

# Prosiect Maen Hir

Solar a Storio Ynni



## Preliminary Environmental Information Report Volume III

Appendix 6-5: Stakeholder Engagement and Consultation

Prosiect Maen Hir - September 2024

EN010156

lightsource bp





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## 13 Introduction

### 13.1 Summary of Project Engagement

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<b><i>Applicants Response to EIA Scoping Response from PINS</i></b>				
PINS	19 <sup>th</sup> Feb 2024	<p>Impacts on National Landscape Character Areas (NLCA).</p> <p>The key characteristics and management objectives of NLCAs would inform the description of baseline conditions in the ES assessment. Due to the availability of more detailed IOACC and LANDMAP assessments undertaken at the local level, the Scoping Report proposes to scope out an assessment of impacts on NLCAs. Impacts on IOACC Landscape Character Areas (LCA) would be assessed.</p> <p>The Inspectorate is content that an assessment of effects on NCLAs can be scoped out of further assessment on this basis.</p>	<p>Noted. Assessment of effects on NLCAs will be scoped out of the LVIA. However, consideration will be given to the key characteristics and management objectives of NLCAs in the description of baseline conditions, and to inform the iterative design process and development of proposals for landscape mitigation and enhancement.</p>	National Landscape Character Areas (NLCA) scoped out of LVIA.
PINS	19 <sup>th</sup> Feb 2024	<p>Impacts on Marine Character Areas (MCA).</p> <p>The Scoping Report proposes that this matter is scoped out on the basis that the Zone of Theoretical Visibility (ZTV) maps (see Scoping Report Figs 7-7 to 7-13) and field investigations have shown that the coastal MCAs are</p>	<p>Noted. Assessment of effects on MCA's will be scoped out of the LVIA.</p>	Marine Character Areas (MCA) scoped out of LVIA.

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		<p>unlikely to be affected by the proposed development.</p> <p>Having regard to the location, nature and characteristics of the proposed development, the Inspectorate agrees that significant effects are not likely. Impacts on MCAs can be scoped out of further assessment.</p>		
PINS	19 <sup>th</sup> Feb 2024	<p>Impacts on the following IOACC LCA:</p> <ul style="list-style-type: none"> <li>• LCA 4, North West Coast; and</li> <li>• LCA 9, Red Wharf Bay.</li> </ul> <p>The Scoping Report proposes to assess impacts on five IOACC LCA (as identified in Table 7-2 of the Scoping Report), describing these as the LCAs “...likely to be affected by the Project”.</p> <p>The 2km study area extends into two further IOACC LCA (LCA 4 and LCA 9, as shown on Fig 7-3 of the Scoping Report) which are proposed to be scoped out.</p> <p>Having regard to the location, nature and characteristics of the proposed development, the Inspectorate agrees that significant effects are not likely. Impacts on IOACC LCA 4 and LCA 9 can be scoped out of further assessment.</p>	<p>Noted. Assessment of effects on LCA 4 and LCA 9 will be scoped out of the LVIA. Once the development parameters are fixed, we will review the requirement to assess LCA 4 and LCA 9 within the LVIA.</p>	<p>LCA 4 and LCA 9 will be scoped out of the LVIA.</p>

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PINS	19 <sup>th</sup> Feb 2024	<p>The Scoping Report explains that visual receptors would be identified within the ZTV and a refined ZVI, or the main area of visibility arising from the proposed development as determined from the field surveys. The Scoping Report states that visual receptors located outside of the ZVI would have very limited or no visibility of the proposed development.</p> <p>The assessment of impacts to landscape and visual amenity (including the study area, ZTV, ZVI and photomontages) should be based on the relevant worst-case having regard to any parameters applicable to the proposed development, including panel orientation and all proposed structures such as the BESS. If during the design evolution of the proposed development it is determined that locations of key development components have changed, or maximum parameters will exceed the heights used in the preliminary ZTVs (shown on Figs 7-7 to 7-13 of the Scoping Report), the Applicant should re-run the ZTV and review the study area and identified receptors accordingly.</p> <p>The Applicant should make effort to agree the study area and methodology</p>	<p>Once the development parameters are fixed the ZTV and ZVI will be updated. Landscape and visual receptors located outside of the ZVI for the fixed development parameters will be scoped out once ground truthed through field investigations. The LVIA study area and list of representative, specific and illustrative viewpoints as well as photomontages will be reviewed once the development parameters are fixed and further consultation undertaken if required.</p>	<p>ZTV and ZVI has been updated within Fig 6-12 and 6-13.</p>

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		<p>for the ZTV and ZVI with relevant consultation bodies including IOACC. On the basis of the above, the Inspectorate agrees that any impacts on visual receptors located outside of the ZVI, once 'ground-truthed' by field work, are unlikely to result in significant effects. This matter can be scoped out of further assessment.</p>		
PINS	19 <sup>th</sup> Feb 2024	<p>Impacts on all special qualities of the Anglesey Area of Outstanding Natural Beauty (AONB) (identified within Appendix 1 and Table 1 of the Isle of Anglesey AONB Management Plan 2015-2020), with the exception of the “<i>expansive views</i>” special quality – all phases.</p> <p>The Scoping Report does not provide a list of the special qualities of the Anglesey AONB (now ‘Anglesey National Landscape’) which are proposed to be scoped out and instead, cross refers to the Isle of Anglesey AONB Management Plan 2015-2020 which it states identifies the special qualities.</p> <p>The Inspectorate notes that the Isle of Anglesey AONB Management Plan 2015-2020 has now been superseded by the Isle of Anglesey AONB Management Plan 2023-2028. Without</p>	<p>The LVIA will refer to the more recently published Isle of Anglesey AONB Management Plan 2023-2028. NRW has requested that the LVIA review the <i>expansive views</i> and <i>peace and tranquillity</i> special qualities as detailed within the Management Plan, AONB Objective 4, NRW Report 569 and the online StoryMap.</p> <p>The Applicant will include these within the scope of the assessment of effects on the special qualities of the Isle of Anglesey National Landscape (AONB). Where other defined special qualities are scoped out, justification will be provided.</p>	<p>LVIA will review the more recently published Isle of Anglesey AONB Management Plan 2023-2028’.</p> <p>LVIA will assess “<i>expansive views</i>” and “<i>peace and tranquillity</i>” special qualities of the recently published Anglesey National Landscape (AONB) in terms of the setting of the designation as requested by NRW.</p>



