



Awel y Môr Offshore Wind Farm

Written Summary of Oral Submissions to ISH2 (Seascape and Related Matters)

Deadline 3a

Date: 16 December 2022

Revision: A

Document Reference: 3a.4

PINS Reference: N/A



REVISION	DATE	STATUS/ REASON FOR ISSUE	AUTHOR	CHECKED BY	APPROVED BY
A	December 2022	Deadline 3a	Burges Salmon	RWE	RWE

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Awel y Môr ISH 2: The Applicant's Summary of Oral Submissions



This note summarises the submissions made by Awel y Môr Offshore Wind Farm Limited (the Applicant) at ISH2 on 7 December 2022. This document does not purport to summarise the oral submissions of parties other than the Applicant; summaries of submissions made by other parties are only included where necessary in order to give context to the Applicant's submissions.

Updates or responses to action points will be addressed in the response to ISH2 actions document to be submitted at Deadline 4.

1 GENERAL MATTERS AROUND UPDATES TO EXAMINATION DOCUMENTS

- 1.1 The Applicant noted the points raised by the Examining Authority (ExA) regarding the differences in the naming of documents and the submission of documents with track changes. The Applicant confirmed it will review the naming of documents provided at various deadlines including the appendices to the Code of Construction Practice (CoCP) (REP2-042). The Applicant also confirmed that documents showing track changes have been limited to those where this has been requested by the ExA. The Applicant will provide track changes for all updated documents going forward. The Applicant also confirmed it will provide a rolling update to the Schedule of Changes to the draft Development Consent Order (DCO) (REP3-008).
- 1.2 The Applicant will also review documents referenced in the errata list and will ensure that the documents certified in the DCO have the final versions / information included. The Applicant will review the ExA's request to update and reissue documents and, to minimise the amount of additional documentation being submitted to the examination, consider whether this could be achieved by appending the errata list to documents.

2 SEASCAPE, LANDSCAPE AND VISUAL

Impacts on Isle of Anglesey Area of Outstanding Natural Beauty (IoA AONB), Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (Clwydian Range AONB) and Eryri / Snowdonia National Park (SNP)

- 2.1 The Applicant agreed that the tests in the National Policy Statement (NPS) EN-1 (para 5.9.12) are important and the ExA should consider the importance of the areas of outstanding natural beauty (AONBs) and National Park designations. The Applicant has considered this and aimed to minimise the impacts on the AONBs and Eryri / Snowdonia National Park (SNP). The Applicant also noted that it is important that the tests need to be considered in context including the need for the Awel y Môr Offshore Wind Farm (AyM). For any large scale development of this nature, visible from these designations, it would be very difficult for it to directly conserve or enhance the AONBs or SNP. Notably, however, the purpose of the AyM development is to provide mitigation of climate change impacts, which are predicted to give rise to widespread changes in our landscapes, habitats and species, including those in the AONBs and SNP. AyM would therefore also play a part in conserving aspects of these designated areas. The project is not located within the AONBs or SNP and the Applicant considered that while there are significant impacts identified these do not undermine the reasons for designation of these sites. There are also other large scale development, including other offshore wind farms, located in the vicinity of the AONBs and SNP.
- 2.2 It was accepted by the Applicant that there would be some significant adverse impacts on the views from the AONBs and SNP and that the development of AyM would therefore not be consistent with objectives that seek to enhance the AONBs and SNP. However, it is the case that almost no large-scale development would be able to comply with the principle of enhancement and therefore it must be anticipated that any major development would give rise to some degree of friction with such an aim.

