

Natural Resources Wales
Welsh Government Offices
Cathays Park
King Edward VII Avenue
Cardiff
CF10 3NQ

Ebost/Email:

marine.advice@cyfoethnaturiolcymru.gov.uk

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

By email: monaoffshorewindproject@planninginspectorate.gov.uk

Dyddiad/Date: 04 November 2024

Er sylw / For the attention of: Jake Stephens

Annwyl / Dear Jake,

FFERM WYNT ALLTRAETH MONA / PROPOSED MONA OFFSHORE WINDFARM

**CYFEIRNOD YR AROLYGIAETH GYNLLUNIO / PLANNING INSPECTORATE
REFERECE: EN010137**

EIN CYFEIRNOD / OUR REFERENCE: 20048445

**RE: NATURAL RESOURCES WALES' DEADLINE 4 ISSUE SPECIFIC HEARING 3:
POST HEARING SUBMISSIONS**

Please find below Natural Resources Wales' (NRW) written submissions of its oral case at Issue Specific Hearing 3 ("ISH3"). NRW participated principally in agenda item 5, landscape, seascape and visual impacts.

The submissions are provided together with the following documents (which the Examining Authority ("ExA") requested NRW to provide by Deadline 4):

- (1) All volumes of the White Report (NRW, 2019), which comprise:
 - (i) [Seascape and Visual Sensitivity To Offshore Wind Farms In Wales: Strategic Assessment and Guidance Stage 1- Ready Reckoner Of Visual Effects Related To Turbine Size Simon White, Simon Michaels And Helen King, White Consultants Report No 315 (White Consultants Study)]

- (ii) *Seascape and Visual Sensitivity To Offshore Wind Farms In Wales: Strategic Assessment and Guidance Stage 2- Guidance on Siting Offshore Windfarms Simon White, Simon Michaels And Helen King, White Consultants Report No 330 (White Consultants Study)*
 - (iii) *Seascape and Visual Sensitivity To Offshore Wind Farms In Wales: Strategic Assessment and Guidance Stage 3- Seascape and Visual Sensitivity Assessment for Offshore Wind Farms Simon White, Simon Michaels And Helen King, White Consultants Report No 331 (White Consultants Study)*
- (2) The Anglesey Seascape Character Assessment, 2013.
- (3) A local landscape character assessment undertaken for Eryri National Park, being SPG 07 Landscapes and Seascape of Eryri.

We continue to rely on our previous written submissions on the matters raised at ISH3, but do not repeat those here.

Isle of Anglesey (IoA) National Landscape – effects on special qualities, character and purpose for designation

1. In response to the ExA's request to expand upon its concerns regarding the effect upon the IoA, Mr Jeffcock for NRW explained as follows:
- (1) One of the key differences between the Applicant and NRW relates to how visible or noticeable, and therefore impactful, the turbines will be at locations within the IoA NL. In this regard, our assessment about impact is based both on the facts of the application, as well as on various evidence studies which help to inform an understanding of various matters such as visibility.
 - (2) One of the key evidence studies that has informed our understanding of the likely impacts, are the '*Evidence reports on seascape and visual sensitivity to offshore wind farms*' (referred to by different names, but most commonly the '*White Consultants Study*'). These are independent reports commissioned by NRW based on a digest of evidence related to past cases for UK offshore wind turbines, in large arrays, at different heights and distances away. These reports were commissioned specifically in order to address the issues the present application raises.
 - (3) We addressed the findings of the White Study in our written representations (Page 89 of REP1-056). The White Study seek to provide an analytical approach to identifying the anticipated levels of impact of different heights of offshore wind turbines at different distances from the shore. So far as is relevant to the present application, the key findings of those reports are that:
 - (i) Turbines between 300-350m in height typically have a low magnitude of effect, resulting in a moderate and potentially significant effect on high sensitivity receptors who are up to on average 44km in distance from the turbines;

