



Awel y Môr Offshore Wind Farm

Category 5: Reports

Report 5.1, Annex 1: Consultation Report Appendices Part 2 (E to H)

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1 Appendix E: Section 48 Publicity

1.1 Appendix E1: Section 48 Notice

FFERM WYNT ALLTRAETH AWEL Y MÔR
ADRAN 48, DEDDF CYNLLUNIO 2008
RHEOLIAD 4 CYNLLUNIO SEILWAITH (CEISIADAU: FFURFLENNI A GWEITHDREFNAU RHAGNODEDIG) RHEOLIADAU 2009
GORCHYMYN FFERM WYNT ALLTRAETH AWEL Y MÔR 2021
HYSBYSIAD YN CYHOEDDI CAIS ARFAETHEDIG AM ORCHYMYN CYDSYNIAD DATBLYGU (“DCO”)
Hysbysir drwy hyn fod Fferm Wynt Alltraeth Awel y Môr Cyfyngedig (yr “Ymgeisydd”) o Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, Y Deyrnas Unedig, SN5 6PB yn bwriadu gwneud cais i’r Ysgrifennydd Gwladol dros Fusnes, Ynni a Strategaeth Ddiwydiannol o dan Adran 37 Deddf Cynllunio 2008 am y Gorchymyn Caniatâd Datblygu a grybwyllir uchod (y “Cais”).
Mae’r Cais yn ymwneud ag adeiladu, gweithredu, cynnal a chadw a datgomiisiynu fferm wynt ar y môr sydd tua 10 cilometr oddi ar arfordir Gogledd Cymru yn Môr Iwerddon; gan gynnwys hyd at 91 generadur tyrbîn gwynt a seilwaith cysylltiedig sy’n cyrraedd y lan yn Nhraeth Ffrith, i’r dwyrain o’r Rhyll, yn Sir Ddinbych, gosod ceblau tanddaearol ac adeiladu is-orasaf drydanol a seilwaith cysylltiedig er mwyn cysylltu’r datblygiad ag is-orasaf bresennol y Grid Cenedlaethol ym Modelwyddan (y “Prosiect”).
Bydd y Gorchymyn arfaethedig, ymysg pethau eraill, yn awdurdodi’r cydrannau gan gynnwys:
Ar y môr
1 Gorsaf gynhyrchu tyrbîn gwynt ar y môr gyda chapasiti allbwn trydan gros o dros 100 megawatt, sy’n cynnwys hyd at 91 generadur tyrbîn gwynt gyda sylfeini cysylltiedig, diamedr rotor o 300m ar y mwyaf ac uchder ton uchaf o 332m uwchlaw’r Cymedr Penllanw Gorllanw (MHWS).
2 Hyd at ddau blatfform is-orasaf ar y môr gyda sylfeini cysylltiedig.
3 Un mast meteorolegol gyda sylfeini cysylltiedig, bwiau LiDAR a bwiau mordwylol.
4 Gosod cebl dan y môr i Fferm Wynt Alltraeth Gwynt y Môr.
5 Rhwydwaith o geblau ‘inter-array’ o dan y môr gan gynnwys cyfarpar diogelu ceblau, cysylltu’r tyrbinau gwynt â’i gilydd ac â phlatfformau’r is-orasaf ar y môr gan gynnwys croesfannau ceblau.
6 Hyd at ddwy gylched ceblau dan y môr gan gynnwys croesfannau ceblau, cyfarpar diogelu ceblau, argaeau coffr a gwaith gosod heb ddefnyddio ffosydd o blatfformau’r isorsaf ar y môr i’r lan, gyda chyfanswm hyd y cebl oddeutu 65 km.
7 Diogelu’r sylfeini a cheblau rhag cyrcydu, yn ôl yr angen.
Ar y tir
8 Newid baeau uno i gysylltu’r ceblau ar y môr a’r ceblau ar y tir yn y Rhyll.
9 Hyd at ddwy gylched ceblau wedi’u claddu o’r baeau uno trosiannol yn y Rhyll o dan yr A525, Afon Clwyd, yr A547 a’r A55 i is-orasaf drydanol newydd i’r gorllewin o Barc Busnes Llanellwly ym Modelwyddan, gan gynnwys pibelli ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
10 Adeiladu is-orasaf drydanol newydd ym Modelwyddan ynghyd ag offer cysylltiedig, mynedfeydd, tirlunio a chompownd adeiladu dros dro.
11 Hyd at ddwy gylched geblau 400kV wedi’u claddu sy’n cysylltu’r is-orasaf newydd ag isorsaf y National Grid ym Modelwyddan, gan gynnwys pibellau ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
12 Mannau adeiladu a ffyrdd mynediad dros dro ynghyd â gwaith i sicrhau mynediad i gerbydau a/neu gerddwyr ar gyfer y Prosiect, gan gynnwys addasiadau i bontydd a thynnu ac adfer grwnau.
13 Caffael tir a/neu hawliau’n barhaol ac yn orfodol ar gyfer y Prosiect.
14 Diystyru hawddfreetiniau a hawliau eraill dros neu sy’n effeithio ar dir ar gyfer y Prosiect.
15 Cymhwyso a/neu ddatgymhwyso deddfwriaeth sy’n berthnasol i’r Prosiect gan gynnwys, ymysg pethau eraill, deddfwriaeth sy’n ymwneud â chaffael gorffodol.
16 Y darpariaethau, trwyddedau a chaniatadau ategol, achlysurol a chanlyniadau ag sy’n angenrheidiol a/neu’n gyfleus.
Mae’r Prosiect yn Ddatblygiad Asesiad o’r Effaith Amgylcheddol. Yn unol â hynny, bydd yr Ymgeisydd yn sicrhau bod gwybodaeth amgylcheddol ragarweiniol ar gael. Gellir edrych ar gopi o’r Adroddiad Gwybodaeth Amgylcheddol Ragarweiniol (PEIR) a’r crynodeb annhechnegol (NTS), sy’n cynnwys manylion y cynigion, yn rhad ac am ddim yn adran arddangos gwefan yr Ymgeisydd: <https://exhibition.awelymor.cymru/> sydd hefyd yn cynnwys gwybodaeth arall am y Prosiect.
Yn amodol ar gyfyngiadau COVID-19, bydd yr NTS, yn ogystal â deunyddiau ymgynghori eraill, hefyd ar gael ar ffurf copi caled yn y lleoliadau isod. Edrychwch ar wefan y cyfleuster ymlaen llaw i gadarnhau’r oriau agor ac unrhyw ofnyion archebu er mwyn cael gafael ar y dogfennau’n ddigidol.

Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor
Sir Ddinbych	Llyfrgell Prestatyn: Rhodfa’r Brenin, Prestatyn LL19 9LH, y DU	31 Awst - 11 Hydref 2021	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstiaeth/lyfrgelloedd/prestatyn.aspx
	Llyfrgell y Rhyll: 11A Stryd yr Eglwys, Y Rhyll LL18 3AA, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstiaeth/lyfrgelloedd/y-rhyl.aspx
	Llyfrgell Rhuddlan: 9 Coetiau Postol, Rhuddlan, Y Rhyll LL18 2UE, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstiaeth/lyfrgelloedd/rhuddlan.aspx
	Llyfrgell Llanellwly: Y Llyfrgell, Y Roe, Llanellwly LL17 0LU, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstiaeth/lyfrgelloedd/llanellwly.aspx
Sir y Fflint	Llyfrgell Treffynnon: Canolfan Hamdden Treffynnon, North Road, Treffynnon, Sir y Fflint, CH8 7UZ, Sir y Fflint	Fel yr uchod	https://aura.cymru/lyfrgell-treffynnon/
Conwy	Llyfrgell Bae Colwyn: Ffordd Coetir Orllewinol, Bae Colwyn LL29 7DH	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llyfrgell Llandudno: 48 Mostyn Street, Llandudno LL30 2RP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Llandudno-Library.aspx
	Llyfrgell Abergele: Stryd y Farchnad, Abergele LL22 7BP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Abergele-Library.aspx
	Llyfrgell Llanfairfechan: Village Rd, Llanfairfechan LL33 0AA	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Llyfrgell Gyhoeddus Bangor Ffordd Gwynedd, Bangor LL57 1DT	Fel yr uchod	https://www.gwynedd.llyw.cymru/cy/Trigolion/Llyfrgelloedd-ac-archifau/Eich-lyfrgelli-eol/Llyfrgell-Bangor.aspx
Ynys Môn	Llyfrgell Porthaethwy: Wood St, Porthaethwy LL59 5AS, y Deyrnas Unedig	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-lyfrgell-leo/Llyfrgell-Porthaethwy.aspx
	Llyfrgell Biwmares: Grammar School Lane, Biwmares LL58 8AL	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-lyfrgell-leo/Llyfrgell-Biwmares.aspx

Os oes angen dulliau eraill arnoch i archwilio’r PEIR, ffoniwch yr Ymgeisydd ar: 0800 197 8232 neu anfonwch neges e-bost at: awelymor@rwe.com. Gallwch i’r arweiniad ar ddefnyddio gwefan y prosiect neu, ar gais, gallwn roi cof bach rhad ac am ddim sy’n cynnwys y PEIR. Gellir rhoi copïau caled o’r NTS, y Datganiad o Ymgynghori Cymunedol (SoCC), a’r Holiadur Ymgynghori yn rhad ac am ddim hefyd ar gais yn ystod y cyfnod ymgynghori. Codir uchafswm ffi o £1,000 am gopiâu caled o’r PEIR ar gyfer costau argraffu.
Bydd y dogfennau (sy’n cynnwys cynlluniau sy’n dangos lleoliad y datblygiad arfaethedig) ar gael **rhwng 31 Awst 2021 ac 11 Hydref 2021**.

Dylid anfon unrhyw ymatebion mewn perthynas â’r Prosiect drwy e-bost at awelymor@rwe.com neu drwy’r post i Fferm Wynt Alltraeth Awel y Môr Cyf/ Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB. Rhaid i unrhyw ymateb fod yn ysgrifenedig ac wedi dod i law yn y cyfeiriadau uchod ar **11 Hydref 2021** neu cyn hynny. Dylai’r ymatebion egluro pwy sy’n gwneud yr ymateb a rhoi cyfeiriad ar gyfer gohebiaeth yn y dyfodol. Gellir cyhoeddi ymatebion.
Cofiwch efallai na fydd unrhyw ymatebion i’r ymgynghoriad a ddaw i law ar ôl y dyddiad hwn yn cael eu hystyried.
24 Awst 2021

AWEL Y MÔR OFFSHORE WIND FARM
SECTION 48 PLANNING ACT 2008
REGULATION 4 INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009
THE AWEL Y MÔR OFFSHORE WIND FARM ORDER 2021
NOTICE PUBLICISING A PROPOSED APPLICATION FOR A DEVELOPMENT CONSENT ORDER (“DCO”)

Notice is hereby given that Awel y Môr Offshore Wind Farm Limited (the “Applicant”) of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, United Kingdom, SN5 6PB proposes to apply to the Secretary of State for Business, Energy and Industrial Strategy under Section 37 of the Planning Act 2008 for the above mentioned Development Consent Order (the “Application”).
The Application relates to the construction, operation, maintenance and decommissioning of an offshore wind farm located approximately 10 kilometres off the coast of North Wales in the Irish Sea; including up to 91 wind turbine generators and associated infrastructure making landfall at Frith Beach, east of Rhyll, and in the County of Denbighshire, the installation of underground cables and the construction of an electrical substation and associated infrastructure in order to connect the development to the National Grid’s existing substation at Bodellwyddan (the “Project”).
The proposed DCO will, amongst other things, authorise components including:
Offshore

- 1 An offshore wind turbine generating station with a gross electrical output capacity of over 100 megawatts, comprising up to 91 wind turbine generators with associated foundations, a maximum rotor diameter of 300m and a maximum tip height of 332m above Mean High Water Springs (MHWS).
 - 2 Up to two offshore substation platforms with associated foundations.
 - 3 One meteorological mast with associated foundations, LiDAR buoys and navigational buoys.
 - 4 Installation of a subsea cable to the Gwynt y Môr Offshore Wind Farm.
 - 5 A network of subsea inter-array cables including cable protection, connecting the wind turbines to each other and to the offshore substation platforms including cable crossings.
 - 6 Up to two subsea cable circuits including cable crossings, cable protection, cofferdams and trenchless installation works from the offshore substation platforms to shore, with a total cable length of approximately 65 km.
 - 7 Scour protection, as required, for foundations and cables.
- Onshore
- 8 Transition joint bays to connect the offshore cables and the onshore cables at Rhyll.
 - 9 Up to two buried cable circuits from the transition joint bays at Rhyll under the A525, the River Clwyd, the A547 and the A55 to a new electrical substation west of the St Asaph Business Park at Bodellwyddan, including cable ducts, jointing and trenchless installation works.
 - 10 The construction of a new electrical substation at Bodellwyddan together with associated equipment, accesses, landscaping and a temporary construction compound.
 - 11 Up to two buried 400kV cable circuits connecting the new substation to the National Grid substation at Bodellwyddan, including cable ducts, jointing and trenchless installation works.
 - 12 Temporary construction areas and access roads together with works to secure vehicular and/or pedestrian means of access for the Project, including alterations to bridges and removal and remediation of groynes.
 - 13 The permanent and compulsory acquisition of land and/or rights for the Project.
 - 14 Overriding of easements and other rights over or affecting land for the Project.
 - 15 The application and/or disapplication of legislation relevant to the Project including, inter alia legislation relating to compulsory acquisition.
 - 16 Such ancillary, incidental and consequential provisions, permits and consents as are necessary and/or convenient.

The Project is Environmental Impact Assessment Development. Accordingly, the Applicant will be making preliminary environmental information available. A copy of the Preliminary Environmental Information Report (PEIR) and non-technical summary (NTS), which includes details of the proposals, may be inspected free of charge in the exhibition section of the Applicant’s website: <https://exhibition.awelymor.cymru/> which also contains other information on the Project. Subject to COVID-19 restrictions the NTS, as well as other consultation materials, will also be available in hard copy at the deposit locations below. Please check the facility’s website in advance to confirm opening hours and any booking requirements to access the documents digitally.

Location	Address	Dates available	Opening hours
Denbighshire	Prestatyn Library: Kings Ave, Prestatyn LL19 9LH, UK	31 August - 11 October 2021	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/prestatyn.aspx
	Rhyl Library: 11A Church St, Rhyl LL18 3AA, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/rhyl.aspx
	Rhuddlan Library: 9 Vicarage Ln, Rhuddlan, Rhyl LL18 2UE, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/rhuddlan.aspx
	St Asaph Library: Library, The Roe, Saint Asaph LL17 0LU, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/st-asaph.aspx
Flintshire	Holywell Library: Holywell Leisure Centre, North Road, Holywell, Flintshire, CH8 7UZ Flintshire	As above	https://aura.wales/holywell-library/
Conwy	Colwyn Bay Library: Woodland Rd West, Colwyn Bay LL29 7DH	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llandudno Library: 48 Mostyn St, Llandudno LL30 2RP	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Llandudno-Library.aspx
	Abergele Library: Market St, Abergele LL22 7BP	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Abergele-Library.aspx
	Llanfairfechan Library: Village Rd, Llanfairfechan LL33 0AA	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Bangor Public Library Gwynedd Road, LL57 1DT	As above	https://www.gwynedd.llyw.cymru/en/Residents/Libraries-and-archives/Your-local-library/Bangor-library.aspx
Isle of Anglesey	Llyfrgell Porthaethwy Library: Wood St, Menai Bridge LL59 5AS, United Kingdom	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Menai-Bridge-Library.aspx
	Beaumaris Library: Grammar School Lane, Beaumaris LL58 8AL	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Beaumaris-Library.aspx

If you require alternative methods for inspection of the PEIR, please telephone the Applicant on: 0800 197 8232 or email: awelymor@rwe.com. We are able to provide guidance on using the project website or can, upon request, provide a USB stick free-of-charge containing the PEIR. Hard copies of the NTS, the Statement of Community Consultation (SoCC), and the Consultation Questionnaire can also be provided free-of-charge upon request during the consultation period. Hard copies of the PEIR will be subject to a maximum charge of £1,000 to cover printing costs. The documents (which include plans showing the location of the proposed development) will be available for inspection **from 31 August 2021 until 11 October 2021**.

Any responses in respect of the Project should be sent by email to awelymor@rwe.com or by post to Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.
Any response must be in writing and be received at the above addresses on or before **11 October 2021**. Responses should explain who is making the response and give an address for future correspondence. Responses may be made public.
Please note that any consultation responses received after this date may not be considered.
24 August 2021

1.2 Appendix E2: Section 48 Notice Evidence

Public Notices

Public Notices

FFERM WYNT ALLTRAETH AWEL Y MÔR
ADRN 48, DEDDF CYNLLUNIO 2008
RHEOLIAD 4 CYNLLUNIO SEILLWAITH (CEISIADAU: FFURFLENNI A GWEITHDREFNAU RHAGNODEDIG) 2009
GORCHYMYN FFERM WYNT ALLTRAETH AWEL Y MÔR 2021
HYSBYSIAD YN CYHOEDDI CAIS ARFAETHEDIG AM GORCHYMYN CYDSYNIAD DATBLYGU ("DCO")

Hysbysir drwy hyn fod Fferm Wynt Alltraeth Awel y Môr Cyfyngedig (yr "Mgeisydd") o Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, y Deyrnas Unedig, SN5 6PB yn bwriadu gwneud cais i'r Ysgrifennydd Gwladol droes Fuesnes, Ynni a Strategaeth Ddiwydiannol o dan Adran 37 Deddf Cynullino 2008 am y Gorchymyn Caniatâd Datblygu a grybwyllir uchod (y "Cais").

Mae'r Cais yn ymwneud ag adeiladu, gweithredu, cynnal a chadw a datgomiysynu fferm wynt ar y môr sydd tua 10 cilometr oddi ar arfordir Gogledd Cymru ym Môr Iwerddon; gan gynnwys hyd at 91 generadur tyrbîn gwynt a seilwaith cysylltiedig sy'n cyrraedd y lan yn Nhraeth Frith, i'r dwyrain o'r Rhyl, yn Sir Dinbydd, gosod cefnau tanddaerol ac adeiladu is-orasaf drydanol a seilwaith cysylltiedig er mwyn cysylltu'r datblygiad ag is-orasaf bresennol y Grid Cenedlaethol ym Modelwyddan (y "Prosiect").

Bydd y Gorchymyn arfaethedig, ymysg pethau eraill, yn awdurdodi'r cydrannau gan gynnwys:

Ar y môr

- 1 Gorsaf gynhyrchu tyrbin gwynt ar y môr gyda chapasiti allbwn trydan gros o dros 100 megawat, sy'n cynnwys hyd at
2 91 generadur tyrbîn gwynt gyda sylfeini cysylltiedig, diamedr rotor o 300m ar y mwyaf ac uchder ton uchaf o 332m uwchlaw'r Cymed
3 Penllanw Gorllanw (MWS).
- 4 Hyd at ddau plattform is-orsaf ar y môr gyda sylfeini cysylltiedig.
5 Un mast meteorolegol gyda sylfeini cysylltiedig, bwiau LiDAR a bwiau mordwyl.
6 Gosod cebl dan y môr i Fferm Wynt Alltraeth Gwynt y Môr.
7 Rhwydwaith o geblau 'inter-array' o dan y môr gan gynnwys cyfarpar diogelu ceblau, cysylltu'r tyrbinau gwynt â'i gilydd ac â phlattformau'r
8 is-orsaf ar y môr gan gynnwys croesfannau ceblau.
9 Hyd at ddwy gylched ceblau dan y môr gan gynnwys croesfannau ceblau, cyfarpar diogelu ceblau, argaeau coffr a gwaith gosod heb
10 ddefnyddio ffosydd o blattformau'r isorsaf ar y môr i'r lan, gyda chyfanswm hyd y cebl oddeutu 65 km.
11 Diogelu'r sylfeini a cheblau rhag cyrcydu, yn ôl yr angen.
- Ar y tir
- 12 Newid baeau uno i gysylltu'r ceblau ar y môr a'r ceblau ar y tir yn y Rhyl.
13 Hyd at ddwy gylched ceblau wedi'u claddu o'r baeau uno trosiannol yn y Rhyl o dan yr A525, Afon Clwyd, yr A547 a'r A55 i is-orsaf
14 drydanol newydd i'r gorllewin o Barc Busnes Llanellw ym Modelwyddan, gan gynnwys pibell ceblau, uniadau a gwaith gosod heb
15 ddefnyddio ffosydd.
16 Adeiladu is-orsaf drydanol newydd ym Modelwyddan ynghyd ag offer cysylltiedig, mynedfeydd, tirlunio a chompownd adeiladu
17 dros dro.
18 Hyd at ddwy gylched ceblau 400kV wedi'u claddu sy'n cysylltu'r is-orsaf newydd ag isorsaf y National Grid ym Modelwyddan,
19 gan gynnwys pibellau ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
20 Mannau adeiladu a ffyrdd mynediad dros dro ynghyd â gwaith i sicrhau mynediad i gerbydau a/neu gerddwyr ar gyfer y Prosiect,
21 gan gynnwys addasiadau i bontydd a thynnu ac adfer grwynau.
22 Caffael tir a/neu hawliau'n barhaol ac yn orfodol ar gyfer y Prosiect.
23 Diystyru hawddfreintiau a hawliau eraill dros neu sy'n effeithio ar dir ar gyfer y Prosiect.
24 Cymhwysio a/neu ddatgymhwysio deddfwriaeth sy'n berthnasol i'r Prosiect gan gynnwys, ymysg pethau eraill, deddfwriaeth sy'n
25 ymwneud â chaffael gorfolod.
26 Y darpariaethau, trwyddedau a chaniatadau ategol, achlysurol a chanlyniadol ag sy'n angenrheidiol a/neu'n gyfleus.

Mae'r prosiect yn Ddatblygiad Aseidiad o'r Effaith Amgylcheddol. Yn unol â hynny, bydd yr Ymgeisydd yn sicrhau bod gwybodaeth amgylcheddol ragarwiniol ar gael. Gellir edrych ar gopi o'r Adroddiad Gwybodaeth Amgylcheddol Ragarwiniol (PEIR) a'r cynnodb annhechnegol (NTS), sy'n cynnwys manylion y cynigion, yn rhad ac am ddim yn adran arddanoas awefan yr Ymgeisydd:

<https://exhibition.awelymor.cymru/sydd-hefyd-yn-cynnwys-gwybodaeth-arall-am-y-Prosiect>. Yn amodol ar gyfyngiadau COVID-19, bydd yr NTS, yn ogystal â deunyddiau ymgynghori eraill, hefyd ar gael ar ffurf copi caled yn y lleoliadau isod. Edrychwch ar wefan y cyfleuster ymlaen llaw i gadarnhau'r oriau agor ac unrhyw ofynion archebu ar mwyn gael gafael ar y dogfennau'n ddigidol.

Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor
Sir Ddinbych	Llyfrgell Prestatyn: Rhodfa'r Brenin, Prestatyn LL19 9LH, y DU	31 Awst - 11 Hydref 2021	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/prestatyn.aspx
	Llyfrgell y Rhyl: 11A Stryd yr Eglwys, Y Rhyl LL18 3AA, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/y-rhyl.aspx
	Llyfrgell Rhuddlan: 9 Coetiau Postol, Rhuddlan, Y Rhyl LL18 2UE, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/rhuddlan.aspx
	Llyfrgell Llanelwyr: Y Llyfrgell, Y Roe, Llanelwyl LL17 0LU, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/lanelwyr.aspx
Sir y Fflint	Llyfrgell Treffynnon: Canolfan Hamdden Treffynnon, North Road, Treffynnon, Sir y Fflint, CH8 7UZ, Sir y Fflint	Fel yr uchod	https://aura.cymru/llyfrgell-treffynnon/
Conwy	Llyfrgell Bae Colwyn: Ffordd Coetir Orllewinol, Bae Colwyn LL29 7DH	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llyfrgell Llandudno: 48 Mostyn Street, Llandudno LL30 2RP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llandudno-Library.aspx
	Llyfrgell Abergel: Stryd y Farchnad, Abergel LL22 7BP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Abergel-Library.aspx
	Llyfrgell Llanfairfechan: Village Rd, Llanfairfechan LL33 0AA	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Llyfrgell Gyhoeddus Bangor Ffordd Gwynedd, Bangor LL57 1DT	Fel yr uchod	https://www.gwynedd.llyw.cymru/cy/Trigolion/Llyfrgelloedd-ac-archifau/Eich-llyfrgelleol/Llyfrgell-Bangor.aspx
Ynys Môn	Llyfrgell Porthaethwy: Wood St, Porthaethwy LL59 5AS, y Deyrnas Unedig	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-llyfrgell-leol/Llyfrgell-Porthaethwy.aspx
	Llyfrgell Biwmares: Grammar School Lane, Biwmares LL58 8AL	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-llyfrgell-leol/Llyfrgell-Biwmares.aspx

Os oes angen dulliau eraill amoch i archwilio'r PEIR, ffoniwch yr Ymgeisydd ar: 0800 197 8232 neu anfonwch neges e-bost at: awelymor@rwe.com. Gallwn roi arweiniad ar ddefnyddio gwefan y prosiect neu, ar gais, gallwn roi cof bach rhad ac am ddim sy'n cynnwys y PEIR. Gellir rhoi copïau caled o'r NTS, y Datganiad o Ymgyngghori Cymunedol (SoCC), a'r Holiadur Ymgyngghori yn rhad ac am ddim hefyd ar gais yn ystod y cyfnod ymgyngghori. Codir uchafswm ffi o £1,000 am gopïau caled o'r PEIR ar gyfer costau argraffu.

Bydd y dogfennau (sy'n cynnwys cynlluniau sy'n dangos lleoliad y datblygiad arfaethedig) ar gael **rhwng 31 Awst 2021 ac 11 Hydref 2021**.

Dylid anfon unrhyw ymatebion mewn perthynas â'r Prosiect drwy e-bost at awelymor@rwe.com neu drwy'r post i Fferm Wynt Alltraeth Awel y Môr Cyf Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB. Rhaid i unrhyw ymateb fod yn ysgrifenedig ac wedi dod i law yn y cyfeiriadau uchod ar **11 Hydref 2021** neu cyn hynny. Dylai'r ymatebion egluro pryd sy'n gwneud yr ymateb a rhoi cyfeiriad ar gyfer gohebiaeth yn y dyfodol. Gellir cyhoeddi ymatebion.

Cofiwch efallai na fydd unrhyw ymatebion i'r ymgynghoriad a ddaw i law ar ôl y dyddiad hwn yn cael eu hystyried.

31 Awst 2021

**AWEL Y MÔR OFFSHORE WIND FARM
SECTION 48 PLANNING ACT 2008
REGULATION 4 INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009
THE AWEL Y MÔR OFFSHORE WIND FARM ORDER 2021
NOTICE PUBLICISING A PROPOSED APPLICATION FOR A DEVELOPMENT CONSENT ORDER ("DCO")**

Notice is hereby given that Awel y Môr Offshore Wind Farm Limited (the "Applicant") of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, United Kingdom, SN5 6PB proposes to apply to the Secretary of State for Business, Energy and Industrial Strategy under Section 37 of the Planning Act 2008 for the above mentioned Development Consent Order (the "Application").

The Application relates to the construction, operation, maintenance and decommissioning of an offshore wind farm located approximately 10 kilometres off the coast of North Wales in the Irish Sea; including up to 91 wind turbine generators and associated infrastructure making landfall at Frith Beach, east of Rhyl, and in the County of Denbighshire, the installation of underground cables and the construction of an electrical substation and associated infrastructure in order to connect the development to the National Grid's existing substation at Bodelwyddan (the "Project").

The proposed DCO will, amongst other things, authorise components including:

Offshore

- 1 An offshore wind turbine generating station with a gross electrical output capacity of over 100 megawatts, comprising up to 91 wind turbine generators with associated foundations, a maximum rotor diameter of 300m and a maximum tip height of 332m above Mean High Water Springs (MHWS).
- 2 Up to two offshore substation platforms with associated foundations.
- 3 One meteorological mast with associated foundations, LiDAR buoys and navigational buoys.
- 4 Installation of a subsea cable to the Gwynt y Môr Offshore Wind Farm.
- 5 A network of subsea inter-array cables including cable protection, connecting the wind turbines to each other and to the offshore substation platforms including cable crossings.
- 6 Up to two subsea cable circuits including cable crossings, cable protection, cofferdams and trenchless installation works from the offshore substation platforms to shore, with a total cable length of approximately 65 km.
- 7 Scour protection, as required, for foundations and cables.
- Onshore
- 8 Transition joint bays to connect the offshore cables and the onshore cables at Rhyl.
- 9 Up to two buried cable circuits from the transition joint bays at Rhyl under the A525, the River Clwyd, the A547 and the A55 to a new electrical substation west of the St Asaph Business Park at Bodelwyddan, including cable ducts, jointing and trenchless installation works.
- 10 The construction of a new electrical substation at Bodelwyddan together with associated equipment, accesses, landscaping and a temporary construction compound.
- 11 Up to two buried 400kV cable circuits connecting the new substation to the National Grid substation at Bodelwyddan, including cable ducts, jointing and trenchless installation works.
- 12 Temporary construction areas and access roads together with works to secure vehicular and/or pedestrian means of access for the Project, including alterations to bridges and removal and remediation of groynes.
- 13 The permanent and compulsory acquisition of land and/or rights for the Project.
- 14 Overriding of easements and other rights over or affecting land for the Project.
- 15 The application and/or disapplication of legislation relevant to the Project including, inter alia legislation relating to compulsory acquisition.

16 Such ancillary, incidental and consequential provisions, permits and consents as are necessary and/or convenient.

The Project is Environmental Impact Assessment Development. Accordingly, the Applicant will be making preliminary environmental information available. A copy of the Preliminary Environmental Information Report (PEIR) and non-technical summary (NTS), which includes details of the proposals, may be inspected free of charge in the exhibition section of the Applicant's website:

<https://exhibition.awelymor.cymru/> which also contains other information on the Project. Subject to COVID-19 restrictions the NTS, as well as other consultation materials, will also be available in hard copy at the deposit locations below. Please check the facility's website in advance to confirm opening hours and any booking requirements to access the documents digitally.

Location	Address Dates	available	Opening hours
Denbighshire	Prestatyn Library: Kings Ave, Prestatyn LL19 9LH, UK	31 August - 11 October 2021	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/prestatyn.aspx
	Rhyl Library: 11A Church St, Rhyl LL18 3AA, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/rhyl.aspx
	Rhuddlan Library: 9 Vicarage Ln, Rhuddlan, Rhyl LL18 2UE, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/rhuddlan.aspx
	St Asaph Library: Library, The Roe, Saint Asaph LL17 0LU, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/st-asaph.aspx
Flintshire	Holywell Library: Holywell Leisure Centre, North Road, Holywell, Flintshire, CH8 7UZ Flintshire	As above	https://aura.wales/holywell-library/
Conwy	Colwyn Bay Library: Woodland Rd West, Colwyn Bay LL29 7DH	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llandudno Library: 48 Mostyn St, Llandudno LL30 2RP	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llandudno-Library.aspx
	Abergele Library: Market St, Abergele LL22 7BP	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Abergele-Library.aspx
	Llanfairfechan Library: Village Rd, Llanfairfechan LL33 0AA	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Bangor Public Library Gwynedd Road, LL57 1DT	As above	https://www.gwynedd.llyw.cymru/en/Residents/Libraries-and-archives/Your-local-library/Bangor-library.aspx
Isle of Anglesey	Llyfrgell Porthaethwy Library: Wood St, Menai Bridge LL59 5AS, United Kingdom	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Menai-Bridge-Library.aspx
	Beaumaris Library: Grammar School Lane, Beaumaris LL58 8AL	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Beaumaris-Library.aspx

If you require alternative methods for inspection of the PEIR, please telephone the Applicant on: 0800 197 8232 or email: awelymor@rwe.com. We are able to provide guidance on using the project website or can, upon request, provide a USB stick free-of-charge containing the PEIR. Hard copies of the NTS, the Statement of Community Consultation (SoCC), and the Consultation Questionnaire can also be provided free-of-charge upon request during the consultation period. Hard copies of the PEIR will be subject to a maximum charge of £1,000 to cover printing costs.

The documents (which include plans showing the location of the proposed development) will be available for inspection **from 31 August 2021 until 11 October 2021**.

Any responses in respect of the Project should be sent by email to awelymor@rwe.com or by post to Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Any response must be in writing and be received at the above addresses on or before **11 October 2021**. Responses should explain who is making the response and give an address for future correspondence. Responses may be made public.

Please note that any consultation responses received after this date may not be considered.

31 August 2021

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PUBLIC NOTICE

FFERM WYNT ALLTRAETH AWEL Y MÔR
ADRAN 48, DEDDF CYNLLUNIO 2008RHEOLIAD 4 CYNLLUNIO SEILWAITH (CEISIADAU: FFURFLENNI A GWEITHDREFNAU RHAGNODEDIG) RHEOLIADAU 2009
GORCHYMYN FFERM WYNT ALLTRAETH AWEL Y MÔR 2021
HYSBYSIAD YN CYHOEDDI CAIS ARFAETHEDIG AM ORCHYMYN CYDSYNIAD DATBLYGU ("DCO")

Hysbysir drwy hyn fod Fferm Wynt Alltraeth Awel y Môr Cyfyngedig (yr "Ymgeisydd") o Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, Y Deyrnas Unedig, SN5 6PB yn bwriadu gwneud cais i'r Ysgrifennydd Gwladol dros Fusnes, Ynni a Strategaeth Ddiwydiannol o dan Adran 37 Deddf Cynllunio 2008 am y Gorchymyn Caniatâd Datblygu a grybwyllir uchod (y "Cais").

Mae'r Cais yn ymwneud ag adeiladu, gweithredu, cynnal a chadw a datgomiynu fferm wynt ar y môr sydd tua 10 cilometr oddi ar arfordir Gogledd Cymru ym Môr Iwerddon; gan gynnwys hyd at 91 generadur tyrbîn gwynt a seilwaith cysylltiedig sy'n cyrraedd y lan yn Nhraeth Ffrith, i'r dwyrain o'r Rhyl, yn Sir Ddinbych, gosod ceblau tanddaearol ac adeiladu is-orasaf drydanol a seilwaith cysylltiedig er mwyn cysylltu'r datblygiad ag is-orasaf bresennol y Grid Cenedlaethol ym Modelwyddan (y "Prosiect").

Bydd y Gorchymyn arfaethedig, ymysg pethau eraill, yn awdurdod i'r cydrannau gan gynnwys:

Ar y môr

1. Gorsaf gynhyrchu tyrbîn gwynt ar y môr gyda chapasiti allbwn trydan gros o dros 100 megawatt, sy'n cynnwys hyd at 91 generadur tyrbîn gwynt gyda sylfeini cysylltiedig, diamedr rotor o 300m ar y mwyaf ac uchder ton uchaf o 332m uwchlaw'r Cymedr Penllanw Gorllanw (MHWs).
2. Hyd at ddau blatfform is-orasaf ar y môr gyda sylfeini cysylltiedig.
3. Un mast meteorolegol gyda sylfeini cysylltiedig, bwiau LIDAR a bwiau mordwyol.
4. Gosod cebl dan y môr i Fferm Wynt Alltraeth Gwynt y Môr.
5. Rhwydwaith o geblau 'inter-array' o dan y môr gan gynnwys cyfarpar diogelu ceblau, cysylltu'r tyrbînau gwynt â'i gilydd ac â phlatfformau'r is-orasaf ar y môr gan gynnwys croesfannau ceblau.
6. Hyd at ddwy gylched ceblau dan y môr gan gynnwys croesfannau ceblau, cyfarpar diogelu ceblau, argaeau coffi a gwaith gosod heb ddefnyddio ffosydd o blatfformau'r is-orasaf ar y môr i'r lan, gyda chylfanswm hyd y cebl oddeutu 65 km.
7. Diogelu'r sylfeini a cheblau rhag cyrcydu, yn ôl yr angen.

