



Awel y Môr Offshore Wind Farm

Statement of Common Ground 1 – North Wales Local Planning Authorities (Seascape, Landscape and Visual Impacts Assessment)

Closing Submission

Date: 17 March 2023

Revision: D

Document Reference: CS.7

Application Reference: N/A



REVISION	DATE	STATUS/ REASON FOR ISSUE	AUTHOR:	CHECKED BY:	APPROVED BY:
A	October 2022	First issue to LPAs	GoBe Consultants	RWE	RWE
B	January 2023	Deadline 4	GoBe Consultants	RWE	RWE
C	March 2023	Deadline 8	GoBe Consultants	RWE	RWE
D	March 2023	Closing Submission	GoBe Consultants	RWE	RWE




RWE Renewables UK Swindon Limited


Windmill Hill Business Park
Whitehill Way
Swindon
Wiltshire SN5 6PB
T +44 (0)8456 720 090

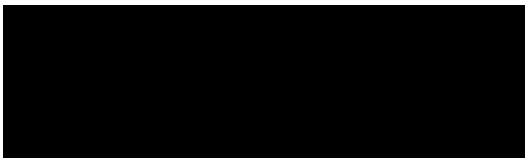


Registered office:
RWE Renewables UK Swindon Limited
Windmill Hill Business Park
Whitehill Way
Swindon

Signatories

Signed	
Name	Paul Mead
Position	Development Manager
For	Denbighshire County Council

Signed	
Name	Ceri Thomas
Position	Principal Planning Officer
For	Conwy County Borough Council

Signed	
Name	Christian Branch
Position	Head of Service – Regulation and Economic Development
For	Isle of Anglesey County Council

Signed	
--------	---

Name	Gwawr Hughes
Position	Development Control Team Leader
For	Gwynedd Council

Signed	
--------	--

Name	Jonathan Cawley
Position	Director of Planning & Land Management
For	Eryri National Park

Signed	
--------	---

Name	Karen Algate
Position	Senior Consents Manager
For	Awel y Môr Offshore Wind Farm Limited (the Applicant)

Contents

1	Introduction.....	6
1.1	Background.....	6
1.2	Approach to SoCG	7
1.3	The Development	7
2	NW LPA Remit as Interested Parties	9
2.1	Introduction	9
2.2	Consultation Summary	9
3	Agreements Log.....	13
3.1	Seascape, Landscape and Visual Impact Assessment.....	14

Tables

Table 1:	Consultation undertaken with the NW LPAs pre-application on SLVIA matters.	9
Table 2:	Position status key.....	13
Table 3:	Status of discussions relating to SLVIA.....	14

1 Introduction

1.1 Background

- 1 This Statement of Common Ground (SoCG) has been prepared between Awel y Môr Offshore Wind Farm Limited ('the Applicant') and the joint North Wales Local Planning Authorities (the 'NW LPAs') to set out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Awel y Môr Offshore Wind Farm ('AyM') as related to Seascape, Landscape and Visual Impact Assessment (SLVIA).
- 2 The need for a SoCG between the Applicant and the NW LPAs was set out within Rule 6 letter issued by the Examining Authority (ExA) on 23 August 2022. Following detailed discussions undertaken through pre-application consultation, the Applicant and the NW LPAs have sought to progress a joint SoCG on SLVIA matters. To date, consultation responses from the NW LPAs on SLVIA matters have taken the form of joint statements via the Evidence Plan process, and as reflected in their joint response to the statutory consultation under Section 42 of the Planning Act 2008.
- 3 It is the intention that this document provides the ExA with a clear overview of the level of common ground between the parties. This document will facilitate further discussions between the Applicant and the NW LPAs and will be updated as discussions progress during the Examination.
- 4 The Interested Parties (IPs) forming the NW LPA group are as follows:
 - ▲ Denbighshire County Council (DCC);
 - ▲ Conwy County Borough Council (CCBC);
 - ▲ Isle of Anglesey County Council (IoACC);
 - ▲ Gwynedd Council (GC); and
 - ▲ Eryri National Park (ENP (formerly Snowdonia National Park)).