- 2.3 This is also acknowledged in NPS EN-1 at paragraph 4.5.1 where it is stated that ‘the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.’
- 2.4 Following consideration of all of these factors the Applicant stated that there would be significant adverse effects on three of the 14 special qualities and the natural beauty of the Isle of Anglesey (IoA) AONB associated with these. Such effects would occur within a limited geographical area along the east coast of the IoA AONB with large parts of the AONB unaffected by visibility of AyM and the other 11 special qualities would be unaffected across the entire AONB. Therefore, substantial areas of the AONB and the majority of its special qualities are conserved. It is considered that the significant effects identified do not occur to such a degree that it would affect the overall integrity of the AONB or its inherent natural beauty and it would occur within a context and understanding of the need for change including accommodating new energy development as set out in the Anglesey AONB Management Plan.
- 2.5 In relation to SNP, seven of the nine special qualities would not be affected by AyM. However, it is considered that there may be adverse effects on the special qualities of Diverse Landscapes and Tranquillity & Solitude – Peaceful Areas and Peacefulness but such effects are not considered to be significant and are therefore limited. NRW and Land Use Consultants (LUC) agreed this would be the case. There would also be some localised areas where significant adverse visual effects would arise. It is not considered that the receptors within the SNP would be diminished to such a degree that this would affect the overall integrity of the SNP or its inherent natural beauty and it would occur within a context and understanding of the need for change including accommodating alternative energy.
- 2.6 The Applicant also confirmed that it did not find any significant effects relating to the Clwydian Range and Dee Valley AONB but there were some adverse effects which would conflict with the purpose of the AONB. The Applicant noted that this was agreed with Natural Resources Wales (NRW) and Denbighshire County Council (DCC).
- 2.7 The Applicant mentioned that there are some areas of difference between the Applicant and NRW and the North Wales Local Planning Authorities (NWLPA) (following the technical review undertaken by the LUC) with regards to the extent of significant seascape, landscape and visual impact assessment (SLVIA) effects in relation to the IoA AONB and SNP. These are set out in the Applicant’s comments on LUC’s review (REP2-006) submitted at Deadline 2 and the SLVIA Statement of Common Ground (SoCG) with NRW (REP3-019) submitted at Deadline 3.

IoA AONB

- 2.8 In relation to IoA AONB, the Applicant noted that there are differences of opinion with NRW and LUC in relation to the geographical extent of those areas that would be significantly affected by AyM. The Applicant confirmed there are fourteen special qualities identified in the AONB Management Plan Review (MPR) and it is the combination and interaction of distinctive resources and activities that form the basis of the designation. The majority of these resources and activities would be unaffected by AyM due to its location at some distance from the IoA AONB. The IoA AONB would therefore only be affected through visibility of AyM at a substantial distance offshore and not through any physical change to the patterns or features of the landscapes therein.
- 2.9 NRW suggests in its Written Representation (REP1-080-.1.10) that on the Isle of Anglesey ‘significant adverse landscape character effects are likely to extend further across these LCAs, as indicated by the Zone of Theoretical Visibility (ZTV), notwithstanding that some parts would be screened by topography, vegetation, and buildings’.
- 2.10 The Applicant does not believe this to be the case based on professional opinion. Whilst there may be some degree of visibility of AyM within the areas of ZTV the Applicant does not agree that visibility of AyM in part of the view looking in one direction translates to a significant effect on landscape character across these areas. Instead, the Applicant considers that significant effects are more confined to the coast and the areas within approximately 1km of the coast where the sea is a more definitive component of the contextual influence on the landscape character of these areas.