Ar y tir

8. Newid baeau uno i gysylltu'r ceblau ar y môr a'r ceblau ar y tir yn y Rhyl.
9. Hyd at ddwy gylched ceblau wedi'u claddu o'r baeau uno trosiannol yn y Rhyl o dan yr A525, Afon Clwyd, yr A547 a'r A55 i is-orasaf drydanol newydd i'r gorllewin o Barc Busnes Llanellwy ym Modelwyddan, gan gynnwys pibellu ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
10. Adeiladu is-orasaf drydanol newydd ym Modelwyddan ynghyd ag offer cysylltiedig, mynedfeydd, tirlunio a chompownd adeiladu dros dro.
11. Hyd at ddwy gylched geblau 400kV wedi'u claddu sy'n cysylltu'r is-orasaf newydd ag is-orasaf y National Grid ym Modelwyddan, gan gynnwys pibellau ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
12. Mannau adeiladu a ffyrdd mynediad dros dro ynghyd â gwaith i sicrhau mynediad i gerbydau a/neu gerddwyr ar gyfer y Prosiect, gan gynnwys addasiadau i bontydd a thynnu ac adfer grwynau.
13. Chaffael tir a/neu hawliau'n barhaol ac yn orfodol ar gyfer y Prosiect.
14. Dlystyru hawddfreintiau a hawliau eraill dros neu sy'n effeithio ar dir ar gyfer y Prosiect.
15. Cymhwysio a/neu ddatgymhwysio deddfwriaeth sy'n berthnasol i'r Prosiect gan gynnwys, ymysg pethau eraill, deddfwriaeth sy'n ymwneud â chaffael gorlodol.
16. Y darpariaethau, trwyddedau a chaniadau ategol, achlysurol a chanlyniadol ag sy'n angenrheidiol a/neu'n gyfleus.

Mae'r Prosiect yn Ddatblygiad Aseiad o'r Effaith Amgylcheddol. Yn unol â hynny, bydd yr Ymgeisydd yn sicrhau bod gwybodaeth amgylcheddol ragarweiniol ar gael. Gellir edrych ar gopi o'r Adroddiad Gwybodaeth Amgylcheddol Ragarweiniol (PEIR) a'r cynrydd arbennigedig (NTS), sy'n cynnwys manylion y cynigion, yn rhad ac am ddim yn adran arddangos gwefan yr Ymgeisydd: <https://exhibition.awelymor.cymru/> sydd hefyd yn cynnwys gwybodaeth arall am y Prosiect.

Yn amodol ar gyfyngiadau COVID-19, bydd yr NTS, yn ogystal â deunyddiau ymgynghori eraill, hefyd ar gael ar ffurf copi caled yn y lleoliadau isod. Edrychwch ar wefan y cyfeuster ymlaen llaw i gadarnhau'r oriau agor ac unrhyw ofynion archebu er mwyn cael gafael ar y dogfenau'n ddigidol.

Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor
Sir Ddinbych	Llyfrgell Prestatyn: Rhodfa'r Brenin, Prestatyn LL19 9LH, y DU	31 Awst – 11 Hydref 2021	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstaeth/lyfrgelloedd/prestatyn.aspx
	Llyfrgell y Rhyl: 11A Stryd yr Eglwys, Y Rhyl LL18 3AA, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstaeth/lyfrgelloedd/y-rhyl.aspx
	Llyfrgell Rhuddlan: 9 Coetiau Postol, Rhuddlan, Y Rhyl LL18 2UE, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstaeth/lyfrgelloedd/rhuddlan.aspx
	Llyfrgell Llanellwy: Y Llyfrgell, Y Roe, Llanellwy LL17 0LU, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwrstaeth/lyfrgelloedd/llanellwy.aspx
Sir y Fflint	Llyfrgell Treffynnon: Canolfan Hamdden Treffynnon, North Road, Treffynnon, Sir y Fflint, CH8 7UZ, Sir y Fflint	Fel yr uchod	https://aura.cymru/lyfrgell-treffynnon/
Conwy	Llyfrgell Bae Colwyn: Ffordd Coetir Orllewinol, Bae Colwyn LL29 7DH	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llyfrgell Llandudno: 48 Mostyn Street, Llandudno LL30 2RP	Fel yr uchod	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llandudno-Library.aspx
	Llyfrgell Abergele: Stryd y Farchnad, Abergele LL22 7BP	Fel yr uchod	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Abergele-Library.aspx
	Llyfrgell Llanfairfechan: Village Rd, Llanfairfechan LL33 0AA	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Llyfrgell Gyhoeddus Bangor	Fel yr uchod	https://www.gwynedd.llyw.cymru/en/Residents/Libraries-and-archives/Your-local-library/Bangor-library.aspx
Ynys Môn	Llyfrgell Porthaethwy: Wood St, Porthaethwy LL59 5AS, y Deyrnas Unedig	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Lyfrgelloedd/Chwilio-am-fy-lyfrgell-leol/Lyfrgell-Porthaethwy.aspx
	Llyfrgell Bliwmares: Grammar School Lane, Bliwmares LL58 8AL	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Lyfrgelloedd/Chwilio-am-fy-lyfrgell-leol/Lyfrgell-Bliwmares.aspx

Os oes angen dulliau eraill amoch i archwilio'r PEIR, ffoniwch yr Ymgeisydd ar: 0800 197 8232 neu anfonwch neges e-bost at: awelymor@rwe.com. Gallwn roi arweiniad ar ddefnyddio gwefan y prosiect neu, ar gais, gallwn roi cof bach rhad ac am ddim sy'n cynnwys y PEIR. Gellir rhoi copïau caled o'r NTS, y Datganiad o Ymgynghori Cymunedol (SoCC), a'r Holiadur Ymgynghori yn rhad ac am ddim hefyd ar gais yn ystod y cyfnod ymgynghori. Codir uchafswm ffi o £1,000 am gopïau caled o'r PEIR ar gyfer costau angraffu.

Bydd y dogfenau (sy'n cynnwys cynlluniau sy'n dangos lleoliad y datblygiad arfaethedig) ar gael **rhwng 31 Awst 2021 ac 11 Hydref 2021**.

Dylid anfon unrhyw ymatebion mewn perthynas â'r Prosiect drwy e-bost at awelymor@rwe.com neu drwy'r post i Fferm Wynt Alltraeth Awel y Môr Cyf/ Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Rhaid i unrhyw ymateb fod yn ysgrifenedig ac wedi dod i law yn y cyfeiriadau uchod ar **11 Hydref 2021** neu cyn hynny. Dylai'r ymatebion egluro pwy sy'n gwneud yr ymateb a rhoi cyfeiriad ar gyfer gohebiaeth yn y dyfodol. Gellir cyhoeddi ymatebion.

Cofiwch efallai na fydd unrhyw ymatebion i'r ymgynghoriad a ddaw i law ar ôl y dyddiad hwn yn cael eu hystyried.

24 Awst 2021

PUBLIC NOTICE

AWEL Y MÔR OFFSHORE WIND FARM
SECTION 48 PLANNING ACT 2008REGULATION 4 INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009
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The proposed DCO will, amongst other things, authorise components including:

Offshore

1. An offshore wind turbine generating station with a gross electrical output capacity of over 100 megawatts, comprising up to 91 wind turbine generators with associated foundations, a maximum rotor diameter of 300m and a maximum tip height of 332m above Mean High Water Springs (MHWs).
2. Up to two offshore substation platforms with associated foundations.
3. One meteorological mast with associated foundations, LIDAR buoys and navigational buoys.
4. Installation of a subsea cable to the Gwynt y Môr Offshore Wind Farm.
5. A network of subsea inter-array cables including cable protection, connecting the wind turbines to each other and to the offshore substation platforms including cable crossings.
6. Up to two subsea cable circuits including cable crossings, cable protection, cofferdams and trenchless installation works from the offshore substation platforms to shore, with a total cable length of approximately 65 km.
7. Scour protection, as required, for foundations and cables.

Onshore

8. Transition joint bays to connect the offshore cables and the onshore cables at Rhyl.
9. Up to two buried cable circuits from the transition joint bays at Rhyl under the A525, the River Clwyd, the A547 and the A55 to a new electrical substation west of the St Asaph Business Park at Bodelwyddan, including cable ducts, jointing and trenchless installation works.
10. The construction of a new electrical substation at Bodelwyddan together with associated equipment, accesses, landscaping and a temporary construction compound.
11. Up to two buried 400kV cable circuits connecting the new substation to the National Grid substation at Bodelwyddan, including cable ducts, jointing and trenchless installation works.
12. Temporary construction areas and access roads together with works to secure vehicular and/or pedestrian means of access for the Project, including alterations to bridges and removal and remediation of groynes.
13. The permanent and compulsory acquisition of land and/or rights for the Project.
14. Overriding of easements and other rights over or affecting land for the Project.
15. The application and/or disapplication of legislation relevant to the Project including, inter alia legislation relating to compulsory acquisition.
16. Such ancillary, incidental and consequential provisions, permits and consents as are necessary and/or convenient.

The Project is Environmental Impact Assessment Development. Accordingly, the Applicant will be making preliminary environmental information available. A copy of the Preliminary Environmental Information Report (PEIR) and non-technical summary (NTS), which includes details of the proposals, may be inspected free of charge in the exhibition section of the Applicant's website:

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Subject to COVID-19 restrictions the NTS, as well as other consultation materials, will also be available in hard copy at the deposit locations below. Please check the facility's website in advance to confirm opening hours and any booking requirements to access the documents digitally.

	Address	Dates available	Opening hours
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	Rhuddlan Library: 9 Vicarage Ln, Rhuddlan, Rhyl LL18 2UE, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/rhuddlan.aspx
	St Asaph Library: Library, The Roe, Saint Asaph LL17 0LU, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/st-asaph.aspx
Flintshire	Holywell Library: Holywell Leisure Centre, North Road, Holywell, Flintshire, CH8 7UZ Flintshire	As above	https://aura.wales/holywell-library/
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	Llanfairfechan Library:	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llanfairfechan-Library.aspx
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	Beaumaris Library: Grammar School Lane, Beaumaris LL58 8AL	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Beaumaris-Library.aspx

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The documents (which include plans showing the location of the proposed development) will be available for inspection from **31 August 2021 until 11 October 2021**.

Any responses in respect of the Project should be sent by email to awelymor@rwe.com or by post to: Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Any response must be in writing and be received at the above addresses on or before **11 October 2021**. Responses should explain who is making the response and give an address for future correspondence. Responses may be made public.

Please note that any consultation responses received after this date may not be considered.

24 August 2021

FFERM WYNT ALLTRAETH AWEL Y MÔR

ADRAN 48, DEDDF CYNLLUNIO 2008

RHEOLIAD 4 CYNLLUNIO SEILWAITH (CEISIADAU: FFURFLENNI A GWEITHDREFNAU RHAGNODEDIG) RHEOLIADAU 2009

GORCHYMYN FFERM WYNT ALLTRAETH AWEL Y MÔR 2021

HYSBYSIAD YN CYHOEDDI CAIS ARFAETHEDIG AM ORCHYMYN CYDSYNIAD DATBLYGU ("DCO")

Hysbysir drwy hyn fod Fferm Wynt Alltraeth Awel y Môr Cyfyngedig (yr "Ymgeisydd") o Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, Y Deyrnas Unedig, SN5 6PB yn bwriadu gwneud cais i'r Ysgrifennydd Gwladol dros Fusnes, Ynni a Strategaeth Ddiwydiannol o dan Adran 37 Deddf Cynllunio 2008 am y Gorchymyn Caniatâd Datblygu a grybwyllir uchod (y "Cais").

Mae'r Cais yn ymwneud ag adeiladu, gweithredu, cynnal a chadw a datgomisiynu fferm wynt ar y môr sydd tua 10 cilometr oddi ar arfordir Gogledd Cymru ym Môr Iwerddon; gan gynnwys hyd at 91 generadur tyrbîn gwynt a seilwaith cysylltiedig sy'n cyrraedd y lan yn Nhraeth Ffrith, i'r dwyrain o'r Rhyl, yn Sir Ddinbych, gosod ceblau tanddaearol ac adeiladu is-orsaf drydanol a seilwaith cysylltiedig er mwyn cysylltu'r datblygiad ag is-orsaf bresennol y Grid Cenedlaethol ym Modelwyddan (y "Prosiect").

Bydd y Gorchymyn arfaethedig, ymysg pethau eraill, yn awdurdodi'r cydrannau gan gynnwys:

Ar y môr

- 1 Gorsaf gynhyrchu tyrbîn gwynt ar y môr gyda chapasiti allbwn trydan gros o dros 100 megawatt, sy'n cynnwys hyd at 91 generadur tyrbîn gwynt gyda sylfeini cysylltiedig, diamedr rotor o 300m ar y mwyaf ac uchder ton uchaf o 332m uwchlaw'r Cymedr Penllanw Gorllanw (MHWS).
- 2 Hyd at ddau blatfform is-orsaf ar y môr gyda sylfeini cysylltiedig.
- 3 Un mast meteorolegol gyda sylfeini cysylltiedig, bwiau LiDAR a bwiau mordwyol.
- 4 Gosod cebl dan y môr i Fferm Wynt Alltraeth Gwynt y Môr.
- 5 Rhwydwaith o geblau 'inter-array' o dan y môr gan gynnwys cyfarpar diogelu ceblau, cysylltu'r tyrbînau gwynt â'i gilydd ac â phlatfformau'r is-orsaf ar y môr gan gynnwys croesfannau ceblau.
- 6 Hyd at ddwy gylched ceblau dan y môr gan gynnwys croesfannau ceblau, cyfarpar diogelu ceblau, argaeau coffr a gwaith gosod heb ddefnyddio ffosydd o blatfformau'r is-orsaf ar y môr i'r lan, gyda chyfanswm hyd y cebl oddeutu 65 km.
- 7 Diogelu'r sylfeini a cheblau rhag cyrcydu, yn ôl yr angen.

Ar y tir

- 8 Newid baeau uno i gysylltu'r ceblau ar y môr a'r ceblau ar y tir yn y Rhyl.
- 9 Hyd at ddwy gylched ceblau wedi'u claddu o'r baeau uno trosiannol yn y Rhyl o dan yr A525, Afon Clwyd, yr A547 a'r A55 i is-orsaf drydanol newydd i'r gorllewin o Barc Busnes Llanelwy ym Modelwyddan, gan gynnwys pibelli ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
- 10 Adeiladu is-orsaf drydanol newydd ym Modelwyddan ynghyd ag offer cysylltiedig, mynedfeydd, tirlunio a chompownd adeiladu dros dro.

- 11 Hyd at ddwy gylched geblau 400kV wedi'u claddu sy'n cysylltu'r is-orsaf newydd ag is-orsaf y National Grid ym Modelwyddan, gan gynnwys pibellau ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
- 12 Mannau adeiladu a ffyrdd mynediad dros dro ynghyd â gwaith i sicrhau mynediad i gerbydau a/neu gerddwyr ar gyfer y Prosiect, gan gynnwys addasiadau i bontydd a thynnu ac adfer grwynau.
- 13 Caffael tir a/neu hawliau'n barhaol ac yn orfodol ar gyfer y Prosiect.
- 14 Diystyru hawddfreintiau a hawliau eraill dros neu sy'n effeithio ar dir ar gyfer y Prosiect.
- 15 Cymhwyso a/neu ddatgymhwyso deddfwriaeth sy'n berthnasol i'r Prosiect gan gynnwys, ymysg pethau eraill, deddfwriaeth sy'n ymwneud â chaffael gorfodol.
- 16 Y darpariaethau, trwyddedau a chaniatadau ategol, achlysurol a chanlyniadol ag sy'n angenrheidiol a/neu'n gyfleus.

Mae'r Prosiect yn Ddatblygiad Asesiad o'r Effaith Amgylcheddol. Yn unol â hynny, bydd yr Ymgeisydd yn sicrhau bod gwybodaeth amgylcheddol ragarweiniol ar gael. Gellir edrych ar gopi o'r Adroddiad Gwybodaeth Amgylcheddol Ragarweiniol (PEIR) a'r crynodeb annhechnegol (NTS), sy'n cynnwys manylion y cynigion, yn rhad ac am ddim yn adran arddangos gwefan yr Ymgeisydd: <https://exhibition.awelymor.cymru/sydd-hefyd-yn-cynnwys-gwybodaeth-arall-am-y-prosiect>. Yn amodol ar gyfyngiadau COVID-19, bydd yr NTS, yn ogystal â deunyddiau ymgynghori eraill, hefyd ar gael ar ffurf copi caled yn y lleoliadau isod. Edrychwch ar wefan y cyfleuster ymlaen llaw i gadarnhau'r oriau agor ac unrhyw ofynion archebu er mwyn cael gafael ar y dogfennau'n ddigidol.

Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor
Sir Ddinbych	Llyfrgell Prestatyn: Rhodfa'r Brenin, Prestatyn LL19 9LH, y DU	31 Awst – 11 Hydref 2021	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/prestatyn.aspx
	Llyfrgell y Rhyl: 11A Stryd yr Eglwys, Y Rhyl LL18 3AA, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/y-rhyl.aspx
	Llyfrgell Rhuddlan: 9 Coetiau Postol, Rhuddlan, Y Rhyl LL18 2UE, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/rhuddlan.aspx
	Llyfrgell Llanellwy: Y Llyfrgell, Y Roe, Llanellwy LL17 0LU, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/llanellwy.aspx
Sir y Fflint	Llyfrgell Treffynnon: Canolfan Hamdden Treffynnon, North Road, Treffynnon, Sir y Fflint, CH8 7UZ, Sir y Fflint	Fel yr uchod	https://aura.cymru/llyfrgell-treffynnon/
Conwy	Llyfrgell Bae Colwyn: Ffordd Coetir Orllewinol, Bae Colwyn LL29 7DH	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llyfrgell Llandudno: 48 Mostyn Street, Llandudno LL30 2RP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llandudno-Library.aspx
	Llyfrgell Abergele: Stryd y Farchnad, Abergele LL22 7BP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Abergele-Library.aspx

	Llyfrgell Llanfairfechan: Village Rd, Llanfairfechan LL33 0AA	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Llyfrgell Gyhoeddus Bangor Ffordd Gwynedd, Bangor LL57 1DT	Fel yr uchod	https://www.gwynedd.llyw.cymru/cy/Trigolion/Llyfrgelloedd-ac-archifau/Eich-llyfrgell-leol/Llyfrgell-Bangor.aspx
Ynys Môn	Llyfrgell Porthaethwy: Wood St, Porthaethwy LL59 5AS, y Deyrnas Unedig	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-llyfrgell-leol/Llyfrgell-Porthaethwy.aspx
	Llyfrgell Biwmares: Grammar School Lane, Biwmares LL58 8AL	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-llyfrgell-leol/Llyfrgell-Biwmares.aspx

Os oes angen dulliau eraill arnoch i archwilio'r PEIR, ffoniwch yr Ymgeisydd ar: 0800 197 8232 neu anfonwch neges e-bost at: awelymor@rwe.com. Gallwn roi arweiniad ar ddefnyddio gwefan y prosiect neu, ar gais, gallwn roi cof bach rhad ac am ddim sy'n cynnwys y PEIR. Gellir rhoi copïau caled o'r NTS, y Datganiad o Ymgynghori Cymunedol (SoCC), a'r Holiadur Ymgynghori yn rhad ac am ddim hefyd ar gais yn ystod y cyfnod ymgynghori. Codir uchafswm ffi o £1,000 am gopïau caled o'r PEIR ar gyfer costau argraffu.

Bydd y dogfennau (sy'n cynnwys cynlluniau sy'n dangos lleoliad y datblygiad arfaethedig) ar gael **rhwng 31 Awst 2021 ac 11 Hydref 2021**.

Dylid anfon unrhyw ymatebion mewn perthynas â'r Prosiect drwy e-bost at awelymor@rwe.com neu drwy'r post i Fferm Wynt Alltraeth Awel y Môr Cyf/ Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Rhaid i unrhyw ymateb fod yn ysgrifenedig ac wedi dod i law yn y cyfeiriadau uchod ar **11 Hydref 2021** neu cyn hynny. Dylai'r ymatebion egluro pwy sy'n gwneud yr ymateb a rhoi cyfeiriad ar gyfer gohebiaeth yn y dyfodol. Gellir cyhoeddi ymatebion.

Cofiwch efallai na fydd unrhyw ymatebion i'r ymgynghoriad a ddaw i law ar ôl y dyddiad hwn yn cael eu hystyried.

24 Awst 2021

AWEL Y MÔR OFFSHORE WIND FARM

SECTION 48 PLANNING ACT 2008

REGULATION 4 INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009

THE AWEL Y MÔR OFFSHORE WIND FARM ORDER 2021

NOTICE PUBLICISING A PROPOSED APPLICATION FOR A DEVELOPMENT CONSENT ORDER ("DCO")

Notice is hereby given that Awel y Môr Offshore Wind Farm Limited (the "Applicant") of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, United Kingdom, SN5 6PB proposes to apply to the Secretary of State for Business, Energy and Industrial Strategy under Section 37 of the Planning Act 2008 for the above mentioned Development Consent Order (the "Application").

The Application relates to the construction, operation, maintenance and decommissioning of an offshore wind farm located approximately 10 kilometres off the coast of North Wales in the Irish Sea; including up to 91 wind turbine generators and associated infrastructure making landfall at Ffrith Beach, east of Rhyl, and in the County of Denbighshire, the installation of underground cables and the construction of an electrical substation and associated infrastructure in order to connect the development to the National Grid's existing substation at Bodelwyddan (the "Project").

The proposed DCO will, amongst other things, authorise components including:

Offshore

- 1 An offshore wind turbine generating station with a gross electrical output capacity of over 100 megawatts, comprising up to 91 wind turbine generators with associated foundations, a maximum rotor diameter of 300m and a maximum tip height of 332m above Mean High Water Springs (MHWS).
- 2 Up to two offshore substation platforms with associated foundations.
- 3 One meteorological mast with associated foundations, LiDAR buoys and navigational buoys.
- 4 Installation of a subsea cable to the Gwynt y Môr Offshore Wind Farm.
- 5 A network of subsea inter-array cables including cable protection, connecting the wind turbines to each other and to the offshore substation platforms including cable crossings.
- 6 Up to two subsea cable circuits including cable crossings, cable protection, cofferdams and trenchless installation works from the offshore substation platforms to shore, with a total cable length of approximately 65 km.
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Onshore

- 8 Transition joint bays to connect the offshore cables and the onshore cables at Rhyl.
- 9 Up to two buried cable circuits from the transition joint bays at Rhyl under the A525, the River Clwyd, the A547 and the A55 to a new electrical substation west of the St Asaph Business Park at Bodelwyddan, including cable ducts, jointing and trenchless installation works.
- 10 The construction of a new electrical substation at Bodelwyddan together with associated equipment, accesses, landscaping and a temporary construction compound.

- 11 Up to two buried 400kV cable circuits connecting the new substation to the National Grid substation at Bodelwyddan, including cable ducts, jointing and trenchless installation works.
- 12 Temporary construction areas and access roads together with works to secure vehicular and/or pedestrian means of access for the Project, including alterations to bridges and removal and remediation of groynes.
- 13 The permanent and compulsory acquisition of land and/or rights for the Project.
- 14 Overriding of easements and other rights over or affecting land for the Project.
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Gwynedd	Bangor Public Library Gwynedd Road, LL57 1DT	As above	https://www.gwynedd.llyw.cymru/en/Residents/Libraries-and-archives/Your-local-library/Bangor-library.aspx
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	Beaumaris Library: Grammar School Lane, Beaumaris LL58 8AL	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Beaumaris-Library.aspx

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The documents (which include plans showing the location of the proposed development) will be available for inspection **from 31 August 2021 until 11 October 2021**.

Any responses in respect of the Project should be sent by email to awelymor@rwe.com or by post to Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Any response must be in writing and be received at the above addresses on or before **11 October 2021**. Responses should explain who is making the response and give an address for future correspondence. Responses may be made public.

Please note that any consultation responses received after this date may not be considered.

24 August 2021

**THE LONDON BOROUGH OF BARKING AND DAGENHAM
TOWN AND COUNTRY PLANNING ACT 1990
THE LONDON BOROUGH OF BARKING AND DAGENHAM
STOPPING UP OF HIGHWAY AT ST ANNS ROAD GASCOIGNE
ESTATE (EAST) BARKING ORDER 2021**

The Mayor and Burgesses of the London Borough of Barking and Dagenham ("the Council") hereby gives notice that it proposes to make an Order under Section 247 of the above Act to authorise the stopping up of highway at St Anns Road Gascoigne Estate (East) Barking.

IF THE ORDER IS MADE, the stopping up will be authorised only in order to enable the development described in the Schedule to this Notice to be carried out in accordance with the planning permission granted under Part III of the Act, to the London Borough of Barking and Dagenham by the said Council being the Local Planning Authority on 30 November 2020 under Application Reference No. 20/01866/REM.

COPIES OF THE DRAFT ORDER AND RELEVANT PLAN MAY BE INSPECTED during 28 days commencing on 25 August 2021 on the Council's Website <https://www.lbld.gov.uk/estates-renewal> and may be obtained free of charge (quoting ref: PRF IKEN 026602) by post from the address below.

ANY PERSON MAY OBJECT to the making of the proposed Order within the period of 28 days commencing on 25 August 2021, by written notice to the Council, quoting the above reference, addressed to The Legal Practice, Barking & Dagenham Council, Town Hall, Barking IG11 7LU.

In preparing any objection it should be borne in mind that the substance of the objection may be imparted to other persons who by be affected by it and those persons may wish to communicate with the objector about it.

FIONA TAYLOR, DIRECTOR OF LAW AND GOVERNANCE

SCHEDULE

Planning Permission at Gascoigne Estate East, King Edwards Road, Barking Essex Details in relation to the development comprising 526 dwellings, up to 822 sqm of commercial floorspace (Use Classes A1, A2, A3, and B1) a public square, and associated access roads, car parking and landscaping. (3871461)

FFERM WYNT ALLTRAETH AWEL Y MÔR

ADRAN 48, DEDDF CYNLLUNIO 2008

RHEOLIAD 4 CYNLLUNIO SEILWAITH (CEISIADAU: FFURFLENNI

A GWEITHDREFNAU RHAGNODEDIG) RHEOLIADAU 2009

GORCHYMYN FFERM WYNT ALLTRAETH AWEL Y MÔR 2021

HYSBYSIAD YN CYHOEDDI CAIS ARFAETHEDIG AM ORCHYMYN

CYDSYNIAD DATBLYGU ("DCO")

Hysbysir drwy hyn fod Fferm Wynt Alltraeth Awel y Môr Cyfyngedig (yr "Ymgeisydd") o Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, Y Deyrnas Unedig, SN5 6PB yn bwriadu gwneud cais i'r Ysgrifennydd Gwladol dros Fusnes, Ynni a Strategaeth Ddiwydiannol o dan Adran 37 Deddf Cynllunio 2008 am y Gorchymyn Caniatâd Datblygu a grybwyllir uchod (y "Cais").

Mae'r Cais yn ymwneud ag adeiladu, gweithredu, cynnal a chadw a datgomiysu fferm wynt ar y môr sydd tua 10 cilometr oddi ar arfordir Gogledd Cymru ym Môr Iwerddon; gan gynnwys hyd at 91 generadur tyrbîn gwynt a seilwaith cysylltiedig sy'n cyrraedd y lan yn Nhraeth Ffrith, i'r dwyrain o'r Rhyll, yn Sir Ddinbych, gosod ceblau tanddaearol ac adeiladu is-orsaf drydanol a seilwaith cysylltiedig er mwyn cysylltu'r datblygiad ag is-orsaf bresennol y Grid Cenedlaethol ym Modelwyddan (y "Prosiect").

Bydd y Gorchymyn arfaethedig, ymysg pethau eraill, yn awdurdodi'r cydrannau gan gynnwys:

Ar y môr

1 Gorsaf gynhyrchu tyrbîn gwynt ar y môr gyda chapasiti allbwn trydan gros o dros 100 megawatt, sy'n cynnwys hyd at 91 generadur tyrbîn gwynt gyda sylfeini cysylltiedig, diamedr rotor o 300m ar y mwyaf ac uchder ton uchaf o 332m uwchlaw'r Cymedr Penllanw Gorllanw (MHWS).

2 Hyd at ddau blatfform is-orsaf ar y môr gyda sylfeini cysylltiedig.

3 Un mast meteorolegol gyda sylfeini cysylltiedig, bwiau LiDAR a bwiau mordwyl.

4 Gosod cebl dan y môr i Fferm Wynt Alltraeth Gwynt y Môr.

5 Rhwydwaith o geblau 'inter-array' o dan y môr gan gynnwys cyfarpar diogelu ceblau, cysylltu'r tyrbinau gwynt â'i gilydd ac â phlatfformau'r is-orsaf ar y môr gan gynnwys croesfannau ceblau.

6 Hyd at ddwy gylched ceblau dan y môr gan gynnwys croesfannau ceblau, cyfarpar diogelu ceblau, argaeau coffr a gwaith gosod heb ddefnyddio ffosydd o blatfformau'r is-orsaf ar y môr i'r lan, gyda chyfanswm hyd y cebl oddeutu 65 km.

7 Diogelu'r sylfeini a cheblau rhag cyrcydu, yn ôl yr angen.

Ar y tir

8 Newid baeau uno i gysylltu'r ceblau ar y môr a'r ceblau ar y tir yn y Rhyll.

9 Hyd at ddwy gylched ceblau wedi'u claddu o'r baeau uno trosiannol yn y Rhyll o dan yr A525, Afon Clwyd, yr A547 a'r A55 i is-orsaf drydanol newydd i'r gorllewin o Barc Busnes Llanellw ym Modelwyddan, gan gynnwys pibelli ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.

10 Adeiladu is-orsaf drydanol newydd ym Modelwyddan ynghyd ag offer cysylltiedig, mynedfeydd, tirlunio a chompownd adeiladu dros dro.

11 Hyd at ddwy gylched geblau 400kV wedi'u claddu sy'n cysylltu'r is-orsaf newydd ag is-orsaf y National Grid ym Modelwyddan, gan gynnwys pibellau ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.

12 Mannau adeiladu a ffyrdd mynediad dros dro ynghyd â gwaith i sicrhau mynediad i gerbydau a/neu gerddwyr ar gyfer y Prosiect, gan gynnwys addasiadau i bontydd a thynnu ac adfer grwynau.

13 Caffael tir a/neu hawliau'n barhaol ac yn orfodol ar gyfer y Prosiect.

14 Diystyru hawddfreintiau a hawliau eraill dros neu sy'n effeithio ar dir ar gyfer y Prosiect.

15 Cymhwyso a/neu ddatgymhwyso deddfwriaeth sy'n berthnasol i'r Prosiect gan gynnwys, ymysg pethau eraill, deddfwriaeth sy'n ymwneud â chaffael gorfodol.

16 Y darpariaethau, trwyddedau a chaniatadau ategol, achlysurol a chanlyniadol ag sy'n angenrheidiol a/neu'n gyfleus.

Mae'r Prosiect yn Ddatblygiad Asesiad o'r Effaith Amgylcheddol. Yn unol â hynny, bydd yr Ymgeisydd yn sicrhau bod gwybodaeth amgylcheddol ragarweiniol ar gael. Gellir edrych ar gopi o'r Adroddiad Gwybodaeth Amgylcheddol Ragarweiniol (PEIR) a'r crynodeb annhechnegol (NTS), sy'n cynnwys manylion y cynigion, yn rhad ac am ddim yn adran arddangos gwefan yr Ymgeisydd: <https://exhibition.awelmyr.cymru/sydd/hefyd/yn/cynnwys/gwybodaeth/arall/am/y/prosiect>.

Yn amodol ar gyfyngiadau COVID-19, bydd yr NTS, yn ogystal â deunyddiau ymgynghori eraill, hefyd ar gael ar ffurf copi caled yn y lleoliadau isod. Edrychwch ar wefan y cyfleuster ymlaen llaw i gadarnhau'r oriau agor ac unrhyw ofynion archebu er mwyn cael gafael ar y dogfennau'n ddigidol.

Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor
Sir Ddinbych	Cyfeiriad Llyfrgell Prestatyn: Rhodfa'r Brenin, Prestatyn LL19 9LH, y DU	31 Awst – 11 Hydref 2021	https://www.denbighshire.gov.uk/cy/-hamdden-a-thwristiaeth/-llyfrgelloedd/-prestatyn.aspx
	Llyfrgell y Rhyll: 11A Stryd yr Eglwys, Y Rhyll LL18 3AA, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/-hamdden-a-thwristiaeth/-llyfrgelloedd/y-rhyll.aspx
	Llyfrgell Rhuddlan: 9 Coetiau Postol, Rhuddlan, Y Rhyll LL18 2UE, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/-hamdden-a-thwristiaeth/-llyfrgelloedd/-rhuddlan.aspx
	Llyfrgell Llanellw: Y Llyfrgell, Y Roe, Llanellw LL17 0LU, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/-hamdden-a-thwristiaeth/-llyfrgelloedd/-llanellw.aspx

Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor	Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor
Sir y Fflint	Llyfrgell Treffynnon: Canolfan Hamdden Treffynnon, North Road, Treffynnon, Sir y Fflint, CH8 7UZ, Sir y Fflint	Fel yr uchod	https://-aura.cymru/-llyfrgell-treffynnon/				Chwilio-am-fy-llyfrgell-leol/-Llyfrgell-Porthaethwy.aspx
Conwy	Llyfrgell Bae Colwyn: Ffordd Coetir Orllewinol, Bae Colwyn LL29 7DH	Fel yr uchod	https://-www.conwy.gov.uk/cy/-Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Colwyn-Bay-Library.aspx		Llyfrgell Biwmares: Grammar School Lane, Biwmares LL58 8AL	Fel yr uchod	https://-www.ynysmon.gov.uk/cy/-Trigolion/-Llyfrgelloedd/-Chwilio-am-fy-llyfrgell-leol/-Llyfrgell-Biwmares.aspx
	Llyfrgell Llandudno: 48 Mostyn Street, Llandudno LL30 2RP	Fel yr uchod	https://-www.conwy.gov.uk/cy/-Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Llandudno-Library.aspx	Os oes angen dulliau eraill arnoch i archwilio'r PEIR, ffoniwch yr Ymgeisydd ar: 0800 197 8232 neu anfonwch neges e-bost at: awelymor@rwe.com. Gallwn roi arweiniad ar ddefnyddio gwefan y prosiect neu, ar gais, gallwn roi cof bach rhad ac am ddim sy'n cynnwys y PEIR. Gellir rhoi copïau caled o'r NTS, y Datganiad o Ymgynghori Cymunedol (SoCC), a'r Holiadur Ymgynghori yn rhad ac am ddim hefyd ar gais yn ystod y cyfnod ymgynghori. Codir uchafswm ffi o £1,000 am gopïau caled o'r PEIR ar gyfer costau argraffu. Bydd y dogfennau (sy'n cynnwys cynlluniau sy'n dangos lleoliad y datblygiad arfaethedig) ar gael rhwng 31 Awst 2021 ac 11 Hydref 2021. Dylid anfon unrhyw ymatebion mewn perthynas â'r Prosiect drwy e-bost at awelymor@rwe.com neu drwy'r post i Fferm Wynt Alltraeth Awel y Môr Cyf/ Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB. Rhaid i unrhyw ymateb fod yn ysgrifenedig ac wedi dod i law yn y cyfeiriadau uchod ar 11 Hydref 2021 neu cyn hynny. Dylai'r ymatebion egluro pwy sy'n gwneud yr ymateb a rhoi cyfeiriad ar gyfer gohebiaeth yn y dyfodol. Gellir cyhoeddi ymatebion. Cofiwch efallai na fydd unrhyw ymatebion i'r ymgynghoriad a ddaw i law ar ôl y dyddiad hwn yn cael eu hystyried. 24 Awst 2021 AWEL Y MÔR OFFSHORE WIND FARM SECTION 48 PLANNING ACT 2008 REGULATION 4 INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009 THE AWEL Y MÔR OFFSHORE WIND FARM ORDER 2021 NOTICE PUBLICISING A PROPOSED APPLICATION FOR A DEVELOPMENT CONSENT ORDER ("DCO") Notice is hereby given that Awel y Môr Offshore Wind Farm Limited (the "Applicant") of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, United Kingdom, SN5 6PB proposes to apply to the Secretary of State for Business, Energy and Industrial Strategy under Section 37 of the Planning Act 2008 for the above mentioned Development Consent Order (the "Application"). The Application relates to the construction, operation, maintenance and decommissioning of an offshore wind farm located approximately 10 kilometres off the coast of North Wales in the Irish Sea; including up to 91 wind turbine generators and associated infrastructure making landfall at Ffrith Beach, east of Rhyl, and in the County of Denbighshire, the installation of underground cables and the construction of an electrical substation and associated infrastructure in order to connect the development to the National Grid's existing substation at Bodelwyddan (the "Project"). The proposed DCO will, amongst other things, authorise components including: Offshore 1 An offshore wind turbine generating station with a gross electrical output capacity of over 100 megawatts, comprising up to 91 wind turbine generators with associated foundations, a maximum rotor diameter of 300m and a maximum tip height of 332m above Mean High Water Springs (MHWS). 2 Up to two offshore substation platforms with associated foundations. 3 One meteorological mast with associated foundations, LiDAR buoys and navigational buoys. 4 Installation of a subsea cable to the Gwynt y Môr Offshore Wind Farm.			
	Llyfrgell Abergele: Stryd y Farchnad, Abergele LL22 7BP	Fel yr uchod	https://-www.conwy.gov.uk/cy/-Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Abergele-Library.aspx				
	Llyfrgell Llanfairfechan: Village Rd, Llanfairfechan LL33 0AA	Fel yr uchod	https://-www.conwy.gov.uk/cy/-Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Llanfairfechan-Library.aspx				
Gwynedd	Llyfrgell Gyhoeddus Bangor Ffordd Gwynedd, Bangor LL57 1DT	Fel yr uchod	https://-www.gwynedd.llyw.cymru/cy/-Trigolion/-Llyfrgelloedd-ac-archifau/-Eich-llyfrgell-leol/Llyfrgell-Bangor.aspx				
Ynys Môn	Llyfrgell Porthaethwy: Wood St, Porthaethwy LL59 5AS, y Deyrnas Unedig	Fel yr uchod	https://-www.ynysmon.gov.uk/cy/-Trigolion/-Llyfrgelloedd/				

5 A network of subsea inter-array cables including cable protection, connecting the wind turbines to each other and to the offshore substation platforms including cable crossings.

