

MONA OFFSHORE WIND PROJECT

Annex 3.3 to the Applicant's response to Relevant Representation at the Procedural Deadline

Applicant's Response to Relevant Representations from Natural Resources Wales (NRW): RR-011.89 to RR-011.97

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
NRW	Natural Resources Wales
NL	National Landscape
NP	National Park
ZTV	Zone of Theoretical Visibility

Units

Unit	Description
km	Kilometers

1 APPLICANT'S RESPONSE TO RELEVANT REPRESENTATIONS FROM NATURAL RESOURCES WALES (NRW): RR-011.89 TO RR-011-97

1.1 Introduction

1.1.1.1 This document has been prepared in response to NRW's relevant representation 3.1.1 (RR-011). The relevant representation has been divided into the key issues, and the Applicant has provided a response to these issues.

1.2 Relevant Representation - paragraphs 3.1.1.1 to 3.1.1.3

1.2.1 Introduction

1.2.1.1 Excerpt from Section 3.1.1.1 to 3.1.1.3 of the NRW Relevant Representation (RR-011).

3.1.1.1 Since NRW (A) commented on the PEIR, the MDS for the proposed wind turbines has changed. For MDS Scenario 1 the maximum number of turbines has reduced from 107 to 96 but the maximum blade tip height is unchanged at 293m above Lowest Astronomical Tide (LAT). For MDS Scenario 2 the maximum blade tip height has increased from 324m to 364m above LAT but the maximum number of turbines is unchanged at 68 turbines. (Table 3.5 ES Document Reference: F1.3) [APP-050].

3.1.1.2 The changes above do not address concerns raised in pre-application advice provided by NRW to the applicant regarding the impacts of the proposed turbines on the IoA NL and potential cumulative impacts on both the IoA NL and ENP. Instead of reducing the maximum blade tip height of the turbines, the Applicant has increased it.

We advise that without a reduction in the height of the turbines and/or a reduction in the array area (i.e. away from the coast) it is likely the proposed turbines will cause

- *significant and adverse effects on the character and special qualities of the IoA NL;*
- *adverse cumulative effects on the character and special qualities of the ENP which are potentially significant; and*
- *effects on both the IoA NL and ENP that are not significant, but nevertheless adverse.*

3.1.1.3. The proposed wind turbines individually and cumulatively with e.g., the consented Awel-y-Môr development, will result in visual changes to the settings of the IoA NL and the ENP. These changes will harm characteristics and qualities of these landscapes - particularly those relating to perceptual and scenic aspects. We advise the SDLs exist for the purpose of conserving and enhancing their natural beauty. In the case of both the IoA NL and the ENP, the proposals will harm aspects of these landscapes which contribute to their natural beauty.

1.2.2 Applicant Response

Refinement of the Mona Offshore Wind Project

1.2.2.1 The Applicant has welcomed the consultation with NRW during the pre-application process. The Applicant has sought to avoid and mitigate significant landscape, seascape and visual impacts through the refinement of the Mona Offshore Wind

Project taking into account comments received during statutory consultation. The refinements included a reduction in the proposed Mona Array Area (from 500 km² to approximately 300 km²) and the maximum number of turbines was reduced from 107 to 96. Whilst the maximum number of wind turbines has decreased, the maximum rotor diameter has increased, and thus, maximum tip height, of the larger wind turbine (see Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (APP-051)). The assessment presented in Volume 2, Chapter 8: Seascape and Visual resources (APP-060)) is based on Maximum Design Scenario (MDS) 2.

1.2.2.2 MDS 2 (as assessed in Volume 2, Chapter 8: Seascape and visual resources (APP-060) comprises:

- 68 wind turbines and foundation components (blades, nacelles, towers, navigation and aviation lighting) (364 m maximum blade-tip height above Lowest Astronomical Tide (LAT)
- Four OSPs, each measuring 55m x 65m x 45m (height above LAT x length x width, excluding antenna and lightning protection)
- Construction and service vessels/helicopters.

Effects on the character and special qualities of the Isle of Anglesey National Landscape

1.2.2.3 The Applicant's Zone of Theoretical Visibility (ZTV) for Isle of Anglesey NL is presented in Figure A.3: *Nationally designated landscapes in relation to zone of theoretical visibility for Mona Array Area offshore components and representative viewpoint locations*, in Volume 6, Annex 8.5 International and nationally designated landscape study (APP-105).

1.2.2.4 The Mona Array Area is located approximately 28.8 km from the Isle of Anglesey NL at the closest point at Point Lynas on the coast overlooking the Irish Sea. The theoretical visibility of the Mona Array Area (as shown in the ZTV) is primarily along the northeast coast of the Isle of Anglesey NL, as well as small areas of landscape near Holyhead and Rhoscolyn. The remainder of the Isle of Anglesey NL along southeastern, western and southern coastlines will be unaffected. The Applicant notes that the extent of actual visibility will be less due to screening afforded by intervening woodland and coastal settlements.

Landscape character

1.2.2.5 In Volume 2, Chapter 8: Seascape and visual resources (APP-060) the Applicant has assessed effects on landscape character with reference to the Landscape Character Areas (LCAs) in the Isle of Anglesey AONB Landscape Strategy 2011 and the Seascape Character Areas (SCAs) in the Anglesey Seascape Character Assessment as follows:

- Puffin Island and rocky coastline extending westwards to Pentrellwyn and inland to the highest point at Bwrdd Arthur (hillfort) at representative viewpoint 4 (SCA 5 Penmon and LCA 10 Penmon and Puffin Island)
- Red Wharf Bay extending eastwards to Moelfre comprised an expansive sandy beach, the landward setting of which features headlands along with pine and broadleaved woodlands including Benllech and Pentraeth. Caravan and camping sites are identified in the IoA AONB landscape strategy as visual detractors (SCA 6 Red Wharf Bay to Moelfre and LCA 9 Red Wharf Bay)

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- Dulas Bay extending from Moelfre to Point Lynas featuring beaches at Dulas and Lligwy Bays along with rocky coastline, headlands and island at Ynys Dulas. Areas inland affected by the Project, that are coincidental with the ZTV feature woodlands of varying size (SCA 7 Dulas Bay and LCA 8 Dulas Bay Hinterland)
- Rocky coastline from Bull Bay westwards to the sandy beach at Cemaes Bay with islands at East Mouse and Middle Mouse and further east, a section of rocky coastline from Cemlyn Bay with shingle beach and lagoon extending west to Carmel Head at the northwest corner of Anglesey (SCA 8 Amlwch and Cemaes, SCA 9 Cemlyn Bay, LCA 4 North West Coast and LCA 5 North West Anglesey).