1.2 Approach to SoCG

5 This SoCG has been developed during the pre-examination and examination phases of AyM. In accordance with discussions between the Applicant and the joint NW LPAs, the SoCG is focused on the SLVIA and related topics. The SoCG is structured as follows:

- ▲ **Introduction:** Outlining the background to the development of the SoCG;
- ▲ **NW LPA remit:** Describing the remit of the NW LPAs, the relevance of their interest in the Application, the main areas of discussion within the SoCG and a summary of consultation to date; and
- ▲ **Agreements Log:** A record of the positions of the Applicant alongside those of the NW LPAs as related to SLVIA and related topics of discussion and the status of agreement on those positions.

1.3 The Development

6 The Application is for development consent for the Applicant to construct and operate the proposed Awel y Môr project under the Planning Act 2008.

7 AyM will comprise up to 50 Wind Turbine Generators (WTGs) and will include infrastructure that is required to transmit the power generated by the WTGs to the offshore substation via inter-array cables, before being transmitted via export cables to the proposed onshore substation located to the west of St Asaph Business Park (SABP) and then to the existing National Grid Bodelwyddan substation.

8 The SLVIA is concerned with the assessment of the offshore development. The key offshore components of AyM will include:

- ▲ WTGs with associated foundations and scour protection;
- ▲ Inter-array cables and associated cable protection;
- ▲ Up to two Offshore Substation Platforms (OSPs) with associated foundations and scour protection;
- ▲ Up to two offshore export cable circuits and associated cable protection;
- ▲ A meteorological mast (met mast);

- ▲ Permanent Vessel Moorings (PVMs) and
- 9 More details on the offshore aspects of the proposed development are described in the Environmental Statement (ES) Volume 2, Chapter 1: Offshore Project Description (APP-047).

2 NW LPA Remit as Interested Parties

2.1 Introduction

- 10 The NW LPAs have all been consulted on the proposed development throughout the pre-application phase, having participated in the Seascape, Landscape and Visual Impact Assessment (SLVIA) Expert Topic Group (ETG) under the auspices of the Evidence Plan, as well as via statutory consultation under Section 42 of the Planning Act 2008.
- 11 DCC is the sole host authority for the onshore elements of AyM. The project elements of relevance to this SoCG are the offshore elements of AyM visible from land.

2.2 Consultation Summary

- 12 Table 1 This section briefly summarises the consultation that the Applicant has undertaken with the NW LPAs including both statutory and non-statutory engagement during the pre-application and post-application phases.

Table 1: Consultation undertaken with the NW LPAs pre-application on SLVIA matters.

DATE AND TYPE	DESCRIPTION OF CONSULTATION
ETG - 10/12/2019	Kick-off meeting introducing the SLVIA and LVIA ETG to the AyM project, the Applicant and the Evidence Plan process. An introduction was given to the Planning Act process, the purpose of the Scoping Report and the ongoing site selection process. Key discussion points on the SLVIA and LVIA topics were: <ul style="list-style-type: none">▲ The study area;▲ The baseline data sources that would be used to characterise the receiving environment;▲ The proposed methodology, including the use of photography from representative viewpoints to be agreed; and