6 Up to two subsea cable circuits including cable crossings, cable protection, cofferdams and trenchless installation works from the offshore substation platforms to shore, with a total cable length of approximately 65 km.

7 Scour protection, as required, for foundations and cables.

Onshore

8 Transition joint bays to connect the offshore cables and the onshore cables at Rhyl.

9 Up to two buried cable circuits from the transition joint bays at Rhyl under the A525, the River Clwyd, the A547 and the A55 to a new electrical substation west of the St Asaph Business Park at Bodelwyddan, including cable ducts, jointing and trenchless installation works.

10 The construction of a new electrical substation at Bodelwyddan together with associated equipment, accesses, landscaping and a temporary construction compound.

11 Up to two buried 400kV cable circuits connecting the new substation to the National Grid substation at Bodelwyddan, including cable ducts, jointing and trenchless installation works.

12 Temporary construction areas and access roads together with works to secure vehicular and/or pedestrian means of access for the Project, including alterations to bridges and removal and remediation of groynes.

13 The permanent and compulsory acquisition of land and/or rights for the Project.

14 Overriding of easements and other rights over or affecting land for the Project.

15 The application and/or disapplication of legislation relevant to the Project including, inter alia legislation relating to compulsory acquisition.

16 Such ancillary, incidental and consequential provisions, permits and consents as are necessary and/or convenient.

The Project is Environmental Impact Assessment Development. Accordingly, the Applicant will be making preliminary environmental information available. A copy of the Preliminary Environmental Information Report (PEIR) and non-technical summary (NTS), which includes details of the proposals, may be inspected free of charge in the exhibition section of the Applicant's website: <https://exhibition.awelymor.cymru/> which also contains other information on the Project. Subject to COVID-19 restrictions the NTS, as well as other consultation materials, will also be available in hard copy at the deposit locations below. Please check the facility's website in advance to confirm opening hours and any booking requirements to access the documents digitally.

Location	Address	Dates available	Opening hours
Denbighshire	Prestatyn Library: Kings Ave, Prestatyn LL19 9LH, UK	31 August – 11 October 2021	https://www.denbighshire.gov.uk/en/-/leisure-and-tourism/-libraries/-prestatyn.aspx
	Rhyl Library: 11A Church St, Rhyl LL18 3AA, UK	As above	https://www.denbighshire.gov.uk/en/-/leisure-and-tourism/-libraries/-rhyl.aspx
	Rhuddlan Library: 9 Vicarage Ln, Rhuddlan, Rhyl LL18 2UE, UK	As above	https://www.denbighshire.gov.uk/en/-/leisure-and-tourism/-libraries/-rhuddlan.aspx
Flintshire	Holywell Library: Holywell Leisure Centre, North Road, Holywell, Flintshire, CH8 7UZ Flintshire	As above	https://www.conwy.gov.uk/en/-/Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Colwyn-Bay-Library.aspx
Conwy	Colwyn Bay Library: Woodland Rd West, Colwyn Bay LL29 7DH	As above	https://www.conwy.gov.uk/en/-/Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Llandudno-Library.aspx
	Llandudno Library: 48 Mostyn St, Llandudno LL30 2RP	As above	https://www.conwy.gov.uk/en/-/Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Llandudno-Library.aspx
	Abergele Library: Market St, Abergele LL22 7BP	As above	https://www.conwy.gov.uk/en/-/Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Abergele-Library.aspx
	Llanfairfechan Library: Village Rd, Llanfairfechan LL33 0AA	As above	https://www.conwy.gov.uk/en/-/Resident/-Libraries-Museums-and-Archives/-Libraries/-Libraries-and-opening-times/-Llanfairfechan-Library.aspx
Gwynedd	Bangor Public Library Gwynedd Road, LL57 1DT	As above	https://www.gwynedd.llyw.cymru/en/-/Residents/-Libraries-and-archives/Your-local-library/-Bangor-library.aspx

Location	Address	Dates available	Opening hours
Isle of Anglesey	Llyfrgell Porthaethwy Library: Wood St, Menai Bridge LL59 5AS, United Kingdom	As above	https://www.anglesey.gov.uk/en/-/Residents-Libraries/Find-your-local-library/Menai-Bridge-Library.aspx
	Beaumaris Library: Grammar School Lane, Beaumaris LL58 8AL	As above	https://www.anglesey.gov.uk/en/-/Residents-Libraries/Find-your-local-library/Beaumaris-Library.aspx

If you require alternative methods for inspection of the PEIR, please telephone the Applicant on: 0800 197 8232 or email: awelymor@rwe.com. We are able to provide guidance on using the project website or can, upon request, provide a USB stick free-of-charge containing the PEIR. Hard copies of the NTS, the Statement of Community Consultation (SoCC), and the Consultation Questionnaire can also be provided free-of-charge upon request during the consultation period. Hard copies of the PEIR will be subject to a maximum charge of £1,000 to cover printing costs.

The documents (which include plans showing the location of the proposed development) will be available for inspection from 31 August 2021 until 11 October 2021.

Any responses in respect of the Project should be sent by email to awelymor@rwe.com or by post to Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Any response must be in writing and be received at the above addresses on or before 11 October 2021. Responses should explain who is making the response and give an address for future correspondence. Responses may be made public.

Please note that any consultation responses received after this date may not be considered.

24 August 2021

(3871118)

Roads & highways

ROAD RESTRICTIONS



City of Westminster

EBURY BRIDGE ROAD

THE CITY OF WESTMINSTER (PRESCRIBED ROUTES) (NO. 11) TRAFFIC ORDER 2021

1. NOTICE IS HEREBY GIVEN that Westminster City Council on 23rd August 2021 made the above Order under sections 6 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984, as amended.

2. The general effect of the Order will be to prohibit buses (vehicles constructed to carry more than 8 passengers, exclusive of the driver) from entering or proceeding in Ebury Bridge Road, except for access, disabled badge holders, Zone A residents' permit holders or buses providing a London local service.

3. The Order, which will come into force on 26th August 2021, and other documents giving more detailed particulars of the Order are available for inspection until 4th October 2021 at <http://westminstertransportationservices.co.uk/notices>. Please note that documents will not be available for inspection in person until further notice.

4. Any person desiring to question the validity of the Order or of any provision contained therein on the grounds that it is not within the relevant powers of the Road Traffic Regulation Act 1984 or that any of the relevant requirements thereof or of any relevant regulations made thereunder have not been complied with in relation to the Order may, within six weeks from the date on which the Order was made, make application for the purpose to the High Court.

Dated 25th August 2021

JONATHAN ROWING, Head of Parking (The officer appointed for this purpose) (3871453)



City of Westminster

EXETER STREET AND WELLINGTON STREET

THE CITY OF WESTMINSTER (MOTORCYCLE PARKING PLACES) (AMENDMENT NO. *) ORDER 202*

THE CITY OF WESTMINSTER (ELECTRIC MOTORCYCLE RECHARGING POINTS) (AMENDMENT NO. *) ORDER 202*

THE CITY OF WESTMINSTER (WAITING AND LOADING RESTRICTION) (AMENDMENT NO. *) ORDER 202*

1. NOTICE IS HEREBY GIVEN that Westminster City Council proposes to make the above Orders under sections 6, 45, 46, 49 and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984, as amended.

2. The general effect of the Orders would be, in connection with the introduction of a local safety scheme at the junction of Exeter Street and Wellington Street, to:

(a) shorten the motorcycle parking place on the south-east side of Exeter Street, opposite Nos. 17 and 18, by 10 metres;

(b) introduce 10 metres of double yellow line "at any time" waiting restrictions and loading restrictions operating between 8.30 a.m. and midnight throughout the week on the south-east side of Exeter Street, opposite No. 17 (replacing 10 metres of the motorcycle parking place referred to in paragraph 2(a) above);

(c) extend the double yellow line "at any time" waiting restrictions on the south-east side of Exeter Street, opposite No. 17, north-eastward by 14.5 metres; and

(d) introduce "at any time" loading restrictions:

(i) on the north-west side of Exeter Street, outside Nos. 17 and 18; and

(ii) at the junction of Exeter Street and Wellington Street.

3. The proposed Orders and other documents giving more detailed particulars of the Orders are available for inspection until six weeks have elapsed from the date on which either the Orders are made or the Council decides not to make the Orders at <http://westminstertransportationservices.co.uk/notices>. Please note that documents will not be available for inspection in person until further notice.

4. Further information may be obtained by telephoning the Council's agents, WSP, telephone number (020) 3116 5996.

5. Any objections or other representations about the proposals should be sent in writing to the Council's agents, WSP Traffic Order Team, 3rd Floor, WSP House, 70 Chancery Lane, London, WC2A 1AF, or by email at tmo.westminster@wsp.com quoting reference 7625/GG, by 15th September 2021. All objections must specify the grounds on which they are made.

Dated 25th August 2021

JONATHAN ROWING, Head of Parking (The officer appointed for this purpose) (3871483)

LONDON BOROUGH OF ENFIELD

WOODALL ROAD EN3 - INTRODUCTION OF 'AT ANY TIME'

WAITING RESTRICTIONS CHASE ROAD N14 - INTRODUCTION

OF 'AT ANY TIME' WAITING RESTRICTIONS FALCON ROAD EN3

- REVOCATION OF WAITING RESTRICTIONS

Further information may be obtained from the Traffic and Transportation, telephone number 07855 761934 for Woodall Road & Falcon Road and 020 8132 0983 for Chase Road or by emailing traffic@enfield.gov.uk for all 3 roads.

FFERM WYNT ALLTRAETH AWEL Y MÔR

ADRAN 48, DEDDF CYNLLUNIO 2008

RHEOLIAD 4 CYNLLUNIO SEILWAITH (CEISIADAU: FFURFLENNI A GWEITHDREFNAU RHAGNODEDIG) RHEOLIADAU 2009

GORCHYMYN FFERM WYNT ALLTRAETH AWEL Y MÔR 2021

HYSBYSIAD YN CYHOEDDI CAIS ARFAETHEDIG AM ORCHYMYN CYDSYNIAD DATBLYGU (“DCO”)

Hysbysir drwy hyn fod Fferm Wynt Alltraeth Awel y Môr Cyfyngedig (yr “Ymgeisydd”) o Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, Y Deyrnas Unedig, SN5 6PB yn bwriadu gwneud cais i’r Ysgrifennydd Gwladol dros Fusnes, Ynni a Strategaeth Ddiwydiannol o dan Adran 37 Deddf Cynllunio 2008 am y Gorchymyn Caniatâd Datblygu a grybwyllir uchod (y “Cais”).

Mae’r Cais yn ymwneud ag adeiladu, gweithredu, cynnal a chadw a datgomiysynu fferm wynt ar y môr sydd tua 10 cilometr oddi ar arfordir Gogledd Cymru ym Môr Iwerddon; gan gynnwys hyd at 91 generadur tyrbîn gwynt a seilwaith cysylltiedig sy’n cyrraedd y lan yn Nhraeth Ffrith, i’r dwyrain o’r Rhyl, yn Sir Ddinbych, gosod ceblau tanddaearol ac adeiladu is-orsaf drydanol a seilwaith cysylltiedig er mwyn cysylltu’r datblygiad ag is-orsaf bresennol y Grid Cenedlaethol ym Modelwyddan (y “Prosiect”).

Bydd y Gorchymyn arfaethedig, ymysg pethau eraill, yn awdurdodi’r cydrannau gan gynnwys:

Ar y môr

- 1Gorsaf gynhyrchu tyrbîn gwynt ar y môr gyda chapasiti allbwn trydan gros o dros 100 megawat, sy’n cynnwys hyd at 91 generadur tyrbîn gwynt gyda sylfeini cysylltiedig, diamedr rotor o 300m ar y mwyaf ac uchder ton uchaf o 332m uwchlaw’r Cymedr Penllanw Gorllanw (MHWS).
- 2Hyd at ddau blatfform is-orsaf ar y môr gyda sylfeini cysylltiedig.
- 3Un mast meteorolegol gyda sylfeini cysylltiedig, bwiau LiDAR a bwiau mordwyol.
- 4Gosod cebl dan y môr i Fferm Wynt Alltraeth Gwynt y Môr.
- 5Rhwydwaith o geblau ‘inter-array’ o dan y môr gan gynnwys cyfarpar diogelu ceblau, cysylltu’r tyrbinau gwynt â’i gilydd ac â phlatfformau’r is-orsaf ar y môr gan gynnwys croesfannau ceblau.
- 6Hyd at ddwy gylched ceblau dan y môr gan gynnwys croesfannau ceblau, cyfarpar diogelu ceblau, argaeau coffr a gwaith gosod heb ddefnyddio ffosydd o blatfformau’r is-orsaf ar y môr i’r lan, gyda chyfanswm hyd y cebl oddeutu 65 km.
- 7Diogelu’r sylfeini a cheblau rhag cyrcydu, yn ôl yr angen.

Ar y tir

- 8Newid baeau uno i gysylltu’r ceblau ar y môr a’r ceblau ar y tir yn y Rhyl.
- 9Hyd at ddwy gylched ceblau wedi’u claddu o’r baeau uno trosiannol yn y Rhyl o dan yr A525, Afon Clwyd, yr A547 a’r A55 i is-orsaf drydanol newydd i’r gorllewin o Barc Busnes Llanelwy ym Modelwyddan, gan gynnwys pibelli ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
- 10Adeiladu is-orsaf drydanol newydd ym Modelwyddan ynghyd ag offer cysylltiedig, mynedfeydd, tirlunio a chompownd adeiladu dros dro.
- 11Hyd at ddwy gylched geblau 400kV wedi’u claddu sy’n cysylltu’r is-orsaf newydd ag is-orsaf y National Grid ym Modelwyddan, gan gynnwys pibellau ceblau, uniadau a gwaith gosod heb ddefnyddio ffosydd.
- 12Mannau adeiladu a ffyrdd mynediad dros dro ynghyd â gwaith i sicrhau mynediad i gerbydau a/neu gerddwyr ar gyfer y Prosiect, gan gynnwys addasiadau i bontydd a thynnu ac adfer grwynau.
- 13Caffael tir a/neu hawliau’n barhaol ac yn orfodol ar gyfer y Prosiect.
- 14Diystyru hawddfreintiau a hawliau eraill dros neu sy’n effeithio ar dir ar gyfer y Prosiect.
- 15Cymhwyso a/neu ddatgymhwyso deddfwriaeth sy’n berthnasol i’r Prosiect gan gynnwys, ymysg pethau eraill, deddfwriaeth sy’n ymwneud â chaffael gorfodol.
- 16Y darpariaethau, trwyddedau a chaniatadau ategol, achlysurol a chanlyniadol ag sy’n angenrheidiol a/neu’n gyfleus.

Mae’r Prosiect yn Ddatblygiad Asesiad o’r Effaith Amgylcheddol. Yn unol â hynny, bydd yr Ymgeisydd yn sicrhau bod gwybodaeth amgylcheddol ragarweiniol ar gael. Gellir edrych ar gopi o’r Adroddiad Gwybodaeth Amgylcheddol Ragarweiniol (PEIR) a’r crynodeb annhechnegol (NTS), sy’n cynnwys manylion y cynigion, yn rhad ac am ddim yn adran arddangos gwefan yr Ymgeisydd: <https://exhibition.awelymor.cymru/> sydd hefyd yn cynnwys gwybodaeth arall am y Prosiect.

Yn amodol ar gyfyngiadau COVID-19, bydd yr NTS, yn ogystal â deunyddiau ymgynghori eraill, hefyd ar gael ar ffurf copi caled yn y lleoliadau isod. Edrychwch ar wefan y cyfeuster ymlaen llaw i gadarnhau’r oriau agor ac unrhyw ofnyion archebu er mwyn cael gafael ar y dogfennau’n ddigidol.

Lleoliad	Cyfeiriad	Dyddiadau ar gael	Oriau agor
Sir Ddinbych	Llyfrgell Prestatyn: Rhodfa’r Brenin, Prestatyn LL19 9LH, y DU	31 Awst – 11 Hydref 2021	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/prestatyn.aspx
	Llyfrgell y Rhyl: 11A Stryd yr Eglwys, Y Rhyl LL18 3AA, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/y-rhyl.aspx
	Llyfrgell Rhuddlan: 9 Coetiau Postol, Rhuddlan, Y Rhyl LL18 2UE, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/rhuddlan.aspx
	Llyfrgell Llanelwy: Y Llyfrgell, Y Roe, Llanelwy LL17 0LU, y DU	Fel yr uchod	https://www.denbighshire.gov.uk/cy/hamdden-a-thwristiaeth/llyfrgelloedd/llanelwy.aspx
Sir y Fflint	Llyfrgell Treffynnon: Canolfan Hamdden Treffynnon, North Road, Treffynnon, Sir y Fflint, CH8 7UZ, Sir y Fflint	Fel yr uchod	https://aura.cymru/llyfrgell-treffynnon/
Conwy	Llyfrgell Bae Colwyn: Ffordd Coetir Orllewinol, Bae Colwyn LL29 7DH	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llyfrgell Llandudno: 48 Mostyn Street, Llandudno LL30 2RP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llandudno-Library.aspx
	Llyfrgell Abergele: Stryd y Farchnad, Abergele LL22 7BP	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Abergele-Library.aspx
	Llyfrgell Llanfairfechan: Village Rd, Llanfairfechan LL33 0AA	Fel yr uchod	https://www.conwy.gov.uk/cy/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Llyfrgell Gyhoeddus Bangor Ffordd Gwynedd, Bangor LL57 1DT	Fel yr uchod	https://www.gwynedd.llyw.cymru/cy/Trigolion/Llyfrgelloedd-ac-archifau/Eich-llyfrgell-leol/Llyfrgell-Bangor.aspx
Ynys Môn	Llyfrgell Porthaethwy: Wood St, Porthaethwy LL59 5AS, y Deyrnas Unedig	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-llyfrgell-leol/Llyfrgell-Porthaethwy.aspx
	Llyfrgell Biwmares: Grammar School Lane, Biwmares LL58 8AL	Fel yr uchod	https://www.ynysmon.gov.uk/cy/Trigolion/Llyfrgelloedd/Chwilio-am-fy-llyfrgell-leol/Llyfrgell-Biwmares.aspx

Os oes angen dulliau eraill arnoch i archwilio’r PEIR, ffoniwch yr Ymgeisydd ar: 0800 197 8232 neu anfonwch neges e-bost at: awelymor@rwe.com. Gallwn roi arweiniad ar ddefnyddio gwefan y prosiect neu, ar gais, gallwn roi cof bach rhad ac am ddim sy’n cynnwys y PEIR. Gellir rhoi copïau caled o’r NTS, y Datganiad o Ymgynghori Cymunedol (SoCC), a’r Holiadur Ymgynghori yn rhad ac am ddim hefyd ar gais yn ystod y cyfnod ymgynghori. Codir uchafswm ffi o £1,000 am gopïau caled o’r PEIR ar gyfer costau argraffu.

Bydd y dogfennau (sy’n cynnwys cynlluniau sy’n dangos lleoliad y datblygiad arfaethedig) ar gael **rhwng 31 Awst 2021 ac 11 Hydref 2021**.

Dylid anfon unrhyw ymatebion mewn perthynas â’r Prosiect drwy e-bost at awelymor@rwe.com neu drwy’r post i Fferm Wynt Alltraeth Awel y Môr Cyf/ Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Rhaid i unrhyw ymateb fod yn ysgrifenedig ac wedi dod i law yn y cyfeiriadau uchod ar **11 Hydref 2021** neu cyn hynny. Dylai’r ymatebion egluro pwy sy’n gwneud yr ymateb a rhoi cyfeiriad ar gyfer gohebiaeth yn y dyfodol. Gellir cyhoeddi ymatebion.

Cofiwch efallai na fydd unrhyw ymatebion i’r ymgynghoriad a ddaw i law ar ôl y dyddiad hwn yn cael eu hystyried.

24 Awst 2021

AWEL Y MÔR OFFSHORE WIND FARM

SECTION 48 PLANNING ACT 2008

REGULATION 4 INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009

THE AWEL Y MÔR OFFSHORE WIND FARM ORDER 2021

NOTICE PUBLICISING A PROPOSED APPLICATION FOR A DEVELOPMENT CONSENT ORDER (“DCO”)

Notice is hereby given that Awel y Môr Offshore Wind Farm Limited (the “Applicant”) of Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire, United Kingdom, SN5 6PB proposes to apply to the Secretary of State for Business, Energy and Industrial Strategy under Section 37 of the Planning Act 2008 for the above mentioned Development Consent Order (the “Application”).

The Application relates to the construction, operation, maintenance and decommissioning of an offshore wind farm located approximately 10 kilometres off the coast of North Wales in the Irish Sea; including up to 91 wind turbine generators and associated infrastructure making landfall at Ffrith Beach, east of Rhyl, and in the County of Denbighshire, the installation of underground cables and the construction of an electrical substation and associated infrastructure in order to connect the development to the National Grid’s existing substation at Bodelwyddan (the “Project”).

The proposed DCO will, amongst other things, authorise components including:

Offshore

1

An offshore wind turbine generating station with a gross electrical output capacity of over 100 megawatts, comprising up to 91 wind turbine generators with associated foundations, a maximum rotor diameter of 300m and a maximum tip height of 332m above Mean High Water Springs (MHWS).

2

Up to two offshore substation platforms with associated foundations.

3

One meteorological mast with associated foundations, LiDAR buoys and navigational buoys.

4

Installation of a subsea cable to the Gwynt y Môr Offshore Wind Farm.

5

A network of subsea inter-array cables including cable protection, connecting the wind turbines to each other and to the offshore substation platforms including cable crossings.

6

Up to two subsea cable circuits including cable crossings, cable protection, cofferdams and trenchless installation works from the offshore substation platforms to shore, with a total cable length of approximately 65 km.

7

Scour protection, as required, for foundations and cables.

Onshore

8

Transition joint bays to connect the offshore cables and the onshore cables at Rhyl.

9

Up to two buried cable circuits from the transition joint bays at Rhyl under the A525, the River Clwyd, the A547 and the A55 to a new electrical substation west of the St Asaph Business Park at Bodelwyddan, including cable ducts, jointing and trenchless installation works.

10

The construction of a new electrical substation at Bodelwyddan together with associated equipment, accesses, landscaping and a temporary construction compound.

11

Up to two buried 400kV cable circuits connecting the new substation to the National Grid substation at Bodelwyddan, including cable ducts, jointing and trenchless installation works.

12

Temporary construction areas and access roads together with works to secure vehicular and/or pedestrian means of access for the Project, including alterations to bridges and removal and remediation of groynes.

13

The permanent and compulsory acquisition of land and/or rights for the Project.

14

Overriding of easements and other rights over or affecting land for the Project.

15

The application and/or disapplication of legislation relevant to the Project including, inter alia legislation relating to compulsory acquisition.

16

Such ancillary, incidental and consequential provisions, permits and consents as are necessary and/or convenient.

The Project is Environmental Impact Assessment Development. Accordingly, the Applicant will be making preliminary environmental information available. A copy of the Preliminary Environmental Information Report (PEIR) and non-technical summary (NTS), which includes details of the proposals, may be inspected free of charge in the exhibition section of the Applicant’s website: <https://exhibition.awelymor.cymru/> which also contains other information on the Project.

Subject to COVID-19 restrictions the NTS, as well as other consultation materials, will also be available in hard copy at the deposit locations below. Please check the facility’s website in advance to confirm opening hours and any booking requirements to access the documents digitally.

Location	Address	Dates available	Opening hours
Denbighshire	Prestatyn Library: Kings Ave, Prestatyn LL19 9LH, UK	31 August – 11 October 2021	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/st-asaph.aspx
	Rhyl Library: 11A Church St, Rhyl LL18 3AA, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/st-asaph.aspx
	Rhuddlan Library: 9 Vicarage Ln, Rhuddlan, Rhyl LL18 2UE, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/st-asaph.aspx
	St Asaph Library: Library, The Roe, Saint Asaph LL17 0LU, UK	As above	https://www.denbighshire.gov.uk/en/leisure-and-tourism/libraries/st-asaph.aspx
Flintshire	Holywell Library: Holywell Leisure Centre, North Road, Holywell, Flintshire, CH8 7UZ Flintshire	As above	https://aura.wales/holywell-library/
Conwy	Colwyn Bay Library: Woodland Rd West, Colwyn Bay LL29 7DH	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Colwyn-Bay-Library.aspx
	Llandudno Library: 48 Mostyn St, Llandudno LL30 2RP	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llandudno-Library.aspx
	Abergele Library: Market St, Abergele LL22 7BP	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Abergele-Library.aspx
	Llanfairfechan Library: Village Rd, Llanfairfechan LL33 0AA	As above	https://www.conwy.gov.uk/en/Resident/Libraries-Museums-and-Archives/Libraries/Libraries-and-opening-times/Llanfairfechan-Library.aspx
Gwynedd	Bangor Public Library Gwynedd Road, LL57 1DT	As above	https://www.gwynedd.llyw.cymru/en/Residents/Libraries-and-archives/Your-local-library/Bangor-library.aspx
Isle of Anglesey	Llyfrgell Porthaethwy Library: Wood St, Menai Bridge LL59 5AS, UK	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Menai-Bridge-Library.aspx
	Beaumaris Library: Grammar School Lane, Beaumaris LL58 8AL	As above	https://www.anglesey.gov.uk/en/Residents/Libraries/Find-your-local-library/Beaumaris-Library.aspx

If you require alternative methods for inspection of the PEIR, please telephone the Applicant on: 0800 197 8232 or email: awelymor@rwe.com. We are able to provide guidance on using the project website or can, upon request, provide a USB stick free-of-charge containing the PEIR. Hard copies of the NTS, the Statement of Community Consultation (SoCC), and the Consultation Questionnaire can also be provided free-of-charge upon request during the consultation period. Hard copies of the PEIR will be subject to a maximum charge of £1,000 to cover printing costs.

The documents (which include plans showing the location of the proposed development) will be available for inspection from **31 August 2021 until 11 October 2021**.

Any responses in respect of the Project should be sent by email to awelymor@rwe.com or by post to Awel y Môr Offshore Wind Farm Ltd, RWE Renewables UK Ltd, Windmill Hill Business Park, Whitehill Way, Swindon, SN5 6PB.

Any response must be in writing and be received at the above addresses on or before **11 October 2021**. Responses should explain who is making the response and give an address for future correspondence. Responses may be made public.

Please note that any consultation responses received after this date may not be considered.

24 August 2021

2 Appendix F: Non-Statutory Consultation

2.1 **Appendix F1.1: Minutes of Meetings with Commercial Fishermen and Charter Anglers**

Awel y Môr Offshore Windfarm

Fishery Liaison Meeting, Rhyl Community Fire Station

1830, 28th January 2020

Note of Meeting

1) Attendance

Fishing representatives

Roger Daniels (Merlin), Fisherman & Charter Skipper

Andrew Wragg, Fisherman & Charter Skipper

Carl Davies (Gwen Paul M), Fisherman & Charter Skipper

Dafydd Williams (Stingray), Charter Skipper & Berthing Manager, Cemaes

Stan Dickinson (Tuskar), Charter Skipper

Gary Flint (Discovery), Charter Skipper

Gareth Jones (Luna-Sea Charters), Charter Skipper

Kevin McKie (Size Matters), Charter Skipper

Andy Bynam (Anne Mary B, Julia Anne, Ivy May), Commercial fisherman

Trevor Jones (WFA)

Jack Thomas (Incentive Fishing), Charter Skipper

Raymond Turner (Roma IV), Fisherman

Paul Turner (Roma V), Fisherman

Simon Parry (Jensen Sea Angling), Charter Skipper

Anthony Parry (Jensen Sea Angling), Charter Skipper

Steven Jones (Lucy E), Commercial fisherman

Carl McGrath (Nicola Faith), Commercial fisherman

Jonathan Law (Privateer Angling Charters), Charter Skipper

Awel y Môr Offshore Wind Farm (AYMOWF)

Alex Herbert, innogy, Awel y Môr Offshore Consents Manager

Alisdair Smith, innogy, Gwynt y Môr Marine and Planning Manager

Helen Thomas, innogy, Awel y Môr Stakeholder & Consents Manager

Sammy Mullan, Consultant, GoBe Consultants

Jim Andrews, AWJ Marine

1) Introductions

a) All present introduced themselves by name and status.

b) Jim Andrews set the context for the meeting

c) It was agreed that a brief note of the meeting and actions agreed should be collated and circulated afterwards.

2) Update on Awel y Môr

- a) Alex Herbert gave a presentation describing the geographic extent of the proposed Awel y Môr project, and the timescales for progressing this project.
- b) Key points were:-
 - i) The project is in its very early stages, and the Agreement for Lease for the seabed has not yet been signed between Innogy and the Crown Estate.
 - ii) The maximal extent of the array (where the turbines will be) will cover an area of 106km² to the west of the existing Gwynt y Môr windfarm.
 - iii) Design details (such as the number of turbines and construction methods) have not been finalised.
 - iv) Innogy are starting work on applications for consent to construct the windfarm (which will need a Development Consent Order from UK Government and a Marine Licence from Natural Resources Wales on behalf of Welsh Government). Formal consultation on both applications will be well-publicised. It is likely that the applications will be submitted in 2023.
 - v) If the windfarm is approved, construction is not likely to start until after 2025.

3) Comments from fishing representatives

- a) There was agreement that catches of fish by both angling and commercial fishing vessels had changed since the construction of windfarms off the north Wales coast.
- b) Piling of monopiles was reported to have had an immediate and far-reaching impact, with observations of an impact on fishing more than 40km from the Gwynt y Môr construction area.
- c) After construction of the windfarms and in particular after Gwynt y Môr, the catches of certain fish were reported to have remained at a lower level than previously. The fish species for which this was particularly noticeable were: turbot, dabs, tope, gurnard, black bream and pollock. It was also noted that some other fish (skates and rays) were now more abundant in the Mersey than they had been previously.
- d) It was noted that the abundance of some of these species (such as tope) had been unchanged in areas outside Liverpool Bay.
- e) It was reported that all around the UK commercial whelk fishermen had noted a decline in catches within windfarm areas after their construction.
- f) It was felt that the declines in catches and species abundance in operational windfarm areas might be due to mechanical noise being transmitted to the water column, electro-magnetic fields, or turbulence in the water column.

- g) The possibility of compensation for loss of income was raised. The AyM team indicated that at this early stage in the project it was not possible to provide definitive answers to this query and recommended ongoing engagement throughout the project process.
- h) Trevor Jones (WFA) stated that the Association would represent the interests of commercial fishermen, and that recreational anglers in the area might better represent their own interests by forming an association or cooperative.
- i) There was some discussion about whether windfarms had an impact on birds or cetaceans (whales & dolphins) but there was no consensus on this issue.
- j) Concerns were raised about whether the fish monitoring activities carried out for earlier windfarms (i.e. sampling fish populations before, during and after construction using beam trawls) could detect changes in the abundance of fish in the area. It was noted that proposals for monitoring fish abundance using angling marks have been discussed at previous meetings between charter angling skippers and Gwynt y Môr offshore windfarm representatives.
- k) It was suggested that the creation of artificial reefs within windfarm areas might help to mitigate their impacts.

4) Actions agreed

- a) A note of the meeting should be circulated.
- b) A PDF of the Innogy presentation should be circulated.
- c) Innogy will keep all fishermen informed of progress with the project.
- d) Another meeting should be held in March 2020.

JIM ANDREWS
Fishery Liaison Officer
February 2020

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION

COMMERCIAL FISHERIES – 28/09/2020

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)		
LOCATION:	Zoom meeting with PowerPoint		
PROJECT	Awel y Môr Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Carl McGrath	Commercial Fisherman	CM
	Andy Hunt	Commercial Fisherman	AHu
	Mark Roberts	Commercial Fisherman	MR
	Trevor Jones	Commercial Fisherman	TJ
	Carl Davies	Commercial Fisherman	CD
	Paul Carter	RWE	PC
	Alex Herbert	RWE	AHe
	Jim Andrews	Fisheries Liaison Officer	JA
	Fiona Nimmo	Poseidon	FN
	Sarah McNab	Poseidon	SM
	Sean Leake	GoBe	SL
	Ryan McManus	GoBe	RM
	Zoe Lawrence	Brown and May Marine	ZL
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	
	Steve Jones	Commercial Fisherman	
	Liam Thomas	Commercial Fisherman	
	Paul Turner	Commercial Fisherman	
	Ray Turner	Commercial Fisherman	
	Andy Bynam	Commercial Fisherman	
	Liam Thomas	Commercial Fisherman	
	Gary Thomas	Commercial Fisherman	
	Brian McGuirk	Commercial Fisherman	
	Calvin Jones	Commercial Fisherman	

Documents provided:	Filename
PowerPoint Presentation	AYM_FisheriesMeetings_Sept2020_280920

Agenda item	Minutes
1	<u>Introductions and Aims</u> JA and RM thanked all for attending the call and presented the aims for the meeting. Everyone introduced themselves by their name, organisation and role. The aims of the meeting were to give a project update and to discuss the key outcomes of scoping. RM stressed that the project is still in a relatively early stage of development with ample time until application, and that this meeting was intended as an open floor discussion on key

	matters going forward. It is an opportunity for commercial fisheries stakeholders to voice concerns and feed into forming the baseline characterisation.
2	<u>Project and Site Selection Update</u> AH presented the project update and site selection update slides. He thanked fishermen for being mindful of survey vessels, noting that the current offshore surveys are due to complete imminently. AH also described the upcoming Public Engagement Days (PEDs) and encouraged those on the call to attend if interested. The next steps for the site selection were to refine the offshore and onshore cable route corridors down to one preferred route.
3	<u>Structure of EIA</u> RM gave an overview of the Commercial Fisheries and EIA chapters, noting that there are several inter-linkages to other chapters of the EIA including Fish and Shellfish Ecology, Shipping and Navigation, Socio-Economics and Other Marine Users. He outlined that commercial and recreational angling would be considered within the Other Marine Users and Activities chapter as a standalone receptor.
4	<u>Commercial Fisheries</u> FN gave an overview of how the commercial fisheries assessment is undertaken, including the definition of what constitutes a commercial fishery. She then provided a description of the Commercial Fisheries study area, confirming that the assessment would focus on ICES rectangle 35E6 and the adjacent rectangles. She also noted that AyM sits within the 12 nm limit, and the cables largely within the 6 nm limit. FN presented some headline monetary values of the fishery within ICES rectangle 35E6. MR asked for the basis of these values and whether they included values from Wales only. FN confirmed the data are from all vessels that record information through the Registration of Buyers and Sellers but does not include sales made directly. FN invited input as to further data and statistics that may help inform the baseline. JA noted that the MMO use a multiplier to calculate the value rather than cite the real value of the fish sold, and therefore the value should be taken as indicative. MR also felt that the value presented under-represents the value from ICES rectangle 35E6. FN noted that further data requests will be made, and that the project are keen to ground truth the data through consultation and liaison directly with fishermen. CD asked if ICES rectangle 35E6 is recorded for vessels less than 10 m in length, to which FN replied that it should be recorded for vessels shorter than 10 m, but recognises that there are some areas where this is not recorded. FN again noted that the project is keen to gain insight from the industry on the landings and information to best characterise the baseline environment. CD asked if vessels shorter than 10 m have to record catch location when they land, FN confirmed that they do, but it is also very important to ground truth the data with local industry. FN highlighted that the approach to the baseline characterisation would be focused on landings and statistics for the period 2014 – 2019, and will also include a data request for the ICES sub-rectangles. FN noted that the assessment will also refer to VMS data, but that the weaknesses in the data on 12-15 m vessels is recognised, as well as for the vessels shorted than 12 m. MR noted that his vessel falls within the 12-15 m bracket. FN stated that the data are used to gain an understanding of the fleet, but not a comprehensive picture because of the varying size in fleet at a local level.