- (ii) Turbines between 300-350m in height typically have a medium magnitude of effect, resulting in a moderate/major and therefore significant effect on high sensitivity receptors who are up to on average 33km in distance from the turbines.
- (4) These numbers are only a guide, and they do not fully represent the greater impacts of schemes taller than 350m such as the application (with a 364 blade tip height), nor do they provide an upper limit for these effects. But they illustrate the distances where significant effects – as shown by evidence – may occur or are expected to occur. They also support our advice that 29km – which is the distance of the array offshore from the IoA - should not be assumed to be too far for significant impacts to arise, when what is in issue is the impacts of turbines with a 364m blade tip height.
- (5) In terms of the impacts on the NL, its special qualities relates fundamentally to the coast. What is prized are the expansive views, and the peace and tranquillity that is enjoyed. Sea views are particularly important, especially in areas of undeveloped coast. While the character of coastline varies across its length, its value does not. Further granularity regarding the special qualities of particular areas of coastline are set out in the Anglesey Seascape Character Assessment, 2013, prepared by Fiona Fyfe Associates (see pages 97-99 of REP1-056).
- (6) One of the areas particularly affected by the application proposals is SCA 8: Amlwch and Cemaes. The description of this character area highlights valued aspects including the open views seawards to the north, the wild qualities of the rocky coast and seascape, and the sense of remoteness and wildness particularly in areas of coastal heath.
- (7) These characteristics can all be experienced, for example, at viewpoint (VP) 2: Llanlleiana Head (Figures 2.1 - 2.2) (APP-106)., and the adjoining sections of the coast path. What is noticeable about this viewpoint at present is the empty horizon. The development in this view is going to appear isolated. It is a necessary consequence of introducing tall vertical structures into an otherwise empty and open skyline. The eye will be drawn to it. Fundamentally, the development is located sufficiently close that turbines of the scale proposed (both in terms of the vertical height of the turbines and the diameter of their rotating blades), and their quantity, means they would occupy a substantial vertical and horizontal field of view and consequently appear as obvious structures, with blade rotation also attracting attention. For reference, the turbines, at 364m tall and with 320m wide rotating blades, are taller than the tallest skyscraper in the UK, the Shard. The blade diameter is longer than the Shard building in central London is tall (310m).
- (8) Further, these types of impacts are not limited to isolated locations. The geographical extent of impacts along the Anglesey coastline is large. This is evident in the zone of theoretical visibility (ZTV) analysis, which shows visibility across a large geographical area (Figure A.4 (APP-060)) and is evident from the number and wide distribution of viewpoints along the coast.
- (9) These impacts, as confirmed to the ExA at ISH3, have been under-reported by the Applicant. This is because the Applicant has both underestimated sensitivity and

magnitude of effects. The IoA NL should be treated as an area of the highest landscape sensitivity; this the Applicant has not done. Again to use VP2 as an example, this is a nationally promoted route; open access land; on a scheduled monument; on a heritage coast (that is a stretch of outstanding unspoilt coast); within the NL; and described in the Applicant's own SLVIA as being wild and natural in character.

(10) When having regard to all these factors it can be appreciated that there will be significant effects from the application proposals. Our assessment is that the magnitude of change to the special characteristics and qualities of the Seascape Character Assessments (SCAs) on IoA would be medium and the effect up to moderate/major adverse and significant at locations within for example SCA8 of the Anglesey Seascape Character Assessment.

(11) It was explained that the proposals will harm the special characteristics and qualities of the IoA NL which relate fundamentally to the reason for its protection. Therefore, the proposals will neither conserve nor enhance. If the proposals cannot avoid this harm, and our position is that they cannot, then the only avenue that is left, if development consent is granted, is compensation. That is reflected in the National Policy Statement.

2. The Applicant's first response to these points at the hearing was to seek to explain how the location had been chosen, and why it was that there is no alternative location for the project. This however provides no answer at all to the analysis presented by us about the impacts of the application proposals on the special qualities, character and purpose of the IoA NL designation.
3. At the ExA's request, the Applicant agreed to consider what compensation measures could be provided, without prejudice to its maintained position that the proposals will have no significant effects on the IoA NL.

Eryri National Park - effects on special qualities, character and purposes for designation

4. In response to the ExA's request to expand upon its concerns regarding the effect upon the Eryri National Park ("ENP"), Mr Jeffcock for NRW explained as follows:
 - (1) The purpose of ENP's designation and descriptions of its natural beauty and special qualities relate to its tranquillity and solitude, its peaceful areas and its diverse landscapes. With the exception of VP 6, all the SLVIA viewpoints are from within Landscape Character Area (LCA) 1: Ucheldir y Gogledd, of SPG 07 Landscapes and Seascape of Eryri, prepared by the ENP Authority.
 - (2) The key characteristics of this character area include: *'Long views north across the coastline, out to sea and to the Isle of Anglesey'*, and *'A highly tranquil, remote landscape with few modern intrusions and a pervading 'wilderness' quality associated with the mountains'*. A specific *'force for change affecting landscape character'* is *'Offshore wind turbines visible from the LCA impacting on the tranquillity and remoteness of the landscape'*.