1.2.2.6 The extent of visibility will be less than indicated on the ZTV due to the screening afforded by vegetation and built structures. These include the extensive wooded areas at Pentraeth Forest, overlooking Red Wharf Bay and numerous wooded areas in the vicinity of Benllech, Moelfre and the hinterland overlooking Dulas Bay. Coastal settlements will also restrict views out to the Mona Array Area, including Benllech, and Moelfre.

Special qualities

1.2.2.7 The Applicant has assessed the effects of the Mona Offshore Wind Project on the relevant special qualities of the Isle of Anglesey NL as described below.

1.2.2.8 Direct impacts on visual amenity will be experienced by individuals within the Isle of Anglesey NL only where there are views of the coast and the Irish Sea together with the Mona Array Area. These visual effects have potential implications for only two of the ten special qualities of the NL, these being expansive views and peace and tranquillity, see Volume 6, Annex 8.5: International and nationally designated landscapes study (APP-105). These were assessed as being moderate adverse and not significant.

- Expansive Views:
 - In terms of expansive views, only those views from the northern coastline including the Irish Sea and the Mona Array Area would be affected. The expansive views along the north coast that would be affected are those for which open views towards the Mona Array Area would be available, most of which are located over 30 km away. There are many locations along the north coast where expansive views are available of the coastline and the Irish Sea, where the Mona Array Area would be screened from view by intervening headlands and coastal features. This is especially true at Point Lynas, the closest point, where visibility of the Mona Array Area is limited to the tip and eastern side of this promontory. Other expansive views along this promontory would be unaffected.
- Peace and Tranquillity:
 - The effects of the Mona Array Area on the perceptual quality peace and tranquillity experienced by people within the Isle of Anglesey NL, would be limited to the parts of the north coast where the Mona Array Area would be visible. The baseline level of peace and tranquillity at many of the locations along the coastline are not exceptional due to these locations being promoted for recreation with associated car parking and featuring numbers of visitors (e.g. Point Lynas, Benllech and Red Wharf Bay). Locations inland include Bwrdd Arthur where the baseline sense of tranquillity is already affected by existing vertical infrastructure.

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1.2.2.9 Due to the distance to the Mona Array Area, the influence of sea-based infrastructure and activities (offshore wind farms, shipping) and the presence and influence of infrastructure on land (such as the Wylfa Nuclear Power Station), effects on peace and tranquillity from the Mona Offshore Wind Project would not be significant. Whilst the Applicant recognises there may be adverse impacts on the Isle of Anglesey NL these impacts are found to be not significant in relation to the MDS outlined above because:

1.2.2.10

- the distance between the Mona Array Area and the coastline (see paragraph 1.2.2.4). At these distances (and greater), the Mona Array would have limited influence on landscape character. The representative viewpoints (documented in section 1.7.6 of Volume 6, Annex 8.5 International and nationally designated landscape study (APP-105)) are at distances ranging from 29 km to 54 km from the Mona Array Area and would have very limited influence on expansive views and the perceptual quality of peace and tranquillity
- meteorological conditions are such that the Mona Array would have limited influence on landscape character on days where long-range visibility (20 to 40 km) is afforded, thereby limiting the scale and extent of the indirect effects on landscape character and the special qualities (expansive views and peace and tranquillity) experienced by viewers
- the presence of existing offshore wind farms and other offshore energy infrastructure such as the Douglas oil and gas platforms
- the presence of other offshore activity such as shipping, which is a regular feature in the views of the Irish Sea and the Mona Array Area
- onshore infrastructure development along the Isle of Anglesey coast such as the Wylfa Nuclear Power Plant.

1.2.2.11 All of the above factors are influential on the baseline landscape character of the Isle Anglesey NL (as documented in Volume 6, Annex 8.2: Seascape and landscape character baseline technical report (APP-100) and Volume 3, Chapter 8: Seascape and Visual Resources (APP-060)) and the viewer's experience of 'expansive views' and 'peace and tranquillity'. Taking these factors into account and that the impacts would apply to limited part of the Isle of Anglesey NL (for the reasons highlighted in paragraph 1.2.2.8) the Applicant has concluded overall no significant effects and considers its assessment to be robust.

Effects on the character and special qualities of the Eryri National Park

1.2.2.12 The Applicant's ZTV for Eryri NP is presented in Figure A.3: *Nationally designated landscapes in relation to zone of theoretical visibility for Mona Array Area offshore components and representative viewpoint locations*, in Volume 6, Annex 8.5 International and nationally designated landscape study (APP-105).

1.2.2.13 The Mona Array Area is located 35.9 km from the Eryri NP at the closest point in the vicinity of Penmaen Point on the coast overlooking Conwy Bay. The ZTV indicates theoretical visibility of the Mona Array along most of the northwest edge of the National Park and its coastal setting at Conwy Bay and Traeth Lafan (Seascape Character Areas 2 and 3 of the Snowdonia National Park seascape assessment). Theoretical visibility of the Mona Array is limited inland, primarily affecting the mountain landscape of LCA 1 Ucheldir Y Gogledd where patches of the north facing slopes of these uplands would be affected. These include the summit of Tal Y Fan (representative viewpoint 31), Moel Wnion, Drosogl and Conwy Mountain.

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- 1.2.2.14 In reality, the extent of visibility will be less than indicated on the ZTV due to the screening afforded by vegetation and built structures. Of note, in this regard, are the wooded areas that extend along the National Park boundary near the coast from Bethesda to Llanfairfechan and rising up the valleys and mountain foothills.
- 1.2.2.15 The Applicant has assessed effects on the special quality entitled ‘tranquillity and solitude – peaceful areas’ as being moderate adverse and not significant as documented in Volume 6, Annex 8.5: International and nationally designated landscape study (APP-105).
- 1.2.2.16 Although it is acknowledged that there are adverse impacts on the Eryri NP these are found to be not significant because:
- distance, which at a minimum of 35.9 km is such that the Mona Array would have limited influence on landscape character. The representative viewpoints documented in section 1.7.21 of Volume 6, Annex 8.5 International and nationally designated landscape study (APP-105) are located at distances ranging from 36.7 km to 55.2 km are such that the Mona Array would have very limited influence on existing views and the perceptual quality of ‘tranquillity and solitude – peaceful areas’
 - meteorological conditions are such that the Mona Array would have limited influence on landscape character on days where long-range visibility (20 to 40 km) is afforded, thereby limiting the scale and extent of the indirect effects on landscape character and the special qualities experienced by viewers
 - the presence of existing offshore wind farms and other offshore energy infrastructure such as the Douglas oil and gas platforms
 - the presence of other offshore activity such as shipping which is a regular feature in views of the Irish Sea and the Mona Array
 - onshore infrastructure development along the coast including settlements and transport routes.
- 1.2.2.17 All of the above factors are influential on the baseline landscape character of the Eryri NP (as documented in Volume 6, Annex 8.2: Seascape and landscape character baseline technical report (APP-100) and Volume 3, Chapter 8: Seascape and Visual Resources (APP-060)) and the viewer’s experience of ‘tranquillity and solitude – peaceful areas’. Taking these factors into account and that the impacts would apply to limited part of the Eryri NP (for the reasons highlighted in paragraph 1.2.2.14) the Applicant has concluded overall no significant effects and considers its assessment to be robust.