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		<p>sight of the previous version, it is unclear which special qualities are proposed to be scoped out and whether the special qualities remain the same in the new plan. As such, the Inspectorate is not in a position to scope these matters out of the ES at this stage. Accordingly the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>		
PINS	19 <sup>th</sup> Feb 2024	<p>Impacts on Parciau Estatelands Special Landscape Area (SLA). The Scoping Report states that the ZTV (Figs 7-9, 7-12 and 7-13) and fieldwork has identified that there would be restricted visibility between the proposed development and the Parciau Estatelands SLA, such that the effects are unlikely to be significant. The Inspectorate agrees that impacts on Parciau Estatelands SLA are not likely to result in significant effects and can be scoped out of further assessment.</p>	<p>Noted. Assessment of effects on the Parciau Estatelands Special Landscape Area (SLA) will be scoped out of the LVIA.</p>	<p>Parciau Estatelands Special Landscape Area (SLA) has been scoped out of LVIA.</p>
PINS	19 <sup>th</sup> Feb 2024	<p>Impacts on Eryri / Snowdonia National Park The Inspectorate considers there is insufficient information at this stage regarding the potential for views of the</p>	<p>Eryri National Park is located outside of the study area and approximately 20km to the south-east of Maen Hir South B. Given the distance from the Project and nature of the intervening landscape which includes areas of settlement and</p>	<p>Eryri / Snowdonia National Park has been scoped out of LVIA following consultation with National Park Authority.</p>

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		<p>proposed development from the National Park to demonstrate that significant effects will not occur. Accordingly, the ES should include an assessment of impacts on visual amenity from Eryri/ Snowdonia National Park, or information to demonstrate agreement with the relevant consultation bodies and the absence of a LSE.</p>	<p>other forms of infrastructure, it is unlikely that significant adverse landscape and visual effects would occur.</p> <p>The Applicant will consult with Eryri National Park Authority and seek agreement to the scoping out of the designation from the LVIA. An illustrative viewpoint from within the Eryri National Park may be included within the LVIA, if requested by the consultee.</p>	
PINS	19 <sup>th</sup> Feb 2024	<p>Visual impacts on users of the following key transport routes:</p> <ul style="list-style-type: none"> <li>• A5025 between Cemaes, Amlwch and Penysarn</li> <li>• A55 and A5 between Holyhead, Llanfihangel yn Nhowymn, Gwalchmai and Menai Bridge / Porthaethwy</li> <li>• B5112 between Llanerchymedd, Carmel, Trefor and Engedi.</li> </ul> <p>Table 7-15 of the Scoping Report proposes that an assessment of these matters is scoped out, but no supporting evidence or justification is provided to explain why significant effects would not occur. As such, the Inspectorate is not in a position to scope these matters out of the ES. Accordingly the ES should include an</p>	<p>The Applicant will further consider the potential for visual impacts on:</p> <ul style="list-style-type: none"> <li>• A5025 between Cemaes, Amlwch and Penysarn</li> <li>• A55 and A5 between Holyhead, Llanfihangel yn Nhowymn, Gwalchmai and Menai Bridge / Porthaethwy</li> <li>• B5112 between Llanerchymedd, Carmel, Trefor and Engedi.</li> </ul>	<p>Visual impacts on the A5025, A55 and A5, and B5112 located within the ZVI and 3km Study Area will be further considered within the LVIA.</p>

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		assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.		
PINS	19 <sup>th</sup> Feb 2024	<p>Visual impacts on users of Long Distance Recreational Trails, National Cycle Routes and Accessible Landscapes from the ES LVIA chapter.</p> <p>The Scoping Report proposes that impacts to these receptor groups are scoped out of the ES LVIA Chapter and instead, assessed within a separate Amenity and Recreation Assessment (ARA) to be presented as an appendix to the ES LVIA Chapter. Providing that the ES LVIA Chapter contains a summary of the assessment in the ARA and identifies any significant effects on users of Long Distance Recreational Trails, National Cycle Routes and Accessible Landscapes, the</p>	<p>The Applicant will assess the visual effects on the users of Long Distance Recreational Trails, National Cycle Routes and Accessible Landscapes located within the ZVI.</p> <p>The ARA is a separate assessment which will refer to the LVIA and consider the cross-disciplinary effects on these recreational receptors in terms of landscape and visual effects, glint and glare, and noise. The effects identified within the LVIA and ARA on recreational receptors may therefore differ as they are assessing different considerations.</p>	<p>Visual impacts on Long Distance Recreational Trails, National Cycle Routes and Accessible Landscapes located within the ZVI and 3km Study Area will be further assessed within the LVIA.</p>

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		Inspectorate is content with this approach.		
PINS	19 <sup>th</sup> Feb 2024	<p>Visual impacts on users of the following routes/areas from the ARA:</p> <ul style="list-style-type: none"> <li>• Isle of Anglesey/ Wales Coast Path – between Porth Cynfor/Hells Mouth and Porth Llechog Bill Bay at Amlwch</li> <li>• National Trust – Coronation Tower King Edward VIII and Porth Cynfor/ Hells Mouth</li> <li>• Geotrail – Wyfla Visitor Centre to Cemaes Bay</li> <li>• Geotrail – Bodafon to Moelfre</li> <li>• Geotrail – Porth Amlwch</li> <li>• Circular Walk – Llanellian</li> <li>• Open Access Land – Penygraigwen</li> <li>• PRow located outside of the 500m study area for the northern, central and southern parcels</li> <li>• PRow which are no longer used, accessible or identifiable on the ground.</li> </ul>	The Applicant will assess the visual impacts from users of the recreational routes including the Coast Path and Geotrails located within the ZVI and 3km Study Area.	Visual impacts on recreational routes including the Coast Path and Geotrails located within the ZVI and 3km Study Area will be assessed within the LVIA.