- 2.11 It is the distinct, recognisable and consistent pattern of elements in the landscape within the loA AONB that largely define its inherent character and integrity and these are not affected by AyM.
- 2.12 The ZTV included in Figure 18a of the SLVIA chapter of the Environmental Statement (ES) (APP-219) shows the extent of the theoretical visibility of Maximum Design Scenario (MDS) A, which has been calculated to equate to 39% of the loA AONB. Parts of the loA AONB along the western coast of the Isle of Anglesey are on the very edge of the study area. Figure 12b of the SLVIA ES chapter (APP-206) is the Hub Height ZTV for MDS A. By comparing these two figures it can be seen that much of the more distant wind turbine generators (WTG) visibility would be of blades only (i.e. hubs are substantially less or not visible from these areas). This shows that actual visibility of AyM within the western and the majority of the northern coastal areas of the loA AONB would be extremely limited, particularly due to the incidence of intervening landscape and built features (which are not included within the ZTV).
- 2.13 Actual visibility of AyM from within the eastern coastal areas is also largely restricted to coastal areas and open areas immediately inland or where there are elevated high points. Figure 16 (APP-213) part 1 ZTV with LCA shows the landscape character areas with the ZTV and the loA AONB boundary. Within much of the area beyond the immediate coastal hinterland the landscape is characterised by an extensive pattern of vegetation in the form of hedgerows and in some cases woodland, other characterising elements are also present in some instances in the form of built development. The further inland the greater the influence on character these elements have as opposed to the character being markedly defined by seascape views.
- 2.14 Viewpoint 42: Mynydd Bodafon (APP- 271) usefully shows part of the landscape where the ZTV is shown to spread further inland and the degree to which its character is defined by the inherent elements and patterns of the landscape. At ground level it may be possible to see AyM from open areas but it would not redefine the character of the inland parts of this landscape based on professional opinion.
- 2.15 The viewpoints have been selected to show the views from where AyM would be most visible (coastal or elevated) to assist in providing a clear understanding of the proposals and where there is likely to be a significant effect. They are therefore not representative of views obtained from within large parts of the eastern section of the loA AONB, where similar visibility does not arise. They are also not representative of large parts of the loA AONB which would have no visibility of AyM.
- 2.16 The loA AONB is predominantly coastal but also includes inland areas that form the backdrop to the coast. Some of its characteristics and special qualities include expansive views that may be over the seascape as well as the relative tranquillity, relative openness and exposure the seascape can evoke on the perception of the loA AONB.
- 2.17 Expansive views from within the loA AONB are noted within the Management Plan Review to include not just views out to sea but 'by virtue of their height, scale and sheer size, the mountains of Snowdonia dominate the majority of the AONB's landscape.' Expansive views are described as occurring across the Irish Sea (potentially including AyM) but they are also described as including 'Views across those areas of Anglesey not included in the AONB designation; Local views, for example across the Menai Strait; and Distant views, such as to the Great Orme, Snowdonia, Llyn Peninsula and the Isle of Man, often described as "borrowed landscapes". The majority of the expansive views that include these features would not be affected by AyM.
- 2.18 The Applicant noted that it is not just the expansive seascape that is important from areas around the Isle of Anglesey as a great deal of coastal character and quality of the loA AONB is derived from the interaction between the sea and the land, which occurs at the coast, and the diversity of this interaction be it in the form of bays, cliffs or beaches. People are able to appreciate this directly and at close range rather than just looking at long distance views out to sea.

- 2.19 The Applicant found that the significant effects relation the IoA AONB occur in very specific areas and that seascape is less of a defining feature inland. Large parts of the IoA AONB would be unaffected.

SNP

- 2.20 The Applicant noted that NRW and LUC disagree with the findings of its assessment relating to the Northern Uplands landscape character area (LCA-01). The northerly areas of this LCA are those that are at closest proximity to the AyM 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, including offshore wind farms, 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 as part of their setting would not result in a marked change to their character.
- 2.21 The Applicant noted that NRW and LUC made similar comments in its Section 42 consultation response and the Applicant has therefore set out in Chapter 10 of the Environmental Statement (AS-027) a detailed evaluation of all areas of LCA-01 that are in the ZTV setting out why the magnitude of change was not sufficient to give rise to a significant effect on landscape character.
- 2.22 Landscape character effects are not derived purely as a result of the visibility of something that is apparent in views in a single direction from the LCA but are also, in the main, comprised of the pattern of the elements within them, which makes them distinct and recognisable.
- 2.23 Whilst the Applicant agrees with LUC and NRW that existing coastal development is of a different scale and form to the proposed development it does indicate a human influence over the wider landscape of the intervening coastline. In addition, the existing offshore wind farms are visible from much of the LCA that would also gain visibility of AyM so that changes in the contextual character in this part of the contextual views are incremental.
- 2.24 The Applicant considers that it is the inherent pattern of elements in the landscape in question that constitute its key characteristics and where these are strongly defined, as is the case in the northerly parts of LCA 01, external visual influences are less likely to result in a significant effects on landscape character. Within these areas views out to sea towards AyM would also be part of contextual views that in many instances include the more dramatic, mountainous skyline to the north as part of the wider influential context.
- 2.25 Views across the remotest parts of SNP would not be affected by the proposed development as they are found to the north of LCA 01.