Cumulative effects on character and special qualities of Isle of Anglesey NL and Eryri NP

- 1.2.2.18 The cumulative assessment takes into account Tier 1 existing offshore windfarms, Tier 1 consented offshore wind farms and Tier 2 proposed offshore wind farms in relation to impacts on character and special qualities of Isle of Anglesey NL and Eryri NP.
- 1.2.2.19 The Applicant has found no significant effects on Isle of Anglesey NL within the chapter as set out in section 8.11.6 of Volume 2, Chapter 8: Seascape and visual resources (APP-060).
- 1.2.2.20 Whilst the Applicant recognises that there may be adverse cumulative impacts on the character and special qualities of Isle of Anglesey NL these are found to be not significant for reasons as follows:

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- cumulative effects which would be limited to a part of the northeast coast of Isle of Anglesey NL
- the influence of the North Wales Cluster of existing offshore wind farms on the landscape of the Isle of Anglesey and the special qualities experienced by viewers, these being closer to the coastline than Mona.
- distance between the Mona Array and Isle of Anglesey which at approximately 29 km or greater, is such that the Mona Array would result in limited cumulative effects.

1.2.2.21 Taking into account that the cumulative effects would apply to only a small part of the Isle of Anglesey NL, the Applicant has concluded overall no significant cumulative effects and considers its assessment to be robust.

1.2.2.22 The assessment identified that adverse cumulative effects were reported to arise on only one of the Eryri NP's nine special qualities, this being 'tranquillity and solitude – peaceful areas'. The significant cumulative effects would be limited to some isolated mountain summits overlooking the Irish Sea and would be derived from the addition of Mona together with all other existing, consented and proposed offshore wind farms.

1.2.2.23 Much of the northern part of Eryri NP within the ZTV has relatively low levels of baseline tranquillity due to a range of man-made built influences and the noise emanating from these sources. These include the busy A55 dual carriageway which extends along the coast between the boundary of the Eryri NP and the Irish Sea, caravan parks, remnants of past mining activity in the landscape and Conwy golf links.

Effects on the settings of nationally designated landscapes

1.2.2.24 The Applicant notes that any development within the setting of a nationally designated landscape (referred to as Statutorily Designated Landscapes by NRW) could (to some degree) affect that setting. However, the Applicant considers this effect is limited to designated landscapes/their landscape features that appear in association with the development (in this case, the Mona Array Area). Development beyond the boundaries of a nationally designated landscape can indirectly affect the character of that landscape, when appearing prominent in relation to the features, which contribute to a special quality or characteristic/element/feature. In coastal areas landscape features might include small islands, headlands, sea stacks, incised bays, cliffs, lighthouses etc.

1.2.2.25 The Applicant recognises that the development of the Mona Array will result in some limited visual changes to the settings of the nationally designated landscapes. However, the Applicant considers that the changes will not result in significant effects on their character or visual amenity at representative viewpoints. When viewed from the coast the overriding influences on the intervening seascape character are the existing numerous offshore wind turbines and the large commercial shipping vessels that use these waters. The Applicant considers that the significant cumulative effects will be limited due to:

- the distance to the Mona Array from these landscapes:
 - the Mona Array, at distances of approximately 29 km and greater, and in 'open sea' would have almost no relationship to the coastal landscape and coastal landscape features
 - the Mona Array would be located at a considerable distance, beyond the intervening Awel y Môr offshore wind farm in views related to the headland of Great Orme and Penmon Point/ Puffin Island (see representative viewpoints)

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26, 29, 31, 32, 33, 55, Figures 22.1 and 22.2, Figures 25.1 and 25.2, Figures 27.1 and 27.2, Figures 28.1 and 28.2, Figures 29.1 and 29.2, and Figures 44.1 and 44.2 of Volume 6, Annex 8.6: Seascape visualisations (APP-106-APP-112))

- the intervening seascape character:
 - the Mona Array would not appear in framed views or across inner firths, where developments could take up more of the horizon. In most views from the north coast of mainland Wales the Mona Array would be viewed through the intervening Awel y Môr and existing offshore wind farms. Due to the 13.5 km distance between the consented Awel y Môr offshore wind farm and the Mona Array Area, the addition of the Mona Array would not increase the density of the visible cluster of existing and consented turbines (Volume 3, Chapter 8: Seascape and Visual Resources (APP-060)). Refer to cumulative wirelines in Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 7 Figures 48, 50 and 51 (APP-112)
- its location in a remote area of sea:
 - due to the distance of the Mona Array from the coast, only the closest wind turbines would be perceivable for the majority of the year, due to atmospheric conditions (see Volume 6, Annex 8.4: Seascape, landscape and visual resources impact assessment methodology, Appendix B: Meteorological Office visibility data (APP-104)). The shape and layout of the Mona Array Area would determine that the extent of the Mona Array Area boundary facing the coast would occupy a limited field of view, as assessed in Volume 2, Chapter 8: Seascape and visual resources (APP-060).

1.2.2.26 The effects of the Mona Onshore Substation on the setting of the Clwydian Range and Dee Valley NL are assessed in Environmental Statement, Volume 3, Chapter 6: Landscape and visual resources, section 6.10.2) (APP-069). The effects were not judged to be significant.

1.2.2.27 For these reasons, the Applicant's position is that the Mona Offshore Wind Project would have little if any effect on the setting of the Isle of Anglesey NL, the Eryri NP and the Clwydian Range and Dee Valley NL.

1.3 Relevant Representation – paragraphs 3.1.1.4 to 3.1.1.6

1.3.1 Introduction

1.3.1.1 Excerpt from Section 3.1.1.4 to 3.1.1.6 of the NRW Relevant Representation (RR-011):

3.1.1.4 Effects on the views and visual amenity of visual receptors (people) at locations within both the IoA NL and ENP would be significant and adverse, both as a result of the proposed development individually and cumulatively with the consented Awel y Môr development. This will include harm to views at locations which attract visitors seeking to experience the natural beauty and special qualities of these landscapes.

3.1.1.5 People using the Wales Coast Path would experience both combined and sequential cumulative impacts as a result of the proposal and wind turbines within the consented Awel-y-Môr development. At locations such as Penmon Point, the cumulative effect would be greater than the effect of the Mona Array Area in isolation, and it is likely to be significant. We advise that as a result of both schemes

in combination, people will have to travel ever further west along the north coast of Wales to be afforded coastal views unaffected by wind turbine development.