DATE AND TYPE	DESCRIPTION OF CONSULTATION
	<ul style="list-style-type: none"> ▲ The appointment of an independent consultancy to advise the local authorities on LVIA and SLVA matters.
<p>ETG - 01/10/2020</p>	<p>Project update meeting to update ETG members after receiving the Scoping Opinion. The aims of the meeting were to:</p> <ul style="list-style-type: none"> ▲ Update stakeholders on the ongoing site selection and project refinement process; ▲ Discuss the scope of the SLVIA and the MDS approach taken; ▲ discuss feedback on the proposed representative viewpoint locations; ▲ Outline the approach to the night-time lighting assessment; and ▲ How the archaeology and cultural heritage technical topic relates to the SLVIA.
<p>ETG - 25/01/2021</p>	<p>Meeting with the aim of providing a project update in the site selection, with a focus on the offshore array area and gaining feedback on the refinement options available. Key discussion points were:</p> <ul style="list-style-type: none"> ▲ The refinement off the array area from the initial Area of Search identified at the Crown Estate extensions leasing round stage; ▲ The options available for reduction of the array area; ▲ Development of MDS layouts for consideration in the SLVIA; ▲ The proposed viewpoint locations; and ▲ Presentation of comparative wirelines from selected viewpoints.
<p>ETG - 29/01/2021</p>	<p>Follow up of the meeting above on 25/01/2021 with the archaeology and cultural heritage sub-group. Further discussion was had around the viewpoints proposed in key cultural heritage sites, including Beaumaris, Bangor Peir, Colwyn Bay and Llandudno.</p>

DATE AND TYPE	DESCRIPTION OF CONSULTATION
ETG - 10/02/2021	Follow up with the SLVIA ETG on the comparative wireline images circulated previously. The aim of the meeting was to present and discuss the alternative MDSs identified for assessment and to gain ETG feedback on these alternatives in terms of which comprises the worst-case for SLVIA.
Statutory Consultation carried out under Section 42 of the Planning Act 2008	Combined and individual consultation responses provided by the North Wales LPAs.
ETG - 04/11/2021	<p>Project update meeting following the receipt of stakeholder comments on the PEIR received during the statutory consultation and to propose how the Applicant proposed to address this feedback in the final ES. Key discussion points were:</p> <ul style="list-style-type: none"> ▲ The assessment methodology, including viewpoints and the assessment of the MDS; ▲ Seascape and landscape character areas; ▲ Designated landscapes and their special qualities; ▲ The cumulative assessment; and ▲ Mitigation.
ETG - 14/12/2021	<p>Meeting to present the final project boundary that would form the basis of the application, and to review the list of final viewpoints. Key discussion points were:</p> <ul style="list-style-type: none"> ▲ Agreement of the viewpoints list; ▲ Presentation of the final proposed boundary for application; ▲ Presentation of the final design envelope; and

DATE AND TYPE	DESCRIPTION OF CONSULTATION
	<ul style="list-style-type: none"> ▲ Discussion of mitigation measures.
<p>ETG - 27/01/2022</p>	<p>Meeting to discuss stakeholder feedback in terms of further mitigation for SLVIA effects. Key points discussed included:</p> <ul style="list-style-type: none"> ▲ Summary of the design rationale for the application; ▲ Presentation, discussion and feedback on proposed mitigation measures; ▲ Adaptive lighting to mitigate night-time effects; and; ▲ Stakeholder suggestions of further mitigation and compensation measures. <p>At the meeting, it was agreed that ETG members would provide written feedback on proposals for further mitigation and compensation at a further ETG in February 2022.</p>

3 Agreements Log

- 13 The following sections of this SoCG set out the level of agreement between the Applicant and the NW LPAs for each relevant component of the Application. The tables below detail the positions of the Applicant alongside those of the NW LPAs and whether the matter is agreed or not agreed.
- 14 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion', the agreements logs in the tables below are colour coded to represent the status of the position according to the criteria in Table 2 below.

Table 2: Position status key.

POSITION STATUS	COLOUR CODE
The matter is considered to be agreed between the parties	Agreed
The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	Ongoing point of discussion
The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant or the IP is not considered to result in a material outcome on the assessment conclusions.	Not agreed – No material impact
The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the IP is considered to result in a materially different outcome on the assessment conclusions.	Not agreed – material impact

3.1 Seascape, Landscape and Visual Impact Assessment

Table 3: Status of discussions relating to SLVIA.