Great Orme Heritage Coast

- 2.26 The Applicant noted that Conwy County Borough Council, Great Orme Country Park and Local Nature Reserve Management Plan 2011-2016 does not set out any specific special qualities associated with its Heritage Coast status. However, the plan notes aspects of the Great Orme landscape that are considered important and the relevant aspects of this are drawn out in the assessment of LCA C10, where it is concurrent with the same geographical area as the Great Orme Heritage Coast.
- 2.27 The Applicant noted that AyM would occur within the setting of the Great Orme and would therefore affect views from it as part of its context, which also includes many other components including operational offshore wind farms and a large expanse of open sea. The relevant management plan particularly notes views of SNP as being important and these would be unaffected by AyM. The other defining characteristics and qualities include its steeply sloping whale-backed form, the cemeteries and tourist infrastructure and its role as a landmark and natural limit of the sprawl of Llandudno and these would remain unaffected by AyM. The effects of AyM on the character of the Great Orme would not physically change the pattern of elements but would occur as part of its context, which contains many contextual features.

- 2.28 The Applicant confirmed that the effects on landscape character are assessed as Moderate Significant whilst the effects on viewpoints on the Great Orme are in some cases assessed as Moderate-Major. This finding reflects the differences between the assessment of visual effects, which consider only the impact on the view in one direction, whilst the assessment of the effects on landscape character takes into account many other factors as described previously.

Assessment of viewpoints (VPs) (including VPs 1, 2, 3, 23, 36 and 44)

- 2.29 The Applicant confirmed that the distances of VPs 1, 2 and 3 to the array area ranges from 34.1km to 28.7km and the horizontal field of view occupied by the array area as part of wide panoramic views over open seas and in some cases diverse landscapes ranges from 12-14 degrees. Whilst it is agreed that offshore wind farm development would be a new component of these views it is not considered that the impacts would be of such magnitude as to make them significant even with the high or medium-high sensitivities assessed for these viewpoints
- 2.30 The Applicant considers that although the turbines would be noticeable in the seascape the magnitude of change would be low and the effects would not be significant based on professional judgement. The Applicant reiterated that the extent of the development as a minor part of the overall seascape needs to be considered and the assessment carried out at the viewpoints. At Point Lynas the open seascape represents a very wide panorama of which the development would be a minor part with large areas of open seascape remaining as part of these views.
- 2.31 In relation to VP 23, the Applicant noted that the difference between the Applicant's and LUC's assessment is minor and that LUC do not consider there to be a significant effect on Rhyl.
- 2.32 The Applicant also noted that VP 36 already includes existing offshore wind farms in the view, which were more obvious when undertaking the assessment photography during excellent visibility conditions, which means that the magnitude of change in views has been assessed as medium-low. The Applicant compared this with VP 38 which had lower levels of development characteristics and higher relative wildness and tranquillity. This means that the magnitude of change from VP 36 is less than VP 38. The Applicant noted NRW's disagreement but confirmed that even if a significant effect was found for VP 36, then the same conclusion in relation to LCA 01 would have been reached.
- 2.33 The Applicant confirmed that VP 44 is not publicly accessible and is currently accessed by a somewhat precarious route around the top of the castle walls. The accessible areas are further south so that views of AyM would be partially obscured by intervening castle walls. The Applicant confirmed that AyM WTGs would be partially screened from view by intervening landform and appear in a part of the view that is highly influenced by recreational and other development features. The AyM array would be separate from the most scenic parts of the view which include the Great Orme, the castle walls back-dropped by the mountainous high ground of SNP and the settlement of Beaumaris. These factors increase the capacity of this view to accommodate AyM and ensure that the effects are non-significant.