3.1.1.6 People walking the Offa's Dyke Path National Trail where it crosses the CRDV NL are expected to experience combined and sequential visibility of the Tier 1 onshore and offshore projects (including Awel y Mor substation) and experience potentially significant adverse visual effects. However, mitigation measures are expected to reduce the impact on receptors within the CRDV NL. These measures – which NRW (A) welcome – include proposals for new woodland planting around the proposed substation, as illustrated on the Illustrative Landscape and Ecology Strategy Plan within the Outline Landscape and Ecology Plan (LEMP) [APP-208] together with the intention for substation buildings to be finished in recessive colours as set out in the Design Principles (Document Reference J3) [App-189].

1.3.2 Applicant's Response

Effect on the special qualities of the nationally designated landscapes, including effects on views and visual amenity from the Wales Coast Path and Offa's Dyke National Trail

- 1.3.2.1 The Applicant has assessed the effects of the Mona Offshore Wind Project on views and visual amenity of people within Isle of Anglesey NL, Eryri NP and the Clwydian Range and Dee Valley NL from a range of agreed representative viewpoint locations (as documented in Volume 2 Chapter 8: Seascape and visual resources (APP-060) Table 8.6 and Volume 3, Chapter 6: Landscape and visual resources (APP-069) Table 6.7). The Applicant's position is that the effects of the Mona Offshore Wind Project (both onshore and offshore elements) would have adverse effects, ranging from negligible to moderate on the nationally designated landscapes. However, none of the effects would be significant. This is due to the scale of the Mona Array Area at a distance mostly exceeding 30 km from the Isle of Anglesey NL and the Mona Onshore Substation at a distance of approximately 6 kms from the Clwydian Range and Dee Valley NL.
- 1.3.2.2 Significant cumulative effects are not anticipated to arise on the views and visual amenity of people within the Isle of Anglesey NL or the special qualities (expansive views and peace and tranquillity) of Isle of Anglesey NL from the Mona Array Area. The Mona onshore substation is not visible from the Isle of Anglesey NL.
- 1.3.2.3 There is potential for significant cumulative effects on the special quality entitled Tranquillity and Solitude – Peaceful Areas within Eryri NP due to the addition of the Mona Array together with the existing, consented and proposed offshore wind farms, as documented in Volume 6, Annex 8.5: International and nationally designated landscape study (APP-105). Eryri NP lies outside the agreed 10 km study area for the Mona Onshore Substation.
- 1.3.2.4 Significant cumulative effects are not anticipated to arise on the views and visual amenity of people within the Clwydian Range and Dee Valley NL or the special qualities (Tranquillity and Remoteness and wildness, space and freedom, expansive views/seascapes) of the Clwydian Range and Dee Valley NL from the Mona Offshore Wind Project.
- 1.3.2.5 No significant cumulative effects are considered to arise to the relevant special qualities of the Isle of Anglesey NL or those of the Clwydian Range and Dee Valley NL, as a result of the Mona Offshore Wind Project together with onshore and offshore cumulative projects. It is judged that the Mona Array Area would have a moderate and significant cumulative effect on one of the special qualities of the Eryri NP (Tranquillity

and Solitude – Peaceful Areas) (see Environmental Statement, Volume 6, Annex 8.5: International and nationally designated landscapes study).

Effects of the Mona Offshore Wind Project on visual receptors using the Wales Coast Path

1.3.2.6

All representative viewpoints were agreed with the relevant statutory consultees including NRW (Environmental Statement, Volume 2, Chapter 8: Seascape and visual resources, Table 8.6 (APP-060) and Environmental Statement, Volume 3, Chapter 6: Landscape and visual resources, Table 6.7. The following representative viewpoints are located on the Wales Coast Path (APP-069):

- representative viewpoint 2: Llanlleiana Head, Isle of Anglesey NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 1, Figures 2.1 and 2.2) (APP-106)
- representative viewpoint 24: Bull Bay, Amlwch, Isle of Anglesey NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 3, Figures 20.1 and 20.2) (APP-108)
- representative viewpoint 25: Moelfre Headland, Isle of Anglesey NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 3, Figures 21.1 and 21.2) (APP-108)
- representative viewpoint 27: Benllech, Isle of Anglesey (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 3, Figures 23.1 to 23.4) (APP-108)
- representative viewpoint 28: Penmon Point, Isle of Anglesey NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 3, Figures 24.1 and 24.2) (APP-108)
- representative viewpoint 40: Point of Ayr (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 5, Figures 36.1 and 36.2)(APP-110)
- representative viewpoint 47: Llanfairfechan seafront (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 5, Figures 37.1 to 37.4) (APP-110)
- representative viewpoint 48: Llandudno promenade (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 5, Figures 38.1 to 38.3 and Part 6, Figure 38.4) (APP-110)
- representative viewpoint 55: Trwyn Eilian (Point Lynas), Isle of Anglesey NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 6, Figures 44.1 and 44.2) (APP-111)
- onshore representative viewpoint 20: View southeast from the Wales Coast Path at Pont y Ddraig footbridge over the River Clwyd, Kinnel Bay, Rhyl (Environmental Statement, Volume 7, Annex 6.5: Landscape visualisations, Part 3, Figures 39 and 40) (APP-108). Note that this is a view towards the Mona Onshore Substation from the Wales Coast Path.

1.3.2.7

Other agreed representative viewpoints lie within the nationally designated landscapes but are not on the Wales Coast Path.

1.3.2.8

The Applicant assessed the visual impacts from the viewpoints listed above, and from all agreed representative viewpoints in Environmental Statement, Volume 2, Chapter 8: Seascape and visual resources, at section 8.8.4 (APP-060). Assessment of visual

effects experienced by receptor groups is at section 8.8.3 of the chapter. The effects experienced by users of the Wales Coast Path are considered in paragraphs 8.8.3.2 to 8.8.3.18. The visual effects on users of the Wales Coast Path are judged to be not significant.

- 1.3.2.9 Although it is acknowledged that adverse visual effects would be experienced by people at these viewpoints and by these receptor groups the Applicant found that no significant effects on people's views and visual amenity would be experienced, primarily due to distance of the Mona Array from the land.

Combined and sequential cumulative effects experienced by users of the Wales Coast Path

- 1.3.2.10 The Applicant notes that the Mona Array would appear distant, beyond the intervening Awel y Môr offshore wind farm. The Mona Array Area is located too far away to be seen in framed views or within estuaries (including Conwy, where developments could take up more of the horizon. The Mona Array Area would not appear in views associated with coastal features.