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		<p>Table 7-15 of the Scoping Report proposes that an assessment of visual impacts on users of these routes/ areas is scoped out of the ARA. The Inspectorate notes from Fig 7-5 of the Scoping Report that a number of identified routes are located over 500m from the solar development parcels (which represents the proposed study area for the ARA) - but as the route sections proposed to be scoped out are not labelled on Fig 7-5, the Applicant's proposed approach is unclear. No other supporting evidence or justification is provided to explain why significant effects would not occur. As such, the Inspectorate is not in a position to scope these matters out of the ES. Accordingly, the ES should include an assessment of these matters or information demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p> <p>The Scoping Report does not explain why the proposed study area for the ARA is considered appropriate. The Inspectorate considers this is a relatively small study area, given the nature and scale of the proposed development. The ES should explain the how the study area for the ARA has been defined, with reference to the</p>		

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		<p>extent of the likely impacts from the proposed development. Effort should be made to agree the study area and receptors considered within the ARA with relevant consultation bodies.</p>		
PINS	19 <sup>th</sup> Feb 2024	<p>Night-time effects and lighting.</p> <p>Paras 7.2.103 and 7.2.127 of the Scoping Report proposes that a 'separate Lighting Impact Assessment' is scoped out. Table 7-15 proposes that an assessment of impacts from lighting is scoped out of the ES, stating that any lighting during the construction and decommissioning phases would be temporary and any lighting during operation will be restricted to the substations, BESS and security lighting sensors. However, Table 8-1 of the Scoping Report identifies night-time effects and lighting as scoped into the assessment for all phases. As a result the Applicant's proposed approach is unclear.</p> <p>The Inspectorate has interpreted this as the Applicant proposing to scope out a separate Lighting Impact Assessment and assessment of LSE resulting from night-time effects and lighting.</p> <p>Noting the rural, largely unlit environment in which the proposed development is located and the likely</p>	<p>The Applicant will include an assessment of night-time effects within the Landscape ES chapter, during both the construction and operation stages.</p> <p>This will focus on where dark skies are a characteristic of the existing landscape and contribute to the natural beauty/special qualities of designated areas. A selection of representative viewpoints will be visited at night to provide a night-time visual assessment.</p> <p>The night time assessment will cross refer to the relevant heritage and ecology receptors where relevant.</p>	<p>Night time impacts will be assessed within the the ES.</p>

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		<p>change from the current baseline, the Inspectorate does not agree to scope this matter out of the assessment. Impacts on landscape and visual amenity resulting from the introduction of lighting during construction, operation and decommissioning which are likely to result in significant effects should be assessed in the ES, unless it is agreed with relevant consultation bodies that this matter can be scoped out. Any proposed mitigation measures should be described and secured through the DCO. The assessment should cross refer to other relevant aspect assessments and sensitive receptors (such as ecology and cultural heritage).</p>		
PINS	19 <sup>th</sup> Feb 2024	<p>Viewpoints and photomontages</p> <p>Table 7-5 of the Scoping Report sets out 20 preliminary viewpoints (as illustrated on Fig 7-12) located within the 3km study area, with photomontages proposed from viewpoint locations 7, 8, 12, 15 and 17. The Inspectorate considers this is a relatively low number of viewpoints and photomontages, given the nature and scale of the proposed development.</p> <p>The Scoping Report ZTV figs, including Figs 7-12 and 7-13, show that the</p>	<p>The Applicant will include consideration of night-time effects of artificial lighting within the LVIA during both the construction and operation stages. This will focus on where dark skies are a characteristic of the existing landscape and contribute to the natural beauty/special qualities of designated areas. A selection of representative viewpoints will be visited at night to provide a night-time visual assessment.</p> <p>The Applicant will consult with IoACC and NRW seeking to agree the number and location of representative,</p>	<p>Further consultation regarding viewpoint and photomontage locations was undertaken with PINS, NRW and IoACC within the letter on 19<sup>th</sup> Feb 2024.</p> <p>The LVIA has incorporated the following viewpoints requested by PINS:</p> <ul style="list-style-type: none"> <li>• Cemaes Bay to north-west [<i>Illustrative Viewpoint A</i>].</li> <li>• Mynydd Eilian to north-east [<i>Illustrative Viewpoint D</i>].</li> </ul>

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		<p>proposed development may be visible from locations outside of the 3km study area (for example from Cemaes Bay, Anglesey National Landscape, Mynydd Eilian to the north-east and Llyn Llywenan to the south-west) and the Inspectorate advises that suitable viewpoints are selected from these areas. The Inspectorate also advises that suitable viewpoint(s) are selected from Eryri/ Snowdonia National Park and from the highlands within the coastal areas on the mainland, as well from as locations where cumulative effects with other developments may be experienced. IOACC has also provided suggestions for viewpoint locations (see Appendix 2 of this Opinion).</p> <p>Effort should be made to agree the number and location of viewpoints, as well as the locations for photomontages, with relevant consultation bodies including local authorities, CADW and NRW and be in line with relevant guidance, where possible.</p>	<p>illustrative and specific viewpoints and photomontages (see schedule below). Consultation with CADW would be undertaken through cultural heritage consultants for this technical discipline.</p> <p>The LVIA viewpoints as identified within the schedule below will include:</p> <ul style="list-style-type: none"> <li>• Cemaes Bay to north-west.</li> <li>• Mynydd Eilian to north-east;</li> <li>• Llyn Llywenan to south-west.</li> </ul> <p>Viewpoints list suggested by IOACC (App 2 of Scoping Opinion) including:</p> <ul style="list-style-type: none"> <li>• PRoW Footpath MECHELL 38/077/2 at the point where it connects to the Circular Way Long distance footpath adjacent to an unclassified road.</li> <li>• South of PRoW Footpath RHOSYBOL 44/028/2. Centre of Northern parcel.</li> <li>• Point along PRoW Footpath MECHELL 38/067/2. South of northern parcel.</li> <li>• South of PRoW Footpath TREF ALAW 47/021/1 at the point where it connects to an unclassified road.</li> <li>• PRoW Footpath RHOSYBOL 44/027/1 at the point where it connects to an unclassified road. Northeast of central parcel.</li> </ul>	<ul style="list-style-type: none"> <li>• Llyn Llywenan to south-west [<i>Illustrative Viewpoint W</i>].</li> </ul> <p>The LVIA has incorporated the following viewpoints requested by IoACC:</p> <ul style="list-style-type: none"> <li>• PRoW Footpath MECHELL 38/077/2 at the point where it connects to the Circular Way Long distance footpath adjacent to an unclassified road [<i>Illustrative Viewpoint F</i>].</li> <li>• South of PRoW Footpath RHOSYBOL 44/028/2 [<i>Illustrative Viewpoint I</i>].</li> <li>• Point along PRoW Footpath MECHELL 38/067/2 [<i>Illustrative Viewpoint J</i>].</li> <li>• South of PRoW Footpath TREF ALAW 47/021/1 at the point where it connects to an unclassified road [<i>Illustrative Viewpoint L</i>].</li> <li>• PRoW Footpath RHOSYBOL 44/027/1 at the point where it connects to an</li> </ul>