Artificial lighting / night-time effects

- 2.34 The Applicant confirmed that lighting would need to comply with Civil Aviation Authority (CAA) requirements and there would be significant effects on night-time views from the summit and north-eastern parts of the Great Orme.
- 2.35 The Applicant explained that the existing Gwynt y Môr Offshore Wind Farm (GyM) WTGs are operating with 2000 candela aviation lighting and AyM would be seen as having reduced lighting by comparison. The Applicant stated that Requirement 3(2) of the draft DCO provides that the lowest permissible lighting should be used and the Applicant confirmed that there would be sensors on the WTGs to control when this would occur, when visibility is sensed as being less than 5km. During periods of low visibility the lights would be on at 2000 candela, however, due to the incidence of high humidity such as fog that would result in the low visibility being sensed, the light emitted would not be 2000 candela by the time it reaches the coast. It would be less due to the intervening conditions. It is possible that higher levels of light than 200

candela could reach the coast, however it is considered that this would occur infrequently. The Applicant noted LUC agreed with the approach to the lighting assessment.

- 2.36 The Applicant explained that the CAA standards require the light to be emitted and concentrated around 3 degrees from the horizontal with reduced intensity required below this to avoid impacts on people using the marine environment. The result of this is that the lighting visible at lower elevations would be less than assessed in the SLVIA. The Applicant confirmed that night time effects on parts of the Great Orme would remain significant.

Draft DCO and parameters (including Requirement 2)

- 2.37 The Applicant noted MDS A and MDS B were discussed and agreed with the NWPLAs and NRW during the Evidence Plan process and are agreed to represent the worst case scenario for assessment.
- 2.38 The Applicant does not consider that the inclusion of the table included in Appendix Q of the Applicant's response to the ExA's first written questions (REP1-007) would be helpful to include in the DCO. The DCO already contains parameters limiting the maximum quantity of turbines, the maximum total rotor swept area, maximum rotor diameter, maximum tip height and minimum lower tip height. The Applicant considers that these parameters in the DCO are sufficient and that the dimensions in the table are a set of maximums that have been calculated from these controlled parameters.
- 2.39 The Applicant confirmed that all turbines will have the same rotor diameter and that the DCO mentions that the WTGs should be in accordance with the ES and the assessment in the ES is based that all WTGs being the same general arrangement.

Array area and mitigation matters

- 2.40 The Applicant explained that the turbine positions shown for the assessment of MDS A and B are not proposed layouts. The final layout of the WTGs will be determined post-consent and will largely be dictated by technical matters such as stand off from shipping lanes, search and rescue requirements, archaeological exclusion zones and other technical factors. The Applicant also confirmed that the Crown Estate Agreement for Lease (AfL) area covers an area right up to the GyM boundary. The GyM WTGs are at this boundary. As a result some distance is needed between AyM WTGs and GyM WTGs. The Applicant considered that increasing the density of WTGs to the eastern part of the AfL area would not allow for sufficient distance between AyM and GyM. The Applicant also repeated its written submission that the overall array area is comparatively small and densely packed compared to existing schemes or other proposed schemes against which it is likely to be competing for a Contract for Difference (CfD).
- 2.41 The Applicant noted NRW's position that a substantial reduction in the size/scale of AyM would be needed to reduce the significant SLVIA effects. The Applicant noted that this reflected White Consultant's 3 Stage Report¹ (the White Report) issued by NRW in March 2019. The Applicant noted that the White Report is a technical guidance note, not policy and was not subject to consultation. The Applicant has had regard to the report and it was part of the Expert Topic Group (ETG) discussions and influenced the decision to reduce the western extent of the array area. The Applicant mentioned the report has been considered where possible in the ES.
- 2.42 The Applicant also noted that it had set out its detailed response to the aspects of the White Report that NRW suggested should be the basis for determining a substantial reduction in the array in its Deadline 3 submission (REP3-016).
- 2.43 The Applicant noted the White Report is designed to avoid significant effects on high sensitivity coastal visual receptors and in order to avoid such effects from the AONBs and SNP WTGs of up to 332m to tip would need to be 44km away from shore. WTGs of 282m to tip would have to be more than 41.6km away. The AyM AfL site is in the distance range where using the approach in the White Report significant effects would arise for WTGs of 145m to tip. The Applicant noted

¹s Stage 3 Report, Seascape & visual sensitivity assessment for offshore wind farms (White, S. Michaels, S. King, H, 2019)

that the most recent offshore wind farm to be installed in North Wales, Burbo Bank Extension (in 2016), has WTGs of 187m to tip. Turbines in this size range have not been available on the market since then.

