



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

16 Rhagfyr / December 2022

Er sylw / For the attention of: Jake Stephens

Annwyl / Dear Jake,

**FFERM WYNT ALLTRAETH AWEL Y MÔR ARFAETHEDIG / PROPOSED AWEL Y MÔR OFFSHORE WINDFARM**

**CYFEIRNOD YR AROLYGIAETH GYNLLUNIO / PLANNING INSPECTORATE REFERENCE: EN010112**

**EIN CYFEIRNOD / OUR REFERENCE: 20031687**

**RE: NATURAL RESOURCES WALES' WRITTEN SUBMISSION FOR DEADLINE 3a**

**1. Introduction**

This document summarises the case put by Natural Resources Wales (NRW) at the following Issue Specific Hearings (ISH) held in December 2022:

- 7<sup>th</sup> December 2022 – ISH2 on Seascape and related matters
- 8<sup>th</sup> December 2022 – ISH3 on the Substation and related matters

Please note, our oral submissions at the ISHs should be considered alongside our detailed comments as provided in our Deadline 1 [REP1-080] and Deadline 3 [REP3-026] responses.

**2. ISH2 on Seascape, landscape and visual effects of the proposed offshore works and related matters**

- *Designated Landscapes (Isle of Anglesey Area of Outstanding Natural Beauty and Eryri (Snowdonia) National Park)*

- 2.1. We are unable to accept the Applicant's contention that the proposal would not affect the overall integrity of the Area of Outstanding Natural Beauty (AONB). We question, in particular, the Applicant's focus on the "overall integrity" of the AONB when the focus should be on assessing the nature and extent of the impacts on the parts of the AONB that would be affected by the proposal. NRW considers that the proposal would result in substantial harm and adverse effects upon the AONB that would conflict with the purpose of the AONB designation, namely to conserve and enhance natural beauty.
- 2.2. We advise that the scale and location of the turbines would result in numerous significant seascape, landscape and visual effects within the AONB and its seascape setting. The AONB is predominantly coastal in character, with sea views and the coastline being the key focus of scenic views. Receptors are of high sensitivity and the proposal would interfere with the appreciation of the open sea and coastline, including coastal landforms.

- 2.3. In relation to the National Park (NP), we advise that the scale and location of the proposal would result in significant adverse effects on the landscape character and scenic quality of Landscape Character Area (LCA) 1 (Northern Uplands) and on the quality of a number of views. We consider that effects on this LCA have been underestimated. Viewpoints 12, 36, 38 and 40 are within this LCA and effects at all these viewpoints would be significant in our opinion. The receptors which experience significant adverse effects are spread across the LCA, affecting the overall scenic quality and visual experience and thereby the landscape character, not just visual amenity at a few viewpoints. The likely extent of effects over the upland area, as illustrated by the Zone of Theoretical Visibility (ZTV), indicates that significant adverse effects would be likely over a large part of this LCA. Scenic views of the coast and sea are particularly important in this part of the NP and are experienced and appreciated most readily from the high ground of peaks and ridges in the area. The scenic quality is part of the visual experience of the NP in this area, along with tranquillity and remoteness in parts. The proposal is not similar in nature or scale to existing developments in the area. The scale of the proposed wind farm would make it prominent and would interfere with the appreciation of views of the Great Orme and the relationship between the sea, Conwy Bay and the headland.
- 2.4. In view of the numerous significant effects identified, we advise that the proposal would significantly conflict with the purposes of the AONB and NP designations in relation to the conservation and enhancement of natural beauty. We advise that serious consideration is given to these effects, in accordance with statutory duties.