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			<ul style="list-style-type: none"> <li>• Point along PRow Footpath LLANNERCH-Y-MEDD 25/003/. South of central parcel.</li> <li>• South of PRow Footpath RHOSYBOL 44/036/1 at the point where it connects to the National Cycle Network Route 5. North of southern parcel.</li> <li>• B5111 highway near the south of PRow Footpath LLANNERCH-Y-MEDD 25/013/1. East of southern parcel.</li> <li>• Point along the National Cycle Network Route 5. West of southern parcel.</li> </ul> <p>The mainland, coastal highlands and Eryri National Park are located outside of the study area and approximately 20km to the south-east of the southern parcel. Given the distance from the proposed development and nature of the intervening landscape which includes areas of settlement and other forms of infrastructure, it is unlikely that significant adverse landscape and visual effects would occur.</p> <p>The Applicant will consult with Eryri National Park Authority and seek agreement to the scoping out of the designation from the LVIA. An illustrative viewpoint from within the</p>	<ul style="list-style-type: none"> <li>• unclassified road. [<i>Illustrative Viewpoint N</i>].</li> <li>• Point along PRow Footpath LLANNERCH-Y-MEDD 25/003/ [<i>Illustrative Viewpoint Q</i>].</li> <li>• South of PRow Footpath RHOSYBOL 44/036/1 at the point where it connects to the National Cycle Network Route 5 [<i>Representative Viewpoint 20</i>].</li> <li>• B5111 highway near the south of PRow Footpath LLANNERCH-Y-MEDD 25/013/1 [<i>Illustrative Viewpoint Y</i>].</li> <li>• Point along the National Cycle Network Route 5 [<i>Illustrative Viewpoint X</i>].</li> </ul> <p>Further consultation has been undertaken with Eryri National Park Authority. No issues raised.</p>

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			Eryri National Park may be included within the LVIA, if requested by the consultee.	
PINS	19 <sup>th</sup> Feb 2024	<p>Criteria for assessments</p> <p>Some criteria for the landscape and visual assessments are presented within the same table in the Scoping Report (e.g. Table 7-7 presents susceptibility criteria for both landscape and visual receptors). To help clearly distinguish between the assessment of landscape effects and the assessment of visual effects, the Inspectorate recommends separate criteria are presented for each assessment, in line with advice in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3).</p>	The LVIA methodology that has been submitted is an overview, and additional information will be appended to the LVIA chapter. This will include further details of how the landscape and visual criteria will be applied to the professional judgments within the LVIA in accordance with GLVIA3.	The LVIA methodology is set out within the technical chapter and App 6-1.
PINS	19 <sup>th</sup> Feb 2024	<p>The Scoping Report states that only effects on landscape and visual receptors that are Major-Moderate or Major would be considered significant. Moderate effects (and below) would not be considered significant.</p> <p>The Inspectorate considers that moderate effects could be significant, particularly in the context of high value receptors such as the Anglesey National Landscape (AONB). Whilst the GLVIA makes clear that professional judgement is an important part of LVIA,</p>	The LVIA methodology will clarify that effects on landscape and visual receptors that are Major-Moderate or Major would be considered significant, and that Moderate effects may also be identified as being significant based on professional judgement. The assessment of effects within the LVIA will include details of how professional judgement has been applied.	The LVIA methodology is set out within the technical chapter and App 6-1.

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		<p>the ES should fully justify how professional judgement has been used to determine significance of effects, particularly around the determination of significance. The Applicant's attention is drawn to comments from NRW in this regard (Appendix 2 of this Opinion).</p>		
PINS	19 <sup>th</sup> Feb 2024	<p>Many of the field boundaries within the study area are formed by hedgerows and cloddiau (a dry-stone outer wall with a compacted earth, or earth/rubble core), which are an important feature of the existing character of the landscape. The Scoping Report explains that these will be retained where practicable, with the exception of removals and/ or crossings required for new access tracks, perimeter fencing and cable routes.</p> <p>Existing vegetation and cloddiau should be mapped and any loss of or impacts to hedgerows, cloddiau, trees and woodland which are likely to result in significant effects on landscape and visual amenity should be assessed in the ES.</p>	<p>The Project will be designed to provide setbacks from the existing field boundaries to limit the requirements for removal.</p> <p>The Applicant proposes to provide detailed mapping of field boundaries including existing hedgerows and cloddiau at the isolated locations in which vegetation would potentially require removal which would be undertaken on submission of the ES chapter.</p> <p>Impacts on and loss of vegetation would be recorded within the Arboricultural Impact Assessment (AIA) and the ES LVIA chapter and will inform judgements regarding the landscape and visual effects.</p>	<p>Arboricultural Impact Assessment (AIA) will be provided on submission of the ES chapter for the isolated locations requiring vegetation removal.</p>
PINS	19 <sup>th</sup> Feb 2024	<p>Mitigation</p> <p>The ES should demonstrate that the choice of mitigation measures for the purposes of reducing landscape and visual impacts is appropriate to the</p>	<p>The baseline assessment and field work of the LVIA will inform the design of mitigation and enhancement measures, along with engagement with other members of the Applicant's</p>	<p>The LVIA will inform the design of mitigation and enhancement measures.</p>

