

MONA OFFSHORE WIND PROJECT

Mona and Natural Resource Wales (advisory) SLVIA SoCG

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
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, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
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
AEol	Adverse Effects on Integrity
AONB	Area of Outstanding Natural Beauty
CRDV	Clwydian Range and Dee Valley
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ENP	Eryri National Park
EWG	Expert Working Group
ExA	Examining Authority
HRA	Habitats Regulations Assessment
IoA	Isle of Anglesey
ISAA	Information to Support Appropriate Assessment
LAT	Lowest astronomical tide
LSE	Likely Significant Effect
MDS	Maximum Design Scenario
MCZ	Marine Conservation Zone
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
NL	National Landscape
NRW (A)	Natural Resources Wales Advisory

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Acronym	Description
NRW (MLT)	Natural Resource Wales Marine Licensing Team
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SAC	Special Area of Conservation
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area
ZOI	Zone of Influence

Units

Unit	Description
kV	Kilovolts

1 Statement of Common Ground between Mona Offshore Wind Project and Natural Resources Wales Advisory – Seascape, landscape and visual

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and Natural Resources Wales Advisory (‘NRW (A)’), together the parties. The SoCG sets out the areas of current agreement, disagreement and in that context, matters of ongoing discussion between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and NRW is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters and will facilitate further discussion between the parties. The SoCG will be updated during the Mona Offshore Wind Project Examination.

1.1.1.4 This SoCG relates to the seascape, landscape and visual impact assessment (SLVIA) aspects of the Mona Offshore Wind Project Application and is one of three SoCGs between the Applicant and NRW (A) which cover the following broad areas of the DCO application:

- Offshore
- Onshore
- SLVIA.

1.1.1.5 The three SoCGs should be read in conjunction with one another to clarify the Applicant and NRW (A)’s position on the DCO application as a whole. Topics which are covered in this SoCG are listed in section 1.1.2.7.

1.1.1.6 The Applicant has engaged with NRW (A) on these SoCGs for Deadline 1 however the Applicant and NRW (A) acknowledge that additional work is required on the SoCGs as the Examination progresses.

1.1.2 Mona Offshore Wind Project Elements under NRW’s Remit

1.1.2.1 NRW’s remit, as set out in the relevant representation (RR-011) is to pursue the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources. All elements of the Mona Offshore Wind Project may be relevant to NRW (A) in its function as statutory consultee, covering the offshore, intertidal and onshore works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (PDA-003).

1.1.2.2 In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation including (but not limited to) the Environmental Permitting

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(England and Wales) Regulations 2016 (as amended), Conservation of Habitats and Species Regulations 2017 and the Marine and Coastal Access Act 2009.

- 1.1.2.3 NRW broadly has two main functions in relation to marine development:
- As a marine licencing authority (acting on behalf of the Welsh Ministers)
 - As an advisor and statutory consultee
- 1.1.2.4 NRW's role as a licensing authority and statutory consultee are independent to ensure appropriate functional separation between them.
- 1.1.2.5 For the avoidance of doubt, this SoCG relates solely to NRW's advice in its capacity as a statutory consultee and advisor. This SoCG does not include the view of NRW Marine Licensing Function.
- 1.1.2.6 This SoCG covers the onshore and offshore elements of the scheme, including the intertidal zone. In relation to the DCO regime, NRW (A) has engaged in the pre-application process, both through membership of the Expert Working Group (EWG) meetings via the Evidence Plan process, and through bi-lateral discussions pre- and post-application. Key consultation is presented in Table 1.2 and Table 1.3.
- 1.1.2.7 This SoCG covers the following technical topics of the Mona Offshore Wind Project application which are of relevance to NRW (A):
- Seascape and visual resources
 - Landscape and visual resources.

1.1.3 Overview of Mona Offshore Wind Project

- 1.1.3.1 The Applicant has submitted an application for a Development Consent Order under the Planning Act 2008 for the construction, operation and maintenance of the Mona Offshore Wind Project, a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:
- **Mona Array Area:** This is where up to 96 wind turbines with maximum blade tip height above LAT of 364 m, up to four Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), up to 325 km of inter-array cables and up to 50 km of interconnector cables will be located
 - **Mona Offshore Cable Corridor and Access Areas:** The corridor located between the Mona Array Area and the landfall up to Mean High Water Springs (MHWS), in which up to 360 km of offshore export cables will be located and in which the intertidal access areas are located
 - **Intertidal access areas:** The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
 - **Landfall:** This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
 - **Mona Onshore Development Area:** The area in which the landfall, Mona Onshore Cable Corridor (maximum length of up to 15 km), Mona Onshore Substation, mitigation areas, temporary construction infrastructure (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the 400 kV connection to National Grid infrastructure will be located

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- **Mona Onshore Substation:** This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- **Mona 400 kV Grid Connection Cable Corridor:** The corridor from the Mona Onshore Substation to the National Grid substation with a maximum length of up to 1 km.

1.1.3.2 A description of the offshore and onshore components required for the construction, operation and maintenance and decommissioning phases of the Mona Offshore Wind Project is available in Volume 1, Chapter 3: Project Description (APP-050).

1.1.4 Approach to SoCG

1.1.4.1 This SoCG has been developed during the pre-examination phase and will be progressed during the examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by NRW (A) within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan Process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by NRW (A) during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 In accordance with discussions between the Applicant and NRW (A), the SoCG is focused on the topics listed in paragraph 1.1.2.7.