	FN asked if there were any data sources missing from the list that would also be helpful. JA asked if vessel operators would be happy to contact FN directly for industry consultation. TJ voiced that Fishmap Môn is out-of-date and should not have a place within the assessment also noting as previously raised that the landings value statistics seem to be an underestimate. FN responded that Fishmap Môn and other studies are all considered to form part of the picture, but recent data, consultation and liaison are vitally important to complete that picture. TJ asked for clarification as to how data will be collected. FN confirmed that the consultation process would be a question-based process to gain an understanding of general activities on an individual or vessel by vessel basis. It was agreed that the attending fishermen would be happy to provide contact details to allow FN to progress with direct liaison. FN then talked through the impacts scoped-in for assessment. FN noted that the main construction-phase impact is displacement, but that there are also links to the fish and shellfish ecological assessment, for example on issues such as underwater noise. FN talked through the other impacts, giving a description and basis for each impact scoped-in. FN also noted that existing wind farms would form part of the baseline environment in order to understand the effect on the baseline, but that they would not form part of the cumulative effects assessment. CD asked about particle motion effects regarding underwater noise. SL provided an overview of the assessment process from the perspective of the fish and shellfish ecology assessment. MR asked for clarification on the ICES rectangles surrounding 35E6. FN asked what the experience was from previous projects within these surrounding areas. MR noted that the activity within 35E5 and 36E5 is also important. CD noted that pile driving impacts could affect fishing within 35E5 & 36E5 as well as 35E6. FN touched on next steps, that would include data collection and report writing with liaison formally in the new year, but that liaison could be brought forward. She outlined that the plan was to submit the baseline technical report for informal consultation in March/April 2021. TJ reiterated points about underwater noise impacts, stating that the effects are noticeable when construction is underway and that fish catches may be affected over a wide area. CD noted that there were apparent impacts on commercial angling during construction. FN asked if there were any noticeable impacts on shellfish during construction, CD replied that effects on shellfish species had not been noticed. MR also said that he had not seen impacts on scallop. AH said that the effects of piling noise were appreciable when travelling by GyM during piling, and that the vessel gantry would shake. On ICES rectangles, AH noted that he is not required to report from which ICES rectangle his catch was taken. FN added that port of landing data would also be included in the assessment, and that further data on local port of landing can be discussed during consultation. AH noted that he sometimes sends fish to Brixham.
5	<u>Commercial and Recreational Angling</u>

	RM then gave an overview of the commercial and recreational angling assessment process, which would be the focus of a separate meeting on 29/10/2020. He noted that the process would be similar to that of commercial fisheries to define an accurate and contemporary baseline description [<i>see separate minutes of that meeting</i>].
6	<u>Next Steps and AoB</u> RM noted the next steps to include provision of minutes, further consultation meetings and ground truthing. AH asked how the turbine sizes for AyM compare to GyM. RM noted the industry trend towards fewer, larger turbines, with larger corresponding foundations. The assessment would be based on a maximum design scenario approach, with a range of options. PC clarified that the turbines and foundations for AyM would larger than those used for GyM. FN said that the scoping report could be re-circulated to attendees, which TJ and MR agreed would be helpful.

Post-meeting note: Since this meeting, consultation has been held with MCA and Trinity House. In a meeting with those stakeholders, it was clarified that there were no current plans to extend the Traffic Separation Scheme. RWE will hold this as a regular discussion point with those stakeholders at any future meetings.

Agenda Item	Action	Who?	Due Date
1	Circulate request for contact details to arrange ground truthing meetings.	JA	
2	Circulate scoping report.	JA	
3	Arrange next meetings over zoom.	RWE/JA	

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION

CHARTER ANGLERS – 29/10/2020

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)		
LOCATION:	Zoom meeting with PowerPoint		
PROJECT	Awel y Môr Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Maldwin Griffith	Anglesey Council	MG
	Carl Davies	Charter Angler	CD
	Jack Thomas	Charter Angler	JT
	Jonathan Law	Charter Angler	JL
	Paul Carter	RWE	PC
	Alex Herbert	RWE	AH
	Jim Andrews	Fisheries Liaison Officer	JA
	Fiona Nimmo	Poseidon	FN
	Sarah McNab	Poseidon	SM
	Sean Leake	GoBe	SL
	Ryan McManus	GoBe	RM
	Jonathan Keer	Brown and May Marine	JK
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	
	Tony Parry	Charter Angler	
	Simon Parry	Charter Angler	
	Gary Flint	Charter Angler	
	Stan Dickinson	Charter Angler	
	Kevin McVie	Charter Angler	
	Gary Thomas	Charter Angler	
	Eric McIlraith	Charter Angler	
	Richie Brownson	Charter Angler	
	Andy Wragg	Charter Angler	
	Steve Jones	Charter Angler	
	Gareth Williams	Charter Angler	
	Dave Williams	Charter Angler	
	Ray Turner	Charter Angler	
	Ray Crowe	Charter Angler	
	Phil Crowe	Charter Angler	
	Dave Williams	Charter Angler	
	Alan Marsh	Charter Angler	
	Elfyn Jones	Charter Angler	
	Pat Jones	Charter Angler	
	Roy Smith	Charter Angler	
	Gareth Williams	Charter Angler	
	Liam Jones	Charter Angler	

	Roger Daniels	Charter Angler
	Simon Coll	Charter Angler
	G Hefin Jones	Welsh Federation of Sea Anglers
	Paul Connelly	Charter Angler
	David Price	Charter Angler
	Gethyn Owen	Charter Angler
	Toby Read	Charter Angler
	Mel Smith	Charter Angler
	Gary Jones	Charter Angler
	Jon Shaw	Charter Angler
	Martin Sampson	Charter Angler

Documents provided:	Filename
PowerPoint Presentation	AYM_FisheriesMeetings_Sept2020_280920

Agenda item	Minutes
1	<u>Introductions and Aims</u> JA and RM thanked all for attending the call and presented the aims for the meeting. Everyone introduced themselves by their name, organisation and role. The aims of the meeting were to give a project update and to discuss the key outcomes of scoping. RM stressed that the project is still in a relatively early stage of development with ample time until application, and that this meeting was intended as an open floor discussion on key matters going forward. It is an opportunity for commercial fisheries stakeholders to voice concerns and feed into forming the baseline characterisation.
2	<u>Project and Site Selection Update</u> AH presented the project update and site selection update slides. He thanked fishermen for being mindful of survey vessels, noting that the current offshore surveys are due to complete imminently. AH also described the upcoming Public Engagement Days (PEDs) and encouraged those on the call to attend if interested. The next steps for the site selection were to refine the offshore and onshore cable route corridors down to one preferred route. AH noted the project programme, highlighting the developer is RWE Renewables rather than innogy now, and the next primary steps being the upcoming series of meetings followed by PEIR (formal/statutory consultation Aug 2021) and formal application (2022). RWE are keen to engage at an early stage informally, valuable opportunity to provide data and engagement.
3	<u>Structure of EIA</u> RM gave an overview of the EIA chapters, noting that there are several inter-linkages to other chapters of the EIA including Commercial Fisheries, Fish and Shellfish Ecology, Shipping and Navigation, Socio-Economics and Tourism and Recreation. He outlined that commercial and recreational angling would be considered within the Other Marine Users and Activities chapter as a standalone receptor.

4	<u>Commercial Fisheries</u> FN gave a brief re-cap of the commercial fisheries presentation and matters arising from the consultation meeting the day before on 28/09/2020 [see separate minutes of that meeting]. RM confirmed that the commercial fisheries minutes would be circulated to charter anglers for completeness, and <i>vice versa</i>.
5	<u>Commercial and Recreational Angling</u> RM then presented the slides for commercial and recreational angling, noting that the impacts compared to commercial fisheries would be broadly aligned. He clarified that commercial and recreational angling would be considered within the Other Marine Users and Activities chapter, highlighting that all receptors within the EIA are considered equally. RM then talked through the data sources proposed to be used to inform the baseline characterisation, with clear references to other sources and assessments used in other topic chapters. The species baseline would be informed by commercial fisheries landings, the fish and shellfish ecology baseline and monitoring studies. The angling activity baseline would be informed by the shipping and navigation baseline (including surveys), the tourism and recreation baseline and existing studies on angling in Wales. RM also noted the industry consultation exercises planned for commercial fishermen, whereby fishermen would be asked about their activity for the project to gather contemporary data. This information could be put into a confidential annex to be used for assessment but would not go public. RM asked if that type of exercise would be welcomed and useful for commercial anglers. CD said that he would be happy to take part in such an exercise if it was offered. RM also noted that the assessment would aim to draw on records from angling competitions and asked if there were any other data sources that should be considered. RM then summarised the current understanding and described how the baseline will be presented in the assessment. It would be split into recreational angling that is mostly shore based or based from small vessels in nearshore waters, and commercial charter angling made up of larger vessels operating further afield taking paying customers out for fishing day trips. RM described that charter anglers fish targets around wrecks and rocky outcrops known as 'marks', and also described the species generally targeted by anglers. JL said that gurnard, a target species, was affected by GyM. He also explained that the seasonal aspect of charter angling is mainly related to the weather, but some boats still operate year-round in Liverpool Bay. He said that he had seen a general decline in the size and abundance of fish since the construction of the wind farms. CD suggested that a specific angling survey could be undertaken for target species to show fluctuations over time. RM outlined the scope of the assessment in terms of the impacts to be considered. During construction these would be focused around the displacement of activity and impacts to target species. During operation, it would be focused on displacement due to the presence of infrastructure and planned maintenance activities. He noted that angling vessels will not be impeded by the presence of the wind farm. Fishing marks on shipwrecks will be avoided by the project as these will form "designated features". CD noted that although the marks may be unaffected directly, the fish that aggregate around them may still be affected and displaced. JL raised the behavioural effect on fish from underwater noise (particularly during piling operations) that causes fish to stop feeding and therefore stop biting on hooks. RM and SL confirmed that behavioural impacts

	of underwater noise are a key consideration of the fish and shellfish ecology assessment. CD reported that the impact of GyM construction noise had been discernible many miles away and asked over what distance impacts will be considered. SL confirmed that the underwater noise modelling outputs will inform the area of study. CD also raised the impact of particle motion. SL confirmed that this would form a qualitative part of the assessment on fish and shellfish ecology. In terms of cumulative impacts, CD asked how the surrounding wind farms will be taken into consideration. RM explained that a cumulative effects assessment would be undertaken that combines the project envelopes of all surrounding projects screened-in for assessment. SL added that physical processes modelling will also be undertaken in terms of hydrodynamics, that builds in the existing infrastructure of the surrounding wind farms. JL asked whether the Traffic Separation Scheme (TSS) that sits to the north of the array would be extended. He said that he would be keen for this to be avoided as any extension would impact marks currently fished to the west of the existing TSS. SL and PC confirmed that there is no plan to do so and that the project are in direct liaison with the MCA and Trinity House. <i>[See post-meeting note below this table for an update].</i> JT voiced concerns about the long-term effects from both construction and operation, stating that fishing for tope, brill and gurnard had reduced since construction of GyM, however some inshore wrecks have recovered. He also felt that scientific trawl surveys under-represented angling target species, since fish have to be exhibiting feeding behaviour to be caught by line, whereas trawls will catch fish regardless of their behavioural state. JT reported that his clients are already asking questions about the construction dates for the windfarm. JT said that clients for all vessels are aware that fishing will be impacted during construction and for several years afterwards and won't book trips during this period, therefore operators in the area will lose income as a result.
6	<u>Next Steps and AoB</u> RM noted the next steps to include provision of minutes, further consultation meetings and ground truthing. JL asked about artificial reefs as potential mitigation. RM noted that mitigation can be factored into the assessment and is considered if the outcome predicts a significant effect. There is also 'embedded' mitigation that is part of the project design. SL provided commentary that the NRW position on things like artificial reefs as mitigation was that any change to the baseline environment is seen as an adverse impact. RM elaborated that biodiversity net-gain was a well-established principle in onshore planning, but offshore it was currently not favoured by the licensing authorities, but that position may change in future. CD asked whether the Bangor University Prince Madog surveys had been considered. RM clarified that data from that survey had been requested to form part of the baseline for fish and shellfish ecology.

	JA asked attendees whether they would be happy to take part in industry consultation if that option was pursued, and whether attendees would be happy for contact details to be circulated. JA agreed to contact all after the meeting to arrange this. RM and JA thanked all for their attendance and closed the meeting.
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Post-meeting note: Since this meeting, consultation has been held with MCA and Trinity House. In a meeting with those stakeholders, it was clarified that there were no current plans to extend the Traffic Separation Scheme. RWE will hold this as a regular discussion point with those stakeholders at any future meetings.

Agenda Item	Action	Who?	Due Date
1	Circulate request for contact details to arrange industry consultation meetings.	JA	

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
COMMERCIAL FISHERIES MEETING MINUTES– 8TH DECEMBER 2020

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)
LOCATION:	Online (Zoom)
PROJECT	Awel y Môr Offshore Wind Farm
ATTENDEES:	CARL DAVIES (CD) ANDY HUNT (AHu) JON LAW (JL) JACK THOMAS (JT) PAUL TURNER (PT) JIM ANDREWS (FISHERIES LIAISON OFFICER) PAUL CARTER (PC) (RWE) ALEX HERBERT (AHe) (RWE) FIONA NIMMO (FN) (POSEIDON) RYAN MCMANUS (RM) (GOBE)
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	SEAN LEAKE (GOBE) SARAH MCNAB (POSEIDON)

Documents provided:	Filename
PowerPoint Presentation	AyM fishers update 081220

Agenda item	Minutes
1	<u>Introductions and Aims</u> JA introduced the meeting, noting that most attendees present had met previously at the September meeting, and that the purpose of the meeting was to provide an update on project progress since the last meeting in September. The meeting was also another opportunity to comment on the proposals. Everyone gave introductions, starting with the project team and then the commercial fishermen and anglers. PC noted that the public consultation is still open after being extended to 13th December 2020, and that comments and feedback are welcome through the project consultation website or via email. AHe ran through the agenda of the meeting, namely to give an update on the status of the ongoing virtual consultation, to provide an update on the project details and to discuss the site selection process again as required. He made it clear that the slides presented were all

	part of those presented at the September meeting, with some slight updates where relevant. He added that everything seen here is available to see on the virtual consultation website, a link to which is provided in the slides (also here: https://exhibition.awelymor.cymru/). AHe reiterated that the virtual consultation was open until 13th December 2020, where feedback could be provided to RWE on the proposals.
2	<u>Project Update</u> AHe presented the project update slide, noting the various onshore and offshore surveys and engagement completed and/or ongoing. He thanked the fishermen for co-operating with the offshore surveys. He also said that a PhD study by the Bangor University School of Ocean Sciences into the impacts of wind farm infrastructure had been confirmed. AHe stated again that the virtual consultation is underway, presenting the 'Have your say' slide, containing a link to the virtual consultation website. AHe touched on programme, stating that the programme had not changed since the September meeting, and that the project is anticipating publishing its Preliminary Environmental Information Report (PEIR) in August 2021, making final planning applications in May 2022, with decisions on those applications expected in late 2023/early 2024. This is in view of being operational by 2030 in order to meet Welsh Government renewable energy targets. In an addition to information presented at the last meeting, AHe explained that in a letter received from Natural Resources Wales Marine Licensing Team (NRW-MLT) on 6th October 2020, NRW-MLT has deferred its EIA consent decision to the Secretary of State (SoS) for Business, Energy and Industrial Strategy (BEIS). In practice this means that NRW-MLT retains the decision on the Marine Licence, but the Environmental Impact Assessment (EIA) would follow the Planning Inspectorate (PINS) process. CD asked whether that referred to the Welsh PINS. AHe clarified that it would be the 'UK-wide' PINS rather than the Welsh PINS specifically, as the project is classed as a "Nationally Significant Infrastructure Project" (NSIP). CD asked if there was any Welsh Government involvement in the decision-making process. AHe answered that NRW has a twofold involvement in exercising its responsibilities to the Welsh Government. The first is in an advisory capacity on the EIA, which will feed into the PINS-led Development Consent Order (DCO), and a second as the Marine Licensing determining authority in Welsh waters. AHe added that the deferral by NRW is intended to reduce duplication of process in practice but does not result in NRW being side-lined.
3	<u>Site Selection</u> AHe then presented the site selection part of the presentation, noting that the optionality for three cable routes was exactly as shown at the previous meeting in September, but the project team is still deciding which route to progress. Therefore, as part of the virtual consultation, RWE is seeking feedback on route preference from all stakeholders. He said that so far, consultation is going well and lots of responses had been received. However, most responses have focused on the principle of the project itself, rather than preferences for the offshore and onshore routes, and for the onshore substation location.
4	<u>Next Steps</u> AHe described the next steps for the project, which are to continue virtual consultation on the project as a whole until 13th December 2020, select a single preferred landfall, cable route and substation location by Q1 2021, and undertake detailed consultation with

	fishermen [led by Poseidon]. He asked if there were any questions arising on the project updates so far, but no questions were raised at this point.
5	<u>Detailed Consultation</u> AHe handed over to FN to talk about the plan for detailed consultation. FN explained that Poseidon would be undertaking consultation on an individual basis with both commercial fishermen and charter anglers. This would take the format of a structured questionnaire over telephone, seeking feedback on the vessels and gear types used, working patterns and seasonality, target species and target grounds/marks. She explained that detailed consultation is scheduled for Q1 2021, with the plan being to arrange calls for February/March time. FN is currently collating a list of consultees via replies to emails from JA but added that she is also happy to receive direct contact [<i>FN's contact details provided in PowerPoint presentation</i>]. FN thanked those who had been in contact so far and encouraged anyone else to do so who wished to be consulted.
6	<u>AoB</u> JA stated that this marked the end of materials presented from the project side and opened the floor to fishermen for questions or any other points they wished to raise. JT said that the route between Rhyl Flats and Gwynt y Môr (GyM) was an area fished by him and others. There were several fishing marks, known as 'The Rockies' because of the presence of rocky ground. He said that cabling could damage that area and therefore his business, given how wide the route corridor was. JA said that it was important to note that although the corridors displayed were quite wide, the actual cable will only disturb a width of a few metres within that corridor, and that in the detailed design phase, it would be possible to 'microsite' around certain features where cable burial could be difficult. JT asked that if certain marks are known, could these be avoided through micrositeing. AHe responded that the project must have regard to all representations made through formal consultation, and therefore known areas would be considered through that process, but micrositeing decisions themselves would not be made until the detailed design phase, several years down the line. JL raised concerns about potential impacts from Electromagnetic Fields (EMF) in relation to the western corridor and impacts to tope. He said that the western route crossed a feeding area for tope. This species seemed to avoid areas where existing cables are present, therefore the AyM cables could have an additional impact. FN stated that those types of impacts would be considered through the fish and shellfish ecology assessment, that would in turn feed results through to the commercial fisheries assessment. CD also stated that the area between GyM and Rhyl Flats was one with rocky habitats, noting that most other areas off North Wales are sandy or muddy habitats. He said that this habitat was quite rare in the context of the region, and therefore would there be an incentive to avoid that type of ground. PC responded that the preference for cable installation is burial in soft seabed areas as this provided the best protection for the cable itself, and the least interaction with other users of the sea. AHu asked whether the cables could be buried alongside the GyM cables. PC clarified that the routes, to a large extent, do follow the tracks of existing infrastructure including the GyM cables as well as the East-West Interconnector, but there does have to be a separation between assets to allow maintenance and recovery.

FN asked the group if there was a consensus among fishermen in terms of a preference for a particular route. CD said that the route between GyM and Rhyl Flats should be avoided if possible due to the presence of rocky ground and marks within that area.

AHu also said that the area in question was known colloquially as 'Rhyl Stones', and was a large area fairly unique to North Wales as the rest of the surrounding area is predominantly sand.

PC thanked AHu for the useful feedback on that area. PC added that the project is currently waiting on results from the geophysical survey which will give Side Scan Sonar (SSS) data on the seabed type, which needs to be known from an engineering point of view in terms of the Cable Burial Risk Assessment (CBRA) that informs the certainty of successful cable burial across the route.

JA said that a PDF of the presentation would be circulated after the meeting [*Action*]. AHe reminded everyone that all the relevant materials are also available to view on the virtual consultation website.

AHu asked about rock protection for the cables. PC said that at this stage the project can't commit to no rock protection, but that it is not a preferred solution. The first preference is to bury the cables, however rock protection, or other measures, would be retained as options should burial provide difficult in certain locations. AHu then asked if there was any information available on burial depth, to which PC replied this would also be dependent on the results of the CBRA and would likely be variable across the route. PC also added that cable protection would be required at crossings with other assets, and that cable crossings are required in all three route cases.

JA noted that much of the discussions so far had been around the cable route options, but asked the group if there was any feedback on the array. PC said that the location of the array is agreed with The Crown Estate (TCE) and therefore cannot be moved, however the final location of the array would fall somewhere smaller within the current outline, if not using the whole area.

AHu said that the north of the array aligns with the shipping lane, and asked if there was any intention to extend the Traffic Separation Scheme (TSS) westward, noting that anchoring (and therefore charter angling on particular marks) would not be possible in a designated shipping lane. PC highlighted that the project is in regular discussions with the Maritime and Coastguard Agency (MCA) and that currently, the understanding is that the traffic north of the array already aligns well with the TSS, and therefore at this stage there is no need for the TSS to be extended. If it was, there would need to be a safety case from the MCA for them to take potential routeing measures to the International Maritime Organisation (IMO).

RM noted that there had been discussions over the locations of fishing "marks", and asked FN to elaborate on how this would be approached through her detailed consultation next year. FN replied that she would definitely be asking fishermen about the locations of their marks, and added that confidentiality would be respected in each case.

JL asked about the area covered by the vessel traffic survey, noting that the survey vessel had maintained a fairly central position and therefore may have missed vessels further out. He also said that the timing of the survey may under-reflect activity. PC explained that the survey is mandated by the MCA, which requires a winter and a summer survey of 14 days

each to augment the AIS data with radar and visual observations to account for non-AIS traffic. He added that the seasonal element was there to account for winter/bad weather routing, whilst the summer survey was designed to capture the period of highest activity. RM clarified that the survey covered the area of the array plus a buffer of approximately 10 nautical miles, covering all routes. JL asked whether the survey or AIS data accounted for the drop in activity throughout the Covid-19 pandemic. RM explained that through consultation with the MCA, AIS data from previous years would be used to sense check the most recent data, adding that additional consultation with commercial operators would be used to account for nuances compared to a normal year. JT asked whether areas which were found to have high traffic would be avoided by the array. PC clarified that all data would go into the Navigation Risk Assessment (NRA) to determine the acceptability in terms of navigational safety.

AHu asked if there was any update on the size of the turbines to be used at AyM. JA said that there was a range of options being considered but turbines were likely to be larger, and therefore likely further spaced, than those at GyM. RM added that for most design elements, the project will be considering an 'envelope' of design that will remain the case until the detailed design phase which would come a few years down the line post-consent once the project is looking at contracting supply chains. This is to account for the long development timeframe, during which new technologies may come onto the market which do not currently exist.

JL asked if there had been any progress on deciding an Operations and Maintenance (O&M) base for the project. Again, PC explained that this would not be known until the detailed design phase as the project would need to know its requirements in terms of accommodating vessels and the amount of traffic expected.

JL also asked about noise and vibration effects and how these would be assessed. RM explained that noise and vibration is a key part of the fish and shellfish ecology assessment, undertaken separately to, but with obvious links to, the commercial fisheries assessment. This would include a disturbance assessment drawing on results from detailed underwater noise modelling in consultation with the fish ecology advisor at NRW.

JA noted that there was a PhD student at Aberystwyth University potentially undertaking an acoustic fish tagging study in relation to offshore wind farms. JA said that information about this PhD could be shared with attendees [*Action*].

JT asked about known wrecks and whether these would be avoided. PC explained that wrecks are protected by Archaeological Exclusion Zones (AEZs), that vary in size according to the sensitivity of the wreck in question. The project would not be allowed to construct within an AEZ.

FN added a final thought that the commercial fisheries assessment has lots of links with other assessment topics, and she will be in direct contact with the technical leads for shipping and navigation, fish and shellfish ecology, and for the first time marine archaeology.

JA asked if there were any final points anyone wished to raise, however no more points arose. JA thanked all for their attendance and reviewed the actions of the meeting. AHe again thanked all for their feedback and encouraged all to take part in the virtual

	consultation online, for which the deadline for responses had been extended to 13 th December 2020.
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Action point	Action	Who?	Due Date
1	Provide PowerPoint presentation	JA	ASAP
2	Source and provide information on Aberystwyth University PhD.	JA	15/12/20
3	Provide minutes for approval	RM/JA	15/12/20

**AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
COMMERCIAL FISHERIES MEETING MINUTES– 27/04/2021**

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)		
LOCATION:	Zoom meeting with PowerPoint		
PROJECT	Awel y Môr Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Carl Davies	N/A	CD
	Jon Law	N/A	JL
	Simon Parry	N/A	SP
	Jack Thomas	N/A	JT
	Anthony Parry	N/A	AP
	Rob Lee	N/A	RL
	Jim Andrews	FLO	JA
	Alex Herbert	RWE	AH
	Paul Carter	RWE	PC
	Ryan McManus	GoBe	RM
	Zoe Lawrence	Brown and May	ZL
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	
	Fiona Nimmo	Poseidon	
	Sarah McNab	Poseidon	
	Trevor Jones	Welsh Fishermen's Association	
	Andy Hunt		
	Gary Flint		
	Stan Dickinson		
	Kevin McKie		

Documents provided:	Filename
Powerpoint presentation	AyM update for fishers FINAL 270421

Agenda item	Minutes
1	<u>Introductions</u> JA welcomed everyone to the meeting and started a brief round of introductions of attendees. PC outlined the agenda and moved on to give the project update.
2	<u>Project Update</u> PC gave an overview of the non-statutory consultation and public engagement days run in November and December 2020, including with Expert Topic Group members, local MPs and MSSs, councils etc. run virtually online. Over 1000 people visited the online consultation

	portal and over 100 pieces of feedback were received in the form of complete feedback forms, emails and phone calls. The majority of the feedback received was supportive of the project (85%), with little in the way of negative feedback. Feedback indicated that the delivery of renewable energy, meeting climate goals of the Welsh government and green investment were the most important beneficial aspects of the project, and the majority of respondents felt that AyM is very important to meeting Wales' green energy goals. PC added that the formal consultation as required under the Planning Act will be run later in August through to October 2021. PC also said that the draft Statement of Community Consultation (SoCC) has been completed and has been designed to be flexible to account for the Covid situation as it evolves. RM then gave an overview of the informal consultation process run by Poseidon via the questionnaires and interviews with fishermen and charter anglers. A total of 12 interviews had been conducted, however some respondents represented multiple vessels or individuals. The consultation had provided valuable information in terms of the species targeted, areas targeted, and routes taken that can be used to supplement the existing evidence base from national datasets. RM noted that feedback was being collated in the baseline technical reports that will accompany the PEIR documentation published for the formal consultation period towards the end of Q3 2021. RM added that Anatec [shipping and navigation consultants] will be conducting a hazard workshop on shipping and navigational safety with the MCA and regular vessel operators. Two representatives from the fishing industry (one from each of the commercial and charter fishermen) had been invited to the workshop. PC described how the commercial fishing assessment and consultation process ties in with other receptor topics areas, most notably fish and shellfish ecology, other marine users, tourism and recreation and the inter-linkages between the EIA topics. PC then outlined the onshore and offshore surveys that were either ongoing or complete.
3	<u>Site Selection</u> PC moved onto the site selection update, providing information on the previous announcements made on refining the project. Since the last update given to the fishermen, the project have selected the preferred routes for the offshore and onshore cables and onshore substation location. The second part of the site selection announcement had been made on the reduction of the array boundary. The western tip of the array had been excluded from the development area following public consultation and discussions with NRW in particular, resulting in a reduction in overall area and a reduction in the maximum number of turbines considered within the design envelope. CD asked what reasons were behind cutting off the western tip of the array. PC and RM outlined in brief that it was due to a number of 'overlapping' constraints in that area. In particular, discussions had been held with NRW regarding sensitive views in Anglesey and Snowdonia, and concerns over cumulative impacts together with the existing wind farms in the region. Other factors included underwater noise impact ranges extending further west in the deeper water, and its effects on marine mammals, as well as shipping and navigation impacts to vessels transiting to and from the anchorage and pilot boarding station off Point Lynas.

	AP asked where cables will be brought ashore north of the perch, voicing concerns that cable installation could affect vessel transit to and from the harbour. PC and JA took an action to provide a zoomed in map of the cable corridor to show distances from the cable corridor to the harbour. Once it was clarified that the landfall location was east of Rhyl, near the landfall for Burbo Bank Extension, AP was satisfied that there shouldn't be a problem. JL asked whether the project had a preference on the size of turbine. PC explained that the project has to develop a wide envelope to accommodate future changes in the market and developments in technology in terms of larger, more efficient turbines. However, at the moment there is no preference, selection will be made in the post-consent phase via competitive tender to turbine manufacturers depending what machines are on the market at the time. AP asked PC to confirm the rotor diameters and blade lengths being considered. PC confirmed that at the larger end of the envelope, 300 m rotor diameters were considered, with blade lengths of approximately 145 m. CD asked if NRW were concerned about piling impacts on marine mammals, were there also concerns about effects on fish as a prey resource for mammals. PC and RM outlined the process for assessing impacts from underwater noise on fish and marine mammals is based on underwater noise modelling and reported within the fish and shellfish ecology and marine mammal chapters. RM also said that once the impact assessments are complete, mitigation may be considered (in addition to the embedded mitigation), in terms of alternative piling techniques and noise abatement measures such as bubble curtains. AP added that he had previous experience from piling at GyM, and noted poor fishing conditions during piling, recalling that noise/vibration was heard and felt through the vessel hull tens of kilometres away. RM indicated that <i>noise disturbance to fish (and other receptors) from impact piling is one of the key considerations of the EIA, and it is well understood and expected that receptors will experience disturbance for the duration of piling out to several kilometres, as informed by underwater noise modelling. The impact assessment process identifies where those effects are potentially significant or unacceptable and applies mitigation to reduce impacts to an acceptable level if necessary. Some mitigation is already designed into the project, such as soft start piling and ramp up to avoid injury, disturbance, and mortality to fish and marine mammals in close proximity to the piling event. The outcomes of the impact assessment will be reported in the PEIR, and there will be an opportunity to comment on the conclusions of this work later in 2021.</i>
4	<u>Programme</u> PC briefly touched on the project programme, noting that there was a design freeze in January 2021 that the PEIR assessments will be based on. The PEIR is planned to be published for formal statutory consultation in late August/ early September.
5	<u>Draft Fisheries Liaison Plan</u> JA moved on to the FLP, noting that the draft FLP was currently available for consultation and comment until 6th May 2021. He explained the purpose of the FLP was to keep fishers informed of progress, to provide notice of site work and allow safe operations in and around the AyM site going forward. JA noted that at the moment, the draft FLP is a work in progress, and face to face consultation was difficult in the current circumstances. The main proposals of the FLP would be the appointment of a project FLO, with input from EIA

	specialists (Poseidon) and a Fisheries Co-operation Strategy Specialist (Brown and May Marine), with the overall aim of minimising impacts on fishers and facilitating a line of communication between fishers and the project.
6	<u>Next Steps and AoB</u> JA said that the draft FLP is available for comment until 6th May, and the team are looking for opportunities to meet when time is available in the near future. JA and ZL are currently working through a methodology as to how that will be approached, which will be agreed and finalised in the coming months. JL asked if there is a contact at NRW that the project are liaising with. AH explained that NRW are divided into the advisory team (topic specialists) led by case manager Adam Cooper, and the Marine Licensing Team (case manager Pete Morrison) who will make the decision on the marine licence on behalf of the Welsh Government. He added that the advisory and Marine Licensing Teams are separate, despite being part of the same overall organisation. With no further queries or comments, JA thanked all for their attendance and closed the meeting.