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		<p>prevailing landscape character. For example, tree belt screening planting may not be appropriate in open landscapes.</p> <p>The ES should clearly present any assumptions made with regards to the height that the proposed mitigation planting would have reached by the assessment years, for the purposes of generating photomontages and reaching the assessment conclusions.</p>	<p>project team, notably ecologists and heritage consultants in order to optimise outcomes and align with the prevailing character of the locality.</p>	
PINS	19 <sup>th</sup> Feb 2024	<p>Cumulative effects</p> <p>The assessment of cumulative effects on visual receptors should be supported by ZTV(s) to illustrate the potential impact of the proposed development cumulatively with other relevant developments.</p>	<p>The Applicant will seek to source published ZTVs where possible. It may not be possible for the Applicant to obtain ZTV information for other planning applications in the locality. However, field surveys and investigations will be undertaken to consider the potential for cumulative effects.</p>	<p>Cumulative assessments will be provided within the LVIA.</p>
<b>Applicants Response to EIA Scoping Response from NRW</b>				
NRW	19 <sup>th</sup> Feb 2024	<p>Para 1.1.11 states that <i>“we agree that effects on the AONB should be scoped into the LVIA. However, we do not agree with the proposed LVIA scope being narrowed to one special quality ‘Expansive Views’. We advise that the special quality of ‘Peace and Tranquillity’ may also be relevant. The contribution of views to a sense of</i></p>	<p>The LVIA will assess the <i>“expansive views”</i> and <i>“peace and tranquillity”</i> special qualities as requested by NRW in the assessment of effects on the special qualities of the Anglesey National Landscape (AONB). The LVIA will also review the NRW Report 569 Tranquillity and Place and the accompanying online StoryMap for</p>	<p>Assessment of Anglesey National Landscape (AONB) will include <i>“expansive views”</i> and <i>“peace and tranquillity”</i> special qualities within the LVIA.</p>

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		<i>peace and tranquillity is recognised in AONB Objective 4, which seeks to safeguard unspoilt panoramic views, dark skies and tranquillity. Further evidence on visual tranquillity is provided in NRW Report 569 Tranquillity and Place and the accompanying online StoryMap for visually tranquil places (Tranquillity and Place (arcgis.com)). These resources should be considered as part of the LVIA.”</i>	visually tranquil places (Tranquillity and Place (arcgis.com)).	
NRW	19 <sup>th</sup> Feb 2024	<i>Para 1.1.12 states that “the potential impacts on dark skies should be considered within the LVIA. NRW Report 514 Tranquillity and Place – Dark Skies and online StoryBoard for the dark skies mapping undertaken in 2021 should be considered as part of the LVIA: Wales Dark Skies (arcgis.com).”</i>	The Applicant will include consideration of night-time effects of artificial lighting within the LVIA during both the construction and operation stages. This will focus on where dark skies are a characteristic of the existing landscape and contribute to the natural beauty/special qualities of designated areas. Night-time representative viewpoints assessment.	Night-time effects included within the DCO Stage 5 LVIA.
NRW	19 <sup>th</sup> Feb 2024	<i>Para 1.1.15 states that “if potential impacts are identified within the V&amp;S Aspect Area YNSMNVS011, the LVIA should report on how these may alter any relevant characteristics of LCA 4, if at all.”</i>	The Applicant will assess the effects on the landscape character of LCA 4 if it is located within the ZVI for the final development parameters.	LCA 4 has been assessed within the LVIA following an updated to the ZTV and ZVI.
NRW	19 <sup>th</sup> Feb 2024	<i>Para 1.1.16 states that “we advise the preliminary ZTVs indicate theoretical visibility on the public rights of way (PRoW) network within V&amp;S Aspect</i>	The Applicant has included additional specific viewpoint on the A5025 and on the boundary of the Anglesey National Landscape (AONB) near Porth Wen	Viewpoints within Anglesey National Landscape (AONB) have been included within the LVIA at:

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		<i>Area YNSMNVS011, closer to the proposed development than Viewpoint 1 e.g. landscape southeast of Porth Wen. Similarly, the ZTVs indicate theoretical visibility at locations on the northern slopes of Mynydd Bodafon which may have a different focus to Viewpoint 17. We recommend checking these locations as part of the detailed LVIA site survey work. If they would illustrate different types of impact, including cumulative impacts to Viewpoints 1 and 17, then they should be included as separate viewpoints.”</i>	has been included to north of Maen Hir North (Illustrative Viewpoint B).  The exact locations for viewpoints will be micro-sited to obtain the clearest views towards the proposed development in the locality of the selected viewpoints.	<ul style="list-style-type: none"> <li>• Representative Viewpoint 1, A5025 near Burwen.</li> <li>• Specific Viewpoint ii, Mynydd Bodafon (south)</li> <li>• Illustrative Viewpoint D, Mynydd Eilian</li> <li>• Illustrative Viewpoint D, Mynydd Eilian</li> <li>• Illustrative Viewpoint S, Mynydd Bodafon (trig point)</li> </ul>
NRW	19 <sup>th</sup> Feb 2024	Para 1.1.17 states that “ <i>a photomontage would be prepared from Viewpoint 17 but not Viewpoint 1. In general, the number of photomontages proposed (5 in total) is disproportionately low for a scheme of this scale and nature, which relates to 3 large and geographically separate sites.</i> ”	The Applicant submitted an updated viewpoint schedule in response to comments from PINS, NRW and IoACC.	A total of 51 no. viewpoints have been included within the LVIA following consultation. Representative Viewpoints 1, 3, 4, 6, 9, 14, 18, 21, 22, 24 and Specific Viewpoints (i) and (ii) and Illustrative Viewpoint H have been produced as visualisations.
NRW	19 <sup>th</sup> Feb 2024	Para 1.1.8 states that “ <i>the following guidance, not referenced in the Scoping Report, should be referred to when designing/refining the proposals and undertaking the LVIA:</i> <ul style="list-style-type: none"> <li>• <i>Design Commission for Wales, Designing for Renewable Energy in Wales, November 2023 which includes principles</i></li> </ul>	The Applicant will refer to these guidance documents within the LVIA.	The LVIA refers to these guidance documents.