- 1.3.2.11 The Applicant recognises that for users travelling east on the Wales Coast Path there would be visibility of parts of both the Mona Array and the consented Awel y Môr offshore wind farm from approximately 35 km at Penmon Point, as indicated on the Zone of Theoretical Visibility (ZTV) Figure A4, of Volume 2, Chapter 8: Seascape and visual resources (APP-060). The ZTV presents the MDS as explained in Volume 6, Annex 8.4: Seascape, Landscape and Visual Assessment Methodology (APP-104)). When considering the context of the Mona Offshore Wind Project, the boundary of the Mona Array Area is angled in such a way as to present its narrowest point towards the closest area of land (Figure A2 of Volume 6, Annex 8.5 International and nationally designated landscapes study of the Environmental Statement (APP-105)). At this distance the effects of people are already at a distance where visibility of the type of the development proposed is strongly affected by weather conditions.

- 1.3.2.12 The consented Awel y Môr is located 17 km from the Isle of Anglesey NL, 16.6 km from Eryri NP and 23.4 km from the Clwydian Range and Dee Valley NL at its closest point. The Mona Array Area, is located approximately 29 km from the Isle of Anglesey NP, 36 km from the Eryri NP and 41 km from the Clwydian Range and Dee Valley NL. The combined effect attributable to the addition of the Mona Array at these distances, given the context and prevailing atmospheric conditions, from the nationally designated landscapes would not noticeably increase any effects already caused by Awel y Môr, which retains its prominent position in relation to the national landscapes and areas of the non-designated north Wales coast, such as the Great Orme headland and Penmon Point (representative cumulative viewpoints 7 and 28 in Figures 49 and 56 of Environmental Statement Volume 6, Annex 8.6: Seascape visualisations (APP-106 to 112)). The Mona Array, by contrast is viewed, either beyond the existing and consented offshore wind farms, or within an open sea, where scale is difficult to gauge and atmospheric conditions in the East Irish Sea play a large factor in visibility.

- 1.3.2.13 Regarding cumulative impacts with the Awel y Môr array, the Applicant assessed cumulative visual impacts from the following representative viewpoint on the Wales Coast Path:

- representative viewpoint 28: Penmon Point, Isle of Anglesey NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 7, Figure 56) (APP-112).

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- 1.3.2.14 Cumulative wirelines have been undertaken from other agreed representative viewpoints, which lie within nationally designated landscapes, but are not on the Wales Coast Path. Assessment of cumulative visual effects experienced by receptor groups is at section 8.11.4 and 8.11.8 of the chapter. The cumulative visual effects on users of the Wales Coast Path are judged to be not significant.
- 1.3.2.15 Although it is acknowledged that adverse cumulative effects on views and visual amenity would be experienced by users of the Wales Coast Path the Applicant found no significant cumulative effects on views and visual amenity would be experienced by viewers using the Wales Coast Path, primarily due to distance of the Mona Array Area from the Wales Coast Path, but also on elevation of the Wales Coast Path and separation from cumulative projects. A comparison of the distances of the Mona Array Area and the Awel y Môr array from the Wales Coast Path is presented in Figure 1.1 to Figure 1.3 of this response below. Only those areas of the Wales Coast Path that either array area can be seen from are noted. The figures are based on the cumulative ZTV at Environmental Statement Volume 2, Chapter 8: Seascape and visual resources, Appendix A: Figures, Figure A.10: Cumulative ZTV of Mona and Awel y Môr (APP-060).
- 1.3.2.16 The Applicant's conclusions are based on a robust assessment of the impacts, using fieldwork and representative viewpoints from and including views of the Wales Coast Path.

[Effects of the Mona Offshore Wind Project on visual receptors using Offa's Dyke Path National Trail](#)

Assessment of effects of the Mona Array Area

- 1.3.2.17 All representative viewpoints were agreed with the relevant statutory consultees (Environmental Statement, Volume 2, Chapter 8: Seascape and visual resources, Table 8.6). The following representative viewpoint represents receptors on Offa's Dyke Path National Trail:
- representative viewpoint 39: Prestatyn hillside, Clwydian Range and Dee Valley NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 5, Figures 35.1 and 35.2) (APP-110)
 - In addition, the following agreed representative viewpoints are located adjacent to Offa's Dyke National Trail within the Clwydian Range and Dee Valley NL:
 - representative viewpoint 10: Graig Fawr, Clwydian Range and Dee Valley NL (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 2, Figures 10.1 and 10.2) (APP-107) is located on a high point within Access Land adjacent to Offa's Dyke National Trail
 - representative viewpoint 11: Moel y Parc (Environmental Statement, Volume 6, Annex 8.6: Seascape Visualisations, Part 2, Figures 11.1 and 11.2) (APP-107) is located on a high point within Access Land adjacent to Offa's Dyke National Trail.
- 1.3.2.18 Other agreed representative viewpoints lie within the nationally designated landscapes but are not on or adjacent to Offa's Dyke Path National Trail, e.g. Representative viewpoint 54: Public right of way 205/4 (Environmental Statement, Volume 6, Annex, 8.6: Seascape Visualisations, Part 6, Figures 43.1 and 43.2) (APP-111).
- 1.3.2.19 The Applicant assessed the visual effects of the Mona Array Area experienced by people using Offa's Dyke Path National Trail in Environmental Statement Volume 2, Chapter 8: Seascape and visual resources, at paragraphs 8.8.3.19 to 8.8.3.32 (APP-060). Assessment of visual effects experienced by people at agreed representative

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viewpoint locations is at section 8.8.4 of the chapter. The visual effects of the Mona Array Area on users of Offa's Dyke Path are judged to be not significant; this is primarily due to the distance of Offa's Dyke Path from the Mona Array Area.

Assessment of effects of the Mona Onshore Substation

1.3.2.20 All representative viewpoints were agreed with the relevant statutory consultees (Environmental Statement, Volume 3, Chapter 6: Landscape and visual resources, Table 6.7) (APP-069). The following representative viewpoints are at locations on Offa's Dyke Path National Trail:

- representative viewpoint 11: View west southwest from Offa's Dyke Path, to the south of Moel Maenefa, Clwydian Range and Dee Valley NL (Environmental Statement, Volume 7, Annex 6.5: Landscape visualisations, Part 2, Figures 21 and 22) (APP-107)
- representative viewpoint 12: View west-southwest from Offa's Dyke Path, to the south of Pen-y-Mynydd, Clwydian Range and Dee Valley NL (Environmental Statement Volume 7, Annex 6.5: Landscape visualisations, Part 2, Figures 23 and 24) (APP-107)
- representative viewpoint 19: View southwest from Offa's Dyke Path/public footpath 405/12, Prestatyn hillside, Clwydian Range and Dee Valley NL (Environmental Statement Volume 7, Annex 6.5: Landscape visualisations, Part 3, Figures 37 and 38) (APP-108).
- In addition, the following agreed representative viewpoints are located adjacent to Offa's Dyke National Trail within the Clwydian Range and Dee Valley NL:
- representative viewpoint 18: View southwest from Graig Fawr summit, Clwydian Range and Dee Valley NL (Environmental Statement, Volume 7, Annex 6.5: Seascape Visualisations, Part 3, Figures 35 and 36) (APP-108) is located on a high point within Access Land adjacent to Offa's Dyke National Trail.

