



# Awel y Môr Offshore Wind Farm

## Comments on Land Use Consultants' Review of LVIA and SLVIA

### Deadline 2

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# 1 Introduction

- 1 This document sets out Awel y Môr Offshore Wind Farm Limited's (the Applicant's) comments on the North Wales Local Planning Authorities Awel y Môr Offshore Wind Farm (AyM) Examination Review of LVIA and SLVIA Documents, Final report Prepared by LUC October 2022 (REP1-091).
- 2 The 2022 LUC review covers both the Seascape Landscape and Visual Impact Assessment (SLVIA) chapter of the Environmental Statement (ES) (AS-027) and the Landscape and Visual Impact Assessment (LVIA) chapter (AS-29).
- 3 LUC provided comment on such matters on behalf of the North Wales Planning Authorities following its review of the Preliminary Environmental Information Report (PEIR) as part of the statutory consultation under Section 42 of the Planning Act 2008. Many of LUC's comments were taken on board by the Applicant when preparing the SLVIA and LVIA for the Development Consent Order (DCO) application as outlined in the SLVIA Consultation Record (APP-113).
- 4 In order to avoid repetition the Applicant has not responded in detail to all points set out in the narrative sections of the report but has responded where necessary to aid the understanding of the Examining Authority (ExA). In many cases, the Applicant has already responded to matters in relation to the ExA's First Written Questions (PD-009), so this is not repeated here.
- 5 In addition to the narrative responses, LUC provides a tabular review of where there is agreement or disagreement with the findings of the SLVIA in Appendix A. The Applicant has set out in Table 1 of this document LUC's tabular review along with a summary of Natural Resources Wales's (NRW) position as there are some differences. This has been done in order to provide some clarity to the ExA on where the outstanding differences of opinion lie between the parties. Notably, there is agreement between all parties on the vast majority of the assessed effects and their geographical extents.

## 2 Comments on the LUC Review of LVIA and SLVIA

### 2.1 Introduction and General Points

6 The Applicant notes that the focus of the 2022 LUC review is the changes made between the PEIR and ES and that, as with the PEIR review, no field work was carried out by LUC.

7 The Applicant is aware that LUC has undertaken field work in North Wales in the past in relation to previous studies but notes that as stated in paragraph 1.6 *'As with the PEIR review, no field work was carried out'* in relation to their review. It may be that the scope of work, requested by the North Wales Local Planning Authorities, to be undertaken by LUC did not include a provision for field work.

8 Nature Scot (2017) Visual Representation of Wind Farms Guidance Version 2.2 recognises at paragraph 11 that many people such as members of planning committees and other decision makers may not be able to visit all of the viewpoints. Paragraph 18 states that:

*'In all cases it is important that decision makers consider the proposal within the wider landscape and visual context, ideally by visiting the viewpoint or by viewing suitable panoramas.'*

9 A paragraph 18 it is noted that:

*'It is important that key viewpoints are visited in order to assess likely effects.'*

10 At paragraph 97 it is noted that:

*The assessor, consultees, decision-makers and any interested parties or members of the public should ideally visit the viewpoint(s) where visualisations can be compared to the 'real life' view. It is acknowledged this is not always possible – time, weather and accessibility will restrict the number of viewpoints which can be visited.*

- 11 The Applicant considers that fieldwork is a very important aspect in understanding the effects of AyM and suggests that this lack of specific fieldwork review may have led to some of LUC's disagreements around the significance and geographical extent of that significance, particularly in relation to what might be described as 'key viewpoints' e.g. where there is disagreement on the assessed effects by the different parties.
- 12 It is acknowledged that the ExA has undertaken extensive field work visiting many of the SLVIA viewpoints on Unaccompanied Site Inspections (USIs) as described in notes EV-001, EV-003 and EV-004a.

## 2.2 SLVIA Methodology, Scope, Baseline, Mitigation and Visualisations

- 13 The Applicant notes that LUC welcomes the approach taken by the Applicant in responding positively to the responses of stakeholders to the PEIR following statutory consultation.
- 14 The Applicant also notes the different approach taken by LUC in relation to the assessment of the effects on settlements whilst advising that 'this difference in approach is unlikely to lead to substantive under-reporting of significant effects.'
- 15 The Applicant set out further information regarding this in the SLVIA methodology from paragraph 42 (APP-112):

*'The assessment also includes consideration of groups of visual receptors that may be located within particular areas or using certain, primary routes through the study area. The SLVIA assesses the effects on views from residential areas within settlements as well as people using the Wales Coast Path, National Cycle Route (NCR) 5 and the A55.*

*The coastal areas of settlements where there may be parking, recreational facilities, commercial areas, beaches etc are not included in the assessment of the effects on settlements. This is to avoid double counting of effects from such areas as these are generally considered in relation to the representative viewpoints and the assessments of the effects on the Wales Coast Path and/ or NCR 5.*

*This accords with paragraph 6.36 of GLVIA which advises that 'the combined effects on a group of people within an area may also be considered, by aggregating properties within a settlement, as a way of assessing the effect on*

*the community as a whole. Care must, however, be taken first to ensure that this really does represent the whole community and second to avoid any double counting of the effects.'*

16 At paragraph 2.5 of REP1-091, LUC queries the Applicant's methodology for defining the threshold of significant and non-significant effects whilst acknowledging that the approach taken is not uncommon.

17 The Landscape Institute and Institute of Environmental Management & Assessment 3<sup>rd</sup> Edition (2013) Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) notes on page 118 that:

*'Final judgements must be made about which visual effects are significant as required by the Regulations. There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances vary with the location and context and with the type of proposal.'*

18 With regard to the SLVIA and LVIA assessing some moderate effects as Significant and some as Non-significant the Applicant's explanation is set out below.