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
Environmental Impact Assessment			
Planning and policy	The EIA has identified and given due regard to all appropriate plans and policies relevant to SLVIA.	The NW LPAs are satisfied that due regard has been given to the plans and policies relevant to SLVIA identified within Section 10.2 of AS-027.	Agreed
Consultation	The EIA has had regard to matters raised by the NW LPAs via statutory and non-statutory consultation activities in relation to SLVIA.	<p>The NW LPAs are satisfied that due regard has been given to the matters raised in relation to SLVIA in respect of:</p> <ul style="list-style-type: none"> ▲ Matters raised in the Scoping Opinion (APP-295); ▲ Comments on the PEIR raised during the formal consultation under Section 42 of the Planning Act 2008; and ▲ Matters raised in pre-application consultation via the Evidence Plan process. <p>Records of consultation in respect of SLVIA are accurately described in:</p> <ul style="list-style-type: none"> ▲ The SLVIA Consultation Record (APP-113); ▲ The Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303); and ▲ The Consultation Report (APP-024). <p>It is noted in the Land Use Consultants (LUC) Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs that a clear record of consultation has been included.</p>	Agreed
Site Selection and Consideration of Alternatives	The Site Selection and Alternatives Chapter of the ES (APP-044) provides a full and detailed account of the considerations and decision-making process undertaken to develop and refine the project boundary and design envelope.	Notwithstanding comments below, the NW LPAs are satisfied that the Site Selection and Alternatives chapter of the ES (APP-044) provides a detailed and accurate record of the considerations and decision-making process undertaken to develop and refine the project boundary and the project design envelope.	Agreed
	Refinements to the project boundary and design envelope made during pre-application consultation have reduced and minimised the potential significance of effects. The Applicant considers that the design envelope has been reduced as far as practicable.	The NW LPAs acknowledge the mitigation afforded by the reduced western extent of the array, and the corresponding reduction in the number of WTGs that has been applied. The LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs also notes the reduction in size of the offshore wind farm in relation to offshore	Not agreed – material impact

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
		mitigation, but concurs with the Applicant's SLVIA that the reduced MDS has not resulted in any effects being reduced from significant at PEIR to non-significant at DCO. The NW LPAs do not consider the reduction to be sufficient to reduce the likely significant effects and consider that a further, substantial reduction would be required to minimise the significance of effects.	
Assessment scope and methodology	The EIA has identified and assessed all likely significant effects relevant to SLVIA as identified within the Scoping Report and Scoping Opinion.	The NW LPAs are satisfied that the SLVIA has identified and assessed all potential significant effects within the ES (AS-027). This is also noted in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs. The LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs notes that the scope of the assessment is considered sufficient to capture all potentially significant effects.	Agreed
	The study area defined for the assessment is appropriate for the impacts, pathways and receptors considered.	The NW LPAs are satisfied with the study area presented and defined within the SLVIA Methodology (APP-112).	Agreed
	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of assessment.	The NW LPAs are satisfied with the consideration of the dual MDS (MDS-A: largest turbines and MDS-B: most numerous turbines) and this has been agreed through the Evidence Plan process as identified within the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303).	Agreed
	The methods for assessing potential impacts on significance of designated heritage assets through change to their setting is appropriate.	The NW LPAs are satisfied with the methodology presented in Section 8.45 of the Onshore Archaeology and Cultural Heritage chapter of the ES (APP-069) for assessing potential impacts on the significance of designated heritage assets through change to their setting.	Agreed
	<p>The methods for assessing potential impacts on seascape, landscape and visual receptors are appropriate.</p> <p>The Applicant set out further justification for its approach to determining the significance of 'moderate' effects from Para 17 of Document 2.6 Comments on Land Use Consultants' Review of LVIA and SLVIA submitted at Deadline 2 (REP2-006)</p> <p>The Applicant notes that in LUC Review of SLVIA Documents (REP1-091) LUC has acknowledged in relation to the assessment</p>	<p>The NW LPAs do not agree with the approach taken to determining the significance of 'moderate' effects, as set out in the LUC Review of SLVIA Documents (REP1-091).</p> <p>The NW LPAs do not agree with the narrow approach taken to assessing effects on views experienced by people within settlements, as set out in the LUC Review of SLVIA Documents (REP1-091).</p>	Not agreed – No material impact