- (3) The concerns expressed in respect of the under-reporting of landscape effects as apply to the IoA NL also apply to ENP. At locations within LCA 1, such as the summit of Tal y Fan, we consider the magnitude of change to characteristics of the LCA – which also relate directly to the identified special qualities of the ENP – would be small and the effect moderate adverse.
 - (4) The key difference between the impacts on IoA and ENP is how the turbines will be seen, and the extent over which they are visible, but also fundamentally the difference in the designations. IoA has a specific focus on the coast; whereas ENP has characteristics also focused on mountainscape. There is however a cumulative impact, and clear and adverse effects on ENP.
 - (5) As we emphasised at ISH3, with reference to §427 of Rep1-056, part of the Applicant's error in approach was its misunderstanding of the special qualities of this landscape. As set out in §427, ENP's "*special quality is not confined to the fabric of the landscape but also relates to the character of the ENP and how it is perceived and experienced by people. The full title of the quality is the 'Diverse, high quality landscapes and seascapes within a small geographic area, ranging from coast to rolling uplands to rugged mountains for which Eryri is famed' and the description refers to evidence such as the ENP being 'named the most beautiful National Park in Europe'*".
5. As with IoA, our view is that due to there being cumulative harm that is significant (as well as harm that is non-significant but plainly still adverse), there ought to be some form of mitigation; and if this is not available then there needs to be appropriate compensation. The IoA will require proportionally more compensation given the greater effects to it, but the ENP should also receive compensatory measures.

Methodological concerns of the SLVIA

6. We raised methodological concerns in the context of the particular impacts upon the above landscapes. To confirm, however, there are two principal concerns.
7. The ***first*** of these relates to the inclusion and use of a "very high sensitivity" within the SLVIA. As noted above, the Applicant determined that the nationally significant landscapes that will be affected by the development were of high, and not very high, sensitivity. That has resulted in skewed results and under-reporting of effects.
8. Mr Jeffcock illustrated this point by reference to Table 1.14 on Page 30 in the Volume 6, Annex 8.4: Seascape, Landscape and Visual Resources Impact Assessment Methodology [APP-104]. As can be seen from this table, the inclusion of a very high row makes the matrix uneven. There is no need for the 'no change' column. If that is omitted, there are four categories across the top of the table, but five along the side. The effect is to reduce the number of scenarios where an effect might be considered to be significant.
9. For example, there are 18 instances of either a no change effect or an effect containing the phrase negligible or minor (which are not significant). In contrast, there is only one instance of moderate, and only three instances of moderate/major which is a split category. If you remove the very high category and move the judgements up a level, this would better reflect best and common practice. For example, you would then have

small magnitude with high value resulting in a moderate effect, which is what would normally be expected.

10. We contend that the best practice approach is represented in Table 6 of Department of Trade and Industry (DTI) Report Guidance On The Assessment Of The Impact Of Offshore Wind Farms, which can be seen on page 25 of the White Report (Stage 1 NRW Report) which reproduces that table. The approach in this table provides for an even number of corresponding judgements resulting in a more balanced opportunity for significant effects. It allows for 15 scenarios resulting in significant or potentially significant effects versus 15 scenarios resulting in not significant effects or potentially not significant effects. In contrast the SLVIA has seven significant or potentially significant scenarios versus 18 not significant scenarios (which is more than twice the number).
11. The threshold for receptors being acknowledged as having the highest sensitivity is too high because it is reserved for international designations with the highest levels of susceptibility: see e.g. Table 1.9 [APP-104]. There are very few receptors in the whole of Wales that fall into this category. The Applicant mentions World Heritage Sites, and referred to Slate Landscapes of North Wales. There are only four World Heritage Sites in Wales and these are usually the focus of a cultural heritage impact assessment not of a SLVIA.
12. The reason the Landscape Institute published guidance titled 'Assessing landscape value outside national designations' (TGN 02/21) and not assessing value outside of international designations, is because it is best practice and an established and almost universally agreed principle that receptors relating to National Parks and National Landscapes should generally be treated as having the highest value, and typically also sensitivity.
13. As noted above, an example of the outcome of the Applicant's approach is amply illustrated by VP 2. SLVIA para 8.8.4.22 [APP 060] assesses that views and visual amenity at VP2 are of only high value rather than very high. But this location is:
 - (1) On a locally and nationally promoted route (The Isle of Anglesey Coast Path & Wales Coast Path);
 - (2) Within an area of Open Access Land;
 - (3) Within the Dinas Gynfor Hillfort Scheduled Monument;
 - (4) Within an area of Heritage Coast (stretches of outstanding, unspoilt coastline set up to protect coastlines from insensitive developments and to encourage and help the public to enjoy, understand and appreciate these areas);
 - (5) Within an Area of Outstanding Natural Beauty / National Landscape (designated for the purpose of conserving and enhancing the natural beauty of the area); and,
 - (6) The current view, as described in the SLVIA is an '*attractive seascape view [which] is wild and natural in character*'.
14. All these are indicators of a receptor that should be treated as having the highest value.