19 The threshold of how the various levels of sensitivity and magnitude are broadly combined to determine which effects are considered Significant and which are considered Non-significant is set out in the matrix at Table 4 of the SLVIA Methodology (APP-112). This remains as it was in the PEIR which LUC reviewed at that time and was satisfied with the methodology. The difference is that following comments made in the S42 responses, the SLVIA authors have added levels of significance to the matrix. Moderate effects are considered to be in the middle ranges between being Significant or Non-significant. Therefore, the threshold between these naturally sits within the Moderate level of effect, with professional judgement used to determine whether effects are Significant or Non-significant in accordance with GLVIA 3 and the SLVIA Methodology set out in APP-112. In each case, where professional judgement is used to determine whether moderate effects are considered to be Significant or Non-Significant, the assessment explains the factors that have led to that conclusion.

20 It is noted that at paragraph 2.12 LUC endorses the approach taken to the night-time visualisations which show the 200 candela aviation lighting scenario. The Applicant advises that the lighting mitigation would be secured via the lighting and marking plan as set out in Condition 30 of the Marine Licence Principles document (REP1-025) and the Schedule of Mitigation (REP1-018). In addition, a requirement has been added to Requirement 3 of the draft DCO (REP1-008) which means that aviation lighting will be operated at the lowest permissible lighting intensity level.

## 2.3 Onshore LVIA

21 The Applicant notes LUC's comments on the visualisations depicting the proposed trees in full leaf alongside the trees that are bare of leaf in the photographs. The Applicant has responded separately to the ExA on this matter in ExQ1.10.6 (REP1-007) and acknowledges that LUC 'accept the difficulties of accurately depicting planting in this type of illustration.'

22 In relation to LUC's point regarding the threshold of significance reference should be made to Section 2.2 of this document.

23 There is no correlation between the 'tall hedgerows' included in Table 8 of the LVIA (AS-027) and the 'important hedgerows' included in the Hedgerow and Protected Tree Plan (APP-2.12). The tall hedgerows in Table 8 relate to hedgerows that have been identified due to their greater influence on landscape character compared to smaller hedgerows whilst the 'important hedgerows' relates to their ecological importance.

24 The Applicant has identified that the moderate (non-significant) effects on Bodelwyddan designed landscape would occur in a localised area in the south-east area of the parkland. Elsewhere within the parkland the effects would be less.

25 The Applicant acknowledges LUC's agreement on the Effects on Visual Receptors and that there would be no potential for significant effects on the Clwydian Range and Dee Valley AONB.

26 In relation to LUC's comments on Faenol Brodor the Applicant has responded to the ExA separately on this matter in ExQ1.10.5 (REP1-007)



- 27 In relation to the effects on Glascoed Nature Reserve the Applicant has prepared an Clarification Note (Document 2.29 of the Applicant's Deadline 2 submission), which responds to these specific matters.
- 28 The mitigation planting around the OnSS and along the ECC would be secured through DCO Requirements 8 and 13 (see REP1-008 and Document 2.14 of the Applicant's Deadline 2 submission) for detailed agreement of the planting proposals and their maintenance with Denbighshire County Council.

## 2.4 Conclusions

- 29 The Applicant does not consider there to be extensive disagreement between the assessments contained in the LVIA and SLVIA when compared with the findings of LUC or NRW as set out in Table 1. This is also acknowledged by NRW and LUC as noted below.
- 30 As noted by NRW in its Written Representation REP1-080-3.1.5

*'Whilst there is broad agreement on most of the findings in the SLVIA, NRW considers that there has been an under-estimation of some seascape, landscape, and visual effects on designated landscape receptors within the SLVIA. These are also explained in detail in Annex B [of REP1-080]. However, we do not consider that the areas of disagreement affect our overall conclusion and that, solely based on the conclusions in the ES where there is agreement, we consider the proposal would conflict with the purpose of the Isle of Anglesey AONB and Snowdonia NP.'*

- 31 It is noted by LUC in paragraph 5.4 that:

*'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.'*

- 32 Notably LUC and NRW in some cases disagree with the Applicant's assessment of the receptors that would be significantly affected or the geographical extent of such effects as noted in Table 1.

- 33 There are divergencies between the LUC summary text and the tabular review and with the reported LUC findings in REP1-093 – Joint LPA Response to LVIA and SLVIA in relation to the effects on Viewpoint 23: Rhyl Aquarium and the settlement of Rhyl as noted by the Applicant in Table 1.
- 34 Following the Applicant's review of LUCs comments some inconsistencies in the assessments of the geographical extent of the significant effects on SCA 3 have been identified. This relates to locations where the assessed level of effects or geographical extent of the effects were not found to be consistent with the SLVIA findings for LCA 11 on the Isle of Anglesey and LCA GA01 in Gwynedd where the land is concurrent within these two receptors.
- 35 Notably the significant effects on these areas had not been missed in the SLVIA, and as noted by NRW in its Written Representation REP1-080- Annex B-6.1.4 'It should be noted that there is some overlap between coastline SCAs and coastline Landscape Character Areas (LCAs) and effects over the same parts of SCA/LCAs should not be double counted'.

## 2.5 Tabulated Review of the SLVIA and LVIA

36 LUC presented a review of all assessments made in the SLVIA in a series of tables contained within Appendix A of REP1-091. The appendix included assessments made in the PEIR and LUC's comments from that review, together with a revised assessment of the effects presented in the ES. Table 1 below sets out that table with the Applicant's comments (if appropriate). The table also includes NRW's position (where relevant) in order to provide the ExA with an understanding of where disagreements remain between the parties.