Action Item	Action	Who?	Due Date
1	Provide a zoomed in map of the offshore export cable corridor in relation to the coast and port access.	JA/PC	N/A

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
FISHERIES MEETING MINUTE – 26TH JULY 2021

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)
LOCATION:	Online (Zoom)
PROJECT	Awel y Môr Offshore Wind Farm
ATTENDEES:	ANTHONY PARRY (TP) (JENSEN SEA ANGLING) HARRY THATCHER (HT) (ABERYSTWYTH UNIVERSITY) JIM ANDREWS (JA) (FISHERIES LIAISON OFFICER) ROBERT LEE (RL) (MERLIN SEA ANGLING) SIMON PARRY (SP) (JENSEN SEA ANGLING (SUVERAN)) ANDY HUNT (AH) (FV QUEST)
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	ALEX HERBERT (AHe) (RWE) ALISDAIR SMITH (AS) (RWE GWYNT Y MÔR) CARL DAVIES (CD) (GWEN PAUL M) FIONA NIMMO (FN) (POSEIDON) JACK THOMAS (JT) (INCENTIVE) JIM EVANS (JE) (WELSH FISHERMEN'S ASSOCIATION) JON SHAW (JS) (SEEKAT CHARTERS) PAUL CARTER (PC) (RWE) PAUL TURNER (PT) (ROMA V) RYAN MCMANUS (RM) (GOBE) SARAH MCNAB (POSEIDON) SEAN LEAKE (SL) (GOBE) TREVOR JONES (TJ) (WELSH FISHERMEN'S ASSOCIATION)

Documents provided:	Filename
PowerPoint Presentation	AyM Update for Fishers July 2021

Agenda item	Minutes
1	<u>Introductions and Aims</u> JA introduced the meeting, noting that most attendees present had met previously. Harry Thatcher (from Aberystwyth University) introduced himself. The purpose of the meeting was to provide an update on project progress since the last meeting and to alert participants to the consultation process that is due to start later in the year. Before starting the Awel y Môr discussion, JA mentioned some “at sea” activity that was relevant to the participants:- • Gwynt y Môr – a hydrographic survey of the Gwynt y Môr export cables is underway, and is being conducted by an unmanned survey vessel. • Awel y Môr vessel monitoring – monitoring of vessel movements in the proposed Awel y Môr arear had been carried out in the spring. •
2 & 3	<u>Project Reminder / Context</u> JA provided the meeting with a brief update and reminder of the project details. The key points were:- • Since the last meeting in March, some project details have been finalised:- • The export cable corridor will run from the SE edge of the array area, between the existing Rhyl Flats and Gwynt y Môr windfarms, and to a landfall at Bodelwyddan. • Wind Turbine Generator size and number has not been finalised, the two would be dependent to some extent on one another. • The Draft Preliminary Environmental Information Report (PEIR) is being prepared and will be published for the statutory consultation period for the project which is due to start in late August 2021. • Statutory Consultation on the proposal is being planned, this would have to be Covid-safe and would be online, with as many local meetings with stakeholders as the restrictions in place at the time would permit – likely to be a mobile exhibition visiting key points along the coast during the statutory consultation period. • Next steps • At sea: • The second shipping & navigation survey is scheduled to take place after the PEIR consultation in late summer 2021 for a period of 14 days. • A floating LIDAR deployment is being considered for late October 2021 – may be delayed to December 2021. • Geotechnical survey is being considered for spring 2022 (maximum of 5 boreholes to be drilled across site). • Consenting process • 2022 - Development Consent Order (DCO) application due to be submitted and subject to public examination • 2023 – Decision on the DCO • 2023/24 – Decision on the Marine Licence • 2030 – target date for operational windfarm

Agenda item	Minutes
	JA agreed to circulate a PDF of AHe's presentation to all interested parties. Action: JA
4	<u>Fisheries Cooperation Strategy</u> JA provided an update on progress. Key points were:- • The Fisheries Cooperation Strategy was presented to the meeting. • Brown & May have been contracted to implement this strategy. They are involved with similar projects all around the UK and are experts at assessing the economic impact of windfarms and other offshore developments on fishers' livelihoods. • All of the commercial fishers and charter angling businesses that are known to operate in the area (and the relevant representative bodies) will be invited to participate in the process of reviewing and assessing the potential impact of the windfarm development on their individual businesses. • The deadline for registering for this process is 12th November 2022. • Information will be requested by Brown & May for each individual or business that registers in this process – such as track records to show dependence on the area, and financial records. All information provided to Brown & May will be treated in confidence and will be used to determine the financial impact of the project on each operator. • Where operators are asked to cooperate with the various stages of the project (for instance by moving static gear during survey or construction activity), the assessment will be used to determine the financial impact of cooperation and provide a basis for compensation. • JA agreed to circulate this cooperation strategy to all fishers (commercial and charter anglers). Comments were made at the meeting, including:- • TP felt that the financial impact of the Gwynt y Môr windfarm had been too high to measure. As well as losses of fishing opportunity it had resulted in higher fuel costs because vessels had to steam further offshore to find fish, and / or travel around safety zones when construction or maintenance work was underway. • TP further noted that the main impacts had occurred after the construction of Rhyl Flats and Gwynt y Môr, and that he had lost a significant amount of business. • AH remarked that commercial catches of turbot and brill had significantly fallen. He caught just 4 turbot in 2020 and 2 so far this year. The number of species he was catching had fallen and he was not catching any plaice or gurnard. • TP agreed with the reduced number of species, fall in plaice abundance and also the absence of gurnard in angling catches. • TP remarked that work by Rachel Ball from Cranfield University had done some work looking at the effect of electromagnetic fields on thornback ray embryos, showing a "freeze response". He noted that rays are not found in the windfarm areas. • TP suggested that creating reef areas within or adjacent to the windfarm areas could help to offset their impact • TP enquired about the proposals for monitoring fishing marks within the Gwynt y Môr offshore windfarm that had been discussed several years ago. JA indicated that some

Agenda item	Minutes
	locations had been agreed but that he understood that the plan to carry out experimental fishing had not been progressed. - HT provided an update on the work he is conducting to monitor the movement and behaviour of fish and shellfish around wind turbines in the Gwynt y Môr windfarm area. He had tagged lobsters this year within Gwynt y Môr earlier in the year and their movement was currently being monitored. - AH remarked that one of the only species that may have benefitted from the windfarms are lobsters, with the scour protection around the turbines providing a habitat previously absent. - HT agreed, and responded that lobsters were being used in the first instance to test the equipment and experimental principles, and that other species would be used in future (including, he hoped, fish such as wrasse). The information from lobsters may be helpful in any event to help with the design of scour protection to optimise benefits.
5	<u>Next steps</u> - A further Fishery Liaison meeting would be organised during the statutory consultation period in September-October 2021, ideally a physical rather than a virtual meeting. - JA agreed to keep all informed of work on site and the start of the consultation period.

Agenda Item	Action	Who?	Due Date
4	Circulate Fisheries Cooperation Strategy	JA	ASAP
6	Keep all fishers informed of start of consultation process	JA	Sept-Oct 2021
6	Keep all fishers informed of work on site.	JA	Ongoing

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
FISHERIES MEETING MINUTES – 5TH OCTOBER 2021

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)
LOCATION:	Kinmel Hotel, Abergele
PROJECT	Awel y Môr Offshore Wind Farm
ATTENDEES:	<u>AT MEETING</u> ALEX HERBERT (AHe) (RWE) ALISDAIR SMITH (AS) (RWE GWYNT Y MÔR) ANTHONY PARRY (TP) (JENSEN SEA ANGLING) CARL DAVIES (CD) (GWEN PAUL M) EMMA WHITE (EW) (GWEN PAUL M) HARRY THATCHER (HT) (ABERYSTWYTH UNIVERSITY) JACK THOMAS (JT) (INCENTIVE) JIM ANDREWS (JA) (FISHERIES LIAISON OFFICER) PAUL TURNER (PT) (ROMA V) RHYS KIBBLE (RK) (BROWN & MAY) ROBERT LEE (RL) (MERLIN SEA ANGLING) SIMON PARRY (SP) (JENSEN SEA ANGLING (SUVERAN)) <u>VIA ZOOM</u> JIM EVANS (JE) (WELSH FISHERMEN'S ASSOCIATION) JON SHAW (JS) (SEEKAT CHARTERS) PAUL CARTER (PC) (RWE) SEAN LEAKE (SL) (GOBE) TREVOR JONES (TJ) (WELSH FISHERMEN'S ASSOCIATION)
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	FIONA NIMMO (FN) (POSEIDON) RYAN MCMANUS (RM) (GOBE) SARAH MCNAB (POSEIDON)

Documents provided:	Filename
PowerPoint Presentation	AyM Update for Fishers Oct 2021

Agenda item	Minutes
1	<u>Introductions and Aims</u> JA introduced the meeting, noting that most attendees present had met previously. The purpose of the meeting was to provide an update on project progress since the last meeting and to alert participants to the ongoing consultation process. Everyone gave introductions, starting with those present in Abergele and concluding with those participating remotely via Zoom.
2	<u>Project Reminder / Context</u> AHe provided the meeting with a brief update and reminder of the project details. The key points were:- • Since the last meeting in July, some project details have been finalised:- • The turbine array extent now covers an area of 88km²; and • The export cable corridor will run from the SE edge of the array area, between the existing Rhyl Flats and Gwynt y Môr windfarms, and to a landfall at Bodelwyddan. • Wind Turbine Generator size has not been finalised, it is now likely that these will have a capacity of between 12-22MW each, with between 45-91 WTGs scheduled for installation, the number of individual WTGs being dependent on their capacity. • Statutory Consultation on the proposal is currently underway (ending on 11th October 2021). Key aspects of this consultation are:- • Statement of Community Consultation – which was agreed with the Local Planning Authorities in the area (Denbighshire, Gwynedd, Ynys Môn); and • Preliminary Environmental Information Report (PEIR) – this is a draft version of the EIA that will be submitted in support of planning applications. Input to inform fisheries consultations has been included in the PEIR, with clear reference to where further information will be available. • A mobile exhibition has been touring the North Wales coast during late September – early October, and an online exhibition has been available since 31st August. • Now is the time to respond to this consultation! • Next steps • At sea: • A floating LIDAR deployment is being considered for late October 2021 – may be delayed to December 2021. • Geotechnical survey is being considered for spring 2022 (maximum of 5 boreholes to be drilled across site). • Consenting process • 2022 - Development Consent Order (DCO) application due to be submitted and subject to public examination • 2023 – Decision on the DCO • 2023/24 – Decision on the Marine Licence • 2030 – target date for operational windfarm JA agreed to circulate a PDF of AHe's presentation to all interested parties. Action: JA

3	<u>Fisheries Cooperation Strategy</u> RK from Brown & May provided an update on progress. Key points were:- • The Fisheries Cooperation Strategy was presented at the last meeting in July and published shortly afterwards. • Brown & May are involved with similar projects all around the UK and are experts at assessing the economic impact of windfarms and other offshore developments on fishers' livelihoods. • All of the commercial fishers and charter angling businesses that are known to operate in the area (and the relevant representative bodies) have been invited to participate in the process of reviewing and assessing the potential impact of the windfarm development on their individual businesses. • The deadline for registering for this process is 12th November 2022. • Information will be requested by Brown & May for each individual or business that registers in this process – such as track records to show dependence on the area, and financial records. All information provided to Brown & May will be treated in confidence and will be used to determine the financial impact of the project on each operator. • Where operators are asked to cooperate with the various stages of the project (for instance by moving static gear during survey or construction activity), the assessment will be used to determine the financial impact of cooperation and provide a basis for compensation. • Rhys stressed that this process was being started very early for this project to allow ample time for discussion of each operator's assessment. Questions were asked by participants, including:- Q Impacts on steaming time – many of the fishing marks used by both commercial fishers and charter anglers lie to the north of the outer edge of the windfarm. This means that vessels steaming from ports on the North Wales coast will have to detour around the array site or cable corridor during the construction period. Would this be taken into account? A The economic impact will examine the typical pattern of activity over recent years and how this might be affected, including impacts on steaming time. Q Cable corridor route – this corridor lies between N Wales ports and fishing areas to the east of the proposed windfarm. Would access across this route be prohibited? A It was anticipated that cable laying would take a relatively short time, and that the only exclusion for vessels in transit would be in the safety zone around the cable laying vessel and its anchors. Q Confidentiality – there was some concern that plotter data and information on fishing marks was being sought. This information was commercially valuable. Could confidentiality be assured? A RK assured all present that any data provide to Brown & May would be treated in confidence and would be securely stored.

4	<u>Discussion of PEIR Documents</u> AH outlined the purpose of the PEIR, which is to encourage stakeholder feedback and engagement in the consenting process for the project. RWE were keen to receive feedback on or before 11th October. Feedback can be provided in writing, using the questionnaire on the project website, or by printing out a hard copy of the questionnaire and submitting it by post. Most of the remainder of the meeting was taken up with detailed discussions about the consultation on PEIR documents. CD opened this section of the discussion with a brief summary of his family's long involvement with fishing off the North Wales coast from Conwy, and the tradition of stewardship of the fish and shellfish in the area that is shared by both commercial fishermen and the angling community. CD stated that over the years he has seen oil and gas exploration and development offshore, then the construction of windfarms in coastal waters. He has seen changes in the abundance and diversity of fish in the area and is concerned that the gathering pace of windfarm development will have further effects. He has participated in meetings and consultation in good faith but felt that his advice and experience has been largely ignored. He felt that the PEIR documents speak about sustainable management of the area, but the precautionary principle has gone out of the window. CD indicated that the overall picture presented in the two background reports on commercial fishing and angling was reasonably accurate, but that the main PEIR chapters presented a very different view which seems to ignore important points. He felt that those facts had been manipulated and that a wall of words had been erected for the project. He drew attention to some specific points, including:- • Other Marine Users Report • Paragraph 68 attributes the decline in gurnard to an increase in commercial inshore fishing in recent years. There has been no such increase, and no inshore commercial fishery for gurnard in this area. • Paragraph 68 also refers to a population study of grey gurnard in this area. This is not relevant to the concerns that have been raised by anglers in the area, which relate to tub gurnard, a completely different species. • Paragraph 107 states that fish will return immediately to the area after construction. Based on the experience of other windfarms in the area this is not the case, and it may take several years for fish communities to start to recover. • Noise Report • This report fails to consider either gurnard or pollack, the two species in this area that have been most affected by piling work. • CD queried why in Germany there is a limit on piling noise of 160dB at a distance of 750m from the piling work, yet the noise report predicts a noise level of 186dB several km from piling work on this project. • Survey work – CD was concerned that NRW had agreed with the developer that no survey work was needed for this project, even though he has seen impacts from other similar projects.
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- Outcome – CD was also concerned that all of the conclusions were that the project would have impacts of “low” or “medium” significance and short-term; but in his view the impacts on fish and fishermen in the area from this windfarm would be “high” and sustained.

SL responded to these points, as follows:-

- Inshore gurnard fishery – SL noted that the wording in the paragraph could be clearer to note that the regional (Irish Sea) fishery for gurnard has increased in recent years, to avoid any inference that there is a local (North Wales) inshore fishery.
- Research on gurnard population – SL acknowledged that the assessment has drawn on all available scientific literature for the gurnard family and wider species, and reference to any difference in species would be made clearer in the ES. SL also noted that the EIA team recognise the fishing community concerns and have tried to collate all available literature to understand what is causing the apparent reduction in certain species; it appears to be at a regional rather than site specific level but we would welcome any further information which indicates fisheries are sustained elsewhere whilst declining here.
- Survey work – it had been agreed with NRW that no surveys would be needed to characterise the marine habitats and species in the area given that they have already been characterised in earlier studies. SL noted it was important to make the distinction between characterising the environment for EIA, and monitoring, which could be undertaken pre and post construction if required.
- Significance of impacts – SL recognised that the language of EIA can feel as if the importance to individual operations is described differently to the experience for the business operator. SL went on to note that the assessment in the PEIR considers impacts at the regional / stock level for the species concerned, and not in terms of local impacts on individual operators. The mechanism for considering individual operators would require detailed landings and values to be published in the public domain (as the PEIR is a consultation document), which it is generally considered would be inappropriate. Instead focus is placed on FLOWW guidance, with individual operations considered in a parallel but separate, and confidential, process.
 - Brown & May had been appointed by AYMOWF to assess impacts on individual operators, which is a separate exercise to the assessment of wider impacts.

AP mentioned that the report on angling seems to focus mainly on gurnard and tope. Other species are also affected, and he listed turbot, brill, plaice and dab as being some of them.

SL responded that tope and gurnard had been used as examples to set a context for potential local changes because of the concerns that had previously been raised by anglers about these species.

CD stated that in his experience, wrecks up to 20 miles from Gwynt y Môr have been impacted by the windfarm, with low catches of species targeted by angling boats, in particular pollack. He indicated that he now has to make a trip of 30-40 miles to find decent pollack catches. He could not attribute this to commercial fishery removals in the inshore area (there is no commercial fishery for pollack inshore); nor to a reduction in the abundance of Irish Sea pollack, since the fish are abundant within the areas that they are now found. He is concerned that with the construction of Awel y Môr followed by the

Round 4 windfarms, all of the wrecks from Anglesey to the Isle of Man will be impacted after 2025.

TP stated that in the past, before construction of windfarms, it was possible for club angling competitions on his charter vessel to catch over 20 different species. Now it was typically around 14 species. Species such as greater weaver and dragonets are now absent from the area. He felt that the pre and post survey work should cover an area from the Dee estuary to Douglas and the Skerries.

SL responded that the assessment of noise impacts had already used the most up-to-date thresholds. Underwater noise would be carefully monitored during the construction of the windfarm. The information from this monitoring will be used to validate the noise modelling that has been carried out and if necessary to inform and alter the piling work.

CD remarked that in Germany the use of bubble curtains was mandatory. SL indicated that it was a mitigation option that might be used for Awel y Môr if monitoring showed it was necessary, but it is not currently mandatory in the UK.

TP noted that mackerel catches over the past few years had fallen significantly over spring tide periods, when water clarity noticeably worsened. He was concerned that the monopiles were causing seabed scouring and that sediment was being suspended in their wake.

SL responded that “turbid wakes” had been investigated in detail for the Thanet windfarm. This study found that turbidity increased down-tide of the monopiles, with higher concentrations within 50-100m of them. Although this turbidity was visible out to 1-2km, the nearfield higher concentrations are in the range expected of storms in this area and thus within the limits of natural variation.

SL also noted that NRW had raised concerns about reliance on UK experience rather than site-specific sediment suspension during and after construction, and that this had been reviewed in the PEIR, including extensive site-specific modelling by ABPmer, which is reported in Volume 2, Chapter 2 of the PEIR.

TP commented that he has asked on a number of occasions for artificial reefs to be included in the design of new wind farms and added to existing wind farms. These could provide new habitats for fish, and might offset the impact of the windfarm for local angling businesses and fishers. Such reefs would need to be located outside the windfarm area to provide the greatest benefit. He understood that NRW were concerned about the impact of creating such areas, and asked if they could attend future meetings to explain and discuss their position.

CD’s big concern was about the cumulative effect of windfarms. He remarked that if the turbidity was comparable to storms, there are now ‘storms’ on 365 days of the year near to the windfarms.

CD asked whether potential impacts of zinc anode corrosion had been considered in the PEIR, since this could input tonnes of zinc into the sea.

SL responded that the impact of anode corrosion and all potential effluents were considered in the appropriate sections of the PEIR (notably the benthic ecology chapter and the fish ecology chapter). A plan for managing the risk and impacts of pollutants had been submitted to NRW for this project.

JE noted that the development of Awel y Môr and proposals for further windfarm development in the area raised some wider marine planning issues. The Wales Marine Plan contained safeguarding policies for fish and fisheries. How have these been considered in the planning of this project?

SL responded that cumulative impacts have been considered as far as possible, but there is limited information currently available about the proposed Round 4 windfarms further offshore. This prevented their impact from being considered in detail until we know what they are proposing. RWE and GoBe were keeping a close eye on these proposals and all other projects on the PINS, local planning portal and NRW project registers, and would update the assessments in response to any new information that becomes available before submission.

JE also raised concern that the information used in the PEIR contained gaps which could affect the conclusions drawn. For instance, VMS data have been used. 90% of the fleet that work in this area are <10m, so are not equipped with VMS. This will result in a significant under-estimate of the level of fishing activity.

SL acknowledged that the VMS data are recognised as having shortcomings, and that Poseidon had interviewed local fishers in the process of preparing the baseline reports to ensure the site and fleet specific baseline is presented as comprehensively as possible. Interviews were offered to all fishers following requests issued at fisheries liaison meetings in Oct 2020. Other sources of data such as FishMapMon had been used to try to address this.

JE responded that FishMapMon was now quite old and had known shortcomings, and that the current experience of fishers in the area was more relevant to the project.

JE noted that the Welsh fishing industry fish quota had increased under the post-Brexit arrangements, and that the Welsh fleet is still in the process of adjusting so that it can make use of the additional quota. This means that the current impact of Awel y Môr on fishing opportunities may be less than it will be in the future after the fleet has adjusted its capacity.

SL responded that it is hard to address a new “future baseline” in the face of uncertainty around changes in quotas etc, but that Poseidon had presented a section which seeks to address this issue in the PEIR chapter. SL went on to confirm that if the section could better reflect any more recent changes in quota that would change the future baseline we would welcome formal submission as part of the consultation.

RK indicated that opportunity costs could be considered in the impact assessment for individual operators.

JS indicated that in his view impacts on fish and fishing in the area are likely, and that in his experience observations at sea and from mariners are more useful than numerical models.

	HT (Aberystwyth University) gave the meeting a brief update on the work that he is carrying out to monitor fish and shellfish movements in the vicinity of wind turbines in the Gwynt y Môr windfarm. This work is being conducted to fill a gap in knowledge. There is a great opportunity for wind farm developers to work with local fishermen and scientists to better understand the relationship between windfarms and commercially important species. PC responded that RWE is keen to be involved in and to sponsor research. RWE is already working with nature conservation agencies in the UK (NRW, NE, JNCC) on the impact of offshore windfarms, and strategic studies such as ORJIP. Research requirements for this project have been specified by NRW and are listed in the DCO for it. He welcomed the work being carried out by HT and looked forward to future updates. PC also noted that RWE would be carrying out a consultation in 2022 about the content of the Community Fund for the project, and this would provide an opportunity to fund further research.
6	<u>AoB</u> There were no items raised as AoB. AH thanked all present for their valuable contributions and reminded everyone to submit any comments on the PEIR documents on or before 11th October and to register for participation in the Fisheries Cooperation Strategy by 12th November.

Agenda Item	Action	Who?	Due Date
1	Provide PowerPoint presentation	JA	ASAP
3	Provide minutes for approval	JA	ASAP

DRAFT

**AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
COMMERCIAL FISHERIES MEETING MINUTES– 20/01/2022**

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)		
LOCATION:	Zoom meeting with PowerPoint		
PROJECT	Awel y Môr Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Carl Davies	Local fisherman	CD
	Jim Evans	WFA-CPC	JE
	Trevor Jones	WFA-CPC	TJ
	Fiona Nimmo	Poseidon	FN
	Jim Andrews	Fisheries Liaison Officer	JA
	Sean Leake	GoBe Consultants	SL
	Ryan McManus	GoBe Consultants	RM
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	
	Sarah McNab	Poseidon	

Documents provided:	Filename
PowerPoint pdf	AYM S42 consultation 20 Jan 2022 final

Agenda item	Minutes
1	<u>Introductions</u> JA opened the meeting and thanked attendees for their time. All attendees gave a brief introduction. <u>Agenda</u> The agenda of the meeting was to discuss the collated Section 42 feedback on the Preliminary Environmental Information Report (PEIR) documents that was received during the statutory consultation period of 31st August 2021 – 11th October 2021, and how the Awel y Môr is responding to that feedback is the Environmental Statement (ES) is updated and finalised for application.
2	<u>ES chapter coverage</u> JA handed over to FN to discuss the feedback. FN described the engagement with the local fishing industry to date, namely: - Consultation on the Scoping Report via the Scoping Opinion in summer 2020; - Engagement via stakeholder group meetings in September and December 2020, and April and October 2021;

	- Individual one-to-one meetings with Poseidon; - Public consultation events in the locale of AyM; and - Statutory consultation on the PEIR under Section 42 of the Planning Act 2008 in the period 31st August 2021 – 11th October 2021. FN outlined the various chapters of the PEIR (which will now be updated into the ES) where commercial, recreational and ecological fisheries interests are described and assessed. These are: - The Commercial Fisheries Chapter, which also has a separate extended baseline annex. This considers the interactions with the commercial fishing industry; - The Other Marine Users Chapter, which also as a separate extended baseline annex. This considers (amongst other things) interactions with charter angling and recreational fishing; and - The Fish and Shellfish Ecology Chapter; which has a separate baseline characterisation annex. This considers interactions with the ecology of fish and shellfish receptors (including both commercial and non-commercial species at a regional/stock level). <u>EIA study areas</u> FN reminded everyone of the study areas considered in the commercial fisheries assessment as being: - The local study area within the vicinity of the proposed AyM project within ICES rectangle 35E6; - The regional study area which extends out to the three adjacent ICES rectangles 36E5, 36E6 and 35E5; and - The wider study area which includes the wider Irish Sea.
3	<u>Section 42 responses</u> FN explained that the feedback received had been tabulated and proposed to go through each key area of feedback for discussion and to provide the response to that feedback. In many cases, feedback from multiple attendees covered the same key themes and issues, so responses had been grouped. 1. <i>Baseline data does not cover smaller vessels under 10m.</i> FN explained the limitations of the data sources, noting VMS data is not available from MMO for vessels <15m in length, however the MMO landings data includes landings by vessels <10m in length. FN explained that the MMO iFISH database includes sales note data recorded under the Registration of Buyers and Sellers Legislation, which is required for all vessel lengths. Consultation is underway to understand fishing activity by smaller vessels in the area. JE highlighted the need to understand the details in a more refined way because 90% of the Welsh fleet is <10m, therefore there is limited mandatory information available. FN responded noting awareness of the limitations of the VMS data and have contacted Welsh Government for further information. JE flagged that there may be confidential data from Succorfish deployments from NRW but was not certain of its availability. TJ said that the baseline characterisation not adequate. FN disagreed, highlighting consideration of all available data which has been supplemented with additional data from interviews and consultation.

2. *Baseline data does not fully capture Welsh/ IoM vessel activity.* FN noted that the VMS and MMO landings data includes Welsh and IoM vessels, with IoM data being incorporated into the UK MMO datasets since 2011.
3. *Data gathered by Bangor University/ RV Prince Madog surveys should be included.* FN said that the Bangor University reports have been considered and cited, showing the references on the next slide. Any additional proposed references were welcome.
4. *Aquaculture should be considered.* FN responded that aquaculture is considered, however was not aware of present 'offshore' aquaculture sites. Mussel areas in the Menai Strait are considered but do not interact with AyM. In addition, shellfish waters are considered through the Water Framework Directive (WFD) assessment. TJ highlighted an existing aquaculture site south-east of Puffin Island which hasn't been considered and noted another forthcoming site. Both sites are rope mussel sites. TJ took an action to provide links/references to both sites [**Action 1**].
5. *Additional VMS data for all sizes classes and a longer time series should be presented.* FN outlined the response has been to update the assessment to include the 2018 and 2019 VMS data which is now available, and a time series of 2016 to 2019.
6. *Data sourced from FishMap Mon and from the WNMP should be removed.* FN said the data would still be referenced, and the limitations of these datasets are acknowledged within the limitations section of the report. JE responded that if the data were being retained, FN should be aware of an evaluation of that work which raises issues around that report. FN will make sure that is reflected [**Action 2**].
7. *Trawling activity not adequately considered in the chapter, though described in the technical report.* FN outlined that the chapter presents a summary of the extended baseline described in the technical report. It was noted that data and consultation had indicated that there is limited trawling in the area and therefore it was not considered further in the assessment. CD acknowledged that there was not much trawling in this area the moment, but historically it was a popular trawling area that reduced over time because of issues including quotas. In future, it may be able to return. JE agreed with CD and highlighted those opportunities may be realised in future with developments like quota uplifts post-Brexit. TJ pointed to historic trawling in this area being landed in Conwy. FN replied that the baseline covers five years which is consistent with commercial fisheries EIAs in general and pointed to the section in the baseline characterisation on future baseline where future opportunities can be covered. FN suggested adding this to the "Future Baselines" section of the ES chapter [**Action N**].
8. *Changes in fish abundance and distribution have been observed by fishermen. These changes have not been considered.* FN responded that trends in commercial landings are described in the commercial fisheries chapter and technical report. In interviews with fishermen, a specific question was asked around observed trends in catches. CD noted the descriptions of grey and tub gurnard. SL replied that references to the grey and tub gurnard in the chapter were not adequately made in the PEIR but this will be addressed in the ES chapter updates. CD said that gurnard catch had declined in recent years. SL said that response was noted in the consultation section of the ES chapter, and as much evidence as possible provided to try and answer the concern raised with regards it being attributed to windfarms. SL referred to monitoring studies for Gwynt y Mor that concluded there to be no impact, including EMF studies by a local vessel targeting thornback ray, and monitoring more broadly. SL agreed to see if these data could be shared [**Action N+1**]

9. *Baseline to consider quota uplift following Brexit.* Already discussed under Point 7.
10. *Request evidence to support statement that majority of netting vessels are 10m and under.* FN added that MMO landings data indicated all landings from drift and fixed nets were made by vessels under 10m. JE said that there was no statutory reporting requirement for the under 10m vessels, and sales notes of buyers and sellers may not capture catch method. FN agreed to check on whether this information was captured within the MMO iFISH database [**Action N+2**]
11. *Should include Welsh Government heat maps of scallop dredge activity based on iVMS.* FN noted this had already been discussed with request to Welsh Government. JE added there is data on scallop activity on iVMS which may be available from NRW under their Habitats Regulations reporting. FN took an action to look into obtaining the NRW dataset [**Action 3**].
12. *Several comments regarding fleet range, particularly of smaller vessels – smaller vessels indigenous under 12m Welsh vessels prosecuting dredge, net pot and line fisheries are local and limited in range.* FN outlined that the limited range of smaller vessels is considered in the sensitivity assessments. JE comments that this doesn't consider the displacement itself. FN clarified that displacement is considered as a separate impact.
13. *Several comments querying assumptions made regarding resumption of fishing following construction of the wind farm.* FN recognised that not all fishing gears may be deployed in the array and noted that significant impacts were found on the potting fleet during construction, adding that steps being taken for additional mitigation via the FLP.
14. *Several comments querying the definition of impact assessment criteria e.g. how is the high magnitude suggested to be greater than 8 years for a substantial loss of target fish or shellfish, medium less than 8 years, low less than 2-3 years and negligible for less than 1 year.* FN explained that the assessment criteria are consistent with those set out in the EIA methodology chapter, and magnitude of impact is not based solely on duration of impact, but also physical extent.
15. *Impact of piling noise on fish catches should be considered.* FN replied that effects on fishing activity resulting from impacts to fish and shellfish resources (including piling noise) are assessed within the commercial fisheries chapter and suggested that a clearer reference to the fish and shellfish ecology underwater noise assessment would be made in the ES. CD asked why noise limits in Germany are there but not in UK. SL explained that UK regulators take a site-specific modelling approach against noise sensitivity thresholds but do not currently mandate noise limits. TJ asked where the underwater noise assessment was in the PEIR. TJ asked if before, during and after monitoring will be part of the licensing / consenting conditions for the project. FN took an action to reference to where noise is assessed in the PEIR chapter [**Action 4, Post-meeting note: The assessment of underwater noise impacts to fish and shellfish receptors during the construction of AyM is presented in pages 79 – 117 of Volume 2, Chapter 6: Fish and Shellfish Ecology of the PEIR**].
16. *Assessment of cumulative effects should further consider proposed Round 4 offshore wind developments.* FN said that the scope of the cumulative assessment will be revisited in the ES and where further information is available on projects to allow their inclusion in the assessment, they will be considered. CD noted that it is known that the Round 4 projects are forthcoming and have published indicative dates for construction and asked what further information is needed to include those sites. RM replied that although the Round 4 areas have been identified, there is limited specific project information in the public domain that would allow a

	meaningful assessment of cumulative effects – they have not yet sought a Scoping Opinion. 17. <i>Disagreement with conclusions of assessment of wind farm construction on exclusion of netting activity.</i> JE said he was comfortable with response on data previously so this did not need to be discussed further. FN took an action to look at the sales data for netting [Action 5]. 18. <i>Disagreement with conclusions of assessment of wind farm construction on exclusion of scallop dredge activity.</i> No discussion needed as point 17 above. 19. <i>Several comments relating to concerns about displacement and gear conflict (e.g. concerns about where displaced gear could be deployed given limited potting grounds, presence of other gear elsewhere – e.g. during scallop season, and in winter when more vessels work inshore.</i> FN highlighted that it is acknowledged there is the potential for significant effects on relation to temporary exclusion of potters and are committed to developing additional mitigation via the FLP. JE asked about consultation on the FLP. JA clarified that consultation had been undertaken on the FLP and the process of developing it was ongoing. JA took an action to re-issue the agreed FLP & Cooperation Strategy to JE [Action 6]. 20. <i>Any displacement of fishing activity to ‘alternate fishing grounds’ is likely to disproportionately impact in Manx waters. It is not clear that this has been considered in the assessment.</i> FN clarified that displacement is assessed at an Irish Sea scale (noting scallop grounds in the Irish Sea extend beyond Manx waters. It was assessed that AyM would not cause significant displacement of the scallop fishery given that the main scallop fishing grounds are outside of the AyM development area. 21. <i>Mitigation measures for potting to be delivered via the FLP – mitigation options should be explored fully in the EIA and agreed with fishermen.</i> FN responded that the EIA does not focus on mitigation at the individual level, and it would not be appropriate for specific details to fall within the EIA setting, noting above that a draft FLP has been shared as mentioned previously, and the process of developing this, including mitigation at an individual level, is ongoing. JA noted that the upcoming liaison meeting on 2nd February would provide an opportunity to discuss community projects such as mitigation measures associated with the windfarm. 22. <i>CD enquired about para 99 & 115 of the report which refer to the storage of pots excluded from the area on land or that if stored in the sea their doors should be left open so that they don’t catch lobster. Will there be payment for lost catches in this gear and payment for land/container rental for storage? There is also a risk to gear stored at sea with open doors, as if the gear rolls in bad weather, open doors maybe damaged. There are significant financial and time costs in both cases.</i> FN replied that this was noted, and these should be taken as examples of how displacement could be minimised, which will be given further consideration in relation to the FLP and the specifics of mitigation which are agreed on an individual basis. 23. <i>Does the Fisheries Liaison Plan include the cable corridor?</i> FL clarified that the FLP is applicable to all offshore aspects of AyM, including the cable corridor. 24. <i>Cited reports include those looking at angling activity in English Waters, not Welsh waters.</i> FN clarified that data within the reports focused on angling activity in English waters usefully covers the northwest coast of England/the north-west Marine Plan area, which fall within the defined study area. 25. <i>Absence of data on tub gurnard – why the focus on grey gurnard?</i> Covered above in Point 8.
4	<u>Design changes</u>

	SL described the design changes that have been made since the PEIR was published, resulting in a reduction of the size of the proposed array from its western end. This has also resulted in a reduction in the number of proposed turbines, from 91 of the smallest turbines at PEIR, to up to 50 of the smallest turbines at the application stage. JE asked what the reasons for the reduction were. SL explained that the primary reasons were to reduce impacts in the context of stakeholder concerns over seascape, landscape and visual impacts to designated landscapes on the North Wales coast. The reduction also directly reduces impacts to shipping and navigation receptors which transit from the TSS to and from the anchorage area off Point Lynas. The design change also reduces the extent of underwater noise impacts due to a combination of now being in slightly shallower water (in which noise does not travel as far) and by way of reduction of the number of potential piling events due to having fewer proposed turbines.
5	<u>AoB</u> CD asked about the GyM study into EMF effects on elasmobranchs from subsea cables. SL clarified that this study was undertaken as part of a licence condition from NRW. Data were collected from sites in and around GyM using a combination of trap nets and landings from a local vessel between 2011 and 2016. SL took an action to check if the study is publicly available and if it can be provided to CD [Action 7].