1.1.4.3 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreements log.

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 07 August 2024 (Deadline 1).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and those Matters Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, ongoing points of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreement status
Seascape and visual resources	Some matters agreed, some matters not agreed
Landscape and visual resources	Some matters agreed, some matters not agreed

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1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a brief overview of the consultation undertaken by the Applicant with NRW during the pre-application (both statutory and non-statutory) phases of the Mona Offshore Wind Project.

1.3.1.2 Table 1.3 below provides a summary of the consultation undertaken by the Applicant with NRW during the post-application phases of the Mona Offshore Wind Project. The consultation presented is not exhaustive but provide an indication of aspects of key discussions undertaken. All attendees at the meetings are provided in the Technical Engagement Plan (APP-041) and Consultation Report (APP-037) however, for the avoidance of doubt, this SoCG is limited to matters between NRW (A) and the Applicant.

1.3.1.3 This SoCG makes reference to other documents submitted with the Mona Offshore Wind Project application that set out, in greater detail, the discussions that have taken place between NRW (A) and the Applicant. These documents are:

- The Technical Engagement Plan (APP-041) and appendices (APP-042, APP-043, APP-044)
- The Consultation Report (APP-037) and appendices (APP-038, APP-039, APP-040)
- NRW’s Relevant Representation (RR-011)
- The Applicant’s response to NRW’s Relevant Representation at the Procedural Deadline (PDA-008 to PDA-019).

Table 1.2: Summary of key pre-application consultation with NRW regarding seascape and landscape matters.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
15 June 2022	Scoping Opinion	Statutory	<ul style="list-style-type: none"> • Issue of Scoping Opinion (APP-194)
Statutory (Section 42) consultation			
04 June 2023	Statutory consultation	Statutory	<ul style="list-style-type: none"> • Statutory consultation responses from NRW are presented in Consultation Report Appendices – Part 3 (D.25-F) (APP-040).
Evidence Plan steering group			
14 December 2021	Meeting	Non-statutory	<ul style="list-style-type: none"> • Introduce the cable route selection study • To procure high level feedback on the cable routing process • To identify any concerns.
20 July 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> • Approach to cable route selection • Likely Significant Effect (LSE) screening methodology • Opportunities to discuss points from the Scoping Opinion.

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
14 February 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> Habitats Regulations Assessment (HRA) Stage 1 Screening and Information to Support Appropriate Assessment (ISAA) methodology Consultation on the Preliminary Environmental Information Report (PEIR) and building towards the SoCGs Cable route site selection study updates Engineering considerations towards Special Areas of Conservation (SACs).
29 June 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> HRA Stage 1 Screening and ISAA methodology Section 42 responses Agreement logs.
17 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> HRA Stage 1 Screening and ISAA methodology Underwater Sound Management Strategy Agreement logs.
Seascape, landscape and visual resources			
24 November 2022	Online meeting	Non-statutory	<ul style="list-style-type: none"> Baseline characterisation (study area, indicative distances, baseline character) Wind turbine layouts and viewpoint plan Wirelines (discussion and agreement on 'worst case').
17 August 2023	Online meeting	Non-statutory	<ul style="list-style-type: none"> Presenting the Design Review Report.
4 October 2023	Meeting (Onshore Ecology EWG 05)	Non-statutory	<ul style="list-style-type: none"> Consultation on the substation design strategy Landscape and ecology strategy Factors that influenced design of the landscape and ecology strategy including existing vegetation, hedgerows and trees Draft visualisations.
8 December 2023	Meeting (Onshore Ecology EWG 06)	Non-statutory	<ul style="list-style-type: none"> Outline Landscape and Ecology Management Plan (APP-208) which confirmed that it will focus on retention and/ or enhancements of key boundary features at the Onshore Substation and additional planting.

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Table 1.3: Summary of post-application consultation with NRW regarding seascape and landscape matters.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
10 May 2024	Relevant representation	Statutory	<ul style="list-style-type: none"> Provision of NRW's relevant representation (RR-011).
05 July 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> Review of the initial SoCG
25 June 2024	Applicant's response to NRW's relevant representation	Statutory	<ul style="list-style-type: none"> Provision of the Applicant's response to NRW's relevant representation at the Procedural Deadline (PDA-011 and PDA-012).
17 July 2024	Issue Specific Hearing 2	Statutory	<ul style="list-style-type: none"> Discussion on landscape, seascape and visual matters
7 August 2024	Written representation	Statutory	<ul style="list-style-type: none"> Provision of NRW's written representation at Deadline 1 (REP1-056).
9 August 2024	Applicant's Response at Deadline 1	Statutory	<ul style="list-style-type: none"> Submissions include: <ul style="list-style-type: none"> Hearing summary (ISH2) (REP1-010) Hearing action points (REP1-012, REP1-015 and REP1-016) Statement of Common Ground – Natural Resources Wales (Advisory) (Seascape, Landscape and Visual Impact Assessment) at Deadline 1 (REP1-027)
27 August 2024	Applicant's Response at Deadline 2	Statutory	<ul style="list-style-type: none"> Provision of the Applicant's response at Deadline 2 to NRW's written representation (REP2-080).
30 September 2024	Response to Ex.Q1	Statutory	<ul style="list-style-type: none"> Natural Resources Wales response to the Ex.Q1 (REP3-093).
30 September 2024	Response to Ex.Q1	Statutory	<ul style="list-style-type: none"> The Applicant's response to the Ex.Q1 (REP3-062).
30 September 2024	NRW's Response at Deadline 3	Statutory	<ul style="list-style-type: none"> NRW's response to the Applicant's submission at Deadline 2 (REP3-089).
30 October 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> Meeting to discuss an updated draft of the SoCG.
16 October 2024	Issue Specific Hearing 3	Statutory	<ul style="list-style-type: none"> Discussion on landscape, seascape and visual matters
4 November 2024	NRW's Response at Deadline 4	Statutory	<ul style="list-style-type: none"> Submissions include: <ul style="list-style-type: none"> Hearing summary (ISH3) (REP4-107) Response to the Applicant's deadline 3 submission (REP4-105) Papers associated with seascape matters (REP4-104, REP4-109, REP4-110, REP4-111 and REP4-112)