15. In sum, this matters because the resulting assessments in the SLVIA underestimate the value and sensitivity of receptors which, combined with the skewed matrix, means that the impacts on receptors which would ordinarily be considered to be significant have not been assessed as such in the SLVIA.
16. The **second** principal concern relates to the omission to deal with local seascape and landscape character areas. A high level lens has been applied which again results in effect being under-reported. This was a point raised both orally and in pages 97 and 98 of our REP1-056.
17. The consequence of omitting local baseline studies is that key characteristics and qualities within those areas and the impact on these are unreported. It also means that sensitivity is underestimated. For example, by concluding that National Character Area (NCA) 1 is the only receptor to consider in respect of character, the sensitivity of the IoA NL (which it includes) is assessed as 'medium to high'. This is reasoned to be on account of *'the NLCA which is punctuated by settlement and occasional conspicuous infrastructure (e.g. Wylfa Nuclear Power Station and onshore wind farms'* (see para 8.8.2.53 [APP 060]). However, these factors do not apply to most of the NL.
18. Furthermore, judgements on the geographical extent of impacts also distort conclusions because they are based on the geographical extent of a national character area, which covers a substantial area drawn at a national scale. By focusing on the NCA, for example, the Applicant is able to conclude that the *'remainder of coastal landscape of NCLA will be scarcely affected'* (para 8.8.2.63 [APP 060]). The NCA relates to a landscape which covers all of the coast of IoA and its hinterland. It is an enormous area. The Applicant's conclusion as a result is that the magnitude of change on the character of NCA 1 (the Anglesey Coast which includes the AONB) is negligible to small, with a minor effect.
19. Overall, we advise that the Applicant's lack of a detailed assessment has led to key aspects of the landscape being missed and conclusions being skewed towards being considered of lesser importance, than had a more detailed assessment being undertaken. These issues are also compounded by the underlying faults in the methodology regarding the lack of opportunities for significant effects to be identified, only in the most extreme scenarios.
20. Finally, we urge caution when relying on the photomontages and wirelines that have been produced. Our concerns about these matters are expressed in response to the ExA's question 1.20.1 in REP1-056, and in respect of the need to consider impacts in conditions of maximum visibility, as set out in §181 onwards in REP3-090.

Compensation matters

21. We are grateful for the ExA's direction that the Applicant should consider what compensation measures could be provided, without prejudice to its maintained position that the proposals will have no significant effects on the relevant landscapes. We confirm that we are willing to discuss compensation measures with the Applicant, which we maintain will be necessary should development consent be granted in this matter.

Our comments are made without prejudice to any further comments we may wish to make in relation to this application and examination whether in relation to the Environmental Statement (ES) and associated documents, provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by bpENBW ('the Applicant'), the Examining Authority or other Interested Parties.

Should further clarity be required, we will be pleased to answer these further through the Examining Authority questions and / or a Rule 17 request(s).

Please do not hesitate to contact Emma Lowe [REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)
Nia Phillips ([REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)) and Siôn Williams [REDACTED]
[REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)) should you require further advice or information regarding these representations.

Yn gywir / Yours sincerely,

[REDACTED]

Andrea Winterton
Marine Services Manager
Natural Resources Wales