

MONA OFFSHORE WIND PROJECT

GN 017 and the Mona Landscape and Visual Impact Assessment

Deadline: 6

Application Reference: EN010137

Document Reference: S_D6_51

Document Number: MOCNS-J3303-RPS-10526

20 December 2024

F01



Image of an offshore wind farm

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Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D6	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	20 Dec 2024

Prepared by:

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Prepared for:

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition,

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Term	Meaning
	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

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Term	Meaning
Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).

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Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

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Units

Unit	Description
GW	Gigawatt
km	Kilometres
km ²	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

1 GN 017 AND THE MONA LANDSCAPE AND VISUAL IMPACT ASSESSMENT

1.1 Introduction

1.1.1.1 At the request of the Examining Authority (ExA) the Applicant provided an extract from NRW's latest guidance on landscape sensitivity assessment guidance, Guidance Note GN 017: Landscape Sensitivity Assessment guidance for Wales (NRW, 2023). This guidance was published in February 2023.

1.1.1.2 During Statement of Common Ground (SoCG) discussions, NRW(A) commented as follows:

“NRW (A) have been unable to find any reference to GN 017 within the SLVIA methodology and therefore it is not clear whether GN 017 informed the methodology.”

1.1.1.3 This note sets out the influence that GN 017 (NRW, 2023) has had on the seascape and landscape assessment for the Mona Offshore Wind Project.

1.2 Overview and purpose of Guidance Note GN 017

1.2.1.1 When GN 017 (NRW, 2023) was published, it was reviewed in the context of the Mona seascape, landscape and visual resources assessment methodology (as set out in Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156) for the landscape sensitivity assessment, and APP-104 (Volume 6, Annex 8.4: Seascape, landscape and Visual Resources Impact Assessment Methodology (APP-104) for the seascape assessment) prior to the Application for Development Consent being made. However, the Applicant notes that as GN 017 (NRW, 2023) applies to landscapes and as the nationally designated areas are landscapes, the methodology set out in Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156) is the relevant methodology to consider alongside GN 017.

1.2.1.2 GN 017 (NRW, 2023) is about *“How to commission, carry out, use, and update a landscape sensitivity assessment to influence spatial planning and land management change.”* (first page of GN 017; NRW, 2023). It is primarily guidance on how to undertake or update an area-wide landscape character assessment, not methodology on how to assess the sensitivity of a landscape to a particular development.

1.2.1.3 The guidance note also explains who the document is for:

- *“Forward Planners and landscape specialists, typically in Local Planning Authorities, considering landscape in spatial planning and policymaking*
- *Those carrying out landscape sensitivity assessments, usually Landscape Architects*
- *Decision-makers and stakeholders wanting an understanding of the technique and use of landscape sensitivity assessment”* (first page of GN 017; NRW, 2023).

1.2.1.4 Section 2.1 of Guidance Note GN 017 (NRW, 2023) explains that *“Landscape Sensitivity Assessments are strategic appraisals of the relative sensitivity of landscapes to development or land use changes. They are an important tool to help guide development to the least sensitive locations in the early stages of spatial planning, before individual development proposals come forward on specific*

development sites. As such, Local Planning Authorities often use them when preparing their Local Development Plans.” This is the primary area that GN 017 covers.

- 1.2.1.5 The different stages of landscape sensitivity assessment are set out on page 9. Stage 2b instructs the assessor to *“Use LANDMAP or existing character assessments and amalgamate, subdivide and update areas to provide the right scale of units for reporting the change scenarios.”* The Applicant’s methodology explains that it has used the LANDMAP assessments together with GLVIA3 (Landscape Institute and Institute of Environmental Management and Assessment, 2013) methodology, as the basis for the LVIA methodology (see sections 1.4 and 1.5, of Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156)).
- 1.2.1.6 As described above in paragraphs 1.2.1.2 *et seq.*, GN 017 (NRW, 2023) is primarily guidance on spatial planning and how to commission/undertake a landscape character assessment in Wales. Nevertheless, there are elements of the guidance which are applicable to the assessment of a development on a landscape and this note explains the approach taken in Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156) and the applicable components of GN 017 (NRW, 2023).

1.3 GN 017 and Landscape Visual Impact Assessment (LVIA) methodology

- 1.3.1.1 The guidance provided in GN 017 (NRW, 2023) is not directly comparable with that in GLVIA3 (Landscape Institute and Institute of Environmental Management and Assessment, 2013), as Section 3 of GN 017 (NRW, 2023) explains. The guidance is primarily concerned with using landscape sensitivity assessment in spatial planning (i.e. at an area-wide level). With sub-section 3.3 of GN 017 (NRW, 2023) explaining the difference between landscape sensitivity, and landscape and visual impact assessments. Guidance Note GN 017 (NRW, 2023) notes that *“Landscape Sensitivity Assessments share some common principles with the Guidelines for Landscape and Visual Impact Assessment, published by the Landscape Institute.”* However, it differs, in that *“Landscape sensitivity assessments are used in forward planning before an actual development proposal or preferred site comes forward. It specifies generalised scenarios for types and scales of development or land management change.”*
- 1.3.1.2 GN 017 (NRW, 2023) does not require professionals undertaking LVIAs to rework the existing, published landscape character and landscape sensitivity assessments. Rather it advises landscape professionals to use the existing guidance, which in Wales includes LANDMAP (as the most detailed form of landscape characterisation).