Table 1: Review of assessment of effects on seascape, landscape and visual receptors.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
Reported SLVIA Effects for Isle of Anglesey						
VP1. Bull Bay near Amlwch – Wales Coast Path	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Not agreed	Agreement with LUC noted. Refer to Applicant's response to NRW's written representation (Document 2.2 of the Applicant's Deadline 2 submission) in relation to their disagreement.
VP 2. Point Lynas - PRow to north of lighthouse	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Not agreed	Agreement with LUC noted. Refer to Applicant's response to NRW's written representation Document 2.2 of the Applicant's Deadline 2 submission) in relation to their disagreement.
VP 3. Mynydd Eilian - near trig point	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Not agreed	Agreement with LUC noted. Refer to Applicant's response to NRW's written representation Document 2.2 of the Applicant's Deadline 2 submission)in relation to their disagreement.
VP 4. Moelfre Headland at sculpture (daytime)	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted.
VP 5. Red Wharf Bay	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
VP 6. Bwrdd Arthur - north of trig point	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted.
VP 7. Penmon Point - north-east of parking	Significant	Agreed	Major-moderate (significant)	Agreed	Agreed	Agreement noted
VP 8. Beaumaris - Wales Coast Path	Significant	Agreed	Major-moderate (significant)	Agreed	Agreed	Agreement noted
VP 14. Wales Coast Path near Penrhyn (Traeth yr Ora)	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted
VP 16. Benlech Bay View Road	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted
VP 28. Trwyn y Penrhyn parking layby	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted
VP 42. Mynydd Bodafon – Trig Point	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed	Agreement noted
VP 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	No comment received	Applicant notes LUC agreement with Moderate level of effect.  Notably Gwynedd Archaeological Planning Service (GAPS) has set out in its written representation (REP1-063-2.2.14) in relation to the cultural heritage impact of AyM on Beaumaris Castle with reference to Viewpoint 44 that due to the reduction in the array area (between the PEIR and ES) 'the impact would be more appropriately graded as of low magnitude, minor to moderate significance, and not significant in EIA terms.'

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
				<p>have been classed as a significant effect, although it is a borderline case.</p> <p>We note elsewhere the approach to 'moderate' effects. All other 'moderate' effects on Anglesey are considered significant in the SLVIA.</p>		Refer to section 2.2 of this document in relation to moderate (non-significant) effects.
Amlwch	Non-significant	Agreed	Minor (non-significant)	Agreed	Agreed	Agreement noted
Moelfre	Non-significant	<p>Not agreed: the SLVIA acknowledges the screening effect of buildings, but also states that much of "Moelfre's appeal is due to the combination its picturesque quality, its maritime history, beaches, coastline and countryside. The village's attractions include</p> <p>the active Moelfre Lifeboat Station and popular Moelfre Seawatch Centre". 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).</p>	<p>Moderate (significant) "from a small number of properties along the coastal edge".</p> <p>Otherwise moderate-minor (non-significant)</p>	<p>Potential for significant effects on views experienced by the community at Moelfre are acknowledged in the ES.</p> <p>Consideration of views from properties represents a narrow focus of assessment.</p>	Agreed	<p>Applicant notes NRW agreement.</p> <p>Applicant notes LUC agreement with Moderate (significant) of effect over part of the settlement.</p> <p>Refer to section 2.2 of this document in relation to differing approach of the Applicant to the assessment of the effects on settlements .</p>
Benllech	Non-significant	Not agreed: the SLVIA acknowledges the screening	Moderate (significant)	As for Moelfre above.	Agreed	Applicant notes NRW agreement.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		effect of buildings, but also states that "Benllech is a popular holiday destination due to its sandy beach that looks out towards Penmon Point and the Great Orme". 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).	"from a small number of properties along the coastal edge". Otherwise moderate-minor (non-significant)			Applicant notes LUC agreement with Moderate (significant) of effect over part of the settlement.  Refer to section 2.2 of this document in relation to differing approach of the Applicant to the assessment of the effects on settlements.
Llanddona	Non-significant	Agreed	Moderate (non-significant)	Agreed	Agreed	Agreement noted
Beaumaris	Non-significant	Questioned: the SLVIA acknowledges the screening effects of buildings and topography and states that "(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". 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.	Agreed	Applicant notes LUC agreement with Moderate level of effect.  Refer to section 2.2 of this document in relation to moderate (non-significant) effects.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
Wales Coast Path – Section A Llanlleiana Head	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed	Agreement noted
Wales Coast Path – Section B Amlwch	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed	Agreement noted
Wales Coast Path – Section C Dulas Bay	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted
Wales Coast Path – Section D Moelfre	Significant	Agreed	Moderate (significant)	Agreed. Reflects the findings at Viewpoint 4 Moelfre.	Agreed	Agreement noted
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.	Agreed	Agreement noted
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.	Agreed	Agreement noted
Wales Coast Path – Section G	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed	Agreement noted
National Cycle Route 5	Non-significant	Agreed	Minor (non-significant)	Agreed	Agreed	Agreement noted
LCA 6 – Amlwch and Environs	Non-significant	Agreed	Minor-moderate (non-significant)	Comment. We note that the eastern coast	Agreed	This difference in effects is due to the lower sensitivity level of LCA 6

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
				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.		compared to LCA 8 which is largely as a result of the lower susceptibility. This is set out from paragraph 383 of the SLVIA (AS-027).
LCA 8 – Dulas Bay Hinterland	Locally significant, but otherwise non-significant	Agreed, in part: the SLVIA assesses significant effects “along the immediate coastal edge where there is a direct association with the seascape to the north and north-east” 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 “along the coastal edge extending to a maximum of approximately 1 km where there may be a direct association with the seascape”. While the 1 km distance may be disputed, it is clear there are non-coastal areas of this LCA that would not be affected.	NRW considers that the significant adverse effects are likely to extend further inland across this LCA and that the sensitivity of these areas is high.	Applicant notes agreement by LUC. Applicant's response to NRW's position is set out in its response to the Written Representations (Document 2.2 of the Applicant's Deadline 2 submission).
LCA 9 – Red Wharf Bay	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects “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”, and non-significant effects elsewhere. ZTV coverage suggests that potential visibility is widespread in this LCA and, given	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.	NRW considers that the significant adverse effects are likely to extend further inland across this	Applicant notes agreement by LUC. Applicant's response to NRW's position is set out in its response to the Written Representations (Document 2.2 of the Applicant's Deadline 2 submission).



RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		its strong coastal focus, suggests there is potential for significant effects to occur across the whole of the LCA.			LCA and that the sensitivity of these areas is high.	
LCA 10 – Penmon and Puffin Island	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects “in the coastal, northerly exposed areas of the LCA, extending inland by 0.5 to 0.75km”, and non-significant effects “to the west of Bwrdd Arthur and in the settled inland and former quarry area to the east”. 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.	NRW considers that the significant adverse effects are likely to extend further inland across this LCA and that the sensitivity of these areas is high.	Applicant notes agreement by LUC. Applicant's response to NRW's position is set out in its response to the Written Representations (Document 2.2 of the Applicant's Deadline 2 submission).
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.	Agreed.	Agreement noted. Applicant notes LUC's comment relating to inconsistency with SCA 3 within the same geographical area. Applicant's response to NRW's position is set out in its response to the Written Representations (Document 2.2 of the Applicant's Deadline 2 submission).
SCA 3 – Traeth Lafan	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) north of Beaumaris, moderate (non-	The area where significant effects is predicted is the same as for LCA 11, though effects on the SCA are	Agreed	Applicant notes agreement by NRW. Agreement by LUC based on their agreement of LCA 11 assessment

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
			significant) elsewhere	moderate rather than moderate-major. The same magnitude of effect is predicted.		The Applicant acknowledges that the effect on SCA-3 should be the same as for LCA 11 where the geographical locations are coincidental (i.e. Moderate-major (significant) north of Beaumaris rather than Moderate (significant) as was reported in the SLVIA (AS-027) from paragraph 472).  This change arises through the recognition that the landscape of the coastal area to the north of Beaumaris within SCA 3 lies within the Anglesey AONB and would be of high sensitivity based on its high value and medium-high susceptibility as reported in relation to LCA 11.
SCA 5 – Penmon	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects “in the coastal, northerly exposed areas of the LCA (sic), extending inland by 0.5 to 0.75km”. 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.	NRW does not consider effects to be limited but that they are likely to occur across a substantial part of this SCA as the majority of the SCA occurs across the northern coastline and	Applicant notes agreement by LUC.  Applicant's response to NRW's position is set out in its response to the Written Representations (Document 2.2 of the Applicant's Deadline 2 submission).

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
					immediate hinterland.	
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.	Agreed	Agreement noted
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.	Agreed	Agreement noted
IoA AONB LCA 8: Dulas Bay Hinterland	Significant	Agreed	Moderate (significant)	Agreed. These reflect the findings for the coastal edge of each LCA	NRW made no further comment on these LCAs, which	Applicant notes agreement by LUC. Applicant's response to NRW's position is set out in its response to the Written Representations (Document 2.2 of the Applicant's Deadline 2 submission).
IoA AONB LCA 9: Red Wharf Bay	Significant	Agreed	Moderate (significant)			

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
IoA AONB LCA 10: Penmon and Puffin Island	Significant	Agreed	Moderate (significant)		are considered above.	
IoA AONB LCA 11: Eastern Menai Strait	Significant	Agreed	Moderate-major (significant)			
Special Quality: Expansive Views	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects "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". 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.	Moderate to Major-Moderate (significant) in certain areas, non-significant elsewhere.	Comment. This special quality is divided into effects on 'expansive views' and effects on 'relative wilderness and the feeling of isolation'. These are reported separately in the same table row on pp.177-182. The extent of significant effects on 'expansive views' is related to those viewpoints where significant effects are reported. This is appropriate. The extent of significant effects on wilderness is as reported at PEIR. Given the separation between this and 'expansive views', the extent includes the 'wildest' coasts and is an appropriate conclusion.	Agreed in REP1-080-3.1.11	Agreement noted
Special Quality: Peace and Tranquillity	Locally significant, but	Agreed	Moderate to moderate-major	Agreed. The significant effects relate to the visual component of	Agreed in REP1-080-3.1.11	Agreement noted

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
	otherwise non-significant		(significant) in limited locations, minor (non-significant) elsewhere.	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'.		
Special Quality: Islands Around Anglesey	Locally significant, but otherwise non-significant	Not agreed: the SLVIA assesses significant effects "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". 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.	Agreed in REP1-080-3.1.11	Agreement noted.
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.	Agreed at REP1-080-Annex B - 6.1.33	Agreement noted
Across Isle of Anglesey, with reference to:	Locally significant, but	Agreed: the SLVIA assesses significant night-time effects "in	Moderate-minor (non-significant) in the vicinity of	Agreed for the 200 candela scenario.	REP1-080-Annex B - 6.1.33	Agreement noted

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
<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>	otherwise non-significant	<p>the vicinity of the following coastal locations:</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>	Penmon Point (VP7) and Trwyn y Penrhyn (VP28), minor (non-significant) elsewhere			
Reported SLVIA Effects for Gwynedd (Snowdonia National Park in Table A.3 below)						
VP 9. Bangor Pier (Southern End)	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
VP 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.	No comment received	Agreement noted
Bangor	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted
Wales Coast Path – Section H	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) between Penrhyn Castle and Llanfairfechan,	Comment: the finding in relation to significance is agreed, though we query why both significant and non-	No comment received	The Applicant provides the following clarification in response to LUC's comment.  The Medium magnitude of change would apply along the 8 km, open

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
			moderate (non-significant) west of Penrhyn Castle	significant effects are 'moderate'. Magnitude of change is not clearly stated in relation to this division of the route.		coastal section of the route to the east of Penrhyn Castle east to Llanfairfechan the Medium-low magnitude of change would apply elsewhere along the 11.5 km section of the route.  Refer to Section 2.2 of this document in relation to moderate (non-significant) effects.
National Cycle Route 5	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted
A55 (North Wales Expressway)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted
LCA G01 – Bangor Coastal Plain	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) “in the coastal, exposed areas to the north-east of Bangor, extending inland by 0.3-1 km”, and minor (non-significant) elsewhere.	Agreed	No comment received	Agreement noted
SCA 3 – Traeth Lafan	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) in “the immediate coastal area between a point north of	Comment: it is not clear why the finding is not consistent with the more extensive significant effects noted for LCA	No comment received	LCA G01 is assessed in the SLVIA (AS-027) from paragraph 628 and covers an area that includes Bangor, Penrhyn Castle and the coast of Anglesey which are not part of SCA-3 and therefore the LCA G01 assessment is



RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
			Aber Farm, to the west of Llanfairfechan."	G01 which covers much of the same area.		<p>not entirely concurrent and relevant to the effects on SCA 3.</p> <p>However, the Applicant notes that there is some inconsistency in the SLVIA (AS-027) from paragraph 483 in relation to the reported effects on the coastal area to the east of Aber-Ogwen, where the LCA G01 and SCA 03 areas are partially concurrent.</p> <p>The Medium magnitude of change in this area of SCA 3 would extend east from Aber-Ogwen to the west of Llanfairfechan and extend inland by approximately 0.3 – 1 km to the edge of the rail line.</p> <p>The Moderate effect (Significant) during the latter stages of construction and the early stages of decommissioning and during operation would include this area.</p> <p>This results in an increase in the geographical extent of the significant effects on SCA 3 to accord with those assessed in the SLVIA for LCA G01.</p>
<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> </ul>	Non-significant	Agreed: the SLVIA assesses non-significant effects "at locations within Gwynedd, largely as a result of the baseline light influence within and around the coastal edge and around Conwy Bay".	Minor (non-significant)	Agreed	No comment received	Agreement noted

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
▲ Figures 22a-c – Hub Height Aviation Lighting ZTV (MDS B).						
Reported SLVIA Effects for Snowdonia National Park						
VP 10. Carnedd Llewelyn	Significant	Agreed	Moderate (significant)	Agreed	Agreed	Agreement noted
VP 12. Conwy Mountain	Significant	Agreed	Major-moderate (significant)	Agreed	Agreed	Agreement noted
VP 34. Snowdon (Yr Wyddfa) Summit	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed	Agreement noted
VP 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	Not agreed as set out in REP1-080-Annex B - 6.1.27 and 6.1.28	See Applicant's responses to REP1-080-Annex B - 6.1.27 and 6.1.28 and REP1-093-9.1.1 in Document 2.2 of the Applicant's Deadline 2 submission in relation to the effects on Viewpoint 36 Tal y Fan.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
				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.		
VP 38. Foel-fras	Significant	Agreed	Moderate (significant)	Agreed, see above for comparison with VP36.	Agreed	Agreement noted
VP 40. Above Capelulo – North Wales Path	Significant	Agreed	Major-moderate (significant)	Agreed.	Agreed	Agreement noted
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.	Agreed	Agreement noted

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
LCA 01 – Northern Uplands (Ucheldir y Gogledd)	Non-significant	Not agreed; the SLVIA suggests that the “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”. 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.	Not agreed as set out in REP1-080-Annex B - 6.1.23	See the Applicant's responses to REP1-080-Annex B - 6.1.23, REP1-093-9.1.1 and REP1-093-1.7 in Document 2.2 of the Applicant's Deadline 2 submission in relation to the effects on LCA 01.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
LCA 02 – Carneddau Range (Y Carneddau)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed	Agreement noted
SCA 2 – Conwy Bay	Locally significant, but otherwise non-significant	Not agreed; the SLVIA acknowledges that effects would be “Significant, adverse, short-term temporary on the upper and northerly slopes of the Great Orme” 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) “on the upper and northerly slopes of the Great Orme” 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.	Not agreed as set out in REP1-080-Annex B - 6.1.6.	<p>The Applicant notes that the findings for SCA 3, as set out above, conclude that significant effects extend to west of Llanfairfechan but to do not extend further east to the boundary of SCA 2.</p> <p>LUC considers that the significant effects should extend east but not beyond Penmaenmawr.</p> <p>The western boundary of SCA 3 is at Gerzim to the east of Llanfairfechan. The landscape to the east of Gerzim where there is shown to be theoretical visibility of AyM (APP-212) is modified by extensive quarries, coastal infrastructure and settlement which have a strong characterising influence along this coastal edge strongly reflecting the human development influence over this landscape. In addition, although markedly smaller than AyM the operational Rhyl Flats and Gwynt y Môr OWFs are also visible from this coast above Llandudno. Whilst Moderate (significant) effects are assessed for parts of the settlement of Penmaenmawr these are visual effects which do not necessarily result in equivalent effects on character due to the different considerations.</p> <p>These factors have been considered when determining that effects on this</p>

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
						<p>part of SCA 2 would be Moderate (non-significant).</p> <p>Refer to section 2.2 of this document in relation to moderate (non-significant) effects.</p> <p>Refer to Applicant's response to REP1-080-Annex B - 6.1.6 in Document 2.2 of the Applicant's Deadline 2 submission in relation to NRW comments.</p>
Diverse Landscapes	Non-significant	Agreed	Moderate-minor to moderate (non-significant)	Agreed.	Agreed	Agreement noted
Tranquillity & Solitude – Peaceful Areas	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed	Agreement noted
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 “there may be some perceived diminishment of (harmful effects on) the Special Qualities of Diverse Views and Tranquillity”, overall the effects would not “affect the overall integrity of the SNP or its inherent natural beauty”. We have disagreed above with effects on LCA 01, where we consider</p>	<p>Not agreed as set out in REP1-080-3.1.1 and REP1-080-3.1.9.</p>	<p>The Applicant notes that whilst LUC disagrees with the findings of the SLVIA in relation to LCA 01, LUC considers the conclusions in relation to the special qualities and overall integrity of the National Park are therefore reasonable.</p> <p>Refer to Applicant's response to REP1-080-3.1.1 and REP1-080-3.1.9 in Document 2.2 of the Applicant's Deadline 2 submission in relation to NRW comments.</p>

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
				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. The conclusions in relation to the special qualities and overall integrity of the National Park are therefore reasonable.		
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.	Agreed	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
Snowdonia National Dark Sky Reserve, with reference to: <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>	Non-significant	Agreed: the SLVIA assesses non-significant effects "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".	Minor (non-significant)	Agreed	Agreed	Agreement noted
Reported SLVIA Effects for Conwy						
VP 11. Llanfairfechan	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted
VP 13. Great Orme – near summit complex	Significant	Agreed	Moderate-major (significant)	Agreed	No comment received	Agreement noted
VP 15. Great Orme – Café	Not assessed at PEIR	N/A	Moderate-major (significant)	Agreed	No comment received	Agreement noted



RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
VP 18. Llandudno Paddling Pool	Significant	Agreed	Moderate-major (significant)	Agreed	No comment received	Agreement noted
VP 20. Bryn Euryn	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted
VP 21. Mynydd Marian	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted
VP 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.	No comment received	Agreement noted. The Applicant also notes that LUC has applied professional judgement when accepting that the Moderate effect is non-significant, which conflicts with their advice elsewhere in relation to Moderate (non-significant) effects.
VP 29. Colwyn Bay Promenade	Significant	Agreed	Moderate-major (significant)	Agreed	No comment received	Agreement noted
VP 37. Cefn Coch Stone Circle	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted
VP 59. Llandudno Promenade – Lifeboat Slipway	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted
Llanfairfechan	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) for “seaside properties” and	Agreed (noting comments elsewhere about the scope of effects on settlements)	No comment received	Agreement noted

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
			non-significant elsewhere			
Penmaenmawr	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted
Dwygyfylchi	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted
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.	No comment received	The Applicant notes that there would be visibility of AyM from parts of the settlement to the south-east where properties are on rising ground (in the vicinity of Vicarage Avenue and Tan-y-Bryn Road. However, these views would be across an intensively developed foreground, which partially screens views of the sea (including in some instances the large forms of the retail park) and a seascape that includes views of the operational OWFs.
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 "views from other properties would be largely unaffected". 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	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	No comment received	The effects on Penrhyn Bay are assessed from paragraph 871 of the SLVIA (AS-027). The assessment of the magnitude of change notes that the sea front properties and those set slightly back from the coast along routes that extend inland would gain visibility of the AyM OWF. This better defines the area where the Applicant considers significant effects may arise.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		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.		potentially extend inland to c.400m.		
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 "magnitude would be lower or no change" 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.	No comment received	Agreement noted.
Colwyn Bay	Locally significant, but otherwise non-significant	Not agreed; the SLVIA suggests that "The sea front properties would gain visibility of the AyM OWF, however views from other properties would be largely unaffected". 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	Moderate or moderate-major (significant) "from the sea facing properties along the promenades in Colwyn Bay and from the properties that	Agreed, the finding recognises potential effects from further inland.	No comment received	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		remain local, but their extent should be clarified.	gain elevated or open views of the AyM OWF from within the urban area"			
Llanddulas	Non-significant	Not agreed; the SLVIA suggests that "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". 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.	No comment received	Agreement noted.
Abergele and Pensarn	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted.
Towyn and Kimmel Bay	Non-significant	Agreed	Minor (non-significant)	Agreed	No comment received	Agreement noted.
Wales Coast Path – Section J	Non-significant	Agreed	Moderate to moderate-minor (non-significant)	Agreed	No comment received	Agreement noted.
Wales Coast Path – Section K	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) "along 0.8 km section at north-	Agreed	No comment received	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
			western extent of Great Orme"			
Wales Coast Path – Section L	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be "Medium-high for 2.5km section along northern edge of Great Orme. Low magnitude to no change elsewhere along the route". 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.	No comment received	Agreement noted.
Wales Coast Path – Section M	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be "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". 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) "along 2.5 km section of Llandudno promenade and a 200m section of Colwyn Road"	Agreed. The assessment has been revisited and clarified, and we agree with the justification provided.	No comment received	Agreement noted.
Wales Coast Path – Section N	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be "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". Given the extent which would be	Significant "for 3.5km section where there are open views from along the Penrhyn and Rhos Bays and headland at Rhos Point"	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	No comment received	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		affected, it is considered that significant effects should be reported for the whole of this section of the route.		be consistent with the adjacent sections.		
Wales Coast Path – Section O	Locally significant, but otherwise non-significant	Not agreed; the SLVIA states that magnitude of change would be “Medium-high for the 5km section from Colwyn Bay to 0.5km west of Llandulas. Medium to low from Llandulas to Pensarn”. 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) “from Colwyn Bay to 0.5 km west of Llandulas”, moderate (significant), “from 0.5 km west of Llandulas to west of Pensarn and Abergele.”	Agreed. The assessment has been revisited and clarified, and we agree with the revised conclusion.	No comment received	Agreement noted.
Wales Coast Path – Section P	Non-significant	Agreed	Moderate-minor to minor (non-significant)	Agreed	No comment received	Agreement noted.
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.	No comment received	Agreement noted.
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.	No comment received	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
LCA C4 – Limestone Farmlands (Abergele to Denbigh Coastal/ Vale Hills unit)	Non-significant	Agreed	Moderate-minor to minor (non-significant)	Agreed	No comment received	Agreement noted.
LCA C9 – Limestone Escarpment and Hills	Non-significant	Agreed	Moderate (non-significant)	Agreed	No comment received	Agreement noted.
LCA C10 – Great Orme and Creuddyn Peninsula	Locally significant, but otherwise non-significant	Agreed	Moderate (significant) "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", non-significant elsewhere	Agreed	No comment received	Agreement noted.
SCA A – Llandudno Bay	Significant	Agreed	Moderate (significant)	Agreed	No comment received	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
SCA B – Colwyn Bay	Non-significant	Not agreed; the SLVIA acknowledges that “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”. 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 “substantially more prominent”. 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.	No comment received	The effects on SCA B are assessed in the SLVIA (AS-027) from paragraph 1186.  Refer to section 2.2 of this document in relation to moderate (non-significant) effects.
SCA C – Vale of Clwyd	Non-significant	Not agreed; the SLVIA acknowledges that “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”. This	Moderate (non-significant)	Agreed. We note that the assessment has been revisited and that the proposed turbines are now described as “similarly prominent” as the existing turbines. With reference to the relevant visualisations (e.g. Viewpoint 23), the detail of this may be queried in terms of	No comment received	Agreement noted.  The Applicant also notes that LUC has applied professional judgement when accepting that the Moderate effect is non-significant, which conflicts with their advice elsewhere in relation to Moderate (non-significant) effects.



RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		would suggest a significant effect at this SCA.		visual appearance. However, we accept that on balance this does not equate to a significant effect on seascape character.		
Character and qualities of the Great Orme Heritage Coast	Not assessed	N/A	Moderate (significant)	Comment: this section reiterates the findings of the assessment of effects on LCAs and SCAs relevant to the heritage coast area. 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. 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.	No comment received	It is not clear if LUC agrees with the SLVIA. See Applicant's response to REP1-055-4.1.ii in Document 2.2 of the Applicant's Deadline 2 submission.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
Viewpoint 13 Great Orme near summit complex	Significant	[omitted from review]	Moderate (significant)	Agreed	No comment received	Agreement noted.
Viewpoint 22 Abergele Promenade	Non-significant	[omitted from review]	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted.
<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>	Locally significant, but otherwise non-significant	Agreed; the SLVIA assesses significant effects would result on “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”.	Moderate (significant) “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.	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.	No comment received	Agreement noted.
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.						
VP 23. Rhyl Aquarium	Non-significant	Not agreed; the SLVIA compares the perceived scale of proposed AyM OWF turbines with those of	Moderate-minor (non significant)	Comment. We accept that the authors have reviewed their	No comment received	Agreement of finding Moderate-minor (non-significant) is noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		the existing GyM and Rhyl Flats developments, stating that "The GyM WTGs are both smaller in scale than the AyM WTGs and are further away from this viewpoint than Rhyl Flats OWF so the scale comparison is greater. They are also more densely spaced". The baseline view shows a gap between GyM and Rhyl Flats, resulting in them being seen as distinct turbine groups. Differences in intervening distance and perceived scale are less noticeable as a result of this gap. The addition of AyM OWF turbines on the horizon will fill in gaps, accentuate the differences between existing and proposed developments and result in greater incidence of stacking and visual clutter. This change would be noticeable and would result in significant effects.		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'.		There seems to be a lack of consistency in LUC's assessment of this viewpoint compared with REP1-093-6.2.1 (the joint NW LPA response) where the assessment of effects is not agreed.  See the Applicant's response to REP1-093-6.2.1 Document 2.2 of the Applicant's Deadline 2 submission in relation to this viewpoint.
VP 24. Graig Fawr	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed. We concur with the assessment of 'low' magnitude of change in this case.	No comment received	Agreement noted.
VP 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.	No comment received	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
Rhyl	Non-significant	Not agreed; the SLVIA assesses a non-significant effect for Viewpoint 23 (Rhyl 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 "provides an indication of the visibility that would be gained from properties close to the coast but also some of the visitor amenities along the seafront, which are an important component of the settlement". Although "The majority of the settlement will have no or limited views of the AyM OWF due to the low-lying nature of the town and the visual screen created by the seafront properties", there is potential for significant visual effects to result locally.	Minor (non-significant)	Comment: We note that the authors have clarified their approach to settlements as 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.	No comment received	Agreement of finding of (non-significant) is noted.  There seems to be a lack of consistency in LUC's assessment of this settlement compared with REP1-093-6.3.1 (the joint NW LPA response where the assessment of effects is not agreed).  See the Applicant's response to REP1-093-6.3.1 Document 2.2 of the Applicant's Deadline 2 submission in relation to this settlement.  Refer to section 2.2 of this document in relation to differing approach of the Applicant to the assessment of the effects on settlements.
Prestatyn	Non-significant	Agreed	Minor (non-significant)	Agreed	No comment received	Agreement noted.
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)	No comment received	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
Offa's Dyke Long Distance Route	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted.
National Cycle Route 5	Non-significant	Agreed	Minor (non-significant)	Agreed	No comment received	Agreement noted.
A55, North Wales Expressway	Non-significant	Agreed	Minor (non-significant)	Agreed	No comment received	Agreement noted.
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)	No comment received	Agreement noted.
LCT 2 – Hill slopes of the Clwydian Hills and Dee Valley AONB (Denbighshire and Flintshire)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted.
LCT 5 – Rolling Lowland of the Clwydian Hills and Dee Valley AONB (Denbighshire and Flintshire)	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	No comment received	Agreement noted.
SCA C – Vale of Clwyd	Non-significant	Not agreed; the SLVIA acknowledges that "The scale of the AyM WTGs when compared with the WTGs of the operational OWF is relatively large making	Moderate (non-significant)	Agreed. We note that the assessment has been revisited and that the proposed turbines are now described as	No comment received	Agreement noted. The Applicant also notes that LUC has applied professional judgement when accepting that the Moderate effect is non-significant, which conflicts with

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
		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". This would suggest a significant effect at this SCA.		"similarly prominent" 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. (Note: Reported under Conwy in the ES, see p.365)		their advice elsewhere in relation to Moderate (non-significant) effects.
Landscape Character and Quality – Tranquillity	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed.	Agreement noted.
Landscape Character and Quality – Remoteness and Wildness	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed.	Agreement noted.
Reported SLVIA Effects for Flintshire						
VP 27. Point of Ayr	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed.	Agreement noted.
Wales Coast Path – Section Q	Non-significant	Agreed	Moderate-minor (non-significant)	Agreed	Agreed.	Agreement noted.
National Cycle Route 5	Non-significant	Agreed	Minor (non-significant)	Agreed	Agreed.	Agreement noted.

RECEPTOR	OPERATIONAL EFFECT IN PEIR	LUC COMMENT	OPERATIONAL EFFECT IN ES	LUC COMMENT	NRW COMMENT	APPLICANT'S COMMENT
A55, North Wales Expressway	Non-significant	Agreed	Minor (non-significant)	Agreed	Agreed.	Agreement noted.

## 2.6 Responses to ExQ1

37 On behalf of the NW LPAs, LUC provided responses to ExQ1 for questions directed at those parties in the context of the SLVIA and LVIA. The Applicant has provided comments on responses to ExAQ1 in Document 2.3 of the Applicant's Deadline 2 submission.

## 2.7 Documents Securing Onshore Mitigation

38 LUC provided a review of the following documents in Appendix C of REP1-091:

- ▲ Document 8.4: Outline Landscape and Ecological Management Plan (APP-305);
- ▲ Document 8.11: Schedule of Mitigation (APP-310);
- ▲ Document 8.13: Outline Code of Construction Practice (CoCP) (APP-312);
- ▲ CoCP Appendix 1: Outline Construction Method Statement (APP-313);
- ▲ CoCP Appendix 4: Outline Soil Management Plan (APP-316); and
- ▲ Document 2.12: Hedgerow and Protected Tree Plan (APP-017).