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
	of effects on people within settlements that 'this difference in approach is unlikely to lead to substantive under-reporting of significant effects.'	Aside from these points, the NW LPAs are satisfied that the approach presented within the SLVIA Methodology (APP-112) is appropriate and reflects good practice guidance.	
	The SLVIA has been completed in accordance with all relevant industry guidance.	The NW LPAs are satisfied that the SLVIA has been completed in accordance with the appropriate industry guidance.	Agreed
	The visualisations produced for the SLVIA meet appropriate standards and are suitable to inform judgements on the visual effects of the offshore infrastructure.	The NW LPAs are satisfied with the wirelines and visualisations produced and are content that they meet the appropriate standards to be suitable for assessing the visual effects of the offshore infrastructure. The LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs notes that the SLVIA has been supported by good quality visualisations, produced and presented in line with the relevant good practice guidance.	Agreed
Baseline characterisation	Sufficient data (including site-specific information) have been collated to appropriately characterise the baseline environment for the purposes of EIA.	The NW LPAs are satisfied that sufficient data, including baseline photography and the creation of visualisations, have been collated to appropriately characterise the baseline and inform the SLVIA. The LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs notes that the assessment has included a comprehensive review of the baseline.	Agreed
	The viewpoint locations for the SLVIA are adequate and appropriate to understand and assess the likely significant effects of AyM.	The NW LPAs are in agreement with the viewpoint locations for the SLVIA, as agreed via the Evidence Plan Process (see the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303)).	Agreed
	The sensitivity and importance of visual receptors has been appropriately and adequately described within the EIA.	Notwithstanding minor comment made in relation to Viewpoint 36: Tal-y-Fan in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs, the NW LPAs are in agreement with the description of sensitivity of visual receptors in the SLVIA.	Agreed
Mitigation measures	The iterative design process has resulted in a reduction in the extent of the project since the EIA Scoping stage and an associated reduction in the significance of predicted effects.	The NW LPAs agree that the iterative design process has resulted in a reduction of the array and number of turbines, however as noted below, a further substantial reduction in scale and/or extent would be required to minimise the significance of effects.	Not agreed – material impact

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
	The proposed lighting mitigation adequately addresses night-time visual effects.	The NW LPAs agree with the conclusions of the night-time visual assessment, as noted in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs. The proposed lighting mitigation reduces night-time visual effects, however adverse effects would still remain.	Agreed
	The Applicant has minimised and mitigated significant effects as far as practicable. The Applicant understands the NW LPAs consider enhancement measures may be necessary to offset significant effects. The Applicant is engaging with the NW LPAs to understand the detail of such measures which are considered to have the potential to offset the predicted adverse effects. Discussions are ongoing and an update was provided in REP6-022.	The NW LPAs do not consider that the reduction in extent of the array or number of turbines to be sufficient to reduce the likely significant effects. Therefore landscape enhancement is required to enhance natural beauty, features and special qualities of designated landscapes. Whilst enhancement opportunities would not directly offset adverse effects, and would not make the predicted effects less harmful, they are considered to have the potential to offset the adverse effects predicted. The NW LPA's have agreed in principle a Landscape Enhancement Fund with the applicant which is intended to offset impacts to the Anglesey AONB (in addition to the Eryri National Park and Great Orme Heritage Coast).	Ongoing point of discussion
Outcomes of the EIA	The conclusions of the SLVIA in relation to effects on seascape character are appropriate.	Notwithstanding the comments below and other minor comments made in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs, the NW LPAs are in agreement with the conclusions of the SLVIA in relation to effects on seascape character.	Agreed
	The conclusions of the SLVIA in relation to effects on landscape character are appropriate.	Notwithstanding the comments below and other minor comments made in the LUC Review (REP1-091), the NW LPAs are in agreement with the conclusions of the SLVIA in relation to effects on landscape character.	Agreed
	The LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs defined the extent of significant effects as being only those areas that lie to the north of the LCA with reference to Para 723 of the SLVIA (AS-027). Para 723 of the SLVIA (AS-027) sets out the following: 'The parts of the LCA that lie to the north are most likely to be affected by AyM OWF due to its closer proximity and strong visual	The NW LPAs consider that effects would be significant across part of LCA 01 Northern Uplands, within the National Park, as set out in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs.	Not agreed – No material impact