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
4 November 2024	Applicant's Response at Deadline 4	Statutory	<ul style="list-style-type: none"> • Submissions include: <ul style="list-style-type: none"> – Hearing summary (ISH3) (REP4-032) – Hearing action points (REP4-036) – Updated visualisations (REP4-038 and REP4-039) – ZTV at 1:50,000 scale (REP4-046) – Response to NRW deadline 3 submission (REP4-047) – Response to NRW Ex.Q1 (REP4-065) – Landscape Sensitivity Assessment Guidance for Wales (REP4-085) – Landscape and Seascape Character in Wales – assessment of effects from the Mona Array Area (REP4-087)
13 November 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> • Meeting to discuss an updated draft of the SoCG and the Isle of Anglesey without prejudice landscape enhancement package.
3 December 2024	NRW's Response at Deadline 5	Statutory	<ul style="list-style-type: none"> • Submissions include: <ul style="list-style-type: none"> – Response to NRW ISH3 post hearing Submission (REP5-060) – Response to NRW D4 submission (REP5-061) – Response to Examining Authority's written questions (ExQ2) (REP5-081)
3 December 2024	Applicant's Response at Deadline 5	Statutory	<ul style="list-style-type: none"> • Submissions include: <ul style="list-style-type: none"> – Deadline 5 submission (REP5-098)
5 December 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> • Meeting to discuss the Isle of Anglesey without prejudice landscape enhancement package.
20 December 2024	NRW's Response at Deadline 6	Statutory	<ul style="list-style-type: none"> • Submissions include: <ul style="list-style-type: none"> – Deadline 6 submission (REP6-137)
20 December 2024	Applicant's Response at Deadline 6	Statutory	<ul style="list-style-type: none"> • Submissions include: <ul style="list-style-type: none"> – Response to NRW D5 submission (REP6-098) – Cumulative Zone of Theoretical visibility at 1:50,000 scales (REP6-127) – GN 017 and the Mona landscape and visual impact assessment (REP6-128)
7 January 2025	Meeting	Non-statutory	<ul style="list-style-type: none"> • Meeting to discuss the Isle of Anglesey without prejudice landscape enhancement package.

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1.4 Agreement log

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed, not agreed but no material impact or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither “agreed” or “not agreed” and is a matter where further discussion is required between the parties. For example, where additional clarification is being sought from either party.
Not agreed – but no material impact	The matter is not considered to be agreed between the parties, but is not deemed material. For example, the matter is not agreed however the outcome of the approach taken by either party does not result in a material impact on the assessment, assessment conclusions in either EIA or HRA terms.
Not agreed – material impact	The matter is not considered to be agreed between the parties. The outcome of the approach taken by either party is considered to result in a materially different outcome on the assessment conclusions.

1.4.1.2 Table 1.5 and Table 1.6 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2).

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1.4.2 Seascape and visual resources