1.3.2.21 The Applicant assessed the visual effects of the Mona Onshore Substation experienced by people using Offa's Dyke Path National Trail in Environmental Statement Volume 3, Chapter 6: Landscape and visual resources, at paragraphs 6.11.1.7 to 6.11.1.21 (APP-069). Assessment of visual effects experienced by people at agreed representative viewpoint locations is at section 6.11.2 of the chapter. The visual effects of the Mona Onshore Substation experienced by people using the Offa's Dyke Path are judged to be not significant. This is primarily due to the distance of Offa's Dyke Path from the Mona Onshore Substation, but also to the context of the Mona Onshore Substation and the proposed mitigation, as detailed in Environmental Statement Volume 3, Chapter 6: Landscape and visual resources, section 6.8 (APP-069).

Cumulative offshore and onshore environmental effects of the Mona Offshore Wind Project experienced by people using Offa's Dyke Path

1.3.2.22 Regarding cumulative impacts with Tier 1 onshore and offshore projects, the Applicant assessed cumulative visual effects that might be experienced by users of Offa's Dyke Path National Trail in Environmental Statement Volume 2, Chapter 8: Seascape and visual resources, at sections 8.11.4 and 8.11.9 (APP-060) and in Environmental Statement Volume 3, Chapter 6: Landscape and visual resources, sections 16.14.2 and 16.14.3 (APP-069).

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- 1.3.2.23 Regarding cumulative impacts with the Awel y Môr array, the Applicant assessed cumulative visual impacts from the following representative viewpoint within the Clwydian Range and Dee Valley NL:
- representative viewpoint 11: Moel y Parc, Clwydian Range and Dee Valley NL (Environmental Statement, Volume 8.6: Seascape Visualisations, Part 7, Figure 51).
- 1.3.2.24 Cumulative wirelines have been undertaken from other agreed representative viewpoints, which lie within nationally designated landscapes, but are not on Offa's Dyke Path National Trail.
- 1.3.2.25 Although it is acknowledged that adverse cumulative effects on views and visual amenity will be experienced by users of Offa's Dyke Path National Trail, the Applicant found no significant cumulative effects primarily due to distance from the Mona Array Area and the Mona Onshore Substation, together with the separation between the offshore and onshore elements of cumulative schemes and the scale and context of the onshore projects.
- 1.3.2.26 The Applicant's conclusions are based on a robust assessment of the impacts, including fieldwork and assessment of views from land adjacent to Offa's Dyke Path National Trail.

1.4 Relevant representation – paragraphs 3.1.1.7 to 3.1.1.9

1.4.1 Introduction

- 1.4.1.1 Excerpt from Section 3.1.1.7 to 3.1.1.9 of the NRW Relevant Representation (RR-011).

*3.1.1.7 Overarching National Policy Statement for Energy (NPS EN-1) sets out a requirement for **projects to be designed carefully**, taking account of the potential impact on the seascape and landscape. The aim is to minimise harm to the seascape and landscape, providing reasonable mitigation where possible and appropriate. NRW (A) do not consider that **sufficient evidence** has been provided to demonstrate that seascape, landscape, and visual **impacts have been minimised in this case**.*

3.1.1.8 We advise the proposal would not accord with Policy SOC06 – Designated Landscapes - of the Welsh National Marine Plan 2019 (WNMP) because it

- does not avoid adverse impacts on designated landscapes;*
- has not satisfactorily minimised impacts which cannot be avoided; and*
- has not satisfactorily mitigated impacts which have neither been avoided nor minimised.*

Therefore, we advise that mitigation measures should be explored in the first instance. Enhancement measures should not be proposed unless and until mitigation measures have been fully exhausted.

3.1.1.9 Opportunities to enhance designated landscapes are encouraged by the WNMP but no proposals for enhancement have been included by the applicant in the draft DCO. NRW (A) considers enhancements represent compensation and/or offsetting and not mitigation for adverse effects, as any enhancements would not be directly related to the impacts.

1.4.2 Applicant's Response

- 1.4.2.1 The Mona Offshore Windfarm Project is a Critical National Priority infrastructure project, as defined on page 171 of NPS EN-1 and as set out in section 4.2 of NPs EN-1.
- 1.4.2.2 Environmental Statement Volume 2, Chapter 8: Seascape and visual resources (APP-060), Table 8.3: Summary of NPS EN-1 and NPS EN-3 policy on decision making relevant to seascape, landscape and visual resources, sets out the relevant NPS policies for the Mona Offshore Wind Project.
- 1.4.2.3 Overarching National Policy Statement for Energy (NPS EN-1) recognises that there may be none, or very little scope to change the infrastructure (paragraphs 4.7.6). Paragraph 5.10.5 recognises that due to scale infrastructure projects may be visible over a very wide area, adverse effects have to be balanced with the need for the project (also noted in paragraph 5.10.35). Paragraph 5.10.26 notes that “*reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output.*” The same paragraph notes that “*There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function.*” The Applicant notes that the Mona Array Area is approximately 29 km from the coast at its closest point, in an area of open sea, with no significant visual effects, due to distance and atmospheric conditions.
- 1.4.2.4 National Policy Statement on Renewable Energy Infrastructure (NPS EN-3) paragraph recognises that “*Neither the design nor scale of individual wind turbines can be changed without significantly affecting the electricity generating output of the wind turbines. Therefore, the Secretary of State should expect it to be unlikely that mitigation in the form of reduction in scale will be feasible.*” The Applicant would note that the design of the Mona Offshore Wind Project has been refined following statutory consultation (as documented in Volume 1, Chapter 4: Site Selection and the Consideration of Alternatives (APP-051)).
- 1.4.2.5 Policy SOC_06 on designated landscapes in the Welsh National Marine Plan is referenced in Table 10.4 in Volume 6, Chapter 10: Seascape, Landscape and visual resources (APP-060). This policy has been considered in the assessment of effects on the special qualities of nationally designated landscapes which demonstrates that effects on the special qualities will not be significant. Moderate adverse and potentially significant cumulative effects may potentially arise on one special quality in Eryri National Park.
- 1.4.2.6 The location of the Mona Array Area adheres to following good design principles which are set out in the Stage 2 report of Seascape and visual sensitivity to offshore wind farms in Wales (NRW/White, 2019) which replicates the Guidance on the Assessment of the Impact of Offshore Wind Farms: Seascape and Visual Impact Report (DTI, 2005). These have sought to avoid or minimise adverse effects as stated in Policy SOC_07 Seascapes of the Welsh National Marine Plan. These are:
- located far away from the coastline/ landscape designations
 - located in lower sensitivity seascapes
 - avoids stacking effect
 - set back from the existing/ consented offshore wind farms
 - avoids developments being visible in juxtaposition with sensitive views to headlands

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- avoids providing scale reference in views with small islands or coastal landform/features
- avoids filling framed views in between headlands.