- 2.44 The Applicant explained that in determining the size of the AyM WTGs it must have regard to the turbines which are available on the market and the increasing WTG size as well as maximising power output, given the urgent need for new renewable energy generation in the UK. The Applicant has sought to make changes to the array area where possible removing turbines from the areas where the White Report considers there to be the higher levels of sensitivity. The Applicant does not consider that a small number of turbines to the north of GyM, which appears to be NRW's suggestion based on the White Report, would be an economically viable and deliverable project. Similarly, an array area located entirely within the medium magnitude of effect buffer area for 226-300m turbines as suggested by NRW with reference to Figure 3 of its Written Representation (REP1-080) would still be seen spread across a similar horizontal extent and give rise to significant effects and would not be economically viable or deliverable as set out in the Applicant's Deadline 3 submission (REP3-016).

Cumulative matters

- 2.45 The Applicant is aware that Mona Offshore Wind Farm was provided with a Scoping Opinion in June 2022 and that in accordance with the Planning Inspectorate's Advice Note 17 it would be a Tier 2 project.
- 2.46 The Applicant confirmed there would need to be a defined project with sufficient information in order to undertake a meaningful assessment. The Scoping Opinion does not consider a project boundary that has been refined beyond the offshore area tendered and does not include any certainty on the export cable corridor, landfall and onshore cables and substation so the scheme is not sufficiently defined at this stage. The Applicant confirmed that it will keep this under review.

Potential off-site enhancement matters

- 2.47 The Applicant confirmed some initial discussions have taken place between NRW and the NWLPAs about the scope and principles for a landscape enhancement fund to address the impacts of the scheme on designated landscapes. The Applicant is willing in principle to put in place a landscape enhancement fund but this is subject to reaching agreement with the other parties about what this will cover and the size of the fund. The Applicant is hoping to be in a position to update the ExA at Deadline 4.

3 CULTURAL HERITAGE

Identification of harm

- 3.1 The Applicant confirmed that when 'negligible' is used in the ES, this means no effect. The Applicant noted that this is agreed by Gwynedd Archaeological Planning Service (GAPS). The Applicant also confirmed its approach to harm within the NPS tests and EIA significance. It noted that none of the effects of AyM would be considered substantial harm for the purposes of the NPS.

Penrhyn Castle and the Penrhyn Castle Registered Historic Park and Garden

- 3.2 The Applicant confirmed that AyM would introduce something new to the view but the key question is whether the scheme would impact on the ability to appreciate the significance of the asset. The Applicant considers that the sea is a part of the wider setting and there is a historic relationship with the sea. However, the ability to appreciate these linkages would not be impacted by the views of WTGs in the distance.
- 3.3 The Applicant considers that the significance of the registered park and garden lies primarily in its role as the setting for the castle, and does not consider this to be affected. The park does have a setting that includes the sea, but also includes the landward side with the backdrop of SNP playing a prominent part of that setting. The historical setting, in relation to the estate and

its ownership and connection to the slate mining areas, with associated infrastructure such as Port Penrhyn is not affected, whether or not the WTGs are visible from the registered park and garden.

- 3.4 The value of the registered park and garden also lies very much in its internal arrangements and planting. While there are more open areas, with specimen trees, planting beds and grassy areas to the north and where longer views which include the Menai Strait are possible, much of the garden is focussed more inwardly or in association with the castle, taking the form of wilderness walks, with dense tree planting and designed glades or more formal arrangements such as the walled garden. The ability to enjoy the registered park and gardens in terms of its historic evolution, with planting and spaces exemplifying the changing fashions over the last two centuries is not impaired even where the WTGs will be visible. The role the garden plays as part of the setting of the castle, including approaches along the designed drives, is not affected.
- 3.5 The Applicant noted that much of the disagreement with GAPS is based on professional judgment. The Applicant also noted that Cadw agreed with the Applicant's position in respect of the castle and registered park and garden which is reflected in the SoCG (AS-046).