Table 1.5: Agreement Log between the parties on seascape and visual resources.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.SVR.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on seascape and visual resources.	NRW (A) agrees that the Applicant has undertaken adequate consultation with NRW (A) on potential impacts on seascape and visual resources.	Agreed
NRW.SVR.2a	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on seascape and visual resources. The Applicant has provided an assessment of local landscape and seascape character in Landscape and Seascape Character in Wales – assessment of effects from the Mona Array Area (REP4-087).	NRW (A) welcomes the provision of the additional assessment, although we do not agree with the findings.	Agreed
NRW.SVR.2b	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on the presentation of information, including presentation of information. The Applicant notes NRW (A)'s response at deadline 3 (paragraph 164) and provided NRW (A) with the Zone of Theoretical Visibility (ZTV) on a 1:50,000 OS base (REP4-046). The Applicant notes NRW (A)'s response within this SoCG and provided NRW (A) with the cumulative ZTV on a 1:50,000 OS base at Deadline 6.	NRW (A) welcomes the provision of the ZTV mapping on a 1:50:000 OS base which replaces the previous mapping presented at 1:1,000,000 (Figure A.4) and the cumulative ZTVs which were presented at approximately 1:200,000.	Agreed
NRW.SVR.3	Policy and planning	The Application has identified and considered all plans and policies relevant to seascape and visual resources, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to seascape and visual resources, within NRW (A)'s remit.	Agreed
NRW.SVR.4	Baseline environment	The Applicant has provided an assessment of the potential effects of the Mona Array Area on the local landscape character areas within the Nationally Designated landscapes in REP4-087.	NRW (A) do not agree with the conclusions of the SLVIA with regards to its assessment of effects on local landscape character areas nor the overall impact on Nationally Designated Landscapes, and consider	Not Agreed – Material Impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		<p>The Applicant has appropriately characterised the baseline environment for seascape and visual resources, notably seascape sensitivity zones and marine character areas in which the Mona Array Area is located. The Mona Array Area is located within Seascape Sensitivity Zone (SSZ) 2 and SSZ5, and adjacent to Wales National Marine Character Area (MCA) 04. Both SSZ2 and SSZ5 have been defined as having the lowest sensitivity to offshore wind development within the east Irish Sea Round 4 offshore wind zone, with a category of medium/low sensitivity (White Consultants, 2019).</p> <p>The Applicant has reviewed the White Consultants (2019) sensitivity studies (Stages 1, 2 and 3).</p> <p>The Applicant provided its response to NRW's assertion that Seascape Sensitivity Zone 2 should have a higher sensitivity than that published in White Consultants (2019) in Response to NRW Deadline 3 Submission (REP4-047; response to REP3-090.202) and reiterates that the authors of the documents have not issued an errata. The Applicant has used the sensitivity as published in White Consultants (2019).</p> <p>The Applicant has had regard to White Consultants (2020), which superseded the White Consultants (2019) reports. White Consultants (2020) considered turbines up to 400 m.</p>	<p>this is partly due to the Applicant's underestimation of the value and sensitivity of the baseline environment.</p> <p>Responding to the specific issue raised in this SOCG by the Applicant regarding the SSZs, NRW (A) consider the Applicant has not adequately reviewed the findings of the sensitivity study, and its relevance to this application. Refer to our Deadline 3 submission [REP3-090] for further details regarding the analysis and evaluation of Zone 2, and its relevance to this application. By way of summary, the evaluation omitted consideration of the IoA NL, signalled that greater sensitivity would apply to taller turbines (between 300-350m), and it did not consider the sensitivity to turbines of the height proposed in the Mona Array (364m). Therefore the findings cannot be directly applied to this application.</p> <p>For our comments regarding differences between the different White Consultants Reports, refer to [REP6-137].</p>	
NRW.SVR.5	Study area	The EIA study area is appropriate for the receptors and impacts assessed	NRW (A) agrees that the EIA study area is appropriate for the receptors and impacts assessed	Agreed
NRW.SVR.6a	Project design envelope	<p>The EIA chapter as identified, described and assessed the maximum design scenario for the EIA.</p> <p>Responding to NRW's position: The Applicant notes that the maximum rotor swept area has now been included in Schedule 2 and 14 of the draft Development Consent Order (REP2-004). The scenario of 96 x 364 m tall turbines is not possible as</p>	NRW (A) note the Applicant's confirmation that it is not technically feasible, for a combination of the maximum number of turbines from Maximum Design Scenario (MDS) Scenario 1 and the maximum turbine height from MDS Scenario 2 (i.e. 96 x 364 m tall turbines) to be constructed within the Array Area.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		this would result in a greater rotor swept area than that included within the draft Development Consent Order.		
NRW.SVR.6b	Project Design Envelope	<p>The correct turbine height (68 turbines with a maximum blade tip height of 364 m above LAT) has been illustrated on the wirelines and photomontages.</p> <p>The Applicant has responded to this point in REP4-065 (REP3-093.22 in response to NRW's response to Q1.20.1). The Applicant confirms that the turbines of the Mona Array were modelled at the correct height in the wirelines. Hard copies of all the wirelines and photomontages have been sent to NRW and the ExA.</p>	In REP3-093 NRW (A) highlighted that the scale of elements within the landscape appeared smaller in the photomontages compared with how those elements are experienced on site. This is likely due to the presentation of the photomontage as opposed to the modelled height of the turbines. However, it follows that if the landscape is presented as a smaller scale in the visualisations, then the height of the turbines would also be underestimated.	Not Agreed – Material Impact
NRW.SVR.7a	Assessment methodology	<p>The <i>Guidelines for Landscape and Visual Impact Assessment: Third Edition</i> (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) is the over-arching guidance that has been used in the Seascape and Landscape Visual Impact Assessment.</p> <p>The applicant has supplemented the guidance on GLVIA3 with UK-wide sector specific guidance and regional specific guidance.</p> <p>Volume 6, Annex 8.4: Seascape, landscape and Visual Resources Impact Assessment Methodology (APP-104) and Volume 7, Annex 6.4: Landscape, seascape and visual impact assessment methodology (APP-156) set out the methodology used in the seascape and landscape assessments. The nationally designated landscapes are assessed using the methodology in APP-156. This explains that the methodology used is derived from GLVIA3 and LANDMAP in sections 1.4 and 1.5.</p>	NRW (A) do not dispute whether the methodology was informed by GLVIA3 or not, but disagreement exists between the parties on aspects of the project specific methodology used in the SLVIA and the outcomes of that assessment. Refer to written representations for details.	Agreed
NRW.SVR.7b	Assessment methodology	NRW Research Note GN 017: Landscape Sensitivity Assessment guidance for Wales was published in 2023. The Applicant produced a comparison of the GN 017 methodology against the methodology employed in Volume 2, Chapter 8: Seascape and	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.	Not Agreed – Material Impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		<p>Visual Resources (APP-060), which was submitted at Deadline 6.</p> <p>APP-156 sets out the methodology used in assessing effects on landscape receptors. This includes LANDMAP methodology which GN-017 recommends (see REP5-098.78) and more fully in REP6-128.</p>	<p>NRW (A) advise that GN 017 is not directly applicable to LVIA methodology. The express purpose of GN 017 is to inform strategic appraisals for future spatial planning not to inform the assessment of detailed proposals for specific sites (GLVIA3 is the relevant guidance in that case). Refer to sections 3.2, 3.3 and 3.4 of GN 017 which explain the difference between the two types of assessment and explain that landscape sensitivity assessment is typically undertaken by LPAs to inform SPDs and Local Plans - the guidance was prepared on that basis, not on the basis of being used by Applicants to support an assessment of effects of a specific development proposal.</p>	