- 1.4.2.7 The Applicant's position is that, regarding offshore effects, due to distance and prevailing atmospheric conditions there will be no significant effects arising from the Mona Array alone, however moderate and potentially significant cumulative effects are identified for the special quality entitled tranquillity and solitude – peaceful areas in Eryri National Park. The National Policy Statements recognise that there is limited, if any, mitigation that can be implemented without reducing electrical generating capacity considerably and making the project uneconomic. As a Critical National Priority infrastructure project, a reduction in electrical generation would not be appropriate, given that no real reduction in significance of effects from the Mona Array on landscape, seascape and visual amenity would be achieved.
- 1.4.2.8 Regarding onshore effects, a landscape strategy has been prepared for the Mona Onshore Substation which includes landscape and visual mitigation as well as landscape enhancements, as set out in the Illustrative Landscape and Ecological Strategy Plan and the Outline LEMP (APP-028). The Outline LEMP is secured through a requirement of the draft DCO (C1 Draft Development Consent Order 03).
- 1.4.2.9 The Applicant notes the wording of Policy SOC_06: Designated landscapes of the Welsh National Marine Plan (2019) recognises that a staged approach should be taken to proposals such that Applicants should seek to avoid impacts in the first instance. Where that is not possible, impacts should be minimised and then mitigated, if required. The Applicant has followed this approach to the Project as demonstrated through its process of site selection as set out in Volume 1, Chapter 4:4 Site Selection and Consideration of Alternatives (APP-051) and its approach to design as set out in J3 Design Principles (APP-189).

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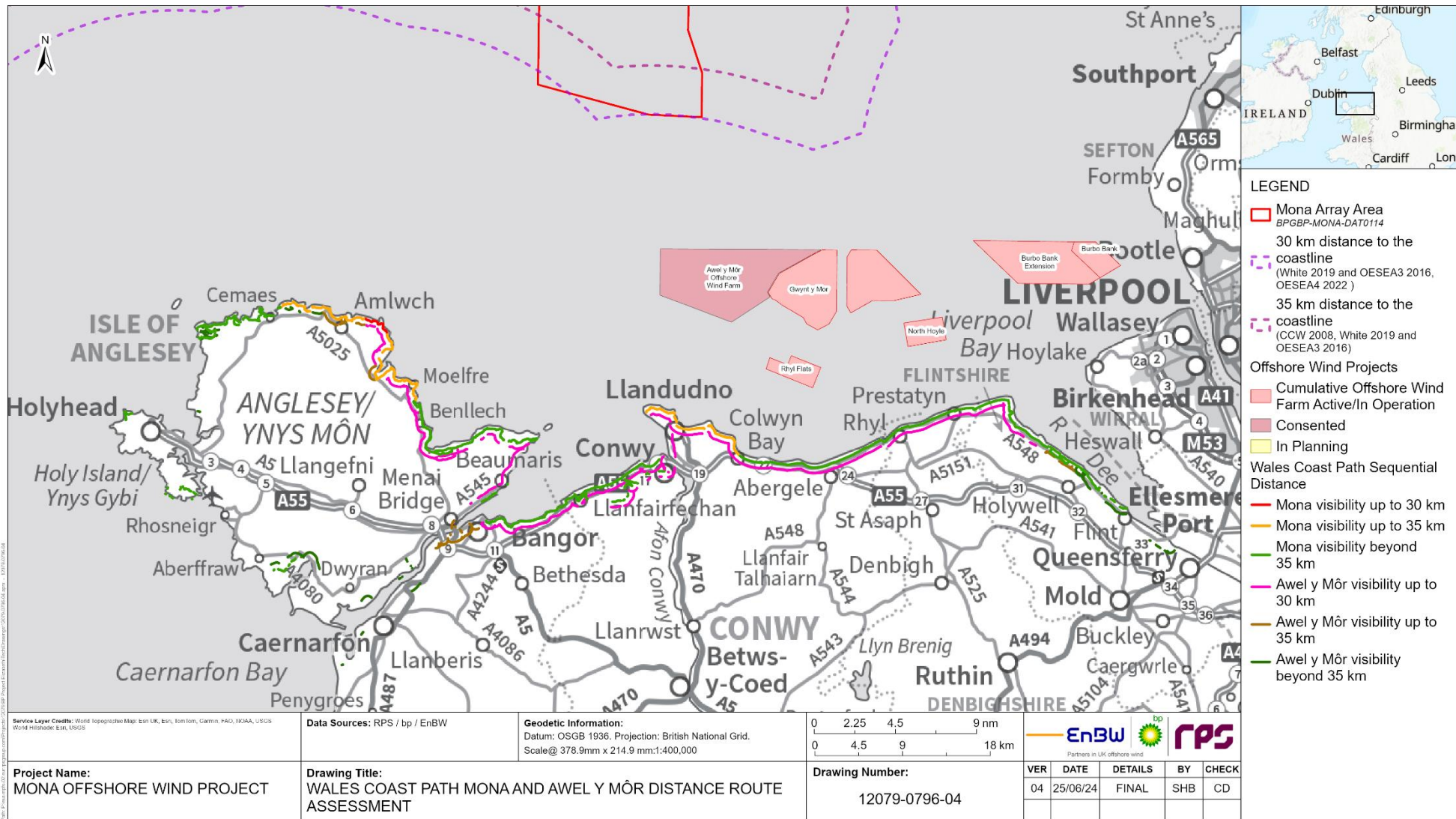


Figure 1.1: Welsh Coastal path to Mona and Awel y Môr distance route assessment (sheet 1).