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
	<p>relationship. However, this area is also the part of the LCA where the external views (which include development and operational OWFs as well as the coastal landforms including the Great Orme) already have a greater influence on the character of the LCA than is the case for other areas.'</p> <p>It is for the reasons set out in the same paragraph that the Applicant does not consider the effect would be significant in these northern areas. The character change that would arise within LCA 01 would only arise as a result of visibility of AyM which would introduce further development as part of its context. The characteristics of LCA 01 that would be changed would relate to the sense of remoteness and lack of development rather than specifically relating to changes in views and larger turbines. The Applicant considers that such changes in character would be incremental due to the existing development that is influential in views to the north and therefore not sufficient for a significant effect to arise.</p> <p>The Applicant has acknowledged (AS-027) that there would be significant visual effects within the northern part of LCA 01 at Viewpoint 12: Conwy Mountain and at Viewpoint 40: Above Capelulo – North Wales Path.</p> <p>It appears therefore that the disagreement between the parties is around the difference between effects on landscape character and visual effects where the landscape character effects arise as a result of changes in a view as part of the wider context.</p> <p>Whilst LUC (REP1-091) have not specifically defined which parts in the north of the LCA it considers significant effects would arise they have stated that 'We agree with non-significant effects over the more inland and upland parts of the LCA.'</p> <p>This suggests that the areas where there is disagreement are not widespread.</p>		

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
	<p>The Applicant has assessed (from paragraph 1139 of AS-027) that the effects on landscape character LCA C10 - Great Orme and Creuddyn Peninsula would be Moderate effect (Significant) adverse, short-term temporary 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.</p> <p>The Applicant's assessment was agreed by LUC in the LUC Review of SLVIA Documents (REP1-091).</p> <p>Both the Applicant and the NW LPA assessments consider the effect on landscape character to be significant.</p> <p>The Applicant assessed that effects on some viewpoints within the LCA would be Moderate-moderate (Significant) (AS-027).</p> <p>Therefore, it appears that the disagreement between the parties is around the difference between what constitutes a Moderate-Major significant visual effect and a Moderate-Major significant effect on landscape character that occurs as a result of changes in a view as part of the wider context. The Applicant considers that in terms of the landscape character influence of the change in the view AyM introduces an incremental change and not a fundamental change, hence the lower level of significance attributed.</p>	<p>The NW LPAs consider that the effects would result in a major-moderate effect on the landscape character of the Great Orme Heritage Coast.</p>	<p>Not agreed – No material impact</p>
	<p>The conclusions of the SLVIA in relation to effects on visual receptors are appropriate.</p> <p>The Applicant notes that at ISH2 LUC stated that the effects on Viewpoint 23: Rhyl Aquarium would not be significant.</p>	<p>As noted in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs, the NW LPAs are broadly in agreement with the outcomes of the assessment in relation to visual effects.</p> <p>However, there are some viewpoints and visual receptors where non-significant effects are found in the SLVIA, that LUC suggested could be significant, but noted that these are borderline and do not represent substantive areas of disagreement. The viewpoints noted are:</p> <ul style="list-style-type: none"> ▲ VP23 Rhyl Flats, where the contrast between the larger, but more distant, AyM turbines and the existing turbines would lead to a magnitude of change greater than 'low'; 	<p>Agreed</p> <p>Not agreed – No material impact</p>