Beaumaris Castle

- 3.6 The Applicant stated that a large part of the importance of the castle is how it is located on the Menai Strait. The Applicant does not consider that AyM will affect the ability to understand the importance of the location on the Menai Strait. The Applicant recognised that the castle has a defensive function, and the visibility to and from the castle is important. Although AyM WTGs will be present in some views, other modern development is also visible. The Applicant noted that it is the availability of views that is important in this regard, not what is specifically in that view. Views to the castle are important in understanding its imposing and formerly controlling nature, but these are not affected. The castle is also obscured by the modern town on approaches from the west and the castle no longer occupies a directly coastal position in any case. The ability to appreciate its topographic location on the northern side of the Menai Strait and its former relationship with the sea for access and supply is unaffected. The Applicant noted the agreement of GAPS in relation to this position given the reduced array area.

Conwy Castle

- 3.7 The Applicant noted that GAPS agreed that there are no significant effects on Conwy Castle in Environmental Impact Assessment (EIA) terms and the viewpoint used from the tower is similar to the effect from the town wall.

Puffin Island Scheduled Monastic Site and Penmon Registered Landscape of Outstanding Historic Interest

- 3.8 The Applicant acknowledged that the introduction of WTGs would be a noticeable addition to seascape. However, the Applicant considers that the ability to understand the importance of the site is not impacted by the development. The Applicant considers that the view is in the context of the wider landscape and that it doesn't affect the ability to understand the importance of the monastic settlement. The expanse of sea and its role in the appreciation of the isolation of the monastic site can still be appreciated even with WTGs and the importance of the site can still be understood.
- 3.9 The Applicant also noted concerns raised by GAPS in relation to VP 8 and considered that this is primarily a landscape point as the Applicant does not consider the view of the island is in itself an important factor in understanding the importance of the monastic site (nor is the monument visible at this range in this view).

Creuddyn and Conwy Registered Landscape of Outstanding Historic Interest

- 3.10 The Applicant stated the effect on this asset is negligible on the basis of its historical value and noted the agreement of GAPS that the effect is not significant in EIA terms.

Llandudno Conservation Area

- 3.11 The Applicant noted concerns raised by Conwy County Borough Council (CCBC) in relation to the importance of seaward views in Llandudno. The Applicant explained that the entire conservation area needs to be considered in the assessment which is why there is a different assessment to Llandudno Pier. The Applicant stated that there is clear juxtaposition in relation to the pier and WTGs which impacts the ability to understand some aspects of the asset. In contrast, a wider area was considered for the conservation area and the Applicant considered there to be a clear difference between these assessments. The Applicant stated that although there are some link roads leading from the centre of the conservation area to the sea, WTGs are already visible on these roads. The ability to understand the conservation area or the ability to appreciate the various interests in the listed buildings with it, is not affected by the additional WTGs. The Applicant recognised there is an effect but it is not significant so there is a difference in assessment for the conservation area and the pier.

Mitigation

- 3.12 The Applicant stated that there is an opportunity to incorporate aspects relating to cultural heritage into the landscape enhancement package. There may also be opportunity to deliver cultural heritage matters as part of the tourism fund. The Applicant does not consider there are any significant effects other than the pier so mitigation measures are not required. The Applicant also confirmed that it would be difficult to directly mitigate the significant effects on the pier.

4 SOCIO-ECONOMICS AND TOURISM

Tourism and Llandudno's built heritage

- 4.1 The Applicant noted that there is no evidence to support concerns that AyM will lead to a reduction of visitors and people staying in hotels in Llandudno. The Applicant highlighted that no representations have been made from businesses engaged in tourism and that representations were made in relation to GyM which suggests that concerns did not materialise.
- 4.2 The Applicant also noted that the assessment was made on a precautionary basis and identified a small risk identified at the final stage of construction and initial period of operation. However, there is no evidence from studies of other offshore wind farms in the UK (including existing wind farms off the coast of North Wales) pointing to negative impacts on local tourism economies, which suggests AyM will not have an impact on tourism. The risk identified in the ES is small given the nature of the scheme and strength of tourist economy in Llandudno.
- 4.3 The Applicant stated that the small risk identified is as a result of when the AyM WTGs become visible. The short term impact, if it were to arise, would decay over a period of a couple of years. The Applicant noted that evidence suggests that behaviour is altered once construction is complete. The Applicant also noted the potential for other visitors to visit Llandudno if some existing visitors are discouraged in the short term.

