assessment focuses on views from the castle with no discussion of views from the town walls, and as such could be argued to be incomplete. VP45 from the Chapel Tower of the castle has been selected as representing the view from the castle with maximum visibility of the proposed development. The view in this direction from the highest point on the Town Walls, the Watchtower, is likely to be similar, and VP45 can therefore be taken as representative of the Conwy component of the World Heritage Site.
- 2.18 Volume 6, Annex 10.5, Fig.72b illustrates the visibility of parts of up to 16 turbines on the skyline in a dip between hills. This is part of an identified significant arc of view in the World Heritage Site Management Plan⁵, but is not identified as being of specific interest, in contrast to views along the estuary, for example. Nonetheless, the turbines are incongruous and detract from the aesthetic quality of this view. In relation to significant views, the World Heritage Site Management Plan states that “Inappropriate development or change is considered to be that which would obstruct or interfere with or distract from these views” (paragraph 2.4.2). As scenic quality in this part of the view acts to enhance the experience and appreciation of the World Heritage Site, rather than being of intrinsic importance, the turbines are considered to be a small distraction within the wider arc of view. Having regard to the very high status of the monument, it is considered that this constitutes an impact of negligible/low magnitude, minor significance and not significant in EIA terms.
- 2.19 However, it is considered that the assessment should have taken account of the fact that two of the four components of the World Heritage Site would be affected by the scheme, which may be a combined impact of higher significance.

Penrhyn Castle (Grade I Listed Building 3659)

- 2.20 The impact upon Penrhyn Castle is assessed as negligible in magnitude and significance because the contribution made by setting to its significance is undiminished. This is agreed.
- 2.21 The assessment also considers that the contribution made by Penrhyn Castle and its parkland to the Slate Landscape of Northwest Wales World Heritage Site is unaffected. This too is agreed.
- 2.22 However, despite the selected representative viewpoint being located on the eastern terrace, the assessment considers Penrhyn Castle Grade II* Registered Historic Park and Garden (PGW(Gd)40(GWY)) only as a setting for the castle. It is in fact an asset in own right with its own setting, and this should have been subject to assessment.
- 2.23 The Register entry describes the “chief glory of the garden” as “its setting against the landscape of north Wales”, referring to the extensive views from the terrace, including the coast, as “spectacular”. It can be reasonably supposed that views from the terrace are intended to be appreciated as part of the estate design, and as such contribute to the aesthetic value of the asset.

⁵ *World Heritage Site Management Plan 2018–28, Castles and Town Walls of King Edward in Gwynedd World Heritage Site*, Cadw:Welsh Government, Cardiff, 2018

- 2.24 VP17 (Volume 6, Annex 10.5, Fig.44) illustrates this view and is discussed in Volume 2, Chapter 10 SLVIA Table 6. It is shown that the proposed development would extend offshore wind farm development within a framed view across the visible seascape skyline, with the Awel y Môr turbines noticeably taller and more prominent than existing developments. The SLVIA assesses the impact as moderate (significant), taking account of factors increasing the capacity of the view to accommodate new wind turbines, such as topography.
- 2.25 Natural beauty and visitor experience influence the contribution of setting to significance principally in the case of designed and formal vistas. This is considered to be applicable here. The new wind turbines would be conspicuous and intrusive in the view from the terrace, drawing the eye away from the intervening grounds, reducing the prominence of the Great Orme headland, and removing the sense of openness of an undeveloped sea horizon. This would materially reduce the aesthetic value of this view and thereby the contribution that this part of the setting makes to the significance of the Registered Park and Garden. It is considered that this would be a medium impact of moderate significance.
- 2.26 Volume 2, Chapter 8 Table 5 indicates impacts of moderate significance to be non-significant in EIA terms. This is inconsistent with the assessment of the impact on Llandudno Pier (see below) where moderate adverse impact has been assessed as significant for the purposes of EIA. The latter is considered to be more accurate in the context of this scheme and is applicable to the impact on the Registered Park and Garden.

Component Part 1: Penrhyn Slate Quarry and Bethesda, and the Ogwen Valley to Port Penrhyn – Slate Landscape of Northwest Wales World Heritage Site

- 2.27 The impact on the World Heritage Site is assessed as of negligible magnitude and significance since none of the attributes, nor the ability to appreciate them, is affected. The reasoning is considered to be sound and the assessment of impact is agreed.