Agenda Item	Action	Who?	Due Date
1	Provide references to the two mussel aquaculture sites discussed.	TJ	TBC
2	Ensure the findings of the FishMap Mon and WNMP evaluation are reflected in the ES.	FN	For final application
3	Seek to obtain the NRW iVMS dataset on scallop vessels.	FN	TBC
4	Provide reference to underwater noise assessment in the PEIR.	FN	Complete – see post-meeting note.
5	Impact of windfarm on fishing through exclusion of activity (such as netting) to be assessed on a case by case basis and in accordance with the FLP and Cooperation Strategy	JA + Brown & May	Ongoing
6	Send a copy of the FLP & Cooperation Strategy to JE.	JA	TBC
7	To check if the GyM EMF study is available and to provide to CD.	SL	TBC
N	Add information about future trawling opportunities to the “future baselines” section of the ES chapter.	FN	
N+1	Check to see if data describing pre- and post-construction fish abundance for Gwynt y Mor	SL	

N+2	Check if sales note data capture activity of <10m vessels.	FN	
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AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
FISHERIES MEETING MINUTES – 2ND FEBRUARY 2022

MEETING ORGANISER:	JIM ANDREWS (FISHERIES LIAISON OFFICER)
LOCATION:	On-line
PROJECT	Awel y Môr Offshore Wind Farm
ATTENDEES:	ALEX HERBERT (AHe) (RWE) POPPY TREMAYNE (PT) (RWE) ANDY HUNT (AH) (FV QUEST) ANTHONY PARRY (TP) (JENSEN SEA ANGLING) CARL DAVIES (CD) (FV GWEN PAUL M) HARRY THATCHER (HT) (ABERYSTWYTH UNIVERSITY) JACK THOMAS (JT) (FV INCENTIVE) JIM ANDREWS (JA) (FISHERIES LIAISON OFFICER) ROBERT LEE (RL) (MERLIN SEA ANGLING) SIMON PARRY (SP) (JENSEN SEA ANGLING (SUVERAN)) TREVOR JONES (TJ) (WELSH FISHERMEN'S ASSOCIATION)
Documents provided:	Filename
PowerPoint Presentation	AyM Update for Fishers Feb 2022

Agenda item	Minutes
1	<u>Introductions and Aims</u> All participants introduced themselves. JA opened the meeting. The purpose of the meeting was to provide an update on project progress since the last meeting; to provide an update on the consenting process; and to alert participants to the upcoming consultation on the community benefits package.
2	<u>Project Reminder / Context</u> AHe provided the meeting with a brief update and reminder of the project details. The key points were:- • Since the last meeting in October, some project details have been finalised:- • The turbine array extent now covers an area of 78km² (reduced from 88km² in October and the initial proposal of 106km²); and • The export cable corridor will run from the SE edge of the array area, between the existing Rhyl Flats and Gwynt y Môr windfarms, and to a landfall at Bodelwyddan. • Wind Turbine Generator size has not been finalised, it is now likely that these will have a capacity of between 12-22MW each, with between 34-50 WTGs scheduled for installation, the number of individual WTGs being dependent on their capacity. • Statutory Consultation on the proposal took place in September-October 2021, with an online exhibition touring the area and meetings with around 900 people over a 9-day period. Around 300 written responses and survey consultations were received. Follow-up meetings have been held with some of the respondents (including from the fishing sector) to discuss the issues raised in more detail as part of this process. • Next steps • Consenting process • Spring 2022 - Development Consent Order (DCO) and Marine Licence (ML) applications due to be submitted on 28th March and subject to public examination later in 2022 (AyM team to keep Working Group informed) • 2023 – Decision on the DCO • 2023/24 – Decision on the Marine Licence • 2030 – target date for operational windfarm There was some some discussion about how interested parties can continue to participate in the consenting process. AHe had provided hyperlinks to the Planning Inspectorate (PINS) website in his presentation and advised that:- • PINS are in charge of the consenting process and opportunities for participation once the application has been submitted. There are two initial written phases to participation:- 1. “Relevant Representations” will be sought by PINS in spring 2022 if our application (planned for submission in late March) is accepted for consideration. The acceptance decision by PINS takes 28 days and will be widely advertised if successful. This is essentially a registration step where detailed comments are not sought, but stakeholders are able to formally

	register their interested in the project. If you do not register in this way, you may not be able to participate in the Examination; and 2. “Written Representation” will be sought in Autumn 2022, soon after the start of Examination. This is the opportunity to make detailed comments on the project – preferably with reference to the final application documents rather than re-submission of representations that AyM has ‘had regard’ to and reported as such in the Consultation Report. - Registered interested parties will also be invited to participate in hearings. These may be ‘open floor’ hearings (where any interested party can speak on any topic) or ‘issue-specific’ hearings (if the Examining Authority chooses – in response to representations submitted – to call a hearing on fisheries matters). - The PINS website page for the project (https://infrastructure.planninginspectorate.gov.uk/projects/wales/awel-y-mor-offshore-wind-farm/?ipcsection=overview) allows stakeholders to register for project updates so that opportunities for consultation are not missed. AyM and JA will also keep the Working Group informed in the usual way. - AHe provided an update on upcoming project-related work at sea: - A floating LIDAR deployment is being considered for February-March 2022. - Geotechnical survey is being considered for spring 2022 (maximum of 5 boreholes to be drilled across site). JA agreed to circulate a PDF of AHe’s presentation to all interested parties. Action: JA
3	<u>Community Benefits Package</u> PT provided an update on the Community Benefits Package consultation that is due to take place between late February and early April 2022. In summary:- - The Community Benefits Package provides a means for the project to support other activities in the area (such as Gwynt y Môr windfarm funding new equipment for Rhyl RNLI station). Key points are:- - AyM will be liaising with local authorities, community & town councils, and voluntary sector groups to seek ideas for the package. - As AyM is a new project, this is an opportunity to get support for new ideas on how AyM might best support the local community and how funding should be distributed. - The point of contact for the Community Benefits Package will be [REDACTED] - The Awel y Môr website will host a questionnaire and further background information once the consultation period is open (https://awelymor.cymru/the-community/) - Some additional background information is provided in the February 2022 newsletter for the project. JA agreed to circulate this to all interested parties. Action: JA Questions were asked by participants, including:- Q Artificial reefs – for many years, anglers have been keen to see artificial reefs created in the area to mitigate the impact of windfarms on fishing, either as an

	integrated part of the design (e.g. scour protection around turbines or rock protection on cables) or as a distinct and separate feature. There has been no action on this. Would it be possible to consider this. A The rules for managing community funds would prevent the fund from being used to support any construction that is part of the project, and also prevent the project team from being actively involved in the design of a community project; however a proposal for a distinct artificial reef could be proposed by a consortium of the angling interests in the area for the community benefits package. Q Research – HT gave a brief summary of his work, which is looking at the effect of wind turbines on crustacea in their vicinity. It has been clear from discussions in these meetings that there are concerns in the fishing community about the impacts of wind turbines on fish and shellfish. Would such research be eligible for funding? A The decision on which projects will be funded from the Community Benefits Package are likely to be taken by an independent Board or Committee. No guarantees can be made, but a research proposal of this nature would be worthy of consideration. It was agreed that it would be useful for the FLO to remind everyone to submit their proposals when this consultation opens on 21st February. Action: JA
4	<u>Any Other Business</u> CD referred to the previous meeting in October and the comments he had subsequently submitted in response to the PEIR documents. One of his key concerns had been the approach in the PEIR documents to assessing the status of certain fish species, notably gurnard. He had subsequently noticed that the key source of information cited in the PEIR for tub gurnard used data gathered before the construction of Gwynt y Môr had begun, which was when local anglers noticed a change in the abundance of this and other species in the area. AHe thanked CD for this response and indicated that he would draw it to the attention of the consultants working on these documents. There were no other items raised as AoB. AHe thanked all present for their participation and contributions to the consultation process. Although this process has now ended, AyM remain committed to regular and ongoing liaison, as well as implementation of the Fisheries Cooperation Strategy. Further group meeting will be held as the project progresses, as well as 1:1 meetings with the project team as necessary.

Agenda Item	Action	Who?	Due Date
2	Provide PowerPoint presentation	JA	ASAP
3	Circulate February 2022 Newsletter	JA	ASAP
3	Remind all of the start of the Community Benefits Package consultation period.	JA	21 st February 2022
NA	Provide minutes for approval	JA	ASAP

DRAFT

2.2 Appendix F1.2: Minutes of Meetings with Aviation Stakeholders

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION

NHV MEETING MINUTES– 13/07/2021

MEETING ORGANISER:	RYAN MCMANUS		
LOCATION:	Teleconference with PowerPoint		
PROJECT	Awel y Môr Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Chris Cooper	NHV	CC
	Gareth Bithell	NHV	GB
	Stewart Heald	Osprey CSL	SH
	Alex Herbert	RWE	AH
	Ryan McManus	GoBe Consultants	RM
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	
	Sean Leake	GoBe Consultants	

Agenda item	Minutes
1	<u>Introductions</u> All attendees introduced themselves, their organisation and their role. RM thanked all for their attendance and outlined the agenda of the meeting.
2	<u>Project update</u> AH presented the project update section of the presentation, describing the onshore and offshore surveys that were either completed or ongoing. AH added that the project completed non-statutory consultation including public engagement in November and December 2020, during which the project received positive feedback from the public. The statutory (Section 42) consultation on the Preliminary Environmental Information Report (PEIR) and associated material is planned to begin at the end of August. AH then presented the slide on site selection, explaining that since Scoping, the project's array boundary had been reduced at the western end following stakeholder consultation on key areas including visual impacts, shipping and marine mammals. A single landfall and export cable route corridor was now also chosen, and the onshore substation options had been refined. In terms of programme, AH outlined the stages of the project development, adding again that statutory consultation will take place from the end of August, with a view to submitting final applications for a Development Consent Order (DCO) and Marine Licence to The Planning Inspectorate (PINS) and Natural Resources Wales (NRW), respectively. Following

	application and examination, decisions on the DCO and Marine Licence are anticipated to be made at the end of 2023 or early 2024. The wind farm is expected to be built and operational by 2030 in line with UK and Welsh Government renewable energy targets. Before moving on to the detail of Osprey's assessment, RM explained the key maximum project design parameters that it was based on. These are: - A maximum of 48 of the largest 300 metre (m) rotor diameter (336 m above mean sea level (amsl)) Wind Turbine Generators (WTGs), or up to 91 smaller WTGs; - Perimeter WTGs lit with red aviation obstacle lights at the WTG hub level; and - A minimum spacing between WTGs of 830 m.
3	<u>Conclusions of the assessment</u> RM then handed over to SH to discuss the conclusions of the aviation assessment. SH discussed his experience in the assessment of aviation impacts from offshore wind farms in the UK, and as an air traffic controller before that. SH said that the project had held consultation with ENI earlier in the year, during which it was determined that ENI would liaise with NHV internally to discuss the potential for impacts to helicopter operations to and from ENI platforms in the Irish Sea. NHV established that Awel y Môr (AyM) would likely present similar impacts already experienced from the existing Gwynt y Môr (GyM) offshore wind farm. This meeting on 13/07/21 was therefore the next step in discussions to establish NHV operations in the vicinity of the proposed AyM project, discuss the potential for impacts to those operations, and begin discussions for how those effects could be addressed in order to allow co-existence of activities. SH explained that the CAA recommends a 9 Nautical Mile (NM) consultation radius around offshore helidecks as a starting point for consultation. A map was presented showing 9 NM buffers around the platforms in the Irish Sea, three of which overlap with the AyM array area (Douglas, Conwy and Hamilton). RM asked NHV to confirm whether all platforms at the 'Douglas Complex' had helidecks. GB confirmed that there was only one helideck at Douglas. SH then outlined the designed-in mitigation measures embedded into the assessment. The project would be lit and marked in accordance with industry guidance and in consultation with key relevant stakeholders. Aviation stakeholders would also be informed of the locations, heights and lighting status of WTGs in advance of their construction. The potential for impact is created by the introduction of physical obstructions, from which helicopters must maintain applicable separation distances under Visual Meteorological Conditions (VMC) and Instrument Meteorological Conditions (IMC). The go-around/ missed approach procedures and departure procedures are also considered. SH outlined the conclusions of the assessment. AyM presents the potential for a new obstacle environment, and ongoing consultation with ENI is intended to reach mutual agreement of co-existence. The effect on helicopter operations in the vicinity of AyM is predicted to be of minor adverse significance, which is not considered to be significant in Environmental Impact Assessment (EIA) terms.
4	<u>Consultation</u>

	SH explained that consultation with other stakeholders has taken place (CHC, Bristow Group and Babcock), NHV however were the only helicopter operator to respond directly. CC added that Bristow would most likely refer to the Maritime and Coastguard Agency (MCA) in their capacity as operators of Search and Rescue (SAR) operations. SH confirmed that that was the case.
5	<u>Discussion</u> SH opened the floor for questions and discussion around: - Establishing NHV operations in the vicinity of AyM; - The current mitigation in place for operations around GyM; and - Options to maintain safe operations in the vicinity of AyM. CC said that AyM is further to the west than GyM but will likely have similar effects. He added that the project will have an impact on days when Airborne Radar Approach (ARA) is required but may only apply to the Douglas platform. GB added that the Conwy platform may also be affected as although the development is further away, the WTGs are taller and therefore have the potential for a greater impact. CC clarified that the 1 NM lateral radar separation under IMC applies on final approach only. Currently, ARA is not possible south of Douglas (in the sector 120° to 240°) because of GyM, resulting in a number of lost flying days. Under single engine procedures, take-off is also affected by reduced rate of climb when flying to the south. CC agreed that there will be a small negative effect on NHV operations presented as an additional complication to GyM, and the restrictions on operations under certain conditions in place would likely need to be expanded to account for the new wind farm to continue safe operations. CC added that being involved at this early stage was positive and would relay the information to ENI. GB also expected that the ARA sector restriction currently in place would need to be widened to account for AyM. SH asked if it was known if any of the platforms in question were due to be decommissioned in the near future. CC said that that was unknown. SH rounded up by saying that it appears co-existence is achievable with a widening of the current ARA restriction, and NHV are confident that safety of operations can be maintained. CC added that it would now be up to ENI to determine the acceptability of the safety restrictions, and whether further study on the frequency of lost flying days was warranted.
6	<u>AoB and Next Steps</u> It was agreed that minutes would be circulated for agreement and would be used as the basis for further discussion with ENI.

Agenda Item	Action	Who?	Due Date
1	Minutes to be circulated	RM	1 week
2	Feed back discussion outcomes to ENI	NHV	N/A

2.3 Appendix F1.3: Minutes of Meetings with MoD/DIO

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
DEFENCE INFRASTRUCTURE ORGANISATION MEETING MINUTES– 25/09/2020

MEETING ORGANISER:	ALEX HERBERT (RWE)		
LOCATION:	Teams meeting with PowerPoint		
PROJECT	Awel y Môr Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Teena Oulaghan	DIO	TO
	Stewart Heald	Osprey CSL	SH
	Paul Carter	RWE	PC
	Alex Herbert	RWE	AH
	Sean Leake	GoBe Consultants	SL
	Ryan McManus	GoBe Consultants	RM
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	

Documents provided:	Filename
N/A	

Agenda item	Minutes
1	<u>Introductions</u> AH opened the meeting and outlined the agenda. Attendees gave brief introductions to their organisation and role in relation to the Awel y Môr (AyM) project.
2	<u>Project update</u> AH presented the project update in terms of the status of surveys and consultation via the evidence plan Expert Topic Groups (ETGs). He noted that the project had so far received a good level of positive public engagement. Since the last time DIO were consulted, RWE had taken the decision to reduce the size of the array area where wind turbines could be located from the area identified at scoping by removing a portion of the western extent of the array. This had been done following consultation with stakeholders in relation to environmental receptor groups including seascape and landscape, shipping and navigation, and marine mammals. The offshore Export Cable Corridor (ECC) had also been refined down to a single option, making landfall between Rhyl and Prestatyn, and the onward onshore route had also been refined down to one option to make grid connection at Bodelwyddan, noting optionality retained in some areas. AH presented these changes on a map. AH then ran through the project programme, explaining which steps had been completed to date, and that the project is currently preparing to publish the Preliminary Environmental

	Information Report (PEIR) in August 2021 that will form the basis for formal consultation. AH noted that the final application date had been brought forward to March 2022, with the aim of achieving consent in 2023/24 and being fully built and operational by 2030.
3	<u>Radar line of sight</u> With no questions on the project update or programme, AH handed over to SH to present the results of the radar Line of Sight (LoS) analysis that would be presented in the military and civil aviation chapter of the PEIR. SH outlined that the LoS tool was used to give an indication of what impacts the development may have on operational radar systems, including military installations. He explained that the Maximum Design Scenario (MDS) approach was based on the tallest turbines that could be permitted at 336 m above mean sea level (amsl). He also explained that at this stage in the consenting process, the exact locations of turbine infrastructure was not known, and therefore a regularly spaced grid had been assessed, with additional locations on each of the vertices of the proposed array area. <i>RAF Valley</i> SH talked through the assessment conclusions for the radar at Royal Air Force (RAF) Valley, which is approximately 26.5 nautical miles (NM) from the proposed wind farm array. SH explained that a portion of the western extent of the array was highly likely to be detectable at 336 m amsl. The likelihood of detectability decreases eastward as distance from RAF Valley increases. <i>BAE Warton</i> For the radar at British Aerospace Engineering (BAE) Warton, approximately 30 NM from the site, it was explained that the entire wind farm array was highly likely to be detectable at 336 m amsl. It is understood that the radar at Great Dun Fell (GDF) provides supplementary data to BAE Warton. SH also touched on the other points raised by the Ministry of Defence (MoD) in their response to the Scoping Report. SH noted that low-flying operations could be impacted, although this was expected to be mitigated via the standard commitment to appropriate lighting of infrastructure. SH added that now that DIO had seen the results of the assessment, it would be useful to discuss any comments on the assessment conclusions at this stage, and also the potential mitigation options. TO replied that she was in agreement with the conclusions and appeared to align with the analysis undertaken by the MoD. TO said that the analysis would be re-run on the refined project development area.
4	<u>Mitigation</u> SH outlined that in the past, the MoD had made its own assessment on whether their systems would be impacted and hence whether they would require mitigation. SH noted that the impact to RAF Valley in particular was limited to the western portion of the proposed array, and therefore the project needs to understand the conclusions of the MoD assessment to determine if an impact is indeed anticipated to enable discussions on mitigation options to move forward.

	TO explained that a Level 3 LoS assessment had indicated that there will be a LoS for RAF Valley, but this is only based on the boundary locations of the previous [scoping] boundary that was undertaken in mid-2020. Since then, Osprey had completed an updated assessment on the reduced boundary, and SH suggested that the MoD re-run their assessment on this refined area. TO agreed and said that the project would need to provide a list of point co-ordinates of the array boundary to enable this [Action 1] and asked how soon this would be needed. SL added that it would be helpful to put as advanced a position as possible into the PEIR, and so would be needed by the end of July in order to have this position in the PEIR. TO said that the analysis could be run fairly quickly, as soon as the co-ordinate points were provided. TO added that the operational analysis completed by DIO on BAE Warton and GDF had come back and confirmed that no impacts were predicted to the operations at those two sites. SH acknowledged and welcomed this valuable feedback. SH moved the discussion onto the potential mitigation options that may be needed if there is an impact. TO highlighted that it is for the developer to propose mitigation(s), and then for the MoD to deem it acceptable or unacceptable, not for the MoD to propose mitigation(s) itself. Therefore, the MoD would only be able to comment on proposals. SH acknowledged this and added that a few options have been considered. SH added that Osprey had been involved in Project Marshall [which includes a planned upgrade to the radar system at RAF Valley], and one option considered would be to discuss whether Project Marshall has the potential to provide the necessary mitigation. TO explained that the MoD was in the process of assessing both the existing Watchman radar system, and the planned upgrade to STAR NG radar on proposals coming forward. SH asked whether the upgrade to STAR NG had been completed. TO took an action to confirm after the meeting [Action 2]. TO added that in the updated analysis on the refined project boundary, analysis would be run against both systems to determine whether mitigation is required for one, both, or neither system. SH said that it would be useful to move the conversation on at this point as far as RAF Valley is concerned until the updated analysis results are received. The key message from these discussions has been the confirmation that operations at BAE Warton will not be impacted. TO added that the new assessment will also be run for BAE Warton and GDF, but re-affirmed that the operational assessment had been run previously on the old boundary, with no concerns raised. The technical assessors had confirmed that there was LoS on the previous boundary, but the operational assessment indicated no impact.
5	<u>Low flying approach</u> With no further comments on mitigation options, SH moved onto potential impacts to low flying operations. SH noted that in the Scoping Opinion, the Secretary of State (SoS) agreed that there would be no impacts to military Practice and Exercise Areas (PEXA) and added that any impacts to low flying operations are ordinarily mitigated by confirmation and agreement on appropriate lighting. SH asked TO whether that approach was appropriate here. TO agreed and added that the MoD would like to be consulted on the lighting and marking plan, including details of lighting on all turbine structures, masts and platforms. The Civil Aviation Authority (CAA) is the key consultee on lighting, but the MoD needs to be able to confirm that lighting meets the specification for Infrared (IR) detection at night using night vision technology. SL confirmed that it would be ensured that MoD is consulted on any forthcoming lighting and marking plan and asked TO whether that would be expected

	pre- or post-consent. TO confirmed that it would not be expected until the post-consent phase. PC – can leave assessment until after assessment is re-run. Then can get into discussion on ways forward. SH – in that case, PEIR will be published in August for formal consultation. May be the case that a future meeting is require once the assessment is completed ACTION Confirm hub heights, rotor diameter, blade tip heights ACTION.
6	<u>AoB</u> SH outlined the next steps. The PEIR will be published in August 2021 for formal consultation. SH suggested that a future meeting pre-PEIR may be necessary depending on the outcome of the revised MoD technical analysis of the reduced array area [<i>Action 3</i>]. TO asked that further parameters of the proposed turbines be provided alongside the co-ordinate locations for analysis [<i>Action 4</i>]: - Hub height; - Rotor diameter; and - Maximum blade tip height. With no further questions, AH thanked all for their attendance and confirmed that draft minutes would be circulated in due course for agreement, which would contain details of the actions taken.

Agenda Item	Action	Who?	Due Date
1	Provide grid references for array vertices to enable DIO to undertake revised analysis of the reduced array area.	RWE/GoBe/DIO	1 week
2	Provide confirmation that upgrade from Watchman to star NG is complete.	DIO	1 week
3	Arrange future meeting once assessment is completed.	AH/SH	N/A
4	Confirm hub heights, rotor diameter and blade tip heights.	RWE/GoBe	1 week

2.4 Appendix F1.4: Minutes of Meetings with IoM Government

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
ISLE OF MAN GOVERNMENT MEETING MINUTES– 16/12/2020

MEETING ORGANISER:	HELEN THOMAS (RWE)		
LOCATION:	Microsoft Teams meeting with PowerPoint		
PROJECT	Awel y Môr Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Emma Rowan	IoM Government	ER
	Peter Duncan	IoM Government	PD
	Louise Hand	IoM Government	LH
	Paul Carter	RWE	PC
	Alex Herbert	RWE	AH
	Helen Thomas	RWE	HT
	Pete Gaches	GoBe	PG
	Sean Leake	GoBe	SL
	Ryan McManus	GoBe	RM
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	

Agenda item	Minutes
1	<u>Introductions and project overview</u> SL introduced the meeting, thanking attendees for their engagement. Each attendee introduced themselves, their organisation and role on the project. ER introduced herself, emphasising that her role is to make sure that the Isle of Man (IoM) is properly taken into account when considering projects outside of IoM waters. SL ran through the agenda of the meeting. PC gave an introduction to RWE and the Awel y Môr (AyM) project, noting the onshore and offshore surveys ongoing or completed to date. PC also highlighted the virtual consultation that had recently been completed, and the project's sponsorship of a PhD at Bangor University that will utilise geophysical data from the AyM project. PC gave a brief overview of the project programme, adding that the landfall, cable route and substation options would be narrowed down to a single option, with an announcement to be made in Q1 of 2021. He added that RWE plan on having the project operational by 2030 in order to meet Welsh government renewable energy targets.
2	<u>Human environment receptors</u>

	With no questions arising on the project update, SL moved the discussion to the technical aspects of the EIA. The information presented in the slides focuses on physical processes and marine ecology, however SL wanted to first provide some information on the human environment receptor groups of commercial fisheries, shipping and navigation, and aviation and radar. SL noted that the project has been consulting with shipping and navigation stakeholders including the IoM Steam Packet Company [ferry operator] to ensure voices are heard from all interested parties. He said that a winter vessel traffic survey has been completed, with a second survey planned for summer 2021 as mandated by the Maritime and Coastguard Agency (MCA). Data from these surveys will be supplemented with 12 months of Automatic Identification System (AIS) data and, given that reduced vessel traffic may be expected as a result of the coronavirus pandemic, it has been agreed with MCA that data from 2019 can be used instead of the most recent 2020 data. PD asked whether Vessel Monitoring System (VMS) data would also be used. SL confirmed this to be the case, with particular relevance to the commercial fisheries technical topic, supplemented with direct consultation with commercial fishermen and recreational anglers that aren't necessarily picked up in the AIS or VMS data. PD asked who the commercial fisheries consultants on the project are. SL explained that Poseidon Aquatic Resource Management are the technical lead for commercial fisheries and will be undertaking the Environmental Impact Assessment (EIA) for that topic, as well as direct consultation with the interested parties. The project also has a Fisheries Liaison Officer (FLO) (Jim Andrews) who manages day to day communications with the fishermen off the North Wales coast. PC and AH confirmed that Jim Andrews had been in touch with the IoM government; PD confirmed that he was familiar with Jim Andrews as an experienced FLO familiar with IoM fisheries interests. SL also touched on the aviation and radar technical topic, describing the ongoing and planned consultation by the project and by the appointed aviation and radar technical leads, Osprey Consulting Services. SL added that early analyses including Line of Sight (LoS) for individual radar receptors was also ongoing. LH said that she could provide contacts for IoM airport, if needed. SL thanked LH for this and said that this information would be passed on to Osprey. ER also asked whether draft EIA chapters could be shared, when available. SL stated that throughout consultation, technical documentation would be submitted as required for consultation and comment by the relevant interested parties, and that the Preliminary Environmental Information Report (PEIR) chapters are planned to be published in late summer 2021. These PEIR draft chapters are essentially draft Environmental Statement (ES) chapters that form the basis of formal statutory consultation. In addition, SL noted that there were various documents that could be provided for reference and information in advance of PEIR, in order to facilitate a phased review in advance of statutory consultation.
3	<u>Physical processes modelling</u> With no further questions arising, SL moved on to the topic of physical processes modelling. He outlined the approach to the modelling, explaining that the scoping study assumed a 15 km wide study area based on the tidal ellipses for the region as a 'broad brush', but that the full assessment for PEIR and ES would utilise detailed modelling for potential impacts on waves, hydrodynamics, increases in Suspended Sediment Concentration (SSC) and sediment deposition. PD asked whether the 15 km study area was a fixed buffer, or rather takes account of the directions of tidal currents. SL explained that the 15 km buffer was fixed distance from the project as a whole, based on the maximum spring extent of tidal ellipses in the study area. SL presented a map illustrating 15 km and 50 km study areas,

	adding that this map could be shared along with the PowerPoint presentation after the meeting [Action 1]. He explained that the 50 km buffer illustrated was of relevance to fish and shellfish ecology in relation to underwater noise, based on a literature review of recent projects concerning the maximum likely extents of underwater noise from piling activities for scoping purposes, but that this would similarly be refined at the PEIR/ES stage based on detailed modelling. PD stated that fish spawning, in particular regarding scallops, was raised in the IoM scoping response. SL noted this and added that he would discuss fish and shellfish ecology later on in the presentation. The EIA is naturally very interdisciplinary between physical processes, benthic ecology, fish and shellfish ecology and commercial fisheries, to name a few.
4	<u>Underwater noise modelling</u> SL moved onto talk about the underwater noise modelling, again adding that the scoping study assumed a broad study area, but the PEIR/ES assessment would utilise modelling. SL explained that this would be based on the INSPIRE model, which uses empirical data, including monitoring data from existing projects in the region. It uses established and agreed metrics combined with bathymetry data to predict the zones of influence at different thresholds for marine mammal and fish receptors. He added that particle motion would also be considered in the context of the underwater noise, but that this would be based on a qualitative assessment since the science behind it is less well understood. Fish are assumed to flee the source of noise and therefore be exposed to less energy overall as they move away from the noise source. In some cases where there are strong biological incentives to remain in place, such as herring during spawning, it can be considered that fish would not flee noise to the same extent, and therefore static receptor modelling would also be undertaken for fish. PD said that the IoM scoping response made reference to the Northern Irish Agri-Food and Biosciences Institute (AFBI) in relation to herring, noting that although herring are not actively fished by IoM, they do have herring legislation as there are important areas for herring within Manx waters. Therefore, AFBI should be considered as a stakeholder regarding herring as the Northern Irish government have a more direct interest in herring stocks in Manx waters, whereas IoM interests are more about conservation and ecology. SL said that the project has contacted all stakeholders identified by IoM in their scoping response, including AFBI, to obtain data for use in the fish and shellfish ecology assessment. He added that these data sources had been compiled in a fish and shellfish baseline characterisation report which had been submitted to Natural Resources Wales (NRW) who were in agreement of its adequacy for the purposes of an EIA. Finally, SL described the chosen locations for underwater noise modelling. These are the north-west corner of the array in deepest water and therefore the location with the greatest potential for spatial propagation of noise, and the south-east corner which was closest to the area of highest grey seal density.
5	<u>Physical processes</u> SL said that for the next few topics, he would present the scope of the assessments following the scoping opinion, noting that in some cases, impacts the project had originally sought to scope out had been requested to be scoped in by the Secretary of State (SoS). He said he would not take too much time going into the detail of the assessment scopes, instead giving attendees the time to digest the information before feeding back any questions or clarifications. One of the key themes of the scoping opinion related to cumulative and transboundary impacts. SL explained that all impacts considered for the

	project alone would also be given due consideration in a cumulative context, to assess the effects of AyM cumulatively or additively with other plans and projects in the region. <i>[Post-meeting note: a cumulative effects assessment method statement has also been submitted to Evidence Plan stakeholders and is currently under review]</i>. SL said that in their scoping opinion, the SoS asked that transboundary impacts (impacts to non-UK nations) be retained within the scope until a transboundary effects screening exercise has been undertaken. On physical processes, SL briefly described the scope of the assessment, and also explained that a position paper on the physical processes method statement describing the approach to physical processes modelling had been submitted to NRW (and others that sit within the marine ecology and marine mammals evidence plan Expert Topic Groups (ETGs)) and was currently under their review.
6	<u>Marine Water and Sediment Quality</u> With no questions on physical processes, SL moved on to Marine Water and Sediment Quality (MWSQ). He briefly ran through the scope of the assessment and noted that a MWSQ position paper outlining the final scope had been submitted to the marine ecology and marine mammals ETG for review. <i>[Post-meeting note: Separately to the MWSQ assessment, a Water Framework Directive (WFD) assessment will also be undertaken, which assesses the potential for water quality deterioration in WFD protected areas (coastal and transitional waterbodies, bathing waters, shellfish waters etc. A WFD position paper is currently being drafted and will be submitted to the ETG for review in the new year)]</i>.
	<u>Marine mammals</u> SL said that specialist marine mammal consultants, the Sea Mammal Research Unit (SMRU) would be undertaking the marine mammal assessment. PD noted that he was familiar with SMRU. SL described the data collection from site specific digital aerial surveys, as well as existing data sources that would be drawn upon. He said that Manx data could be included as well but this would only be possible if the data are submitted in an appropriate format to incorporate in the baseline characterisation. SMRU will be in direct contact with IoM to follow this up. SL briefly ran through the scope of species that will be considered and touched on the marine mammal density estimates report that this was based upon, which was submitted to NRW earlier in the year. He asked if this report would be of interest to IoM authorities. PD said that it would be useful as minke whale (scoped out) are seen frequently in Manx waters, and it would therefore be helpful to see the justification behind scoping them out <i>[Action 2]</i>. PD agreed with scoping out common dolphin. He also noted that Manx Whale and Dolphin Watch keep a public record of marine mammal sightings which may be useful. SL/RM took an action to feed this back to SMRU <i>[Action 3]</i>. SL briefly ran through the impacts scoped in/out for the marine mammal assessment, adding that the underwater noise assessment would include consideration of Unexploded Ordnance (UXO). The project was requested in the scoping opinion to consider noise abatement measures in the assessment. Therefore, the approach to this will be to first consider the absence of mitigation as a maximum effect, and then apply mitigation measures as necessary. He also noted that although the effects of Electromagnetic Fields (EMF) remain scoped out for marine mammals, they are a consideration for other receptors (fish).

	<u>Fish and shellfish</u> SL presented the baseline data that will be used to inform the fish and shellfish assessment in a map, explaining that lots of data were available including site-specific monitoring studies, an EMF study and regional datasets. He added that the project had drafted a fish and shellfish baseline characterisation report that was submitted and agreed as adequate for EIA purposes with NRW. SL asked if it would be useful to pass that report on to IoM. PD said that it would be useful [Action 4]. PD asked who undertook the EMF study. PC replied that it was Cmacs at the time, who are now NIRAS. PD asked if the studies would be made publicly available. PC and PG said that the reports are likely to be sitting with The Crown Estate (TCE) as part of project requirements to report on monitoring and should be available via that channel, and possibly through the Marine Environmental Data and Information Network (MEDIN) database. SL added that all data sources will be referenced in the PEIR and, where directly relevant to the work undertaken, may be included as part of the application submission itself. PD said that it would be really helpful to IoM if data is properly referenced or made available to provide an increased understanding of the evidence base. SL outlined the approach to assessment, of which underwater noise would be a major element. This would include assessment to sensitive spawning areas in the region for cod, sole, herring and plaice in particular. EMF will also be considered as although the preference is for cables to be buried, the burial depth cannot be guaranteed at this stage
	<u>Benthic ecology</u> For benthic ecology, SL outlined the scope of the assessment and explained that impacts to designated sites will be considered in parallel, either through the Habitats Regulations Assessment (HRA) in terms of Natura 2000 sites, or through the Designated Sites assessment for other designations such as Sites of Special Scientific interest (SSSIs). SL highlighted that Invasive and Non-Native Species (INNS) are a key concern for the region., and that a biosecurity plan would likely be developed. PD asked whether the project was in touch with the UK non-native species secretariat, adding that an NRW contact should also be aware of them. SL said that the specialist ecologists on the EIA team will be contacting the non-native species secretariat, in addition to the Marine Biological Association and other nested organisations, in particular for INNS such as <i>Didemnum vexillum</i>. PD added that the non-native species secretariat has produced agreed risk assessments for INNS. PD also raised underwater noise in relation to larval development of scallops, as he would expect this to be raised as an issue at some point. He said that recent studies in Australia and New Zealand may be of relevance in that regard and took an action to check these submissions and pass on to HT, if available [Action 5]. SL flagged that eggs and larvae are considered as a receptor in the underwater noise modelling assessment within the fish and shellfish ecology assessment. [post meeting note – the team has already gratefully received the journal articles from PD]
	<u>Ornithology</u>

	SL pointed out that there was no presentation slide for offshore ornithology but provided a brief overview of the assessment scope as a key area of consideration. He noted that there had already been a great deal of consultation with NRW, the Joint Nature Conservation Committee (JNCC), Natural England (NE) and others, where the principles of foraging ranges for seabirds had been agreed. These are based on the Woodward <i>et al.</i> (2019) mean/max foraging ranges plus, following consultation, inclusion of one standard deviation, which extended the ranges considerably for some species and screened in more designated Special Protection Areas (SPAs) and Ramsar sites. A revised HRA screening was planned to be submitted to NRW, as well as notes on red-throated diver and migratory non-seabirds. In the new year, a position paper outlining the approach to the Collision Risk Modelling (CRM) and displacement analyses would also be submitted for agreement with NRW and other members of the offshore ornithology ETG. SL asked if IoM would like to be included on the circulation list for those documents as well. PD said that they would [Action 6]. PD added that there are several IoM organisations with an interest in offshore ornithology who could be contacted: Manx Birdlife, Manx National Heritage, The Manx Department of Environment, Food and Agriculture (DEFA) Ecosystem Policy Team, the Manx Ornithological Society and the Manx Wildlife Trust. SL said that the lead ornithologist (Fraser Carter) would be notified of these organisations [Action 7].
	<u>AoB</u> SL asked the group if there were any other questions or points of clarification to be raised. ER asked to confirm the project timeline in terms of when construction was likely to start. PC explained that application is planned for mid-2022, and therefore construction could in theory start following examination and a positive determination sometime between 2025 and 2026, although these dates are only indicative. ER also asked if the project is seeking a Contract for Difference (CfD). PC confirmed that the project is seeking a CfD, noting that at some point in future, offshore wind projects will become competitive enough to progress without a CfD, although the anticipation is that AyM will require a CfD. SL and PD also touched on the planned consultation, in particular noting that the PEIR is planned for publication in late summer 2021 and will form the basis of the formal statutory consultation. The final ES for application would follow on from that, incorporating feedback on the PEIR. SL thanked all for their attendance and closed the meeting, saying that the PowerPoint presentation slides would be provided [Action 1].

Agenda Item	Action	Who?	Due Date
1	Provide PowerPoint presentation and study area figure.	GoBe	23/12/20
2	Provide marine mammal density report to IoM.	GoBe	23/12/20
3	Feedback Manx Whale and Dolphin Watch public sightings record information SMRU	GoBe	TBC
4	Provide fish and shellfish baseline characterisation report to IoM.	SL/GoBe	23/12/20
5	Pass on Australian/New Zealand references to underwater noise effects on scallop to HT.	PD	TBC

6	Add IoM to circulation list for ornithology documents. PD will ensure documentation goes to the right organisations.	GoBe/HT/PD	TBC
7	Make lead ornithologist aware of Manx organisations.	GoBe	TBC

AWEL Y MÔR OFFSHORE WIND FARM APPLICATION
ISLE OF MAN GOVERNMENT MEETING MINUTES: 8/12/2021

MEETING ORGANISER:	POPPY TREMAYNE (RWE)		
LOCATION:	Microsoft Teams meeting with accompanying PowerPoint presentation		
PROJECT	Awel y Môr (AyM) Offshore Wind Farm		
ATTENDEES:	Attendee	Organisation	Abbreviation
	Emma Rowan	IoM Government	ER
	Peter Duncan	IoM Government	PD
	Richard Selman	IoM Government	RS
	Alex Herbert	RWE	AH
	Poppy Tremayne	RWE	PT
	Sean Leake	GoBe	SL
APOLOGIES/MEMBER NOT REQUIRED FOR PARTICULAR MEETING:	Attendee	Organisation	
	Paul Carter	RWE	

Agenda item	Minutes
1	<u>Introductions and project update</u> PT introduced the meeting, thanking attendees for their engagement. Each attendee introduced themselves, their organisation and role on the project. PT gave a brief project update, including a summary of key aspects of the recent s42/s47 statutory consultation (Aug-Oct 2021), a summary of design refinements, and touched upon the AyM programme as we move from the Pre-Application phase of the DCO process and into the Application phase (currently planned for late March 2022 with a DCO submission to the UK Government through the Secretary of State for BEIS, in parallel with the Marine Licence application to the Welsh Government (Natural Resources Wales (NRW))).
2	<u>Areas raised in IoM Govt s42 response</u> PT then handed over to SL to run through the various matters/areas of interest raised by the IoM Government (IoM) in its recent consultation response (PEIR and Scoping topic areas, including marine conservation and fisheries, marine navigation, aviation, offshore ornithology, marine mammals, fish and shellfish and commercial fisheries). SL gave an overview of areas that IoM felt were covered adequately in the PEIR, and those that the project team did not.