Community benefit fund

- 4.4 The Applicant has conducted an initial consultation with various parties and received responses which suggests some framework ideas for a community benefit fund. The Applicant noted that it would like to be led by the community about what sort of projects it can help with and how it would run. The Applicant also wants the fund to be community led and the Applicant would not be involved in the running of the fund. The Applicant would like to present some of the ideas it has received and run further consultations on these.
- 4.5 The Applicant also mentioned that the fund is not directly needed to mitigate the effects of the scheme and so is not a planning consideration that should weigh in the balance of the decision making process.

Tourism fund

- 4.6 The Applicant confirmed that discussions are taking place with CCBC in relation to a tourism fund. The Applicant considers the risk of tourism effects to be low and any impacts would be temporary and relate to a limited geographical area. The Applicant stated that it does not therefore consider the fund is needed to address the low risk of tourism being adversely impacted. The Applicant is looking into how this can be delivered.

Outline Skills and Employment Strategy update

- 4.7 The Applicant confirmed that a number of meetings with interested parties and other bodies have been held. The Applicant mentioned it is collating information from stakeholder engagement meetings and drafting a plan.

5 STATEMENTS OF COMMON GROUND

- 5.1 The Applicant confirmed that further SoCGs are anticipated to be agreed and submitted by Deadline 4. The Applicant provided the following update on SoCGs:

- (a) CCBC: SoCG will cover non-seascape issues and a completed draft has been provided to CCBC for consideration.
- (b) Isle of Anglesey County Council: SoCG has been submitted to the ExA (REP3-018).
- (c) NWLPAs: SoCG on seascape issues will be submitted. The Applicant confirmed Flintshire County Council has withdrawn from the process so will not be included in the SoCG. The Applicant has provided a revised draft SoCG to the NWLPAs so it is with the NWLPAs for consideration. It is hoped an agreed draft will be submitted by D4.
- (d) Community Councils: No substantive responses have been provided by the affected community councils so the Applicant does not consider that SoCGs are necessary.
- (e) NRW: Three SoCGs with NRW have been provided (REP3-019) (REP3-020) (REP3-021). The majority of matters are agreed with main matters of ongoing discussion being SLVIA issues.
- (f) Isle of Man: Draft SoCG has been provided and discussions are ongoing. It is hoped an agreed draft will be submitted by Deadline 4.
- (g) RSPB: Draft SoCG is to be reviewed by RSPB. The Applicant is unable to confirm when this is likely to be submitted.
- (h) North Wales Wildlife Trust: Draft SoCG has been provided and most aspects have been agreed. It is hoped an agreed draft will be submitted by Deadline 4.
- (i) Maritime and Coastguard Agency: SoCG submitted at Deadline 2 (REP2-050) and most matters are agreed.
- (j) UK Chamber of Shipping: Draft SoCG has been provided and it is hoped that an agreed draft will be submitted at Deadline 4.

- 5.2 The Applicant also provided an update on negotiations with other statutory undertakers. It confirmed that an agreed set of protective provisions for SP Energy Networks has been included in the latest version of the draft DCO and active negotiations are ongoing with National Grid, Network Rail and Dŵr Cymru / Welsh Water. The Applicant is also continuing negotiations with Rhyl Flats Offshore Wind Farm (RF) in relation to protective provisions and with North Hoyle Offshore Wind Farm in relation to a cable crossing agreement.

- 5.3 The Applicant reiterated its position in relation to RF and wake loss. The array site is more than 5km from RF which is in accordance with the Crown Estate's siting criteria and the Applicant's understanding is that this is a suitable distance. The Applicant noted RF's submissions in relation to NPS EN-3 that site selection should avoid or minimise loss on other offshore industries. However, the Applicant's position is that this does not apply to other offshore wind

farms otherwise it would have included this in the wording in the relevant paragraphs of the NPS.



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