- *Assessment of Viewpoints*

- 2.5. In relation to viewpoints (VP) 1 (Porth Llechog/Bull Bay) [APP-230], VP2 (Trwyn y Balog/ Point Lynas) [APP-231] and VP3 (Mynydd Eilian) [APP-232], we consider that the effects at these viewpoints have been underestimated in the SLVIA. We consider the effects to be of low-medium magnitude, and that this level of magnitude combined with high sensitivity should lead to an assessment of moderate adverse effects, which we consider significant. We consider the threshold for significance has been reached for VPs 1, 2 and 3.
- 2.6. From these viewpoints, highly sensitive receptors (e.g., walkers on the coastal path) are focused on the coastal landscape and sea views. Although there are large-scale sea views, the scale and nature of the development would make it very noticeable and focus attention upon it. Sea views and the coastline are the key focus of views in the predominantly coastal AONB and sea views are currently untrammelled by development or any other significant human activity, apart from the occasional ship. This part of the AONB is relatively remote and tranquil. The existing offshore windfarms to the east, including Gwynt y Môr, are extremely hard to discern even in fine weather and built development along the coastline is not similar in nature or scale to the proposed wind farm. The proposal would interfere with the appreciation of the open sea and coastline including views of coastal landforms and the mountains of Eryri (Snowdonia). Windfarms inland, as seen from Mynydd Eilian, are smaller scale and associated with the inland rural landscape and not sea views and the coastline.
- 2.7. In relation to VP36 [APP-265], we consider that the effects at this viewpoint have also been underestimated and are likely to be significant adverse. The SLVIA describes sensitivity as medium-high and the effects non-significant (moderate). It claims that the experience is already modified by existing wind farms and pylons. We disagree and consider that, at this viewpoint, existing onshore wind farms and pylons are hard to discern, and that Gwynt y Môr and other offshore wind farms are only visible at a distance, appearing small scale and not prominent in views. Existing housing and other built development in the view is of a very different scale and nature to the proposed wind farm, which would contrast strongly with it.

- *Mitigation*

- 2.8. We do not consider that harm has been sufficiently mitigated and advise that the Applicant considers further measures to reduce harm, including reductions in the array area and/or in the scale/number of turbines.

- 2.9. Whilst we acknowledge the embedded mitigation of the reduced western extent of the array (from that consulted on in the section 42 consultation), and that a reduction in the number of wind turbine generators has already been applied, we do not consider it sufficient to reduce to an adequate extent the likely significant effects at the numerous viewpoints within Isle of Anglesey AONB and Snowdonia NP. The Environmental Statement acknowledges that the likely significant effects on these landscapes have not diminished because of the reduction in the extent and number of turbines.
- 2.10. We advise that a further substantial reduction in the array area and number of turbines, along with a reduction in scale and height of the turbines, would be needed to minimise adverse effects on the Isle of Anglesey AONB and Snowdonia NP to an adequate extent.
- 2.11. In its section 42 consultation response (8<sup>th</sup> October 2021), NRW advised that consideration be given to NRW's technical guidance publication, "*Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and Guidance*" (White Consultants for NRW, March 20197) to assist in informing an appropriate reduction in the extent/scale of the proposed development. The Applicant has not minimised effects in accordance with the advice in the White Consultants' reports.
- 2.12. The White Consultants' reports are commissioned research reports which provide evidence about seascape and visual sensitivity as it relates to potential offshore windfarms in Wales. The reports were produced by a leading landscape/seascape consultant in the field. Whilst not directly peer reviewed by the industry, the reports were informed by a digest and analysis of SLVIAs prepared by consultants working for the industry and anticipated future trends such as increases in turbine height up to 350m. The reports have been shared with consultants working on other windfarm projects and we understand they are being used and applied. The reports constitute technical guidance and aim to guide developers to locations where significant effects on designated landscapes would not occur or would be minimised.

- *Enhancements*

- 2.13. NRW has provided advice to the appropriate local planning authorities on developing a draft enhancement scheme, which has been shared with the Applicant. NRW advises that opportunities for enhancement of the designated landscapes should be considered in accordance with Welsh National Marine Plan Policy SOC\_06: Designated Landscapes. Enhancements of designated landscapes should support the purpose of conservation and enhancement of natural beauty and contribute to the conservation and enhancement of the 'Special Qualities' of those landscapes, as set out in the relevant management plan. NRW considers that enhancements, by nature, would not mitigate the visual effects of the offshore wind farm. However, given the significant concerns identified, we would encourage and endorse the development of an enhancement package.

### 3. ISH3 on the proposed onshore substation site and related matters

- 3.1. On the issue of the potential colour of the proposed substation, NRW suggested that it may help the Applicant to consider undertaking an Environmental Colour Assessment. In order to inform such considerations, NRW shared a relevant ECA paper with the Applicant on 8<sup>th</sup> December 2022.

Please do not hesitate to contact Nia Phillips ( [REDACTED] ) and Bryn Griffiths ( [REDACTED] ) should you require further advice or information regarding these representations.

Yn gywir / Yours sincerely,

[REDACTED]  
**Andrea Winterton**  
**Marine Services Manager**  
**Natural Resources Wales**