	Areas highlighted in green in the relevant slides are those that AyM considers are broadly in alignment with IoM's response, and areas illustrated in dark green are those that we are not necessarily currently in agreement on.
3	<u>Aviation & Navigation</u> ER asked whether we received a s42 response from Ronaldsway Airport re aviation. ER chased them after understanding that we had been in touch in April 2021. ER asked RWE to direct any correspondence through her/Territorial Sea Committee (TSC) regarding the local airport (Ronaldsway Airport). SL advised that Osprey contractors have been liaising directly with some of our aviation stakeholders (also providing shipping and navigation support), and that he will nudge Osprey to contact the airport (and keep ER / TSC in loop in parallel) to re-engage on our relevant plans and any future comms plans. ER and relevant departments are satisfied with shipping and navigation project plans to date. SL advised that we are not planning to conduct any further Hazard workshops (aviation/navigation). SL noted the context of our physical processes and their destinations.
4	<u>Commercial Fisheries</u> IoM provided feedback at both the Scoping and PEIR phases. The relevant chapter is being updated re: commercial fisheries (Poseidon and Fisheries Liaison Officer (FLO)). Local interests in north Wales are also being consulted and FLO will be reaching out to contacts with IoM interests, including those based in the Isle of Man. SL confirmed that the project's FLO is Jim Andrews, who is in contact with Dave Beard (CEO of the Manx Fish Producers' Organisation (Manx FPO)). PD confirmed that we are in touch with the right contacts regarding commercial fisheries, but noted that static gear fishing interests are not fully represented by the MFPO, and may require some additional coordination by the FLO. The liaison between Jim and Dave (or the project's FLO and Manx FPO) will continue to inform the relevant Environmental Statement (ES) chapter. DEFA recognises that the potential zone of influence associated with the project intersects ICEs rectangle 36E5 which is partially within Manx territorial waters. SL confirmed that RWE will continue to consider impacts from underwater noise, which defines the greatest potential zone of influence, and can confirm that Manx territorial waters and fishing interests have been considered in greater detail in the EIA. SL noted the recognised lack of sensitivity/inconclusive evidence of scallops to underwater noise at distance, but welcomed the literature provided which has been applied to the assessment. He also noted an IoM query regarding baseline datasets (sourced through Poseidon): these tend to be based on five-year datasets, and SL will ensure that any datasets used are clear and adequate (suitably representative). The draft Fisheries Liaison Plan (FLP) has been circulated through JA (the FLO). There is a transboundary section within each ES chapter, and the relevant section/s are expanded on where relevant and capturing IoM references specifically. SL noted that this is important for commercial fisheries in particular.

	PD commented that he felt that engagement between AyM and IoM has been healthy to date. Acknowledging that IoM waters lie far enough away that direct fisheries impacts on Manx fisheries may not be as significant as they would be closer to the development, the issues raised in the IoM submission remain valid, and he feels that there is an opportunity to improve knowledge of relevant fisheries/windfarm areas . PD encouraged the two parties to work together to improve collective understanding. IoM works closely with Bangor University (BU) on commercial fisheries datasets. IoM would be supportive of RWE engaging with the BU academics. SL advised that the project has engaged with BU regarding some species datasets, including scallop and a couple of other regional species (e.g. gurnard). PD shared that the sooner we consider collectively monitoring relevant environments the better for all involved, in terms of understanding cumulative impacts over time. SL noted that though some stakeholders (e.g. commercial fishermen) will consider certain relationships between fish numbers and project impacts (for example?), their opinions may differ to that of other stakeholders. PD advised that IoM has a reputation for recreational angling, so if there was potential to explore cumulative impacts on small sharks (for example), IoM would be interested in sharing such datasets and engaging with the AyM project team on these findings. SL advised that we could take away the potential to invest in tagging studies (through the project's FLO), for example. SL advised that Gwynt y Môr (GyM) undertook electro-magnetic field (EMF) monitoring (one of the only projects to date to do so). PD asked whether we had that EMF monitoring data available (given it could assist in avoiding the making of incorrect associations). SL advised that it might already be with The Crown Estate (TCE) or the Marine Management Organisation (MMO) (existing reports within the public domain) but will see if we can share with IoM [ACTION]. SL advised that we will factor into the ES chapter that the offshore array area will reopen for fishing post-construction. PD asked about distance between the wind turbine generators (WTGs). SL responded that, as the WTGs become larger, the spaces between them also increases. ER shared that she would expect this to be included in the Rochdale Envelope approach and SL confirmed that he does not think this particular information has changed since the Scoping Report or drafting of the PEIR. SL advised that this information will be forthcoming in the Project Description (PD) chapter of the ES.
5	<u>Ornithology</u> SL advised that AyM can do a better job of representing IoM ornithological interests in regards to this chapter, which is currently being updated; further consultation is also underway. SL advised that capturing those IoM areas for protected bird species can be improved upon in this ES chapter. RS asked whether we have sea bird counts for relevant areas within other relevant jurisdictions (otherwise available data is 15 years' old). Site-specific surveys are capturing bird numbers on site. RS advised of recent publication regarding IoM bird data (atlas including bird breeding data – published in 2020/21): Birds of Conservation Concern. RS will share link with RWE through ER/PT [ACTION] <i>post-meeting note</i> (08/12) RS completed the action immediately, providing the following details Manx Birds of Conservation Concern http://manxbirdlife.im/bocciom/ For further data, contact Neil Morris at Manx BirdLife Richard. SL advised it would not have appeared in the PEIR if published in past six months or so.

	PD – IoM must consider protected status of birds, and the IoM bird data publication listed directly above, covers this information sufficiently. SL confirmed that the ES chapter will cover these matters off in more detail (particularly regarding Manx shearwater species). Parameters for collision risk and other factors are currently being drafted up for the relevant ES chapter. RS referenced The Walney Extension publ. in 2015/16 or earlier which undertook additional studies on Manx Shearwater as part of the project Conditions. SL advised that we are currently undertaking further data collection and the full 24-month survey will be presented in the ES. RS advised that there has been a massive decline in some local bird numbers recently, though he is unsure why or where regional significance of these figures currently stands. He queried whether there are any other species that might be appearing regarding migratory patterns of interest (regarding future dataset-gathering). SL advised that AyM is in process of firming up migratory patterns of relevant bird species with NRW (e.g. wading birds in Dee Estuary). SL advised that there are some important bird populations to the west and south of the array (in light of foraging activities), and that this will be addressed in the ES.
6	<u>Marine mammals</u> Chapter is being updated. Regarding design refinement: AyM has looked at possible concurrent piling with NRW(?): one spot in the NW corner (deepest corner) of the array and one in the SE corner (the shallowest corner) of the array. AyM is currently looking at requirements for concurrent piling, and seeking to reduce the spread and impacts of concurrent piling in the AyM design envelope (to reduce impacts as far as is reasonably practicable). SMRU (Sea Mammal Research Unit) is supporting RWE in relevant activities. Further/full(?) consideration is being given to several marine mammal species specific to IoM in addition to existing context. Further revisions are being made to the MMMP (Marine Mammal Mitigation Protocol), focussing on possible mitigation measures that might be set up in future. SMRU is currently updating their ES chapter. PD noted that there is a cetacean-specific NGO on island (Manx Whale and Dolphin Watch), and which has potentially relevant data to share. PD recommended contact with this group and other relevant parties.
7	<u>Fish and shellfish</u> There has been a reduction in envelope refinement and zone of influence regarding concurrent piling. At this stage there are no plans to alter the assessment regarding receptors. Chapter is being updated and further consultation is currently underway. PD advised that IoM has had little interest in herring fishing activities, historically, although there is some Manx herring legislation in force. However, AFBI (Agri-Food and Biosciences Institute, Northern Ireland) knows more about these activities than IoM does, in light of existing datasets and active surveys that AFBI conducts. PD advised that Northern Ireland and England (Cefas) has survey/datasets available, and SL confirmed awareness of this.
8	<u>Biodiversity/MPAs (Marine Protected Areas)</u>

	Relevant chapters are currently being updated and will include and consider Manx-statutorily protected areas . Further consultation is underway regarding design refinement. AyM will be picking up relevant biodiversity/MPA information in each relevant chapter. AyM needs to ensure that other relevant chapters reflect back Manx interests too.
9	<u>Next steps & AOB</u> PD asked how AyM will be addressing treatment of non-native (or invasive) marine species? SL advised that a document will be produced that includes mitigation measures and other licence requirements. Project Environmental Management Plan and Biosecurity Management Plan will be undertaken and included. These will include how to manage spread of any non-native or invasive species. Relevant controls and measures will need to be considered also. RS asked whether the project would be monitoring such activities beyond the project life. SL responded that such a monitoring programme is not currently a requirement but may become one and be introduced. ER wanted a note recorded that, though IoM is not a statutory consultee, its representatives really appreciate the level of engagement and consideration given to their feedback, throughout the DCO process thus far. PT will share AyM's December newsletter shortly with IoM upon its release. PT thanked all for their attendance and closed the meeting, saying that the draft meeting notes would be shared this side of Christmas, along with the PowerPoint presentation slides too.

Agenda Item	Action	Who?	Due Date
1	Commercial Fisheries: SL to source existing reports within the public domain on data available from GyM's electro-magnetic field (EMF) monitoring (potentially through The Crown Estate (TCE) or the Marine Management Organisation (MMO))	SL (GoBe)	10/1/22
2	RS to share link with RWE regarding recent publication on IoM bird data (atlas including bird breeding data – published in 2020/21): Birds of Conservation Concern	PD (IoM)	N/A (IoM shared with PT by email, 08/12 (PD through ER))

2.5 Appendix F2.1: Political Stakeholder Briefings

Awel y Môr - Meetings with MSs and MPs

Date	Stakeholder
4th February 2022	Sam Rowlands MS
7th December 2021	James Davies MP
29th Sept 2021	Janet Finch Saunders MS
27th July 2021	Mark Isherwood MS Gareth Davies MS
16th July 2021	Sam Rowlands MS
1st July 2021	Carolyn Thomas MS
29th June 2021	James Davies MP
8th February 2021	<u>Briefing to Labour MPs on Welsh Affairs Committee</u> Present: Tonia Antoniazzi MP, Ruth Jones MP, Beth Winter MP, Nia Griffith MP, Geraint Davies MP.
22nd January 2021	Jack Sargeant MS
15th January 2021	Janet Finch Saunders MS
4th December 2020	Virginia Crosbie MP
20th November 2020	Conservative MPs
9th November 2020	Rhun ap Iorwerth MS
4th November 2020	Darren Millar MS
23rd October 2020	Liz Saville Roberts MP
16th October 2020	Janet Finch Saunders MS
3rd July 2020	Hannah Blythyn MS
1st July 2020	Lesley Griffiths MS
12th June 2020	Andrew RT Davies MS Russell George MS
8th June 2020	Mark Isherwood MS
21st May 2020	Lesley Griffiths MS Ken Skates MS
20th May 2020	Llyr Gruffydd MS
14th May 2020	Darren Millar MS
6th May 2020	Mark Tami MP
24th April 2020	<u>Briefing to Conservative MPs</u> Present: Sarah Atherton MP, Virginia Crosbie MP, James Davies MP, David Jones MP, Robin Millar MP.
11th March 2020	Rhun ap Iorwerth MS
30th Sept 2019	Mark Isherwood MS

Awel y Môr - Meetings with MSs and MPs During PAC

Date	Stakeholder
4th February 2022	Sam Rowlands MS
7th December 2021	James Davies MP
29th Sept 2021	Janet Finch Saunders MS
27th July 2021	Mark Isherwood MS Gareth Davies MS
16th July 2021	Sam Rowlands MS
1st July 2021	Carolyn Thomas MS
29th June 2021	James Davies MP

Awel y Môr – Briefings to Councillors

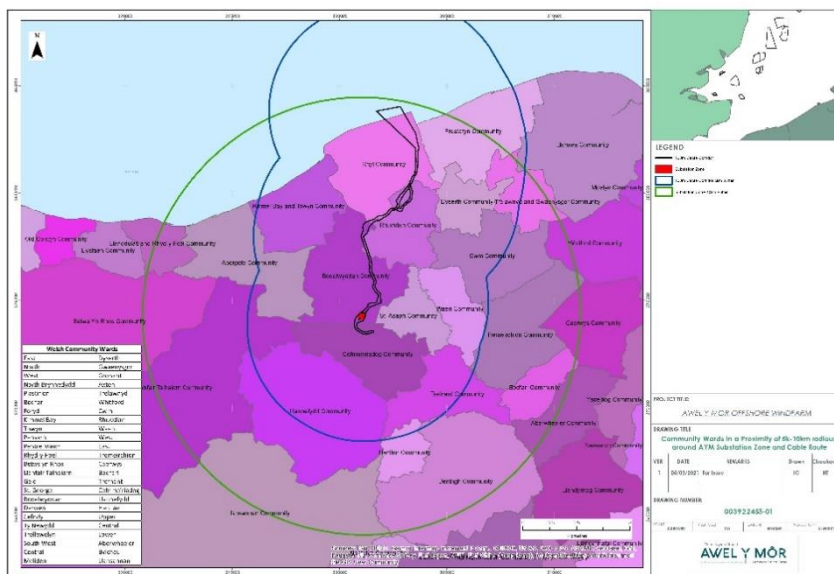
Date	Stakeholder
11.00, 28 th January 2022	Conwy & Flintshire Councillors
15.00, 25 th January 2022	Gwynedd & Anglesey Councillors
15.30, 24 th January 2022	Debigshire Councillors
18.30, 27 th July 2021	Array County Councillors
18.30, 14 th July 2021	Array Community Councils
14.00, 12 th July 2021	Cable route Community Councils
18.30, 8 th July 2021	Cable route Community Councils
14.00, 7 th July 2021	Array Community Councils
18.30, 29 th June 2021	Array Community Councils
12.00, 21 st June 2021	Conservative ward councillors
11.00, 17 th June 2021	Labour ward councillors
09.30, 15 th June 2021	Cllr Meirick Lloyd Davies

Awel y Môr – political stakeholder briefings/meetings: Summer 2021 (lead-up to statutory consultation)

Time & date	Stakeholder invitees	Stakeholder attendees	RWE attendees	Cadno attendees
9.30, 15 June	Cllr Meirick Lloyd Davies			AD
11.00, 17 June	Labour ward councillors (cable route vicinity)	Cllr Brian Blakeley, Cllr Joan Butterfield, Cllr Jeanette Chamberlain, Cllr Barry Mellor, Cllr Pete Prendergast, Cllr Cheryl Williams (Apologies received from Cllr Ellie Chard, Cllr Alan James, Cllr Pat Jones)	PT, HT, PC	SJ
12.00, 21 June	Conservative ward councillors (cable route vicinity)	Cllr Brian Jones, Cllr Tony Thomas (Apologies received from Cllr Richard Mainon)	PT, HT, KA	SJ
14.00, Tues 29 June	James Davies MP	James Davies MP (Conservative MP for the Vale of Clwyd)	HT, PT	AD
18.30, Tues 29 June	Offshore Array Community Councils (1 of 3 offered)	John Pattison (Holywell Town Council)	PT, PC	SJ
15.30, Thurs 1 July	Carolyn Thomas MS	Carolyn Thomas MS	HT, PT	AD
14.00, Wed 7 July	Offshore Array Community Councils (2 of 3 offered)	Cllr Charlene Flynn (Mostyn CC) Cllr Ricki Owen (Bay of Colwyn TC) Cllr Dafydd Griffiths (Llaneilian CC) Cllr Neville Eden (Abergele TC) Cllr Gordon Warren (Amlwch TC) Cllr Brian Bertola (Llandudno TC) Cllr Norma Davies (Flint TC) Cllr David Seddon (Mostyn CC) Cllr Chris Brockley (Rhos Ward, Bay of Colwyn TC) Cllr Catrin Eleri Owen (Clerc y Dref Beaumaris /		DM

		Beaumaris TC) Cllr Huw Roberts (Llanddulas and Rhyd y Foel CC)		
18.30, Thurs 8 July	Cable Route Community Councils (1 of 2 offered)	Martin Barlow, Gwyn Davies and Trefor Hughes (Cefn Meiriadog Community Council), Linda Griffiths & Leanne Groves (St Asaph City Council)	PT, PC	SJ
14.00, Mon 12 July	Cable Route Community Councils (2 of 2 offered)	Cllr Arwel Roberts (Rhuddlan TC) Cllr Syd Gaskin (Rhuddlan TC) Sian Jones (Clerk of Rhuddlan TC) Cllr Linda Muraca (Prestatyn Town Council, Chair of Planning) Cllr Sharon Frobisher (Prestatyn Town Council) Cllr Alan James (Rhyl TC and Denbighshire County Council Vice Chair) Cllr Vicky Roberts (Rhyl TC)		DM
18.30, Wed 14 July	Offshore Array Community Councils (3 of 3 offered)	Thea Brain (Llandudno) Bob Hazlehurst (Mostyn) Claire Hughes (Llanfairfechan)		AD
09.30, Fri 16 July	Sam Rowlands MS	Sam Rowlands MS	HT, AH	AD
10.00, Tues 27 July	Mark Isherwood MS and Gareth Davies MS	Mark Isherwood MS and Gareth Davies MS	HT, PT	AD
18.30, Tues 27 July	County Councillors	Cllr Dafydd Meurig (Gwynedd) Cllr Glyn Banks (Flintshire) Cllr Harry Saville (Conwy) Cllr Ieuan Williams (Ynys Môn/Anglesey) Cllr Louise Emery (Conwy) Cllr Philip Capper (Conwy) Cllr Richard Griffiths (Ynys Môn/Anglesey) (Registered but did not attend: Cllr Dylan Rees (Ynys Môn/Anglesey)	PT, PC	SJ

		Cllr John Roberts (Conwy) Cllr Catrin Wager (Gwynedd)		
16.00, Wed 25 Aug	Conwy CBC	Cllr Charlie McCoubrey, Leader		



District Wards

Ward	Community Council area	Ward Councillor/s
Bodelwyddan	Bodelwyddan	Councillor Richard Mainon (Welsh Conservatives) [REDACTED]
Rhuddlan	Rhuddlan	Councillor Arwel Roberts (Plaid Cymru) [REDACTED]
Rhyl East	Rhyl	Councillor Barry Mellor (Labour) [REDACTED] Councillor Tony Thomas (Welsh Conservatives) [REDACTED]
Rhyl South	Rhyl	Councillor Jeanette Chamberlain-Jones (Labour) [REDACTED] Councillor Ellie Chard (Labour) [REDACTED]
Rhyl South East	Rhyl	Councillor Brian Blakeley (Labour) [REDACTED] Councillor Brian Jones (Welsh Conservatives) [REDACTED] Councillor Cheryl Williams (Labour) [REDACTED]
Rhyl South West	Rhyl	Councillor Pat Jones (Labour) [REDACTED] Councillor Pete Prendergast (Labour) [REDACTED]

Ward	Community Council area	Ward Councillor/s
Rhyl West	Rhyl	Councillor Joan Butterfield (Labour) [REDACTED] Councillor Alan James (Labour) [REDACTED]
Trefnant	Cefn Meiriog	Councillor Meirick Lloyd Davies (Plaid Cymru) [REDACTED] [REDACTED]

Community Councils

Name	Contact
Rhyl Town Council (Rhyl)	Town Clerk - Mr G Nickels [REDACTED] [REDACTED] Councillor Ellie Chard - Mayor
Rhuddlan Town Council (Rhuddlan)	[REDACTED] [REDACTED] Cllr. Arwel Roberts - Mayor
Bodelwyddan Town Council (Bodelwyddan)	Clerk - Jenny Prendergast [REDACTED] [REDACTED] Acting Mayor - Cllr Joan Barker
Cefn Meiridog Community Council	Clerk - Gwyn Davies [REDACTED] [REDACTED]
St Asaph	
Prestatyn CC	

MSs

Name	Constituency	Contact
Gareth Davies MS	Vale of Clwyd (Conservative)	Newly elected MS details TBC
Llyr Gruffydd MS	North Wales (Plaid Cymru)	01824 703 593 Llyr.Gruffydd@senedd.wales
Mark Isherwood MS	North Wales (Conservative)	01352 710232 Mark.Isherwood@senedd.wales
Carolyn Thomas MS	North Wales (Labour)	Newly elected MS details TBC Glad to see your election and wish her well in her new role
Sam Rowlands	North Wales (Conservative)	Newly elected MS details TBC

MP

Name	Constituency	Contact
James Davies MP	Vale of Clwyd	01745 888920 james.davies.mp@parliament.uk

Offshore Array

Community Councils

Name	Contact
Cylch-y-Garn (Anglesey)	Mr Arfon Owen [REDACTED]
Llanbadrig (Anglesey)	[REDACTED]
Amlwch (Anglesey)	Mrs Carli Evans-Thau [REDACTED]
Llaneilian (Anglesey)	Mrs Carli Evans-Thau [REDACTED]
Moelfre (Anglesey)	Mrs Gwenda Parry [REDACTED]
Llaneugrad (Anglesey)	Mr John Parry - [REDACTED] [REDACTED]
Llanfair-Mathafarn-Eithaf (Anglesey)	Mr Griff Pritchard [REDACTED]
Pentraeth (Anglesey)	Mr Eifion Jones [REDACTED]
Llanddona (Anglesey)	Mr Geraint Parry [REDACTED]
Llangoed (Anglesey)	Mr Alun Foulkes [REDACTED]
Beaumaris (Anglesey)	Catrin Eleri Owen – interest in community funding and jobs [REDACTED]
Bangor (Conwy)	Mr Martin Hanks [REDACTED]
Abergwyngregyn (Gwynedd)	Mrs Rita Roberts [REDACTED]
Llanfairfechan (Conwy)	Jayne Neal [REDACTED]
Penmaenmawr (Conwy)	Mr Martin Hanks [REDACTED]
Conwy (Conwy)	Ms Natasha Evelyn Flint [REDACTED]
Llandudno (Conwy)	Ms Tessa Wildermoth [REDACTED]
Rhos-on-sea (Conwy)	[REDACTED]
Colwyn Bay (Conwy)	[REDACTED]
Old Colwyn (Conwy)	[REDACTED]
Llysfaen (Conwy)	Miss Brenda Davies [REDACTED]
Llanddulas (Conwy)	Mrs Helen Stewart – has been very helpful [REDACTED]
Abergele (Conwy)	[REDACTED]
Kinmel Bay and Towyn (Conwy)	Mr Dylan Thomas [REDACTED]
Llanasa (Flint)	Mr Stephen Harms [REDACTED]
Mostyn (Flint)	Mrs Kay Roberts

Holywell (Flint)	Mr Jason Baker
Bagillt (Flint)	Lesley Wood
Flint (Flint)	Mrs L Wood
Llanberis (Gwynedd)	Mr Dei Tomos

2.6 Appendix F2.2: Political Stakeholder Briefing Notes

Awel y Môr – Sample of Notes from Stakeholder Meetings

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11.00, Thursday 17th June 2021 - Labour Ward Councillors in the Vicinity of the Cable Route

PRESENT

Cllr Brian Blakeley, Cllr Joan Butterfield, Cllr Jeanette Chamberlain, Cllr Barry Mellor, Cllr Pete Prendergast, Cllr Cheryl Williams (Apologies received from Cllr Ellie Chard, Cllr Alan James, Cllr Pat Jones)

RWE – Poppy Tremayne, Helen Thomas, Paul Carter

Cadno Communications – Sarah Jones

ACTIONS

- RWE to share a higher quality map with the councillors
- RWE to engage with Rhyl Town Council

PC delivered the presentation.

Consultation

- Joan Butterfield asked how much response had been received from the community to the previous consultation.
- Joan Butterfield recommended RWE engage with Rhyl Town Council.

RWE's response

- The virtual consultation was advertised widely. There were +1000 visitors to the exhibition and around 150 responses to the consultation from members of the public. People overwhelmingly reported they thought it was a good way of delivering the information in the circumstances. RWE will learn from that process and use the same platform for the consultation later this year. Joan Butterfield thought it was a good response rate under the circumstances.
- RWE invited ideas on how to promote the consultation locally.
- PT to engage with Rhyl Town Council.

Cable route options

- Several members requested a clearer map.
- Several members expressed concern about the potential impact on local businesses, namely the caravan park and golf club.
- Joan Butterfield expressed relief that cables will be underground.

RWE's response:

- Cable route options are being considered in consultation with the local authority, taking into account environmental and ecological factors.
- All cables will be underground. The consultation later this year will have a huge amount of information, high resolution maps people will be able to interrogate and zoom in on.

Impact on ecology and environment

- Jeanette Chamberlain expressed concern at potential destruction of trees and fauna and impact on the nature reserves.
- Brian Blakeley noted there are two nature reserves and two caravan parks in the ward: there is a nature reserve at the back of Robin Hood campsite. There are plans to plant more trees on Maes Gwilym.

RWE's response:

- Avoidance of areas of ecological interest has been key in site selection. RWE is working with local authority officers. Ecological and geophysical surveys being undertaken. There are a couple of areas where there is no option to go around woodland. In this case drilling will go under the area. RWE will

limit the need to remove trees, there will be an ecological mitigation plan. Changes are temporary, the land will be fully reinstated after construction. There is a lot of buried infrastructure in the area already (Gwynt y Môr, Burbo Bank Extension).

- Avoidance of ecological areas has been key part of site selection. Been working with Denbighshire CC, NRW to avoid key areas and where close, how to mitigate.
- Have option of different construction techniques
- RWE will be interested in plans for further ecology work (e.g. planting on Maes Gwilym) and welcome feedback so it can be considered in plans.

Impact during construction on existing buildings and businesses

- Joan Butterfield asked whether there will be any demolition and whether there will be compensation for golf club and caravan park owners.

RWE's response:

- RWE is talking to every landowner along the route to negotiate agreements. They nearly have access to 100% of the land for surveys. It's hoped that private agreements can be reached with each landowner. As a statutory utility RWE will apply for compulsory purchase powers if private agreements can't be reached, but RWE don't want to have to do that. Gwynt y Môr was delivered through 100% private agreements.
- There will be no demolition, the route is not going through built up areas. Where the route meets infrastructure RWE will drill underneath using horizontal directional drilling. The main work will be opening up ground to instal trenches and closing it again. Land will be reinstated afterwards.

Local benefits

- Joan Butterfield welcomed apprenticeships.
- Joan Butterfield asked whether the existing windfarm fund will increase. JB feels supporting a particular project would be beneficial, rather than salami slicing the funding.

RWE's response:

- RWE wants to undertake a consultation with relevant bodies to understand what shape a community benefit fund package should look like for the project. The fund is likely to be smaller than the Gwynt y Môr fund because the cost of offshore wind has come down. RWE want the fund to deliver something meaningful.

14.00, Wednesday 7th July 2021 - Offshore Array Community Councils (2 of 3 offered)

PRESENT

Cllr. Charlene Flynn, Ricki Owen, Dafydd Griffiths, Cllr. Neville Eden, Gordon Warren, Cllr Brian Bertola, Cllr Norma Davies, David Seddon, Chris Brockley, Catrin Eleri Owen, Huw Roberts

Cllr Neville Eden (Abergele Town Council) asked what county & town councils do to help support the project and the engagement with the community

PT answered to keep in touch and share info (such as newsletters) via social media. RWE are also keen to take on board any new ideas on community engagement.

Cllr Neville Eden asked is there somewhere members of the public can input opinion.

PT answered that a 'public portal' doesn't currently exist, but that she will discuss options with the team and will report back.

KA added that people can use the website and the contact email to send comments.

Gordon Warren asked where onshore facilities will be located. Are there any opportunities for Amlwch port?

PT answered that we aren't at the stage to choose compounds etc., yet.

KA added that it will be consulted on at PIER at the end of August.

PT added that we are looking at the use of appropriate Welsh ports in the construction process.

PT added that she will ask Helen Thomas to update Gordon as things progress.

Charlene Flynn (Mostyn Community Council) asked where ops/maintenance and substation will be located.

PT answered that the substation will be at Bodelwyddan.

KA added that there are offices at the port of Mostyn, but work is ongoing to identify the best location.

Charlene Flynn asked about EIA.

PT answered that RWE submitted their scoping report to PINS late last year as part of the application process.

This is available on the PINS website.

KA said she can send a link to the PINS website to Charlene.

Charlene Flynn asked about the size of the new proposal. Impact on noise levels and land value?

KA explained RWE will need to make assessments on these issues as part of PIER.

Huw Roberts (Llanddulas and Rhyd y Foel CC) asked about planning processes and who will be responsible for conditions etc?

PT answered that Denbighshire will be the host authority for the cable route work. RWE continue to engage extensively with all local authorities that may be affected.

KA added that there is an Evidence Plan Process that groups stakeholders together based on their area of interest, e.g. historic environment, ecology. This process continues and RWE receive expert feedback from the local authorities.

Huw Roberts asked how town councils submit their opinions.

PT answered that as part of the application process, the county council will engage with TC/CCs and represent their views.

Brian Bertola (Llandudno Town Council) asked who will pay for the project.

PT explained that it is a private enterprise, funded by RWE Renewables.

Huw Roberts (Llanddulas and Rhyd y Foel CC) asked how you are going about employing local contractors.

PT explained that RWE are working with Welsh Government to set up relationships with local suppliers.

KA explained that in addition to their own internal targets, RWE are bound by UK Gov targets of employing local businesses.

KA added that the development phase has prioritised local North Wales companies.

Huw Roberts asked about Sell2Wales.

KA said they will look at using this.

PT committed to sharing slides with attendees.

Neville Eden (Abergele Town Council) asked about creating a mini slide deck with voice-over as an intro to the project.

PT said they will look to do this.

Chris Brockley (Bay of Colwyn Town Council) asked why the size of the project has been reduced.

PT answered that the size had been reduced by 17% due to the views from some areas being seen as not satisfactory to a number of stakeholders.

KA explained that RWE had identified significant visual impacts as part of the consultation process and had taken action to mitigate these. The PIER report will contain a section on design evolution and site selection.

Charlene Flynn (Mostyn Community Council) asked about the number of turbines.

PT answered that the number would range between 45 and 91. The number of turbines is less than Gwynt y Mor (160), due to the increased generator power of the more modern turbines.

Neville Eden (Abergele Town Council) asked about the height of turbines.

PT answered that the small turbines are 200m and the larger turbines would be 300m.

18.30, Thursday 8th July 2021 - Cable Route Community Councils (1 of 2 offered)

PRESENT

Martin Barlow, Gwyn Davies and Trefor Hughes (Cefn Meiriadog Community Council), Linda Griffiths & Leanne Groves (St Asaph City Council)

RWE: PT, PC

Cadno: SJ

RWE: PT, PC

Cadno: SJ

PT delivered the presentation.

Cable route

- LG1 was hoping to see a more detailed onshore route map and asked whether the specific route has been largely decided.

RWE's response

- PC/PT showed the maps again and noted more detailed maps will be available during the public consultation.
- Plans are in development phase and will be consulted on.

Substation

- LG1 - is the substation in the same place as the existing Gwynt y Môr substation?
- MB – what are the approximate dimensions of the substation?
- MB – will the cable route from the substation to the National Grid connection also be underground?

RWE's response

- PC demonstrated on the map the proposed Awel y Môr substation, Gwynt y Môr and Burbo Bank Extension (BBE) substations.
- RWE is consenting the worst case, in this case approx. 250m x 200m. There will be fencing, drainage and landscaping around the substation so the footprint would be larger than 250 x 200m. The Gwynt y Môr substation is considerably smaller.
- All cabling will be underground. National Grid will need to extend their substation slightly to facilitate the Awel y Môr connection which will require some new infrastructure. Existing overhead towers will need to be reconfigured but there won't be lots of new overhead line. Those changes do not form part of RWE's application as National Grid have to bring that project forward but RWE's application will refer to it, it will be included in the cumulative assessment and the application will acknowledge National Grid will have to extend the substation.

Cumulative effect

- There was general frustration that Cefn Meiriadog is a small area with a lot of infrastructure projects.
MB – we've been inundated by offshore and onshore wind farms and solar farms all requiring their own infrastructure. We're a small rural community, it feels like we're under siege. Is there any awareness of cumulative effect on our small rural community? The visual impact is the key issue, rather than things like traffic movement which is temporary.
MB – we've had enough consultation in the past in our own community to know it's bullshit.
MB – it's not pleasant to live around here anymore. Cefn Meiriadog will always be the target for new connections. By the time there's a different approach it will be too late for Cefn Meiriadog.

RWE's response

- The government's approach is that each project has to apply in its own right, have a new connection and be considered on its own merits. Grid connection isn't particularly well coordinated which contributes to a cumulative effect. The government is looking at changing the policy to allow possible coordination but it's a long way off. RWE tries to coordinate with other developers if we're constructing at same time as another project.
- Cumulative impact is assessed as part of the EIA. The project will be judged by the examining authority and Secretary of State on the balance of harm/benefit.
- We consult so people can put their views to the Planning Inspectorate. RWE is a responsible developer and we want to make sure we follow due process. We're keen to consult properly and give people the opportunity to respond. It's for the Secretary of State and Planning Inspector to consider people's opinions. PC encouraged people to get involved in the consultation process.

Communication and transparency

- LG1 – I'm quite local to the cable route and substations that already exist. The BBE substation is visible from my house. I found the communication from DONG Energy misleading at the time and I hope RWE will be more respectful of residents. I had an interest in land affected by BBE and found out about the plans by chance from a notice on a gate. A group of us hadn't had any notification. DONG Energy had sent flyers out but people close to the route didn't have the information. Timescales were misleading. Will other things come along which you haven't told people about?

RWE's response

- Under the planning permission RWE can only build what we've told you about. We can't say more things won't come in the future but planning will follow due process.
- RWE will be informing the public about the forthcoming consultation, sending out newsletters and information will be on the website. PC asked attendees to let others know.

14.00, Monday 12th July 2021 - Cable Route Community Councils (2 of 2 offered)

PRESENT

Poppy Tremayne (RWE Renewables)
Karen Algate (RWE Renewables)
David McAllister (Cadno)
Cllr Arwel Roberts (Rhuddlan TC)
Cllr Syd Gaskin (Rhuddlan TC)
Sian Jones (Clerk of Rhuddlan TC)
Cllr Linda Muraca (Prestatyn Town Council, Chair of Planning)
Cllr Sharon Frobisher (Prestatyn Town Council)
Cllr Alan James (Rhyl TC and Denbighshire County Council Vice Chair)
Cllr Vicky Roberts (Rhyl TC)

Cllr Arwel Roberts (Rhuddlan TC) asked about the topographical/geographical/infrastructure obstructions to the cable route, such as rivers (Clwyd & Ffyddion) and roads, and the local Nature Reserve.

PT answered that the overall approach would be to avoid such obstructions where possible.

Cllr Arwel Roberts asked about mitigation monies that may be available where disruption does occur.

PT answered that the Community Benefit Fund will be discussed with the Planning Authority.

KA added that the red line boundary on the route map widens out in the areas discussed, as technical work is still being undertaken here. Discussions are ongoing with Denbighshire CC, NRW and other bodies to make sure they are happy with RWE's plans and to establish the most appropriate place to cross these rivers. The likelihood is that RWE will use a trenchless technique in these areas, probably with a horizontal directional drill, drilling underneath any obstacle without impacting any surface infrastructure, geology, or ecology in the area.

On nature reserves, **KA** said she does not believe the route will impact on the nature reserve identified by Cllr Roberts, but where sensitive areas are encountered, RWE discuss this with ecologists from the county council (as well as with NRW and the RSPB) to shape the design of the project.

Cllr Arwel Roberts asked about construction vehicles travelling up Nant y Faenol and other rural roads.

PT answered that the routes are agreed as part of the Code of Construction, which is signed off by the local planning authority.

KA added that RWE will submit an outline travel management plan to help explain how vehicle movements are managed. A condition assessment of roads will be undertaken of the route, so any damage caused during the process can be repaired. Construction is by section, so any disruption will be localised at any one time.