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
		<ul style="list-style-type: none"> ▲ VP44 Beaumaris Castle, Anglesey; and ▲ VP36 Tal-y-Fan, Eryri National Park, where a finding of 'moderate' would have been classed as a significant effect. 	
	The conclusions of the SLVIA in relation to the Anglesey Area of Outstanding Natural Beauty (AONB) and its special qualities are appropriate.	As noted in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs, the NW LPAs are in agreement with the conclusions of the SLVIA in relation to the effects on the Special Qualities of Anglesey AONB.	Agreed
	The conclusions of the SLVIA in relation to the Clwydian Range and Dee Valley AONB and its special qualities are appropriate.	As noted in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs, the NW LPAs are in agreement with the conclusions of the SLVIA in relation to the Clwydian Range and Dee Valley AONB.	Agreed
	The conclusions of the SLVIA in relation to the Eryri National Park and its special qualities are appropriate.	As noted in the LUC Review of SLVIA Documents (REP1-091) submitted on behalf of the NW LPAs, the NW LPAs are in agreement with the conclusions of the SLVIA in relation to the effects on the Special Qualities of Eryri National Park.	Agreed
	The conclusions of the onshore archaeology and cultural heritage assessment in respect of potential impacts on significance of designated heritage assets through change to their setting are appropriate.	<p>There is broad agreement that the right receptors are identified, and the correct methodology applied, albeit with some disagreement on the interpretation of and nuance in the relevant guidance (which falls within the realm of professional disagreement). Whilst the outcomes are broadly accepted, some areas of disagreement remain, as indicated below.</p> <p>The significant ("moderate") effect on Llandudno Pier (LB) is agreed. The NW LPAs consider that the effect on the Llandudno Conservation Area should similarly be assessed as being significant and moderate, since coastal views have played a prominent role in the evolution of the town, and are critical to the appreciation of the character and appearance of the Conservation Area.</p> <p>The following designated heritage assets are assessed in the ES as not receiving any significant effect in EIA terms (a "negligible" effect), but the NW LPAs consider will receive some level of effect upon their significance (a "minor" effect). However, the NW LPAs accept any</p>	Not agreed – No material impact

DISCUSSION POINT	APPLICANT'S POSITION	NW LPA POSITION	POSITION STATUS
		<p>effect upon heritage significance is likely to be Not Significant in EIA terms:</p> <ul style="list-style-type: none"> ▲ Beaumaris Castle WHS; ▲ Conwy Castle and Town Walls WHS; ▲ Penrhyn Castle LB; ▲ Penmon Point HLW; ▲ Creuddyn and Conwy HLW; ▲ Bangor Pier LB; and ▲ Menai Bridge LB. 	
		<p>The following heritage assets are considered to be underassessed, and reported in the ES as not significant in EIA terms (i.e., “minor” or “negligible”), but which the NW LPAs consider may be significant:</p> <ul style="list-style-type: none"> ▲ Llandudno Conservation Area; ▲ Penhryn Registered Park and Garden; and ▲ Puffin Island monastic site Scheduled Monument. 	Not agreed – no material impact
	The conclusions of the SLVIA in relation to night-time visual effects are appropriate.	The NW LPAs are in agreement with the conclusions of the SLVIA in relation to night-time visual effects.	Agreed
	The conclusions of the SLVIA in relation to cumulative effects are appropriate.	The NW LPAs are in agreement with the conclusions of the SLVIA in relation to the cumulative effects assessed. However, the NW LPAs note that further cumulative effects may arise in relation to onshore wind farm development that may occur within the Pre-assessed Areas for Wind Energy and the Round 4 offshore wind farms when any development in these areas comes forward.	Agreed



RWE Renewables UK Swindon Limited

Windmill Hill Business Park

Whitehill Way

Swindon

Wiltshire SN5 6PB

T +44 (0)8456 720 090

Registered office:

RWE Renewables UK Limited

Windmill Hill Business Park

Whitehill Way

Swindon