Trwyn Du (Penmon) Lighthouse (Grade II Listed Building 21615)*

- 2.28 The impact on the lighthouse is assessed as of negligible magnitude and significance, because its architectural and historic values and the ability to appreciate them are unaffected. This is agreed.

Tower and Remains of Church and Monastic Settlement on Puffin Island (Scheduled Monument AN064, Grade I Listed Building 5528)

- 2.29 The impact on the remains of the church and monastic settlement is assessed to be negligible in magnitude and significance, because the special interest of the remains and the ability to appreciate this are unaffected. This is not agreed.
- 2.30 The assessment notes correctly that the setting of the monument includes its physical separation in an island location and the accompanying sense of isolation, which may have been factors in the choice of location for the monastery and contribute to understanding the significance of the monument.
- 2.31 VP7 and VP8 (Volume 6, Annex 10.5, Figs.34 and 35) illustrate views towards Puffin Island. VP7 is a close range view in which the Awel y Môr turbines are clearly visible to either side of the island and considerably more prominent than the more numerous and distant

existing offshore wind farms. The Awel y Môr turbines do not dominate the view and their visual influence has lessened as a result of the reduction in the array area since PEIR. Nonetheless, by creating a backdrop of modern development, they appreciably reduce the sense of removal from the secular world.

- 2.32 VP8 is a longer view from Beaumaris promenade. As described in the SLVIA, the Awel y Môr turbines are 'prominent elements on the horizon' in this view, flanking Puffin Island in such a way as to link it to mainland Anglesey and extending towards Great Orme, almost forming a visual connection. The scale of this change, from the existing vista across largely open water to the horizon, is greater than that at VP7 with a correspondingly greater effect on the value of the monument's setting.
- 2.33 In this view, we would agree with the SLVIA that the reduction in array area has not been sufficient to alter the significance of the impact. The Awel y Môr turbines would be a large, unsympathetic intrusion that dominates the skyline and substantially reduces the perception of isolation of Puffin Island, a key attribute of the setting of the monastic settlement that is important for its understanding and appreciation. As such, this would significantly reduce the contribution of setting to the significance of the monument, which would be reduced as a result. It is considered that this would constitute a high adverse impact, of moderate impact on the significance of the monument, and thus significant in EIA terms.

Puffin Island Telegraph Station (former) (Grade II Listed Building 5529)

- 2.34 The impact on the former telegraph station is assessed as of negligible magnitude and significance, because its architectural, aesthetic and historic values and the ability to appreciate them are unaffected. This is agreed.

Pen y Dinas Camp (Scheduled Monument CN039)

- 2.35 The impact upon Pen y Dinas Camp is assessed as of negligible magnitude and significance, because its primary archaeological interest, and the ability to enjoy and understand it, is unchanged.
- 2.36 Whilst noting the influence of existing modern development (including offshore wind farms) within the setting of the hillfort, the assessment does not consider the cumulative impact of additional, larger wind turbines. VP52 (Volume 6, Annex 10.5, Fig. 75b) demonstrates that these would fill the current gap between existing offshore wind farms and the Great Orme headland and that, due to the difference in size, this change would be noticeable. It is also possible that appreciation of the strategic position of the hillfort from long-range views may be impeded (for example in VP12 from Conwy Mountain, Volume 6, Annex 10.5, Fig.39, where the turbines would overshadow the headland). However, the monument does not have a strong landscape expression at distance and it is difficult to argue that this has an appreciable detrimental effect on the significance of the monument or its setting. The assessment of negligible impact is therefore agreed.

Llandudno Conservation Area

- 2.37 The impact on Llandudno Conservation Area is assessed to be of low magnitude and minor adverse significance. This is not agreed.