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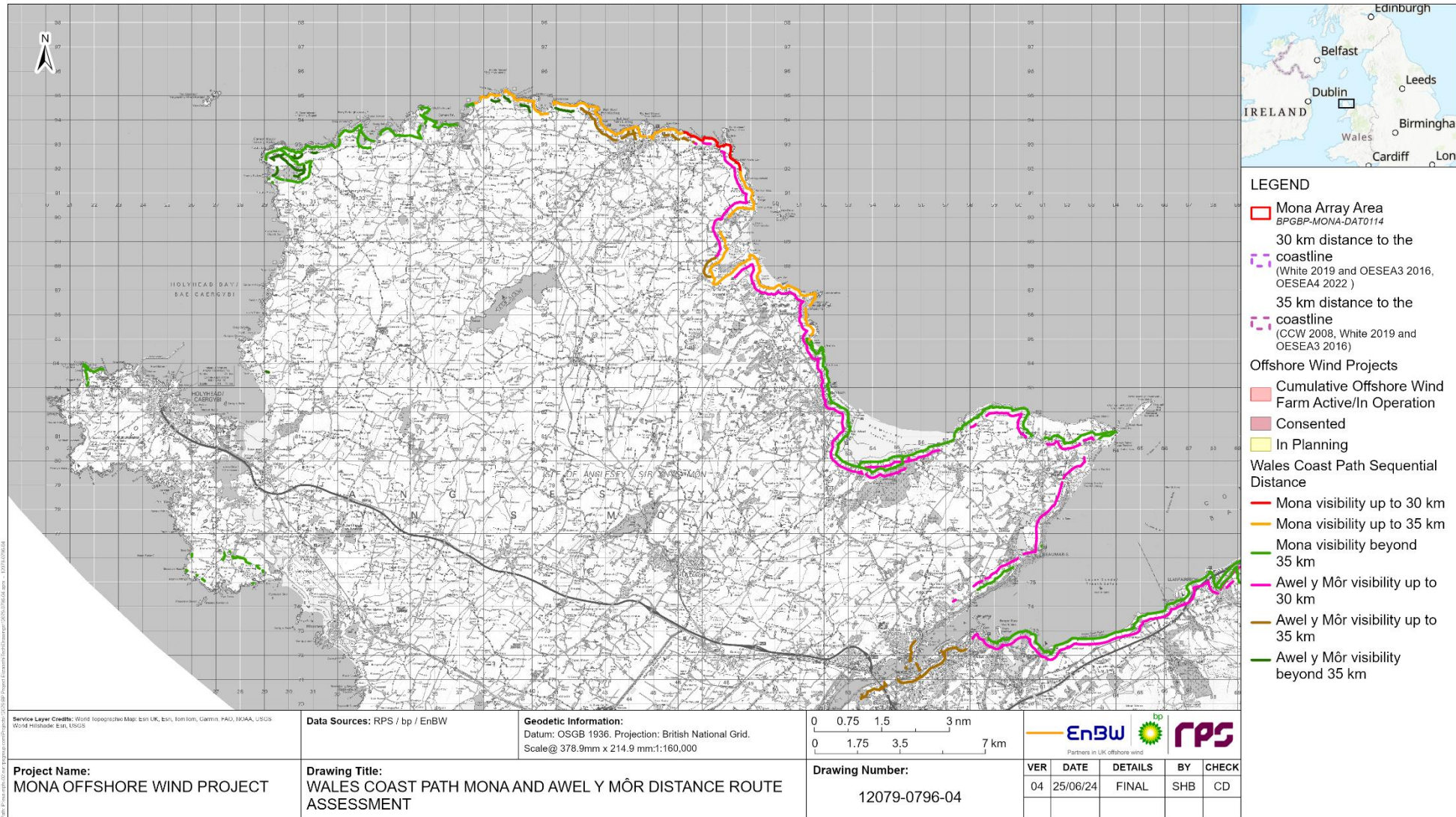


Figure 1.2: Welsh Coastal path to Mona and Awel y Mor distance route assessment (sheet 2)

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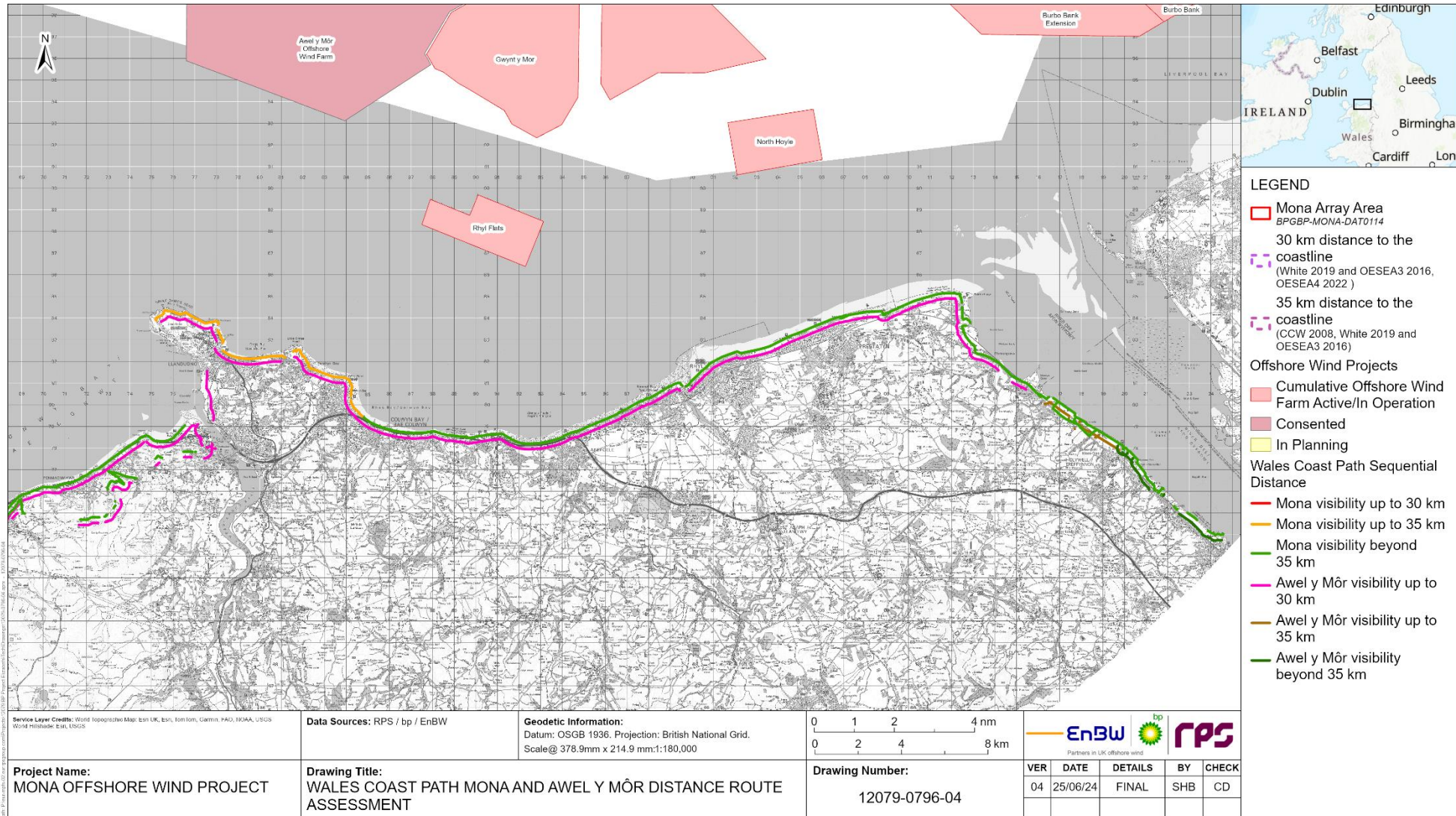


Figure 1.3: Welsh Coastal path to Mona and Awel y Mor distance route assessment (sheet 3).