NRW.SVR.8a	Assessment methodology	<p>Agreement on the approach to assessment methodology.</p> <p>Responding to NRW's position: The Applicant notes that effects of moderate adverse significance can be considered to be not significant or significant, as set out in published guidance.</p> <p>Responding to NRW's position: The Applicant's use of split categories in the matrix used for the assessment (Table 8.15 of Volume 2, Chapter 8: Seascape and Visual Resources (APP-060) is appropriate.</p> <p>The matrix is derived from The Design Manual for Roads and Bridges. The matrix is used in the SLVIA is the same as that used in the LVIA. The onshore chapters use the same matrix. No consultee on any other topic has raised any concerns with its use.</p> <p>The Applicant has explicitly not used the term 'or' in relation to split categories.</p>	<p>NRW (A) have concerns with the SLVIA methodology, most importantly, we do not agree with the threshold used (major or substantial) for effects to be considered significant. This threshold is too high. Refer to written representation for details.</p> <p>NRW (A) have concerns with the matrices used to assess the significance of landscape/seascape and visual effects. As explained at ISH3 and in our post hearing submission [REP4-107] the matrices are skewed by the inclusion of a very high sensitivity column and a no change column. The effect is to reduce the number of scenarios where an effect might be considered to be significant.</p> <p>NRW (A) understand the Applicant's reference to 'split categories' relates to scenarios where the effects judgement falls between two levels i.e. moderate/major as opposed to being either moderate or major. The former is considered acceptable.</p>	Not Agreed – Material Impact
NRW.SVR.8b	Assessment methodology	<p>The Applicant notes a number of limitations associated with the use of wirelines (as outlined in paragraph A.1.6.1.2 of Volume 6, Annex 8.4: Seascape, landscape and visual resources impact assessment</p>	<p>Wirelines are not intended to provide a representation of what the wind farm will look like in a photo-realistic way. They are useful to supplement the photomontages, particularly when the clarity of the</p>	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		methodology (APP-104). Wirelines are therefore not a realistic representation of what the wind farm will look like.	photomontages is affected by e.g. conditions of sub-optimal visibility. They are also useful for the illustration of potential cumulative impacts.	
NRW.SVR.8c	Assessment Methodology	<p>The Applicant has assessed the visual effects of the Mona Array Area based on MetOffice 'Excellent' visibility (i.e. a visibility of greater than 40 km). This assessment of a realistic worst-case (best visibility) is evidenced by the Applicant finding adverse, albeit not significant, effects beyond 50 km in some places.</p> <p>The Applicant refers to its response in REP2-080 (Applicant's response to REP1-056.230).</p>	<p>NRW (A) understand from the Applicant's comments in REP2-080 (e.g. REP1-056.322) that judgements reached in the SLVIA were influenced by atmospheric conditions including cloud cover and haze which would impact visibility at certain times and reduce it below excellent visibility.</p> <p>NRW (A) consider the basis on which SLVIA judgements were reached is not clear, because in some places (e.g. comments across) the Applicant says the assessment was based on excellent visibility, but as per our comments above, in other places the Applicant say the assessment took account of conditions which would reduce visibility.</p>	Not Agreed – Material Impact
NRW.SVR.8d	Sensitivity of receptors	Sensitivity of receptors - The Applicant has correctly identified the sensitivity of seascape and visual resources and receptors within the EIA, by using LANDMAP evaluation criteria, as set out in NRW's guidance note GN 017 (Natural Resources Wales, 2023). Assessment of sensitivity criteria compatibility of Mona with GN 017 submitted as REP6-128.	NRW (A) consider the sensitivity of a number of receptors has been underestimated and this has led to underestimation of effects on receptors, notably within the Isle of Anglesey National Landscape (IoA NL) and Eryri National Park (ENP). Refer to written representation for details, and comments above regarding GN 017.	Not agreed – material impact
NRW.SVR.8e	Sensitivity of receptors	<p>Sensitivity of receptors - The Applicant notes that the overall evaluation of the LANDMAP Visual and Sensory Aspect Areas, within each of the nationally designated landscapes, vary.</p> <p>Isle of Anglesey County Council (undated; Annex 3, Objective 1) states: "LANDMAP is used as the process by which the landscape character of the AONB is valued and assessed". The Applicant has used LANDMAP Visual and Sensory evaluations to value and assess the varied landscape areas within the Isle of Anglesey (AONB) National Landscape.</p>	NRW (A) do not agree with the approach taken in the SLVIA to valuing landscape of the AONB and consider the Applicant's comments which include a quotation from an unidentified source is unhelpful. LANDMAP VSAA does not equate to landscape value, see comments below.	Not Agreed – Material Impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.SVR.8f	Sensitivity of receptors	<p>Landscape Institute (2024) states that national landscapes should have the highest value, but also refers to the NRW guidance at section 5(4), which cites a number of documents to assist in establishing landscape sensitivity, including NRW (2023), which states that nationally designated landscapes can have high or very high value, as outlined in Landscape Sensitivity Assessment Guidance for Wales (REP4-085).</p> <p>The Applicant notes that Landscape Institute (2024, section 5(7)) conflicts with this, but that the guidance fails to address the possibility of internationally designated landscapes, unlike the guidance produced by NatureScot (Landscape Sensitivity Assessment Guidance, 2022, Figure 5) for example, to which it refers in point 5(4)), which should have a higher value than nationally designated landscapes. The Applicant's methodology allows for this higher landscape designation, whilst also recognising that nationally designated landscapes can also have a very high sensitivity.</p> <p>Both the NRW guidance and the Applicant's own methodology recognise that nationally designated landscapes can have either very high or high value. The Applicant has followed a similar methodology to the NRW (2023) guidance, considered the overall visual and sensory evaluations of the different Aspect Areas within the national landscape and found some areas to have a very high value and others to have a high value.</p> <p>The Applicant's assessment has not underestimated the value of the landscape within the nationally designated landscapes and has applied the NRW (2023) assessment criteria.</p>	<p>NRW (A) that LANDMAP evaluations for one Aspect Area e.g. visual and sensory should not be used to identify landscape value, and this is clear from the publicly available guidance provided in Guidance Note 46 (<i>Using LANDMAP in Landscape and Visual Impact Assessments</i>). Further, both parties agree that the latest guidance from the Landscape Institute (<i>Notes and Clarifications on Aspects of GLVIA3</i>, August 2024) confirms that '<i>landscape value within nationally designated landscapes should be at the highest level</i>' (Page 12). However, the SLVIA has not followed this guidance as it has recorded the value of e.g. special qualities of the IoA NL and ENP to be less than the highest level within the SLVIA.</p> <p>Notwithstanding, NRW (A) note that the LI guidance on valuing landscape TGN 02/21 states under the heading 'Internationally valued landscapes' "The International Union for Conservation of Nature (IUCN) provides a global classification system for Protected Areas. National Parks in England, Wales and Scotland, and Areas of Outstanding Natural Beauty (AONBs) in England, Wales and Northern Ireland are internationally recognised as Category V Protected Areas, as living, working landscapes and seascapes"</p> <p>The Applicant's assessment has underestimated the value of the landscape within nationally designated landscapes.</p>	Not agreed – material impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.SVR.9a	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on special qualities in the IoA NL arising from the Mona Offshore Wind Project alone.	NRW (A) consider the Mona Array would cause Significant adverse effects on scenic and perceptual characteristics within the IoA NL, which also relate to identified special qualities of the IoA NL. Refer to our written submissions for further information.	Not agreed – material impact