- 2.38 The assessment recognises the importance of sea views as part of the setting of the Conservation Area (paragraphs 249 and 250). As a historic seaside resort, Llandudno Conservation Area has strong aesthetic and communal values as well as architectural significance. Sea views are integral to its character, and important both for appreciating the reason for its establishment at this location and for contemporary amenity value.
- 2.39 We disagree with the assertion that the development would not detract from appreciation of the Conservation Area and that the setting would remain effectively unchanged (paragraph 254). The assessment refers to the visibility of existing wind farms, implying that this lessens the impact of additional turbines. However, this does not address the substantial difference in size or the cumulative impact.
- 2.40 SLVIA paragraph 1183 notes that the Awel y Môr turbines would be 'substantially more prominent' than operational offshore wind farms as a result of their size and the extent to which they occupy the fields of view from various viewpoints, including views framed by landforms. It notes further that this increases the characterising effect of the turbines on the seascape. Wind energy development would extend across approximately 83 degrees of the view at VP18 (Volume 2, Chapter 10 SLVIA Table 6); at VP59, the combined extent is approximately 62 degrees, leaving only 15 degrees of clear water along the horizon framed by Great and Little Orme. In the latter case, whilst turbines are partly hidden by the Pier, this is in itself a notable impact, discussed separately, but this also contributes to the overall impact on the Conservation Area as the Pier is a key component.
- 2.41 In illustrations at these and other viewpoints (see for example Volume 6, Annex 10.5, Fig. 42 viewpoint 15), the Awel y Môr turbines appear almost comically large in comparison to the existing infrastructure, appearing twice as tall at e.g. VP59 (Volume 2, Chapter 10 SLVIA Table 6). On the basis of these illustrations, it is difficult to regard this as anything less than a major adverse intrusion on the seascape setting.
- 2.42 Having regard to the magnitude of change and the importance of the seascape to the setting of the Conservation Area, it is considered that this would constitute a moderate impact on the contribution of setting, resulting in a medium impact on appreciation of the Conservation Area. This is considered to be a moderate impact on the significance of the asset, and significant in EIA terms.

Llandudno Pier (Grade II Listed Building 3641)*

- 2.42 The impact on Llandudno Pier is assessed as of medium magnitude and moderate adverse significance (significant), as the turbines would detract from appreciation of the architectural interest of the pier in some views. This is agreed.

Bangor Pier (Grade II Listed Building 3987)*

- 2.43 The impact on Bangor Pier is assessed as of negligible magnitude and significance, because its architectural and historic interest, and the ability to appreciate them, are not adversely affected. This is partly agreed.
- 2.44 The assessment notes (paragraphs 267 and 268) that the function of the pier was historically as a landing stage for pleasure steamers and presently provides long views of the surrounding land- and seascape. Both the listing description and the SLVIA refer to structures and furniture indicating that appreciation of these views is intentional and part

of its architectural design. Arguably, therefore, aesthetic or scenic quality of the setting can be said to contribute to the significance of the site as a destination for historic tourists and for appreciating its history.

- 2.45 VP9 (Volume 6, Annex 10.5, Fig. 36) indicates that the proposed development would be a conspicuous alteration to the view, increasing the influence of modern infrastructure in an otherwise mainly rural setting. However, this does not detract materially from the architectural and historical interest of the pier and can be accommodated within the wider views experienced along the pier.
- 2.46 It is therefore considered that the impact is of low magnitude and minor significance, and not significant in EIA terms.

Menai Suspension Bridge (Grade I Listed Building 4049 and 18752)

- 2.47 The impact on the Menai Suspension Bridge is assessed as of negligible magnitude and significance, because its architectural, aesthetic, evidential and historic interests, and the ability to appreciate them, are not adversely affected. This is agreed.
- 2.48 The bridge is an iconic structure, with the interest and drama of the surrounding landscape fortuitously contributing to its aesthetic value and appreciation. Its visual setting is experienced in both close and long range views, as well as views available when crossing the bridge, such as that illustrated by VP49 (Volume 6, Annex 10.5, Fig. 73). In this view, the proposed turbines appear distant but noticeable, extending partway across the Menai Strait to overlap the more distant existing wind farms. At PEIR, the Awel y Môr turbines extended right across the Strait, creating a 'fenced-in' effect that detracted from this view. The reduction of the array area has reduced this effect, so that the contribution of this aspect to the significance of the structure is essentially maintained.