39 Table 2 below provides a tabulation of the LUC review of the above documents, along with the Applicant's comments on that review (if appropriate).



Table 2: Applicant's comments on the LUC Review of documents securing onshore mitigation (Appendix C of REP1-091).

LUC REVIEW	APPLICANT'S COMMENT
Securing Mitigation	
<p>"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."</p>	<p>This is noted by the Applicant. It is also noted that revised versions of several of these documents have been submitted into the Examination and therefore it is important to read these comments in light of the most recent documents submitted.</p>
<p>"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."</p>	
Outline Landscape and Ecological Management Plan (APP-305)	
<p>"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."</p>	<p>This is noted by the Applicant.</p>
<p>"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."</p>	
<p>"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</p>	<p>The Applicant has updated Section 5 of the oLEMP (Document 2.10 of the Applicant's Deadline 2 submission) to clarify that the woodland to the north and west of the OnSS will be protected during construction and that an Arboricultural assessment will be undertaken in advance of works so that guidance within BS5837:2012 Trees in Relation to Construction can be followed.</p>

LUC REVIEW	APPLICANT'S COMMENT
edge of the Order Limits at the OnSS, as the adjacent woodland is within Bodelwyddan designed landscape."	
"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."	A revised version of the oLEMP (REP1-034) was provided at Deadline 1 to clarify that this area of ancient woodland would be retained and no works would be undertaken that would cause significant adverse impact to the woodland (Section 2.1.3). Note a further revision has been provided in Document 2.10 of the Applicant's Deadline 2 submission).
"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."	The Applicant has updated Section 5 of the oLEMP to clarify that all retained trees will be protected during construction and that an Arboricultural assessment will be undertaken in advance of works so that guidance within BS5837:2012 Trees in Relation to Construction is followed.
"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."	The Applicant notes that there is a Water Main located within the area between the TCC and the OnSS (See Appendix E of The Applicant's response to ExA First Written Questions), that would limit tree planting in this area. The final use for this area is yet to be determined as there may be a requirement for SUDS measures for the substation (dependent on detailed design) or for further mitigation (noting the restriction on tree planting).
<p>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).</p> <p>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."</p>	The Applicant welcomes confirmation that the proposed planting appears appropriate to meet the stated aims and that the proposed native species listed and use of nurse species is also considered appropriate. The final details will be set out in the final LEMP for approval by DCC.
"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."	The use of advance planting would be dependent on the final design of the substation and having appropriate landowner agreements in place. As such, advance planting is not assessed within the LVIA (AS-029), which presents a worst-case assessment, and is not secured. If advance planting were to be incorporated it would be done via the final LEMP and approved by DCC.

LUC REVIEW	APPLICANT'S COMMENT
<p>"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."</p>	<p>Section 2.1.3 confirms that The Applicant will seek</p> <p><i>"Achievement of the best environmental fit of the Onshore ECC where practicable, particularly in relation to reducing hedgerow and tree loss along the cable route."</i></p> <p>The Applicant has also added the follow to the landscape and visual strategy in Section 2.1.3:</p> <p><i>Seek to retain all trees that do not require removal for construction</i></p> <p>The protection of retained trees is confirmed via the clarification to Section 5 of the oLEMP (Document 2.10 of the Applicant's Deadline 2 submission).</p>
<p>"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."</p>	<p>The Applicant will include such cross referencing within the final oLEMP.</p>
<p>"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."</p>	<p>The reference to 3 years aftercare for habitats make reference to potential for this to be extended if not successful:</p> <p><i>Reinstated habitats will be subject to an aftercare period of up to three years following reinstatement, to be extended (if required) if reinstatement is not deemed to have been successful.</i></p> <p>As such it is not considered necessary to extend the references in the oLEMP.</p>
<p>"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."</p>	<p>This is noted by the Applicant and a cross reference has been added to Document 2.10 of the Applicant's Deadline 2 submission.</p>
<p>"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)."</p>	<p>This is noted by the Applicant.</p>
<p>"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</p>	<p>The Applicant welcomes the conclusion that the oLEMP will benefit both landscape and biodiversity. Additional clarification on protection of existing features has been added to the document (Document 2.10 of the Applicant's Deadline 2 submission) and an</p>

LUC REVIEW	APPLICANT'S COMMENT
<p>consistency between sections. We recommend seeking further detail from the Applicant with reference to protection of existing features, and advance planting at the OnSS."</p>	<p>explanation of why advance planting details cannot be set out in detail at this stage has been provided.</p>
<p>Outline Code of Construction Practice (APP-312)</p>	
<p>"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.</p> <p>Section 2 of the document sets out high level principles. It provides limited detail but includes references to the appendices where appropriate.</p> <p>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."</p>	<p>The Screening and Fencing section of the CoCP has been updated to include protective fencing for trees (Document 2.42 of the Applicant's Deadline 2 submission).</p>
<p>Outline Construction Method Statement (APP-313)</p>	
<p>"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).</p> <p>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."</p>	<p>The outline CMS has been updated to include the identification and protection of all vegetation to be retained (Document 2.18 of the Applicant's Deadline 2 submission).</p>
<p>Outline Soil Management Plan (APP-316)</p>	
<p>"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."</p>	<p>The Applicant welcomes confirmation that the measures within the outline SMP (Document 2.33 of the Applicant's Deadline 2 submission) are an appropriate basis for development of a detailed SMP.</p>

LUC REVIEW	APPLICANT'S COMMENT
Hedgerow and Protected Tree Plan (APP-017)	
<p>“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.”</p>	<p>This is noted by the Applicant.</p>
<p>“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, centered 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.”</p>	<p>This area of Woodland is specifically mentioned within the updated oLEMP that was provided at Deadline 1 (REP1-034).</p>

# 3 References

Landscape Institute and IEMA (2013) - Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA3).

NatureScot (2017) - Visual Representation of Windfarms, Guidance (Version 2.2)



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