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Dyddiad / Date: 03/08/22

Dear Mr Morrison,

ORML2233 Application from RWE for a Marine Licence under Part 4 of the Marine and Coastal Access Act 2009 to undertake the Awel y Mor Offshore Wind Farm

Further to your invitation to comment on the Marine Licence Application submitted by Awel y Mor Offshore Wind Farm Limited to undertake the above stated works, the Isle of Anglesey County Council (hereafter referred to as 'IACC') has now had the opportunity to review the Application and has the following comments.

1. Interface between Marine Licence and Development Consent Order

The IACC confirms that it has registered as an Interested Party for the application for Development Consent Order (DCO) that has been made under section 37 of the Planning Act 2008 (hereafter referred to as '*the Order*') for the Awel y Mor Offshore Wind Farm Project to the Planning Inspectorate and will participate fully within that examination process.

From our experience and involvement in other NSIP proposals, the interface between the Welsh Ministers and NRW in terms of, determining responsibilities and accountabilities during the construction/operational period and decommissioning for the DCO and Marine Licence and effective collaboration arrangements will be of critical importance from a regulatory perspective.

A number of proposed works have both terrestrial and marine elements. Therefore having consistency and clarity across the marine elements which forms part of any DCO and Marine Licence consents will be critical to ensure effective discharge, monitoring, and enforcement arrangements.

2. Effects on shipping, navigational and recreational interests

The IACC has an interest in maritime harbours and navigation around Anglesey from three standpoints:

1. *The Council is a statutory harbour authority for the ports of Amlwch, Beaumaris and Menai Bridge and also manages approximately 450 moorings alongside the south east and eastern coastline.*
2. *In terms of its responsibilities regarding the economic wellbeing of the Isle of Anglesey, the Council has an indirect interest in the continued success of the Port of Holyhead (owned and operated by Stena Line Ports Ltd); and*
3. *In relation to its interests in promoting local tourism, the Council has an interest in recreational navigation using inshore waters and harbours of the Isle of Anglesey.*

Having reviewed Chapter 9: Shipping and Navigation of the ES, the Council notes that RWE has engaged at pre-application stage with a range of National and Local Stakeholders with an interest in Shipping and Navigation. The Council wishes for this engagement to continue to ensure that any potential impacts identified are appropriately reduced and/or managed.

IACC considered that the main effect of the construction phase will be an increase of commercial traffic, made up mainly of work boats and crew transfer vessels that support the offshore installation vessels with only a slight increase in traffic when the site is operational.

IACC considers it is imperative that navigational safety in this busy section of sea is to be maintained during all phases of the project. The Council is satisfied that the main points of relevance regarding commercial shipping and recreational navigation that will have a bearing on the eastern approaches of the Menai Straits is satisfactorily covered within the ES, chapter 9 in particular..

IACC notes the detail of the outline mitigation measures confirmed in the Navigational Risk Assessment (Volume 4, Annex 9) and summarised in paragraph 9.9 of Chapter 9. The IACC is satisfied that the detail of the mitigation measures which would be employed would form consultation with the Maritime and Coastguard Agency (MCA) navigation safety branch and other relevant statutory stakeholders, dependent on the final design. Although full consideration needs to be given at the final design to all users to ensure minimal impact, IACC are satisfied with the temporary deviation measures being proposed within the ES.

IACC strongly encourages this engagement to continue throughout all phases of the development in order to ensure that all key stakeholders are kept up-to-date about the project and that they are able to influence and advise as appropriate to ensure that their interests are protected and maintained. This engagement needs to include consideration for all marine craft including Ferry vessels and cruise ships, workboats and fishing vessels and recreational craft.

- Holyhead Port

With nearly 500,000 vehicles and 2 million foot passenger going through the Port each year, Holyhead Port is the second busiest ferry port in the UK. It handles over 70% of all road traffic moving between Ireland and Wales and is supported by the E22 arterial route between mainland Europe and Dublin. Stenaline Ports Ltd own and operate the port of Holyhead. Holyhead port is a non tidally restricted and is operational 24hrs / 365 days per year.

The port has a wealth of experience in specialist handling of large project related cargoes. It has a deep-water berth as well as smaller berths and standage areas. The Port's experience includes serving windfarm vessels, jack-up rigs and support vessels, including handling abnormal Indivisible Loads. Recently, Stena Line Ports Ltd constructed a Manufacturing and Assembly Hall for the green energy supplier, Minesto Ltd, to enable construction of their offshore power generation equipment.

Stena Line Ports Ltd have recently applied for a Harbour Revision Order (HRO) for the expansion of the Port. The expansion principally comprises of the reclamation of land to provide new berths for vessels and associated landside areas for Port related uses. Two areas of land would be reclaimed; the Salt Island Expansion to serve as a new multi-purpose area for freight traffic, heavy and abnormal loads and cruise ships; and the Pelham Patch

Development to serve as a smaller new multi-purpose berth. The additional facility will guarantee a further 23 acres of available space, including a 370m long deep-water quay capable of accommodating cruise ships and other large vessels. With the current timeline, assuming funding was available, the port expansion project would be completed by June 2023.

The IACC through its direct engagement with the applicant is seeking a commitment to maximise the use of Holyhead Port during construction, operation and maintenance phases of the development in order to maximise the social-economic benefits of the project to Anglesey.

3. Seascape, Landscape and Visual Impact Assessment

The IACC have assessed the Environmental Statement Report Volume 2, Landscape and Visual Impact Assessment which presents the Landscape and Visual Impact Assessment (LVIA) for the onshore elements of the proposed development.

It is considered that the development will have a significant adverse impacts on views of the seascape from the Ynys Môn Area of Outstanding Natural Beauty (AONB) and a harmful effect on a number of AONB special qualities. It is not considered that the development would be consistent with the conservation and enhancement of natural beauty. Adverse effects on the designated landscape and seascape as a setting and feature of the Ynys Môn AONB, relate to the likely visibility of the proposed Offshore Wind Farm (OWF) alone and cumulatively with other OWFs.

The introduction following pre-application consultation of design mitigation to reduce the extent of the horizontal and vertical field of view and number of turbines has reduced the area and number of receptors from which significant adverse effects would be experienced; however, significant effects are predicted for a substantial portion of the east coast, recreational routes within such as the Wales Coast Path and properties within coastal communities.

The situation results in the requirement for consideration of compensation measures, including enhancement of features to balance the effects of adverse impacts. These should be focused upon the north-east part of the Island, especially the coast, where the significant effects will be concentrated.

- Dark Skies

IACC has a vision to obtain Dark Sky Community Status via the International Dark-Sky Association (IDA). In view of achieving and protecting such potential future status, it is important that any lighting associated with the project be kept to the minimal level required to maintain navigational safety within the zone.

It is noted that a specific condition is imposed on the draft Order that requires the approval an Environmental Light Management Plan prior to the commencement of the offshore Works. Given that navigational safety and lighting is also matter for the marine licence the Council

requests that consideration is given to adopting a single Environmental Light Management Plan under both regimes to ensure consistency.

We thank you for consulting with the Council. Please do not hesitate to contact us should you wish to discuss our comments further or wish any clarification on any of the comments made.

Yn gywir / Yours sincerely



Christian Branch

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