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		<p><i>for designing large scale solar installations.</i></p> <ul style="list-style-type: none"> <li>• <i>Scoping Report paragraph 7.2.57 refers to the previous Isle of Anglesey AONB Management Plan 2015-2020. The current Plan is the Area of Outstanding Natural Beauty Management Plan 2023-2028.</i></li> <li>• <i>NRW Guidance Note 46 Using LANDMAP in Landscape and Visual Impact Assessments.</i></li> <li>• <i>NRW Report 569 Tranquillity and Place and the accompanying online StoryMap for visually tranquil places (Tranquillity and Place (arcgis.com))</i></li> <li>• <i>NRW Report 514 Tranquillity and Place – Dark Skies and online dark skies mapping undertaken in 2021. Wales Dark Skies (arcgis.com).”</i></li> </ul>		
NRW	19 <sup>th</sup> Feb 2024	<p>Para 1.1.20 states that <i>‘we advise the following methodological issues may result in some effects being underestimated:</i></p> <ul style="list-style-type: none"> <li>• <i>Paragraph 7.2.87 states moderate effects are not significant. We advise that moderate effects can potentially be significant, particularly in the</i></li> </ul>	<p>The LVIA methodology clarifies that effects on landscape and visual receptors that are Major-Moderate or Major would be considered significant, and that Moderate effects may also be identified as being significant based upon professional judgement.</p>	<p>Refer to LVIA methodology within App 6-1.</p>

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		<p><i>context of an AONB. We advise the LVIA methodology should be updated to reflect this.</i></p> <ul style="list-style-type: none"> <li><i>Table 7-8 sets out different categories of landscape value, and the implications of these categories on overall sensitivity is set out in Tables 7-9 and 7-10. We advise that an approach which only affords the highest value to landscapes which are nationally or internationally designated is not appropriate and is not supported by best practice guidance in TGN 02-21: Assessing Landscape Value Outside National Designations.</i></li> <li><i>Because of the methodology above, a highly valued landscape receptor such as a Special Landscape Area (SLA) (falling under the LVIA 'local/district' value category), with a medium susceptibility to change, would only have a 'medium' overall sensitivity. This means that a medium magnitude of change to said receptor would typically only result in a moderate and not significant effect (under LVIA definition) (Image 7-2). We would consider</i></li> </ul>	<p>The assessment of effects will include details of how professional judgement has been applied.</p> <p>With regards to the landscape value assessments, it is considered appropriate for the Special Landscape Areas (SLA's) fall within the Local/District Value category as they are non-statutory local plan designations and of lesser value in relation to the statutory National Parks, National Landscapes (AONB) or World Heritage Sites (WHS). It is important for the LVIA to differentiate between the landscape values associated with these statutory and non-statutory landscape designations.</p> <p>The LVIA methodology will include reference to TGN 02-21: Assessing landscape value outside national designations and the chapter will consider the values associated with these undesignated landscapes.</p>	



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		<p><i>this to be an underestimation. Typically, an SLA receptor with medium susceptibility would have a medium/high overall sensitivity and a medium magnitude of change to this receptor would potentially result in a moderate/major and significant effect. We advise the LVIA methodology should be updated to address this issue.</i></p>		
NRW	19 <sup>th</sup> Feb 2024	<p>Para 1.1.21 states that:</p> <ul style="list-style-type: none"> <li>• <i>“The AONB boundary is not shown on the ZTV figs. We request that it be added to all relevant figs at the PEIR stage.</i></li> <li>• <i>A topographic / shaded relief map for the entire study area would be helpful to illustrate this aspect of the landscape context. This should also identify the AONB boundary.</i></li> <li>• <i>Fig 7-12 (Cumulative ZTV and LVIA Viewpoints) is difficult to understand due to the way areas of combined visibility have been shaded. We consider it preferable to show areas of combined visibility as a distinct colour and to avoid shading the site.</i></li> <li>• <i>Fig 7-4 (LANDMAP) is difficult to read due to the way in which the</i></li> </ul>	<p>The LVIA will include:</p> <ul style="list-style-type: none"> <li>• AONB boundary on the ZTV figs as requested.</li> <li>• A plan illustrating the landform/topography for the LVIA study area with the AONB boundary illustrated.</li> <li>• Fig 7-12: The ZTV plan will be updated to provide a single shaded area or visual envelope for the entire development as requested.</li> <li>• Fig 7-4: The LANDMAP figs will not include shading outside of the study area, and the notation and use of colours will be reviewed to improve legibility. The overall evaluation for each LANDMAP aspect will be contained within the LVIA report.</li> </ul>	<p>LVIA figs have been updated to include the boundaries of the Anglesey National Landscape (AONB) designation and updates to the LANDMAP overall evaluation graphical presentation.</p>