Creuddyn and Conwy Registered Landscape of Outstanding Historic Interest (HLW(Gw)5)

- 2.49 The impact on the Registered Historic Landscape is assessed as of negligible magnitude and significance since the scheme would not affect the historic landscape value or the components that form the basis for its registration, and consequently does not threaten its status. This is not agreed.
- 2.50 The assessment identifies that the sea “adds significantly to the character of [the Registered Landscape], defining the distinct headlands of Great and Little Orme...” (paragraph 283). The coastline is the most distinctive element of the Registered Landscape's setting, delimiting the Registered area. The Great Orme is a principal component of the historic landscape and a well-known landmark. It has intangible historic landscape value derived from the Norse origin of the place-name (meaning worm, serpent or dragon). This is thought to refer to the landform and is one of few Norse place-names within the region.
- 2.51 There are multiple viewpoints in which the new wind turbines would be visible in combination with the headland (for example, VP11, VP12, VP60 and VP64). To a greater or lesser degree depending on location, this juxtaposition compromises the identity and aesthetic value of the headland. For example, in VP36 and VP37 (Volume 6, Annex 10.5, Figs. 63 and 64), the wind farm would be a conspicuous addition to the view, but being separated from the Great Orme by clear water and in the context of the wide panorama,

the definition of the headland is maintained and there is negligible impact on the contribution of the seascape setting to the historic landscape or individual assets therein.

- 2.52 In contrast, in VP11 (Volume 6, Annex 10.5, Fig. 38) and other, longer range views, the turbines would effectively extend the terrestrial/built landscape beyond the headland, impairing appreciation of its primary physical characteristic as the coastal edge. Similarly, in VP12, VP40 and VP60 (Volume 6, Annex 10.5, Figs. 39, 67 and 83) the turbines would appear on the skyline of the headland, as well as extending to one or both sides, reducing its aesthetic and landmark value.
- 2.53 The presence of existing turbines in many views is noted in the assessment seemingly as a mitigating factor in the capacity of the seascape setting to accommodate the proposed scheme. However, this fails to consider the corresponding cumulative impact of increasing wind energy infrastructure in these views, and the impact of the difference in scale between the existing and proposed turbines (illustrated for example in VP40, VP61 and VP62). This makes the visual change greater than would be the case for new turbines of comparable height to the existing developments.
- 2.54 The assessment observes that individual assets within the historic landscape are not discernible at landscape scale, and neither their intrinsic interest that contributes to the Registered status nor the function of the Registered Historic Landscape in providing their setting would be affected. This is agreed with the exception of Llandudno Pier and Conservation Area (see above), as Llandudno is an important sub-character area. We would also note the likelihood that individual assets not scoped in for assessment would experience setting impact to a minor degree, which may collectively equate to a minor impact on the interest of the archaeological resource of the Registered Landscape. Irrespective of this, it is apparent that the encroachment of many, very large turbines in immediate visual proximity to the Great Orme will reduce the contribution of the marine setting to significance at a regional landscape scale.
- 2.55 Although it is agreed this is not sufficient to alter the national significance of the Registered Historic Landscape, this does not mean that the impact is negligible. Rather, in light of the importance of the marine setting and the form of the Great Orme to the Registered Historic Landscape character, combined with the number and spread of views in which appreciation of the historic landscape would be affected, this is considered to be a moderate adverse impact on the contribution of setting, leading to a minor loss of significance of the Registered Historic Landscape. This is a minor impact, which is not significant in EIA terms.

Dyffryn Ogwen Registered Landscape of Outstanding Historic Interest (HLW(Gw)10)

- 2.56 The impact upon the Registered Historic Landscape is assessed as of negligible magnitude and significance, as the seascape does not contribute significantly to the historic landscape character and views are incidental, with no loss of ability to appreciate those elements where there is a maritime connection (such as Porth Penrhyn). This is agreed.

North Arllechwedd Registered Landscape of Outstanding Historic Interest (HLW(Gw)12)

- 2.57 The impact upon the Registered Historic Landscape is assessed as of negligible magnitude and significance, as the seascape does not contribute directly to the historic landscape significance. This is agreed.

Penmon Registered Landscape of Outstanding Historic Interest (HLW(Gw)15)