NRW.SVR.9b	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on visual receptors in the IoA NL arising from the Mona Offshore Wind Project alone.	NRW (A) consider the Mona Array would cause significant adverse effects on the views and visual amenity of people within the IoA NL. Refer to our written submissions for further information.	Not agreed – material impact
NRW.SVR.9c	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on special qualities in the ENP arising from the Mona Offshore Wind Project alone.	Agree that Mona Array alone is unlikely to result in significant effects on special qualities of the ENP but it would result in non-significant adverse effects and significant adverse cumulative effects.	Agreed
NRW.SVR.9d	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on visual receptors in the ENP arising from the Mona Offshore Wind Project alone.	NRW (A) consider the Mona Array would cause significant adverse effects on the views and visual amenity of people within the ENP. Refer to our written submissions for further information.	Not agreed – material impact
NRW.SVR.9e	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on special qualities within the Clwydian Range and Dee Valley (CRDV) NL arising from the Mona Offshore Wind Project alone.	Agree that Mona Array is unlikely to result in any significant landscape effects within the CRDV NL, but non-significant adverse effects would occur. Refer to our written submissions for further information.	Agreed
NRW.SVR.9f	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on visual receptors within the Clwydian Range and Dee Valley (CRDV) NL arising from the Mona Offshore Wind Project alone.	Agree that Mona Array is unlikely to result in any significant visual effects within the CRDV NL, but non-significant adverse effects would occur. Refer to our written submissions for further information.	Agreed
NRW.SVR.9g	Assessment of the effects from the Mona	There will be no significant effects on seascape and visual receptors over 50 km within the IoA NL, the Eryri	Agree that Mona Array is unlikely to result in significant effects beyond 50km.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
	Offshore Wind Project alone	NP or the CRDV NL arising from the Mona Offshore Wind Project alone.		
NRW.SVR.9h	Assessment of the night-time effects from the Mona Offshore Wind Project alone.	<p>There will be no significant night-time effects on seascape and visual receptors.</p> <p>As noted in REP3-062, Applicant's response to ExA Q1.20.13, the ReSoft software used to generate the night-time visualisations automatically sets the lighting levels at the brightest intensity, 2,000 candelas. In good visibility conditions, the aviation lighting will be kept to 200 candelas. In poor visibility (e.g. foggy conditions), the lighting levels may rise to 2,000 candelas. The visualisations have used the worst case (2,000 candelas) for the aviation lighting, which is a situation which would never occur, as in clear conditions the level of light used would be 200 candelas. The higher lighting intensity would only be used in poor visibility conditions, in which situations, the aviation lighting would not be visible from shore due to the poor visual conditions.</p>	<p>Within designated landscapes in North Wales, it is unlikely the aviation warning lighting would generate significant effects at night in clear conditions when the intensity would be reduced to 200cd. If the lighting is viewed at full intensity (2000cd) in clear conditions (for example because the maximum intensity is triggered by patchy cloud) impacts on visual receptors within the loA NL and ENP would be greater and potentially may be significant.</p>	Not agreed – but no material impact
NRW.SVR.10a	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	<p>There will be no significant cumulative effects on special qualities within the loA NL arising from the Mona Offshore Wind Project cumulatively with other projects and plans.</p>	<p>NRW (A) consider the Mona Array in combination with Awel y Mor, would cause significant adverse cumulative effects on scenic and perceptual characteristics within the loA NL, which relate to identified special qualities of the Statutory Designated Landscape.</p>	Not agreed – material impact
NRW.SVR.10b	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	<p>There will be no significant cumulative effects on visual receptors within the loA NL arising from the Mona Offshore Wind Project cumulatively with other projects and plans.</p>	<p>NRW (A) consider the Mona Array in combination with Awel y Mor, would cause significant adverse cumulative effects on visual receptors within the loA NL.</p>	Not agreed – material impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.SVR.10c	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant cumulative effects on the special qualities of the CRDV NL arising from the Mona Offshore Wind Project cumulatively with other projects and plans.	Agree Mona Array is unlikely to significantly increase harm already experienced in CRDV NL as a result of existing offshore wind turbine developments.	Agreed
NRW.SVR.10d	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant cumulative effects on visual receptors within the CRDV NL arising from the Mona Offshore Wind Project cumulatively with other projects and plans.	Agree Mona Array is unlikely to significantly increase harm already experienced in CRDV NL as a result of existing offshore wind turbine developments.	Agreed
NRW.SVR.10e	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	Barring the one significantly affected special quality identified by the Applicant in the Eryri NP, there will be no significant effects on seascape and visual receptors over 50 km within the IoA NL, the Eryri NP or the CRDV NL arising from the Mona Offshore Wind Project alone.	NRW (A) and the Applicant agree the Mona Array would cause significant harm to special qualities of the ENP as a result of its cumulative impact with other offshore wind turbine projects, notably Awel y Mor.	Agreed
NRW.SVR.10f	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	Barring the significantly affected viewpoints identified by the Applicant in the Eryri NP, there will be no significant cumulative effects on visual receptors within the Eryri NP arising from the Mona Offshore Wind Project cumulatively with other projects and plans.	NRW (A) and the Applicant agree the Mona Array would cause significant harm to visual receptors within the ENP as a result of its cumulative impact with other offshore wind turbine projects, notably Awel y Mor.	Agreed
NRW.SVR.11	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 8: Seascape and visual resources (APP-060) and the Mitigation and Monitoring schedule	NRW (A) disagree. The only mitigation measure is for the turbines to be painted grey which is a standard measure and would not ensure significant effects are	Not agreed – material impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		(APP-196) are appropriate and will ensure significant effects are avoided.	avoided in relation to the IoA NL and ENP. The only measures that would be effective in reducing the harm on these landscapes and receptors within them, would be a reduction in the height of the turbines and/or increasing the distance between turbines in the Array and the aforementioned areas.	
NRW.SVR.12	Landscape Enhancement Package	<p>The Applicant and NRW (A) have discussed a landscape enhancement package for the effects from the Mona Array Area. The Applicant has presented a Landscape Enhancement Scheme to NRW (A). Following detailed discussions between the parties, the Landscape Enhancement Scheme Principles (S_D7_30) have been agreed and is considered adequate to offset landscape and seascape impacts that may arise from the presence of the Mona Array Area alone and in combination with other projects.</p> <p>The Landscape Enhancement Scheme Principles are secured in Requirement 28 of the draft Development Consent Order (C1_F08). By inclusion of the Requirement in the draft DCO the Applicant has removed its 'without-prejudice' position and committed to the landscape enhancement scheme being delivered as secured.</p>	NRW (A) agree with the Heads of Terms relating to the enhancement package S_D7_30 proposed by the Applicant.	Agreed