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		<i>aspect areas have been shaded and the different opacities between the study area and land outside the study area.”</i>		
NRW	19 <sup>th</sup> Feb 2024	Para 1.1.23 states that <i>“the ES will include a glint and glare assessment. A 1km study area for ground-based receptors will be used and this will scope out receptors within the AONB. Although receptors at Mynydd Bodafon would potentially overlook MH South, it is expected that due to the arrangement of PV arrays facing south (albeit potentially tracking from east to west), that the potential for glint and glare effects at Mynydd Bodafon is small, if not avoidable.”</i>	Noted. A separate standalone Glint and Glare Assessment will be undertaken by technical specialists appointed by the Applicant.	Refer to separate Glint and Glare assessment.
<b>Applicants Response to EIA Scoping Response from IoACC</b>				
IoACC	19 <sup>th</sup> Feb 2024	Methodology: <ul style="list-style-type: none"> <li>• Table 7-7 presents susceptibility criteria for both landscape and visual receptors;</li> <li>• Table 7-8 presents value criteria for landscape receptors only; There are no value criteria for visual receptors;</li> <li>• Tables 7-11 to 7-13 present magnitude of change criteria for both landscape and visual changes together; and</li> </ul>	The LVIA methodology includes details of how landscape value will be assessed, and how value and susceptibility inform judgements regarding visual receptor sensitivity.  Table 7-12 Duration of Effect adopts time periods that are independent of the project being assessed and have been established based on experience undertaking LVIAs for many types of development.	Refer to LVIA methodology within App 6-1.

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		<ul style="list-style-type: none"> <li>Table 7-12 presents duration of change criteria. This could helpfully be aligned with the project's construction phase and the assessment design year for operational mitigation, stated at paragraph 7.2.93 to be 15 years. This would help with the narrative around operation effects at paragraph 7.2.107.</li> </ul>	<p>The assessment design year for operational mitigation is selected as it represents a point in time, post-completion, when proposed mitigation planting would have become established but not fully mature.</p> <p>The LVIA methodology has been submitted for numerous other DCO and TCPA applications and provides a consistent approach to the assessment of landscape and visual effects which has been tested at numerous public inquiries and examinations.</p>	
IoACC	19th Feb 2024	<p>Methodology:</p> <ul style="list-style-type: none"> <li>To avoid any potential omission or double counting in the assessments, the Applicant should clarify the division of scope and the methodological relationships at the interface between the LVIA and the Cultural Heritage chapter. This should cover how and where the heritage aspect of the landscape character and designated sites are considered.</li> <li>It should also clarify how effects on the significance and visual setting of designated and non-designated heritage assets (Fig 7-17), such as listed buildings</li> </ul>	<p>All heritage matters including impacts on any non-designated and designated assets including scheduled monuments, listed buildings or registered parks and gardens and their settings will be assessed within the Heritage chapter.</p> <p>The LVIA will assess the landscape and visual effects arising from the Project and will include consideration of the NRW LANDMAP historic and cultural aspects and overall evaluations.</p>	Refer to separate Heritage chapter for impacts on any scheduled monuments, listed buildings or registered parks and gardens.

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		and scheduled monuments, will be addressed. This is unclear in the information submitted in support of the Scoping Request.		
IoACC	19th Feb 2024	<p>Landscape Receptors:</p> <ul style="list-style-type: none"> <li>• Level of detail and granularity proposed for the landscape assessment seems appropriate based on an understanding of the scale and extent of the development proposals.</li> <li>• Unclear why designated landscape receptors are included under Visual Amenity in 7.2.48 and under Visual Effects at Table 7-14.</li> <li>• Applicant should provide further clarity on how designated landscape receptors will be assessed in the LVIA.</li> </ul>	<p>The effects on statutory and non-statutory landscape designations will be assessed within the LVIA, drawing upon the assessment of effects on landscape character and visual receptors, and supplemented with additional consideration of factors that contribute to the purpose of the designation and relevant natural beauty/special qualities which are highlighted in published material.</p> <p>For example, Natural Resources Wales (NRW) has requested that the LVIA review the expansive views and peace and tranquillity special qualities as detailed within the Management Plan, AONB Objective 4, NRW Report 569 and the online StoryMap.</p> <p>The LVIA will include an assessment of the effects on the Anglesey National Landscape (AONB), the Parys Mountain and Slopes SLA and the Mynydd Mechell and Surrounds SLA.</p> <p>The Parciau Estatelands Special Landscape Area (SLA) would be scoped-out of the LVIA. As further detailed within paragraph 7.2.66 of the</p>	Refer to Section 6-6 of the LVIA.

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			Applicant's Scoping Report, the ZTV (see Figs 7-9, 7-12 and 7-13) and fieldwork has identified that there would be restricted visibility between the southern parcel and the Parciau Estatelands SLA.	
IoACC	19th Feb 2024	<p>Assumptions and Limitations:</p> <ul style="list-style-type: none"> <li>Scoping Request content is relatively high-level in respect of the scope of the LVIA. It does address some limitations throughout the body of the text, (e.g. paragraph 7.2.38 where it is stated that the ZTV may change with design development). However, Section 7 does not clearly cover overarching limitations and assumptions.</li> </ul>	The Applicant has provided confirmation of the assumptions and limitations which apply to the PEIR assessment, and will do the same for the ES.	Refer to Section 6-3 of LVIA.
IoACC	19th Feb 2024	<p>Selection of LVIA viewpoints:</p> <ul style="list-style-type: none"> <li>Lack of clarity between a Visual Receptor Group and Representative Viewpoint.</li> <li>Representative viewpoints do not appear to include the viewpoints that will be included in the RVAA and the ARA.</li> <li>Council requests that further consideration is given to the range of viewpoints that will be available to inform the assessment.</li> </ul>	<p>Visual effects are assessed within the LVIA for groups of visual receptors within close proximity of each other and that are judged to experience similar visual effects arising from the proposed development. These will be referred to as 'Visual Receptor Groups' (VRG's) and might include motorists on local roads, users of rights of way and local residents and visitors to settlements.</p> <p>Representative viewpoints will be selected within the LVIA to provide a sample of visual effects from the locality. Representative viewpoints,</p>	<p>Refer to Section 6-6 of LVIA. The LVIA has incorporated the following viewpoints requested by PINS:</p> <ul style="list-style-type: none"> <li>Cemaes Bay to north-west [Illustrative Viewpoint A].</li> <li>Mynydd Eilian to north-east [Illustrative Viewpoint D].</li> <li>Llyn Llywenan to south-west [Illustrative Viewpoint W].</li> </ul>