- 2.58 The impact upon the Registered Historic Landscape is assessed as of negligible magnitude and significance, as appreciation of the maritime context is not affected and the visibility of the wind turbines is not considered to affect key components or overall historic landscape value. This is not agreed.
- 2.59 The assessment notes that the new wind turbines would be visible either side of Puffin Island in VP7 (Volume 6, Annex 10.5, Fig.34) but are clearly separate and do not challenge the island for prominence (paragraph 302). As discussed above in relation to Scheduled Monument AN064 (Grade I Listed Building 5528), the juxtaposition of turbines in this view nonetheless reduces the sense of place as a remote monastic site, and this is even more stark from VP8. This impact was assessed as of moderate significance at an individual level.
- 2.60 Similarly, the assessment is consistent in maintaining that as there is no impact upon the significance of Beaumaris Castle nor its contribution to the Registered Historic Landscape. As discussed above, we would consider there to be a minor impact on the castle resulting from the change to its setting.
- 2.61 As principal components of the Registered Historic Landscape, the impacts upon Beaumaris Castle and the Puffin Island group of assets do have some bearing on the implications for the Registered area. The assessment appears to acknowledge this, qualifying the assessment of significance by reference to the visibility of the turbines in relation to these two assets (paragraph 307). The significance of the impacts discussed is lower in the context of the whole Registered Landscape. Taking account of the high status of the assets and the degree to which they are affected, it is considered that the proposed development would have a low impact on the contribution of setting to the Registered Landscape, of minor significance overall.

3 Mitigation

- 3.1 No mitigation is proposed for setting-related impacts other than the embedded mitigation from reduction of the array area already implemented. It is widely acknowledged that there is no suitable mitigation for this type of impact other than design modification. This is particularly challenging for developments of this nature with very extensive visibility and multiple assets that may be affected, which may have competing concerns.
- 3.2 Of the cultural heritage indirect impacts considered to be significant in EIA terms, it is unlikely to be possible to alter the design or layout sufficiently to allay concerns about the effects on Penrhyn Castle Registered Historic Park and Garden, Llandudno Conservation Area and Llandudno Pier whilst remaining economically viable. This is due to the large lateral extent of the proposal and the much taller scale of the turbines that the applicant anticipates will be available at the time of construction. These inherent properties of the scheme are the source of the identified impacts.
- 3.3 However, it is considered possible that further reduction of the array area could materially lessen the impact on the Tower and Remains of Church and Monastic Settlement on Puffin Island (Scheduled Monument AN064, Grade I Listed Building 5528). Whilst the development would still encroach on the sense of isolation of the island, removal of the outlying turbines to the right of the island in VP7 (Volume 6, Annex 10.5, Fig.34) and/or the

turbines clustered around the island in VP8 (Volume 6, Annex 10.5, Fig.35) could reduce the impact to a non-significant level.

- 3.4 The former would additionally benefit the impact on the setting of Bangor Pier, Beaumaris Castle and Menai Suspension Bridge.

4 Conclusions

4.1 We have reviewed the documentation relevant to the indirect impact of the offshore array on onshore historic assets, which principally comprises Volume 2 Chapter 10 – Seascape, Landscape and Visual Impact Assessment, and the associated information in Volume 4 Annexes 10.1-10.3, and Volume 6 Annexes 10.4 and 10.5; and Volume 3 Chapter 8 – Onshore Archaeology and Cultural Heritage Assessment, and the supporting reports in Volume 5, Annexes 8.1 and 8.2.

4.2 We acknowledge that Chapter 8 has responded to the comments made at PEIR especially as regards assets requested to be scoped in to assessment.

4.3 There are some points of disagreement in the assessment of the significance of impacts. The majority of these are not significant in EIA terms. Impacts which are considered to be significant in EIA terms, which are not identified as such in the assessment, are:

- Tower and Remains of Church and Monastic Settlement on Puffin Island (Scheduled Monument AN064, Grade I Listed Building 5528) – Moderate Impact
- Llandudno Conservation Area – Moderate Impact
- Penrhyn Castle Grade II* Registered Historic Park and Garden – Moderate Impact

These are in addition to the Moderate Impact identified at the Grade II* listed Llandudno Pier, which is agreed.

4.4 Assessment of indirect impacts is in part a matter of professional judgement. The points of disagreement stem chiefly from two factors: a generally narrow interpretation of the attributes of setting that can contribute to heritage significance and a tendency towards extremes of grading, in which anything other than fundamental harm is regarded as of negligible significance. This representation contends that the majority of impacts fall between these extremes.

4.5 No mitigation is currently proposed to address indirect impacts on cultural heritage. It is felt that there may be opportunities to reduce the impacts identified through further reduction of the array area. Whilst it is recognised that the application presents a worst case scenario which may not be fully implemented, the principle of this approach seeks to establish that this worst case is acceptable. It is therefore considered reasonable to examine further the feasibility of additional design measures to overcome the more significant impacts as far as possible.

END