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1.4.3 Landscape and visual resources

Table 1.6: Agreement Log between the parties on landscape and visual resources.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.LVR.1	Consultation	The Applicant has undertaken adequate consultation with potential impacts on landscape and visual receptors.	NRW (A) agrees that the Applicant has undertaken adequate consultation with potential impacts on landscape and visual receptors.	Agreed
NRW.LVR.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on landscape and visual receptors.	NRW (A) agrees that the EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on landscape and visual receptors.	Agreed
NRW.LVR.3	Policy and planning	The Application has identified and considered all plans and policies relevant to landscape and visual resources, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to landscape and visual resources, within NRW (A)'s remit.	Agreed
NRW.LVR.4	Baseline environment	Agreement on the baseline characterisation for landscape and visual resources.	NRW (A) agrees with the baseline characterisation for landscape and visual resources.	Agreed
NRW.LVR.5	Study area	The study area is appropriate for the impacts and receptors assessed.	NRW (A) agree with the 10 km study area used for the Onshore Substation. Source: NRW's section 42 response on 01 June 2023.	Agreed
NRW.LVR.6	Project design envelope	The EIA chapter as identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agrees that the EIA chapter as identified, described and assessed the maximum design scenario for the EIA.	Agreed
NRW.LVR.7a	Assessment methodology	The sensitivity of landscape receptors relating to Statutory Designated Landscapes has been correctly identified and sufficiently described within the EIA.	Disagree for the same reasons outlined above in relation to the assessment of offshore effects.. Status is orange because we do not consider the onshore substation would cause significant effects on receptors within Statutory Designated Landscapes. This does not discount the issues raised by NRW (A) having the potential to materially affect the assessment outcomes for receptors outside of designated landscapes.	Not agreed – but no material impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW. LVR.7b	Assessment methodology	<p>The sensitivity of seascape and landscape resources and receptors:</p> <p>Overall evaluations of the LANDMAP Visual and Sensory Aspect Area Layers within each of the nationally designated landscapes vary.</p>	<p>Refer to comments above, which address disagreement regarding the way in which the Applicant has valued receptors within nationally designated landscapes.</p> <p>LANDMAP VSAA evaluations vary as do the evaluations for other Aspect Areas which make up LANDMAP. LANDMAP is not only confined to visual and sensory aspect areas, and these do not automatically equate to value or sensitivity, as per comments above.</p>	Agreed
NRW.LVR.8a	Assessment methodology	<p>Agreement on the approach to assessment methodology relating to Statutory Designated Landscapes.</p> <p><i>The Guidelines for Landscape and Visual Impact Assessment: Third Edition</i> (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) is the over-arching guidance that has been used in the LVIA.</p>	<p>It is understood GLVIA3 has informed the Applicant's approach to their assessment as it has informed our comments on the application.</p>	Agreed
NRW.LVR.8b	Assessment methodology	<p>The Applicant's methodology is based on the guidance within GLVIA3 (Landscape Institute, 2013).NRW Research Note GN 017: Landscape Sensitivity Assessment guidance for Wales was published in 2023. The Applicant is intending on producing a comparison of the GN 017 methodology against the methodology employed in Volume 3, Chapter 6: Landscape and Visual Resources (APP-069), which will be submitted at Deadline 6.</p>	<p>Refer to comments above. It is not clear that GN 017 informed the methodology.</p> <p>NRW (A) advise that GN 017 is not directly applicable to LVIA methodology. The express purpose of GN 017 is to inform strategic appraisals for future spatial planning not to inform the assessment of detailed proposals for specific sites (GLVIA3 is the relevant guidance in that case). Refer to sections 3.2, 3.3 and 3.4 of GN 017 which explain the difference between the two types of assessment and explain that landscape sensitivity assessment is typically undertaken by LPAs to inform SPDs and Local Plans - the guidance was prepared on that basis, not on the basis of being used by Applicants to support an assessment of effects of a specific development proposal.</p>	Not agreed – material impact

