



9<sup>th</sup> November 2022

Our Ref: 0908je/D3444.04

The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Sir/Madam,

**EN010112 Awel y Môr Offshore Wind Farm  
Deadline 2 Comments**

Following the publication of the responses to the ExQ1 questions and submission of written representations, we would like to take this opportunity to offer some brief comments on the submissions made. There are naturally points of agreement and disagreement between the comments made in our own written representation (REP1-063) and those by others; to avoid repetition, these are not reiterated below.

We note the concerns expressed by Conwy CBC (REP1-054 and REP1-055) relating to potential implications for the maintenance of Llandudno's built heritage, should there be a decline in tourism as a result of the development, leading to a loss of investment. We would concur that maintenance and enhancement of built heritage is a continuing challenge for owners and local authorities, and vulnerable to any additional economic pressure. Although difficult to predict, we would agree that this should be considered as a potential indirect impact on the local historic environment.

In the written representation by the National Trust (REP1-075), we note that the view from the terrace at Penrhyn Castle has previously been used for the purposes of interpretation. This demonstrates clearly the value of this view in understanding, experiencing and appreciating the setting of the property, and firmly refutes the claim by the Applicant in their response to ExQ1 8.13, that *"it is the availability of these long-distance sea views that is important (and not necessarily what is in them) that adds to the asset"* and that *"the presence of the WTGs in this view does not affect the availability of the view which is what is important for this asset. The WTGs will result in an addition to the current sea view but this doesn't affect the ways in which the interests of the assets are understood, experienced and appreciated."* It is surely self-evident that the composition of a view, particularly from a designed landscape, is fundamental to its significance and how this is understood, experienced and appreciated, and that where this is an intended part of visitor experience, the impact of change on its contribution is magnified.

The Applicant provides a clear and comprehensive explanation of the difficulties in reducing the Maximum Design Scenario in any way in their response to EXQ1 17.19 and 17.25. They observe that, as agreed by both their own consultants and consultees, substantial reduction would be needed to achieve the desired (by consultees) reduction in seascape, landscape and visual impacts, concluding that it is not possible to reduce



these impacts with only a small loss of function. The case is made that any large reduction would likely render the scheme economically unviable. Whilst acknowledging both the array refinements made to date and the valid points made, we are not convinced that *'Relocating some or all of the westernmost turbines into other parts of the array area'* would simply reduce the size (and therefore the energy output of the scheme) without materially reducing seascape, landscape and visual effects (REP1-007, ExQ1 17.19). We remain of the opinion that material improvement (in terms of the effects on the historic environment) could be achieved by relatively minor modification to layout to reduce impact on the setting of the Puffin Island and Penmon historic assets. As non-specialists, we would welcome clarification as to why relocation (as opposed to removal) of turbines results in a lower output. Additionally, while accepting that the application is necessarily based on future market assumptions, we would welcome further evidence that any further reduction would jeopardise the viability of the scheme.

Finally, we note that submissions made by the local planning authorities, Natural Resources Wales, the National Trust and the Applicant all refer to ongoing discussions about the possibility of landscape enhancement provision, potentially to be secured through a S106 Agreement, to offset or compensate for impacts on the natural and built environment which cannot be mitigated directly. We would welcome the opportunity to contribute to these discussions, having regard to the impacts on the historic environment identified by us and other consultees.

Yours faithfully

**Jenny Emmett**  
**Senior Planning Archaeologist**

Interested Party - Unique Reference: 20031626