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		<ul style="list-style-type: none"> <li>• Include additional viewpoints within LVIA or ARA from:               <ol style="list-style-type: none"> <li>1. PRoW Footpath MECHELL 38/077/2 at the point where it connects to the Circular Way Long distance footpath adjacent to an unclassified road.</li> <li>2. South of PRoW Footpath RHOSYBOL 44/028/2. Centre of Northern parcel.</li> <li>3. Point along PRoW Footpath MECHELL 38/067/2. South of northern parcel.</li> <li>4. South of PRoW Footpath TREF ALAW 47/021/1 at the point where it connects to an unclassified road.</li> <li>5. PRoW Footpath RHOSYBOL 44/027/1 at the point where it connects to an unclassified road. Northeast of central parcel.</li> <li>6. Point along PRoW Footpath LLANNERCH-Y-MEDD 25/003/. South of central parcel.</li> <li>7. South of PRoW Footpath RHOSYBOL 44/036/1 at the point where it connects to the National Cycle Network</li> </ol> </li> </ul>	<p>(along with illustrative viewpoints) will be referred to in the assessment of effects on visual receptor groups. For each representative viewpoint, analysis will be presented on the scale of visual effects. This will be included on the relevant photopanel for each representative viewpoint, which will be referred to in the assessment of effects on Visual Receptor Groups.</p> <p>Specific viewpoints will also be assessed in the LVIA. These are locations in key and sometimes a promoted viewpoint within the landscape, including for example specific local visitor attractions, viewpoints in areas of particularly noteworthy visual and/or recreational amenity such as landscapes with statutory landscape designations, or viewpoints with particular cultural landscape associations.</p> <p>Definitions for all viewpoint types and details of how there are used in the LVIA will be provided in the detailed methodology and glossary that will be included in the LVIA chapter. This differentiates between representative, illustrative and specific viewpoints as appropriate. Other viewpoints will be included within the RVAA and ARA as</p>	<p>The LVIA has incorporated the following viewpoints requested by IoACC:</p> <ul style="list-style-type: none"> <li>• PRoW Footpath MECHELL 38/077/2 at the point where it connects to the Circular Way Long distance footpath adjacent to an unclassified road [Illustrative Viewpoint F].</li> <li>• South of PRoW Footpath RHOSYBOL 44/028/2 [Illustrative Viewpoint I].</li> <li>• Point along PRoW Footpath MECHELL 38/067/2 [Illustrative Viewpoint J].</li> <li>• South of PRoW Footpath TREF ALAW 47/021/1 at the point where it connects to an unclassified road [Illustrative Viewpoint L].</li> <li>• PRoW Footpath RHOSYBOL 44/027/1 at the point where it connects to an unclassified road. [Illustrative Viewpoint N].</li> </ul>

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		<p>Route 5. North of southern parcel.</p> <p>8. B5111 highway near the south of PRow Footpath LLANNERCH-Y-MEDD 25/013/1. East of southern parcel.</p> <p>9. Point along the National Cycle Network Route 5. West of southern parcel.</p>	<p>separate assessments and an appendix to the LVIA.</p> <p>The additional viewpoints (1-9) requested by IoACC have been included in the revised schedule of representative viewpoints (see schedule below). This includes additional viewpoints requested by other consultees that have responded to the Applicants EIA Scoping Request.</p>	<ul style="list-style-type: none"> <li>• Point along PRow Footpath LLANNERCH-Y-MEDD 25/003/ [Illustrative Viewpoint Q].</li> <li>• South of PRow Footpath RHOSYBOL 44/036/1 at the point where it connects to the National Cycle Network Route 5 [Representative Viewpoint 20].</li> <li>• B5111 highway near the south of PRow Footpath LLANNERCH-Y-MEDD 25/013/1 [Illustrative Viewpoint Y].</li> <li>• Point along the National Cycle Network Route 5 [Illustrative Viewpoint X].</li> </ul>
IoACC	19th Feb 2024	<p>Combined Visual Effects:</p> <ul style="list-style-type: none"> <li>• Assessment should also include receptors which it can be predicted may be able to see parts of the development in sequence during a journey. NCR 5 is likely to have views of both the south and central parcel. There are likely to be a number of recreational routes with views of more than one parcel along a journey.</li> </ul>	<p>The ARA will include an assessment of sequential views and experience of cyclists using NCR 5 in relation to the southern and central parcels.</p>	<p>Refer to the ARA within Appendix 6-4.</p> <p>Refer to separate cumulative assessment within PEIR.</p>

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IoACC	19th Feb 2024	<p>Nighttime Effects and Lighting:</p> <ul style="list-style-type: none"> <li>Applicant should consider the potential effects of lighting on the character of the landscape and on relevant views that will be included in the LVIA. This does not necessitate a separate lighting effects assessment but does require consideration within the assessment of potential effects, leading to the identification of appropriate mitigation proposals to minimise impact on key receptors.</li> </ul>	<p>The Applicant will include consideration of night-time effects of artificial lighting within the LVIA during both the construction and operation stages. This will focus on where dark skies are a characteristic of the existing landscape and contribute to the natural beauty/special qualities of designated areas. A selection of representative viewpoints will be visited at night to provide a night-time visual assessment.</p>	<p>Night time Effects and Lighting will be further assessed within the ES.</p>
IoACC	19th Feb 2024	<p>Cumulative Effects:</p> <ul style="list-style-type: none"> <li>The Applicant should refer to the Alaw Mon Solar farm and the Carrog Ganol BESS facility within the cumulative assessment.</li> </ul>	<p>The Applicant will seek to agree a 'long list' of developments with IOACC with the aim of refining to a 'short list' for inclusion in the cumulative LVIA. The proposed Alaw Mon Solar Farm DNS application and the Carrog Ganol BESS facility will be included in the short list as requested.</p>	<p>Refer to separate cumulative assessment within PEIR.</p>