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.LVR8c	Assessment methodology	Moderate significance of effects can be significant or not significant, as set out in published guidance	Agree but they are typically considered to be significant, particularly when the receptor relates to a national designated landscape.	Agreed
NRW.LVR.9	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant landscape effects on the special qualities of designated landscapes, however significant landscape effects are predicted on the character of some undesignated landscapes.	NRW (A) agrees there will be no significant landscape effects on the special qualities of designated landscapes, however significant landscape effects are predicted on the character of some undesignated landscapes.	Agreed
NRW.LVR.10a	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant visual effects on users of the Offa's Dyke Path National Trail within the Clwydian Range and Dee Valley National Landscape.	NRW (A) agree that significant adverse effects on users of the Offa's Dyke Path National Trail are unlikely. Our comments relate to Statutory Designated Landscapes and therefore we have not commented on the effects of receptors outside of or unrelated to these designations.	Agreed
NRW.LVR.10a	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant visual effects at representative viewpoints within the Clwydian Range and Dee Valley National Landscape.	In combination, the mitigation measures set out in the LEMP and Design Principles document should ensure that adverse effects on the visual amenity of people within the CRVD NL are not significant.	Agreed
NRW.LVR.11	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant cumulative effects on the character of the Clwydian Range and Dee Valley National Landscape and users of the Offa's Dyke Path National Trail as shown on the cumulative viewpoints (AS-027).	Based on the updated cumulative visualisations [AS-027] and the mitigation measures set out in the LEMP and Design Principles document, cumulative effects on receptors within the CRVD NL are unlikely to be significant.	Agreed
NRW.LVR.12	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 3, Chapter 6: Landscape and visual resources (APP-069) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided.	In so far as they relate to receptors within Statutory Designated Landscapes.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Other Documents and Plans				
NRW.LVR.13	Outline Management Plans	The measures set out in the Outline Landscape and Ecology Management Plan (APP-208) and the accompanying landscape appendices are appropriate for the DCO application.	NRW (A) agree with the principles set out in the Outline Landscape and Ecology Management Plan and agree that the final Landscape and Ecology Management Plan will be agreed with the relevant planning authority. Source: NRW's Relevant Representation (RR-011)	Agreed