1.4 LANDMAP Aspect Area assessments

- 1.4.1.1 The LANDMAP Aspect Area assessments have been undertaken by professionally qualified experts. In the case of the Visual and Sensory Aspect layers this includes consultants from the local planning authorities and practices, such as Land Use Consultants and White Consultants.
- 1.4.1.2 The Visual and Sensory Aspect Layers are reviewed and updated regularly. Those Aspect Areas on the Isle of Anglesey were created by IoACC and monitored/reviewed by White Consultants. The overall Visual and Sensory Aspect Area evaluations on the north coast of Anglesey vary between Low and Outstanding
- 1.4.1.3 Those Visual and Sensory Aspect Areas within Eryri National Park were created by the Local Planning Authority and monitored/reviewed by both White Consultants and

Land Use Consultants. The overall evaluations for those Aspect Areas on the northern edge of the National Park vary between Low and Outstanding.

1.5 Similarities between GN 017 and Mona LVIA methodology

1.5.1.1 Where GN 017 (NRW, 2023) and the Mona LVIA methodology are similar are in the definitions of Landscape Sensitivity. The GN 017 (NRW, 2023) definitions are at section 5.5 of the Guidance Note. The Mona definitions are set out in Table 1.8 of APP-156. A comparison of these is set out in Table 1.1 below. Although the Mona definitions of value include regional and local designations, the values are comparable. The Applicant notes that both sets of definitions have nationally designated landscapes having a High or Very High value. The GN 017 (NRW, 2023) definition includes the LANDMAP criteria, which have been used to understand the variety of landscape values within the designated and non-designated landscape areas.

1.6 Comparison of GN 017 and Mona LVIA methodology definitions of landscape sensitivity

Table 1.1: Comparison of GN 017 (NRW, 2023) and Mona LVIA methodology definitions of landscape sensitivity.

Landscape sensitivity level	Susceptibility definitions		Value definitions	
	GN 017 (NRW, 2023)	Mona	GN 017 (NRW, 2023)	Mona
Very High	Susceptibility influences - The assessment unit landscape and its key characteristics are unable to accommodate the change scenario without also fundamentally changing the overall landscape character or key characteristics, without adverse effects. It's resilience to such change is very low.	Exceptional landscape/seascape quality; absence of landscape/ seascape detractors; no or limited potential for substitution. Key elements/features well known to the wider public	Landscape value influences - The assessment unit is within or occupies a prominent part of the visible setting of a nationally important landscape designation , possibly with areas of nature conservation or cultural heritage designations too. The area may also present a famous or iconic cultural or visual image or sense of place derived from its landscape or key characteristics, which is reflected clearly in multiple expressions of landscape value. There are one or more outstanding evaluations in LANDMAP and others are likely to be mostly high.	Internationally/nationally designated landscape , or key elements or features of internationally/nationally designated landscape
High	Susceptibility influences - The assessment unit landscape and its key characteristics may be able to accommodate the change scenario in limited situations, but more typically there would be fundamental change to overall 34 of 56 landscape character or key characteristics, with adverse effects. Resilience to change is low / medium.	Strong/ distinctive landscape/ seascape character; relatively free of seascape/ landscape detractors	Landscape value influences - The assessment unit is within, or part of the visible setting of, a nationally important landscape designation , possibly also with areas of important nature conservation or cultural heritage. The area presents a strong cultural or visual image or sense of place derived from its landscape or key characteristics. There are one or more outstanding or high evaluations in LANDMAP.	Nationally/ regionally designated landscape areas or features

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Landscape sensitivity level	Susceptibility definitions		Value definitions	
	GN 017 (NRW, 2023)	Mona	GN 017 (NRW, 2023)	Mona
Medium	Susceptibility influences - The assessment unit landscape and its key characteristics may have the ability to accommodate the relevant type of development in some defined situations without fundamental change to overall landscape character or key characteristics. There are likely to be adverse effects. Resilience to change is medium.	Some distinctive landscape/ seascape characteristics; presence of landscape/ seascape detractors	Landscape value influences - The assessment unit is an area that presents a recognisable cultural or visual image or sense of place derived from its landscape and has key characteristics that are recognised for this. There are likely to be moderate LANDMAP evaluations, but some variation is likely.	Regionally/ locally designated/ valued landscape and features, e.g., Special Landscape Areas (SLA) or Areas of Great Landscape Value (AGLV)
Low	Susceptibility influences - The assessment unit landscape and its key characteristics can accommodate the change scenario in many situations without fundamental change to overall landscape character. There may be some adverse effects. Resilience to change is medium / high	Absence of distinctive landscape/ seascape characteristics; unavoidable presence of landscape/ seascape detractors	Landscape value influences - The assessment unit is an area that has some cultural or visual identity or sense of place derived from its landscape key characteristics, but this may not be expressed very noticeably. LANDMAP evaluations are likely to be mostly in the moderate or low range.	Undesignated landscape/ seascape and features
Very Low/ Negligible	Susceptibility influences - The assessment unit and its key characteristics can accommodate the change scenario in most situations without adverse effects on landscape character, assuming appropriate siting, design, and mitigation. Resilience to change is high.	Absence of positive landscape/ seascape characteristics. Significant presence of landscape/ seascape detractors	Landscape value influences - The assessment unit is an area where the connection between cultural or visual identity or sense of place and landscape is not clearly expressed. LANDMAP evaluations are mostly low.	Undesignated landscape/ seascape and features

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1.7 References

Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment: Third Edition.

Natural Resources Wales (2023) Landscape Sensitivity Assessment guidance for Wales. GN 017.