Cllr Arwel Roberts asked about emergency service vehicle access in these areas.

KA explained that all accident data is taken into consideration and safety assessments are made for each road on the plan.

Cllr Syd Gaskin (Rhuddlan TC) asked about the height and span of WTGs.

PT explained that the taller WTGs have longer blades.

KA added that the newer wind turbines have shorter towers and longer blades. They have a far higher efficiency.

Sian Jones (Clerk of Rhuddlan TC) asked whether the new Community Benefit Fund will be bolted on to the Gwynt y Mor fund, or if it will be a separate pot of money.

PT explained that they will be 2 unique funds. In Jan/Feb next year there will be further consultations with the public on the use of the fund.

Sharon Frobisher (Prestatyn Town Council) asked about landfall position and about the 25 year lifespan of the

project.

PT answered That 25 years is correct, plus decommissioning time.

KA answered that landfall (offshore to onshore) will be at Rhyl Golf Course and the Robin Hood Caravan Park. The drill will go underneath both of these and will come overground on the other side of the adjacent railway line. The exact engineering and drilling methods for this are still being assessed. Details will be in PEIR.

Linda Muraca (Prestatyn Town Council, Chair of Planning) asked if reports are available now or if we need to wait until they are published on the DCC Planning Portal.

PT explained that PEIR (Preliminary Environmental Inspection Report) will be consulted on between 31 August to 11 October.

KA answered that the reports will actually be hosted on the PINS website, as well as the RWE website. There will be further consultation exercises hosted by RWE as we go forward.

PT explained that non-technical reports and consultations will be made available bilingually, while technical docs will be English only.

PT committed to sharing slides with attendees.

18.30, Tuesday 27th July 2021 - County Councillors

PRESENT

Cllr Dafydd Meurig	Gwynedd
Cllr Glyn Banks	Flintshire
Cllr Harry Saville	Conwy
Cllr Ieuan Williams	Ynys Mon
Cllr Louise Emery	Conwy (stayed for a short time, had already seen presentation with Destination Conwy)
Cllr Philip Capper	Conwy
Cllr Richard Griffiths	Anglesey

RWE: PT, PC

Cadno: SJ

PC provided the presentation.

Questions

Our energy bills have increased. Will cables be futureproof?

The cables will be capable of taking power beyond the life of the windfarm but proposal is about the project we're developing. The cost of renewable energy is coming down.

When you pile into the ground to put in the new turbines will there be any impact on the hydrogen project in Liverpool Bay? There will be carbon storage in Liverpool Bay by the time this is done. Do you have any geological reports to prove nothing will happen?

RWE is aware of the Liverpool Bay project and is engaged with them as a possible consultee and because RWE is interested in the hydrogen economy. RWE do a lot of geological studies to support the engineering design. It won't have an impact on the carbon capture beds as vibration in the seabed is dissipated quickly.

What feedback have you received so far from the informal consultation?

A whole range of feedback, some supportive, some not. We were pleased with the level of support for the project and we've seen a shift since 5, 10 years ago in terms of recognition of need for renewables, and a drop in NIMBYism.

What are the negative impacts? Have you thought about the cumulative environmental impact of the three wind farms you already have, plus Awel y Môr, and BP's Mona and Morgan developments towards the Isle of Man?

RWE has a lot of operational data from existing sites, studies and surveys. That collective data is feeding into the EIA. Have also collected new data for the area. The study will look at cumulative effects of AYM and the operational wind farms. We look at worst case scenario, reality is less impactful. It's for BP to do cumulative assessment of RWE's projects, high level data will be in public domain. The negative impacts will be in the preliminary EIA and NTS. Potential negative impacts are visual impact, temporary construction impacts offshore and onshore, noise and vessel movements. RWE will consult on mitigations and look to mitigate impacts to tolerable/acceptable levels.

What about long term environmental impact on birds, sea life, flora and fauna?

At a regional, population scale there isn't a negative impact, the project wouldn't be given a licence if there were. There might be temporary impact on marine animals from piling, they might move out temporarily but that wouldn't affect the population. Birds are probably the longest term impact during the operational life and is the

focus of a lot of EIA work. There may be a number killed through operational process but it's very small numbers, well within the area of how populations would fluctuate anyway. RWE will engage with NRW and Wildlife Trusts.

You said it would be between around 40 and 90 turbines. If they have developed +20 MW turbines by the time you get the DCO application through, will you go for lower number?

Can't say at present, need to understand the best turbines for the location at the time. Bottom end of turbine size is 220m rotors, there are already larger turbines coming to market. Need to have a range of flexibility in design to make sure final consent is able to be built.

What's the community benefit area and will it be extended as far as Anglesey?

We'll consult on CBF early next year, geographical area and what projects CBF might support. Gwynt t Môr CBF is focused on supporting community initiatives, RNLI, smaller village hall upgrades. Is that the right thing? Should it focus on something different? RWE welcomes feedback. CBF is not tied to the project in the planning.

What method will you use to install the columns for the turbines? When piling was done for Gwynt y Môr residents had several months of 4am thumping from the sea.

We have a range of techniques included in our envelope at the moment so we have the opportunity to install a range of foundation types: piled turbines, jackets, also suction buckets and gravity bases which don't require percussive piling. We now understand the foundation better, so expect to be able to install turbines faster and there are fewer than GYM so should be less intrusive. We wouldn't necessarily choose to pile during the night but once you start piling you have to keep going, sometimes means piling through the night. Understand it's an impact on people but it's also fastest way of installing them.

What cable depth will be used for the offshore cabling? This is a breeding area for skates and rays which find their food by electric pulses.

1-1.5 m. They are well shielded. As part of licence for GYM had to do a EMF study. Skates and rays happily crossed the cables because of the sheathing and burial.

Is it exclusively DCO, or are there any LPA elements?

A lot will be DCO but things like environmental permits and traffic movement licences required from the local authority. Under DCO a lot of the final sign off for onshore construction and mitigation is with the local authority.

Will it generate heat? Will it change the ecology?

The EIA will look at that, installation, temp disruption, long term impacts after reinstatement. There is no expected impact on flora and fauna in sea bed. Flora and fauna will re-establish themselves quickly. It's a very mobile area with lots of movement from vessels anyway. Onshore cables are buried at a suitable depth and crops can be grown over the top. Joint bays will be at every 500-1000m which will need to be protected.

Bearing in mind all councils are trying to become carbon neutral, I have suggested in a council workshop that the six north Wales councils consider buying one of the turbines and use it to offset carbon. Is that a possibility? (Cllr Banks, Flintshire)

It's tricky, there are other shareholders. RWE has had discussions with Welsh Government in the past about WG and LAs being involved in projects. The issue is the scale of finance needed and the level of governance that comes with even a small shareholding. RWE welcomes future models of ownership. Smaller scale demonstrator projects may be a good vehicle to get WG and LAs involved in financing. RWE went out to market to get shareholders for previous projects and may do it again for AYM. What councils can do is support the project at consultation and application stages.

16.00, Wednesday 25 August 2021 - Conwy County Borough Council

PRESENT

Cllr Charlie McCoubrey, Leader

(Cllr Emery, portfolio holder for economic development had been held up in meetings and didn't attend, but had attended an earlier briefing on 27th July).

Cllr McCoubrey's focus was on the community benefit funds and he asked a number of questions relating to what would be offered and when, whether the sum was negotiable or a percentage of profits, and who RWE would be consulting with. He made the point that smaller organisations had less skill and resource to apply for grant funding and that larger organisations tended to fare better.

RWE (PC and HT) acknowledged the point about organisational size and capacity and said that this was well understood by RWE's community investment manager, Katy Woodington. Currently, KW is undertaking an informal consultation with relevant people in LA's and local third sector groups about a potential AyM community fund. This is an early stage consultation and a more formal consultation will be held next year looking more closely at what sort of fund people want. There seems to be more of a desire for funding for small scale renewable energy projects and schemes to reduce energy use. No sums have been determined – the consultation is more focussed on the broad principles of the fund. PC was clear about setting expectations and explained that since GyM construction the price of offshore has decreased hugely and offshore is now a very competitive industry, where CfDs have driven down costs, with the knock on effect that there is less scope for community funding. This means that it's more important than ever to maximise the impact of any funding, hence the purpose of the early-stage consultation. RWE reassured Cllr McCoubrey that consultation was and is happening with LA officers and that RWE would welcome his thoughts on individuals and organisations to reach out to.

Asks: RWE asked Cllr McCoubrey to help advertise the pre-app consultation starting on 31st Aug (Cadno will be in touch) and urged him to feedback any queries or concerns that he may pick up from residents.

2.7 Appendix F3: Mail-Out Leaflet

Fferm Wynt Alltraeth

AWEL Y MÔR

Offshore Wind Farm

Ymgynghoriad cyhoeddus Awel y Môr

Rydyn ni eisiau clywed gennych chi

Mae cynlluniau drafft wedi cael eu cynhyrchu ar gyfer datblygu Fferm Wynt Awel y Môr, oddi ar arfordir gogledd Cymru, ym Môr Iwerddon.

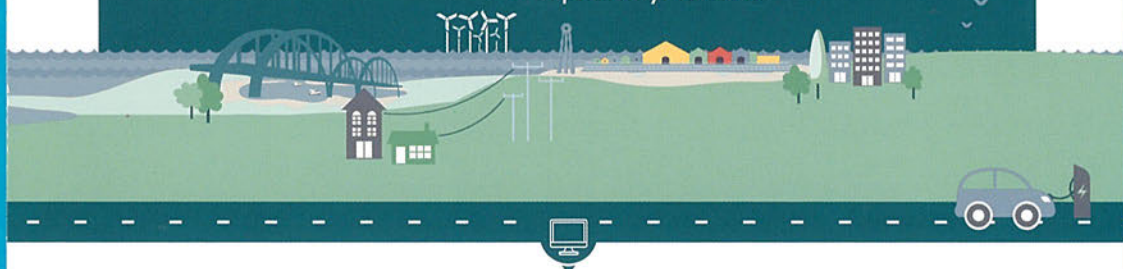
Awst **31-11** Hydref

Rydym yn awyddus i ymgynghori â chi ynghylch ein

Hadroddiad Gwybodaeth Amgylcheddol Rhagarweiniol (PEIR)

sy'n manylu ar gynlluniau
ein prosiect, gan gynnwys
gwybodaeth am y canlynol:

- ▷ Yr arae ar y môr,
- ▷ Y tir
- ▷ Llwybrau ceblau ar wely'r môr ac ar y tir
- ▷ A pharth yr is-orsaf



Rydym yn eich gwahodd i ymweld â'n harddangosfa ar-lein:

www.exhibition.awelymor.cymru

☎ 0800 197 8232

✉ awelymor@rwe.com

🌐 www.awelymor.cymru

Ewch i wefan benodol ein prosiect i gael yr holl wybodaeth ddiweddaraf am yr ymgynghoriad

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Return Address: Postal Administration, Elizabeth House, RG27 9PR

Fferm Wynt Alltraeth

AWEL Y MÔR

Offshore Wind Farm

Awel y Môr Public Consultation

we want to hear from you

Draft plans have been produced for the development of Awel y Môr Offshore Wind Farm, off the coast of North Wales, in the Irish Sea.

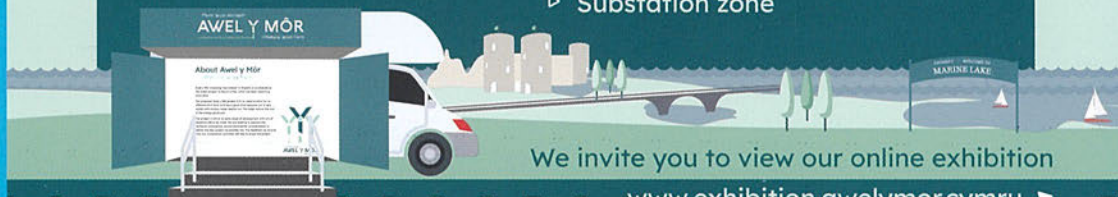
August **31-11** October

We wish to consult with you on our

Preliminary Environmental Information Report (PEIR)

Detailing our project plans,
including information on:

- ▷ The offshore array
- ▷ Landfall
- ▷ Offshore and onshore cable routes
- ▷ Substation zone



We invite you to view our online exhibition

www.exhibition.awelymor.cymru

☎ 0800 197 8232

✉ awelymor@rwe.com

🌐 www.awelymor.cymru

Please refer to our dedicated project website for all updates regarding the consultation

3 Appendix G: Transboundary Consultation

3.1 Appendix G1: Regulation 32 Notice

Notice details

Type:

Planning
> Town and Country Planning

Publication date:

12 October 2021, 14:10

Edition:

The London Gazette

Notice ID:

3902415

Notice code:

1601

Issue number:

63498

Page number:

18093

[About Town and Country Planning notices](#)

Town and Country Planning

Secretary of State for Communities and Local Government

PLANNING ACT 2008

REGULATION 32 OF THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

NOTIFICATION OF INFORMATION ABOUT DEVELOPMENT LIKELY TO HAVE SIGNIFICANT EFFECTS ON THE ENVIRONMENT IN AN EEA STATE

PROPOSED AWEL Y MÔR OFFSHORE WIND FARM

Awel y Môr Offshore Wind Farm Limited has formally notified the Secretary of State, of its intention to submit an Environmental Statement.

The Proposed Development is a proposal for an offshore wind farm located in the Irish Sea, approximately 10.6 km off the coast of North Wales. It would be immediately adjacent to the existing Gwynt y Môr Offshore Wind Farm in Liverpool Bay. The wind turbine array would cover an area of approximately 106.4 km² and consist of up to 107 wind turbine generators. The offshore export cable will extend to the north east coast of Wales and make landfall in the vicinity of Abergele.

Information about the Proposed Development and about its likely significant effects is available in the scoping report and the Secretary of State's scoping opinion which are available electronically on the Planning Inspectorate's website:

<https://infrastructure.planninginspectorate.gov.uk/projects/wales/awel-y-mor-offshore-wind-farm/?ipcsection=overview>

Based on the current information provided by the Applicant to the Secretary of State, and applying a precautionary approach, the Secretary of State is of the view that the Proposed Development is likely to have significant effects on the environment in the Republic of Ireland and France. In accordance with Regulation 32 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) the Secretary of State has provided information to the above mentioned EEA States about the Proposed Development and its likely significant effects, and these States have been asked to indicate by 5 November 2021 whether or not they wish to participate in the procedure for examining and determining the application under the Planning Act 2008 (PA 2008) and Regulation 32 of the EIA Regulations.

The Proposed Development is currently at the pre-application stage of the process. The Applicant has not yet submitted an application to the Secretary of State. If the application is accepted for examination, the application will be examined in public and, subject to the provisions of the PA 2008, the examination must be completed within a period of six months. Further information about how to participate in the examination procedure under the PA 2008 and the way in which the Secretary of State will notify and consult EEA States in accordance with Regulation 32 of the EIA Regulations is available on the Planning Inspectorate's website:

<https://infrastructure.planninginspectorate.gov.uk/>

Following examination of the application and having taken the environmental information into consideration, the decision maker may refuse or grant development consent. If development consent is granted, this may be subject to requirements which, if necessary, will secure measures to avoid, reduce or offset the major adverse effects of the Proposed Development.

Date: 29 September 2021

Signed by the Planning Inspectorate for and on behalf of the Secretary of State for Communities and Local Government

3.2 Appendix G2: Regulation 32 Transboundary Screening



Sgrinio trawsffiniol a gynhelir gan yr Arolygiaeth Gynllunio (yr Arolygiaeth) ar ran yr Ysgrifennydd Gwladol (SoS) at ddibenion Rheoliad 32 Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017 (Rheoliadau AEA 2017)	
Enw'r prosiect:	Fferm Wynt ar y Môr Awel y Môr
Cyfeiriad/Lleoliad:	I'r gorllewin o Fferm Wynt ar y Môr Gwynt y Môr, ac yn union wrth ei hymyl. Byddai ardal yr arâe wedi'i lleoli oddeutu 10.6km oddi wrth arfordir gogledd Cymru, gyda'r cebl allforio ar y môr yn dod i'r lan ar arfordir gogledd-ddwyreiniol Cymru, yn ymestyn i is-orsaf wedi'i lleoli ym Modelwyddan.
Cyfeirnod yr Arolygiaeth Gynllunio:	EN010112
Dyddiad(au) cynnal yr ymarfer sgrinio:	24/09/2021

SGRINIO TRAWSFFINIOL CYNTAF	
Dogfen(nau) a ddefnyddiwyd ar gyfer sgrinio trawsffiniol:	Adroddiad Cwmpasu Asesu Effeithiau Amgylcheddol ('yr Adroddiad Cwmpasu') – dyddiedig mis Mawrth 2020. Adroddiad Sgrinio Asesiad Rheoliadau Cynefinoedd ('Adroddiad Sgrinio HRA') – dyddiedig mis Mawrth 2020. Cyfrol 1, Atodiad 3.2: Adroddiad Sgrinio Trawsffiniol (yr Adroddiad Sgrinio Trawsffiniol') – dyddiedig mis Mawrth 2021.
Meini Prawf Sgrinio:	Sylwadau'r Arolygiaeth:
Nodweddion y Datblygiad	Mae'r Adroddiad Cwmpasu yn datgan y bydd y Datblygiad Arfaethedig yn cynnwys hyd at 107 o Eneraduron Tyrbin Gwynt (WTG) ac yn rhychwantu ardal o oddeutu 106.4km². Mae ardal yr arâe wedi'i lleoli oddi ar arfordir gogledd Cymru ac mae ardal chwilio'r ECR ar y môr yn amgylchynu Fferm Wynt ar y Môr (OWF) bresennol Gwastadeddau'r Rhyl. Y dechnoleg drawsyrro a ddewiswyd ar gyfer y Datblygiad Arfaethedig yw Cerrynt Eiledol Foltedd Uchel (HVAC). Mae'r Adroddiad Cwmpasu yn darparu cwmpas dylunio dangosol i'w fireinio yn ystod y broses AEA. Yn dilyn hynny, mae'r Adroddiad Cwmpasu yn cyfeirio at '<i>ardaloedd chwilio</i>' lle y byddai'r arâe ar y môr, llwybr y cebl allforio (ECR) ar y môr, yr ECR ar y tir a'r is-orsaf ar y tir wedi'u lleoli. Elfennau ar y Môr:

	• hyd at 107 o Eneraduron Tyrbin Gwynt gydag ôl troed sylfeini o hyd at 2,827m² a chyfanswm ardal arâe o hyd at 106.4 km²; • diamedr rotor o hyd at 300m gydag uchder blaen llafn mwyaf o 332m uwchben Penllanw Cymedrig y Gorllanw (MHWS)/Llanw Seryddol Isaf (LAT) (sic) ac uchder blaen llafn lleiaf o 22m uwchben MHWS; • mast mesur wedi'i osod ar seilbost â diamedr mwyaf o 5m; • hyd at ddau blatfform is-orsaf ar y môr (OSP), gydag ôl troed o hyd at 2,827m² fesul sylfaen, uchafswm uchder ochr uchaf o 115m uwchben LAT, uchafswm lled ochr uchaf o 50m ac uchafswm hyd ochr uchaf o 80m; • ceblau rhwng arâe ag uchafswm hyd o 228km, cyfanswm ôl troed aflonyddu ar wely'r môr o hyd at 33km² yn ystod y cam gosod; • gosod deunyddiau i atal erydu – nifer: 107, cyfanswm ôl troed: 4.387km²; • amddiffyn ceblau; a • hyd at ddau gebl allforio ar y môr (HVAC) â chyfanswm hyd o 80km (40km fesul cebl), cyfanswm ôl troed aflonyddu ar wely'r môr o hyd at 1km². Mae'r Adroddiad Cwmpasu yn datgan bod nifer o fathau o sylfeini yn parhau i gael eu hystyried ar gyfer y Generaduron Tyrbin Gwynt a'r Platfformau Is-orsaf ar y Môr. Mae'r rhain yn cynnwys: • seilbyst unigol; • seilbyst bwced sugno; • seilbyst sylfaen disgyrchiant; • ffrâm seilbyst pinio; • ffrâm bwced sugno; a • ffrâm sylfaen disgyrchiant. Mae llawer o fethodolegau'n parhau i gael eu hystyried ar gyfer gosod y ceblau rhwng arâe ac allforio ar y môr. Mae'r rhain yn cynnwys: • ffrwd-dorri ffosydd; • cyflwr cyn-dorri ac ar ôl gosod (neu osod a throi ar yr un pryd); • torri ffosydd yn fecanyddol; • treillio; • cloddio màs-lif; • torri creigiau; a • sled gladdu. Mae'n bosibl y bydd angen amddiffyn ceblau hefyd os nad oes modd claddu'r ceblau rhwng arâe ac allforio, ond nid yw'r Ymgeisydd wedi pennu graddau unrhyw amddiffyniad eto. Mae'r Adroddiad Cwmpasu yn datgan bod nifer o fathau o ddeunyddiau i
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	atal erydu (a dulliau gosod cysylltiedig) ar gyfer sylfeini Generaduron Tyrbin Gwynt a Phlatfformau Is-orsaf ar y Môr yn cael eu hystyried o hyd. Mae'r rhain yn cynnwys: • lleoli cerrig neu raeau; • matresi concrit; • dyfeisiau gwasgaru ynni llif; • ffedogau neu orchuddion concrit neu blastig dwysedd uchel; a • datrysiadau bag. Byddai arwynebedd mwyaf y deunyddiau i atal erydu fesul sylfaen, gan gynnwys arwynebedd ôl troed y strwythur, oddeutu 41,000m². Elfennau ar y Tir: • hyd at ddau gebl allforio ar y tir â chyfanswm hyd o 30km (15km fesul cebl); • Baeau Uniadau Glanfa a Phontio (TJB) – nifer: 2, cyfanswm ôl-troed: 15,000m²; • arwynebedd safle is-orsaf ar y tir o hyd at 50,000m² yn cynnwys 5 adeilad ag uchder mwyaf o 15m, cyfanswm ôl troed: 50,000m²; ac • ymestyn adeilad Is-orsaf Wedi'i Hinswleiddio â Nwy (GIS) ac is-orsaf y Grid Cenedlaethol yn is-orsaf bresennol Bodelwyddan. Mae'r Adroddiad Cwmpasu yn datgan y byddai'r ceblau allforio ar y tir yn cael eu gosod yn bennaf trwy gyfuniad o ddull torri agored a drilio cyfeiriadol llorweddol. Disgwylir y cais Gorchymyn Caniatâd Datblygu (DCO) ar gyfer y Datblygiad Arfaethedig yn 2022. Mae'r Adroddiad Cwmpasu yn datgan bod y Datblygiad Arfaethedig yn debygol o ddechrau cael ei adeiladu yn 2026 a bod yn weithredol erbyn 2028. Oes weithredol y Datblygiad Arfaethedig fyddai oddeutu 25 mlynedd.
Lleoliad y Datblygiad (gan gynnwys defnydd presennol) a'r ardal Ddaearyddol	Y Safle ar y Môr a'i Amgylchoedd Mae elfennau ar y môr y Datblygiad Arfaethedig ym Môr Iwerddon oddi ar arfordir gogledd-ddwyreiniol Cymru, i'r gorllewin o Afon Dyfrdwy ac i'r dwyrain o Gonwy. Mae'r arâe Generaduron Tyrbin Gwynt wedi'i lleoli 10.6km oddi ar arfordir gogledd Cymru. Mae ardal chwilio ECR ar y môr Fferm Wynt ar y Môr Awel y Môr yn amgylchynu Fferm Wynt ar y Môr bresennol Gwastadeddau'r Rhyl, ac mae'n cydreddeg â phrif geblau allforio'r Fferm Wynt ar y Môr, piblinellau nwy a Rhyng-gysylltydd Dwyrain-Gorllewin Eirgrid, sy'n cysylltu gridiau trydan Iwerddon a'r Deyrnas Unedig. Mae'r Adroddiad Cwmpasu yn amlygu nifer o ddefnyddiau presennol ar gyfer y safle ar y môr a'r ardal amgylchynol y gallai'r Datblygiad Arfaethedig effeithio arnynt. Mae'r rhain yn cynnwys: • gweithgareddau hamdden; • pysgodfeydd masnachol; • treillio agregau morol;

	• llwybrau tramwy Cymdeithas Cynhyrchwyr Agregau Morol Prydain (BMPA); a • thraffig morgludiant, gan gynnwys llongau cynnal a chadw ar gyfer Fferm Wynt ar y Môr Gwynt y Môr a llongau sy'n gweithredu allan o Harbwr Lerpwl. Mae'r Adroddiad Cwmpasu yn rhestru pum Fferm Wynt ar y Môr weithredol sy'n gyfagos i'r Datblygiad Arfaethedig, sef: • Gwynt y Môr (gerllaw ardal yr arâe); • Gogledd Hoyle (11km i'r dwyrain o ardal yr arâe); • Gwastadeddau'r Rhyl (sy'n cydreddeg â'r ardal chwilio ECR ar y môr); • Banc Burbo (26km i'r dwyrain o ardal yr arâe); ac • Estyniad Banc Burbo (16km i'r dwyrain o ardal yr arâe). Y Safle ar y Tir a'i Amgylchoedd Mae elfennau ar y tir y Datblygiad Arfaethedig wedi'u lleoli ar arfordir gogledd-ddwyreiniol Cymru, i'r gorllewin o Afon Dyfrdwy ac i'r dwyrain o Gonwy, o fewn siroedd Sir Ddinbych a Chonwy. Mae union leoliad y lanfa a llwybr y ceblau ar y tir yn dal i gael ei fireinio. Fodd bynnag, mae'r Adroddiad Cwmpasu yn nodi y bydd y lanfa mewn lleoliad rhwng Bae Colwyn a Phrestatyn ar arfordir gogledd Cymru. Mae'r Adroddiad Cwmpasu yn amlygu nifer o ddefnyddiau presennol ar gyfer y safle ar y tir a'r ardal amgylchynol y gallai'r Datblygiad Arfaethedig effeithio arnynt. Mae'r rhain yn cynnwys: • twristiaeth; • ardaloedd diogelu mwynau; • y rhwydwaith ffyrdd, gan gynnwys gwibffordd Gogledd Cymru yr A55; a'r • rhwydwaith rheilffyrdd, gan gynnwys gorsafoedd yn y Rhyl, Abergele a Phrestatyn.
Pwysigrwydd Amgylcheddol	Ar y Môr <i>Ansawdd dŵr:</i> • Mae'r Adroddiad Cwmpasu yn amlygu nifer o gyrff y Gyfarwydddeb Fframwaith Dŵr (WFD) o fewn 2km o'r Datblygiad Arfaethedig. Mae'r rhain yn cynnwys corff dŵr arfordirol WFD Gogledd Cymru a chorff dŵr aberol WFD Clwyd sy'n cydreddeg â'r ardal chwilio ECR ar y môr. Mae corff dŵr arfordirol WFD Gogledd Cymru yn cydreddeg â'r ardal chwilio ECR ar y môr. <i>Ecoleg Fenthig Islanw a Rhynglanw:</i> • Mae Ardal Cadwraeth Arbennig (ACA) Y Fenai a Bae Conwy wedi'i lleoli gerllaw'r ardal chwilio ECR ar y môr, ac mae wedi'i dynodi ar gyfer cynefinoedd morol gan gynnwys banciau tywod, fflatiau llaid a riffiau.

- Mae ACA Aber Dyfrdwy wedi'i lleoli 9.3km i ffwrdd o'r ardal chwilio ECR ar y môr, ac mae wedi'i dynodi ar gyfer cynefinoedd morol gan gynnwys fflatiau llaid, *Salicornia* a phlanhigion unflwydd eraill ar laid a dolydd heli'r Iwerydd.
- Mae Parth Cadwraeth Morol (MCZ) Fylde wedi'i leoli 25.8km o ardal arâe y Datblygiad Arfaethedig, ac mae wedi'i ddynodi ar gyfer cynefinoedd islanw a llaid islanw.

Ecoleg Pysgod a Physgod Cregyn:

- Mae'r Adroddiad Cwmpasu yn amlygu nifer o feysydd silio a magu ar gyfer rhywogaethau sy'n bwysig yn fasnachol yn yr ardal astudio pysgod a physgod cregyn, gan gynnwys llymriaid, penfreision, a chregyn y brenin/cregyn y frenhines.
- Dywedir bod rhywogaethau pysgod mudol a allai fod yn bresennol yn ardal astudio'r Adroddiad Cwmpasu yn cynnwys gwangod, herlod, llysywod pendoll y môr, eogiaid yr Iwerydd, brithyllod y môr a llysywod Ewropeaidd. Mae'r rhywogaethau hyn yn nodweddion cymhwys ar gyfer sawl safle dynodedig hefyd, gan gynnwys ACA Aber Dyfrdwy, ACA Y Fenai a Bae Conwy ac ACA Afon Dyfrdwy a Llyn Tegid.
- Mae'r Adroddiad Cwmpasu yn cofnodi gweithgarwch pysgota masnachol o fewn ardal yr arâe ar gyfer y Datblygiad Arfaethedig, gan gynnwys llongau pysgota â chewyll a threillwyr cregyn bylchog.
- Gallai'r cynefinoedd dynodedig yn ACA Y Fenai a Bae Conwy ddarparu cynefinoedd silio ar gyfer llymriaid, sy'n rhywogaeth ysglyfaeth allweddol ar gyfer llamidyddion.

Mamaliaid Môr:

- Mae'r Adroddiad Cwmpasu yn amlygu presenoldeb posibl llamidyddion, morloi llwyd, dolffiniaid trwyn potel, dolffiniaid Risso, dolffiniaid cyffredin trwyn byr a morfilod minke yn yr ardal astudio mamaliaid môr ar gyfer y Datblygiad Arfaethedig.
- Oherwydd natur symudol mamaliaid môr, mae'r Adroddiad Cwmpasu a'r Adroddiad Sgrinio HRA yn nodi cysylltedd posibl rhwng yr ardal astudio mamaliaid môr a nifer o safleoedd ACA dynodedig ar gyfer morloi llwyd, morloi harbwr a/neu lamhidyddion sydd o dan awdurdodaeth gwladwriaethau'r Ardal Economaidd Ewropeaidd (AEE), gan gynnwys Gweriniaeth Iwerddon a Ffrainc.

Adareg ar y Môr:

Mae'r Adroddiad Cwmpasu a'r Adroddiad Sgrinio HRA yn amlygu cysylltedd posibl rhwng yr ardal ar y môr ac Ardaloedd Gwarchodaeth Arbennig (AGA), gan gynnwys:

- Mae Ardal Gwarchodaeth Arbennig (AGA) Bae Lerpwl yn gorgyffwrdd â'r ardal chwilio ECR ar y môr. Mae nodweddion dynodedig yr AGA yn cynnwys trochyddion gyddfgoch, môr-hwyaid duon a chrynodiad o rywogaethau mudol.
- Mae AGA a safle Ramsar Aber Dyfrdwy wedi'i lleoli gerllaw'r ardal chwilio ECR ar y môr. Mae nodweddion dynodedig yr AGA

	yn cynnwys rhostogod cynffonddu, gylfinirod, môr-wenoliaid cyffredin a chrynodiad o adar dŵr. - Mae sawl safle AGA o fewn awdurdodaeth Gweriniaeth Iwerddon wedi'u dynodi ar gyfer eu poblogaethau gwylanod coesddu. <i>Seilwaith ar y môr/llongau:</i> - Mae'r Adroddiad Cwmpasu yn amlygu pum Fferm Wynt ar y Môr weithredol yn agos i ardal arâe Fferm Wynt ar y Môr Awel y Môr, gan gynnwys Gwynt y Môr a Gwastadeddau'r Rhyl. Mae'r ceblau allforio ar gyfer y Ffermydd Gwynt ar y Môr hyn yn gorgyffwrdd â'r ardal chwilio ECR ar y môr. Mae'r Adroddiad Cwmpasu hefyd yn nodi presenoldeb ceblau gweithredol eraill o fewn yr ardal chwilio ECR, ond nid yw'n rhoi rhagor o fanylion. - Dywedir bod piblinellau nwy sy'n mynd o Fae Lerpwl i'r Parlwr Du ac o feysydd nwy Bae Morecambe i Walney yn union gerllaw'r ardal chwilio ECR ar y môr. - Mae Rhyng-gysylltydd Dwyrain-Gorllewin Eirgrid, sy'n cysylltu gridiau trydan Iwerddon a Phrydain, wedi'i leoli o fewn yr ardal chwilio ECR ar y môr a gerllaw'r ardal arâe. - Mae'r Adroddiad Cwmpasu yn amlygu morgludiant masnachol yn yr ardal, gan gynnwys pedwar llwybr fferïau teithwyr a thraffig tanceri. <i>Gweddillion archaeolegol:</i> Mae'r Adroddiad Cwmpasu yn amlygu'r posibilrwydd o nodweddion cynhanesyddol sydd wedi'u cadw. Mae nodweddion y gwyddys amdanynt eisoes yn yr ardal yn cynnwys: - Tair coedwig danddwr a gwelyau mawn rhynglanw yn yr ardal astudio ar gyfer y Datblygiad Arfaethedig. 22 safle llongddrylliad sy'n amrywio o ran oed o'r cyfnod ôl-ganoloesol i'r ugeinfed ganrif, gan gynnwys un safle llongddrylliad gwarchodedig. <i>Milwrol a Hedfan Sifil:</i> - Mae'r Adroddiad Cwmpasu yn nodi derbynyddion milwrol a hedfan sifil, gan gynnwys systemau radar sydd wedi'u lleoli'n agos at y Datblygiad Arfaethedig. Ar y Tir <i>Ecoleg ddaearol:</i> Mae'r Adroddiad Cwmpasu yn rhestru nifer o safleoedd dynodedig yng nghyffiniau'r ardal astudio ar y tir ar gyfer y Datblygiad Arfaethedig. Cofnodwyd y nodweddion canlynol yn yr ardal astudio: - ACA Coedwigoedd Dyffryn Elwy, sydd wedi'i dynodi ar gyfer fforestydd <i>Tilio-Acerion</i> o lethrau, sgrïau a cheunentydd. - Safle o Ddiddordeb Gwyddonol Arbennig (SoDdGA) Bryn Euryn, sydd wedi'i ddynodi ar gyfer cymunedau glaswelltir a rhywogaethau planhigion ar allfrigiadau creigiog calchfaen.
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	• SoDdGa Mynydd Marian, sydd wedi'i ddynodi ar gyfer cymunedau glaswelltir calchfaen a nythfa glesyn serenog. • Calchfaen Llanddulas a SoDdGA Coedwig Castell Gwrych, sydd wedi'i ddynodi ar gyfer cymunedau glaswelltir calchfaen, rhostir a choetir, poblogaethau planhigion fasgwlaidd, bryoffytau, ieir bach yr haf a gwyfynod, a man clwydo ystlumod pedol lleiaf. • 117 o Safleoedd Bywyd Gwyllt Lleol. • Cynefinoedd Pwysig Iawn, gan gynnwys perllannoedd traddodiadol, coed pori, coetir gwlyb a chors bori ar arfordir a gorlifdir. <i>Yr amgylchedd hanesyddol:</i> • Mae'r Adroddiad Cwmpasu yn amlygu nifer o nodweddion hanesyddol yng nghyffiniau'r ECR ar y tir. Mae'r rhain yn cynnwys Safle Treftadaeth y Byd Cestyll a Muriau Trefi'r Brenin Edward I (1.5km i ffwrdd), 23 Heneb Gofrestredig o fewn oddeutu 11km, 626 o Adeiladau Rhestredig a 18 Ardal Gadwraeth o fewn 10km o'r ECR ar y tir.
Effeithiau posibl a Lledaeniad	Ar y môr <i>Prosesau Ffisegol:</i> Effeithiau posibl ar y gyfundrefn hydrodynameg yn ystod gweithredu'r Datblygiad Arfaethedig o ganlyniad i ryngweithio rhwng tonnau a strwythurau sylfaen Generaduron Tyrbin Gwynt (WTG), gan gynnwys y rheiny sy'n perthyn i Ffermydd Gwynt ar y Môr eraill. <i>Pysgod a Physgod Cregyn:</i> Effeithiau posibl ar bysgod a physgod cregyn sy'n nodweddion o'r safleoedd dynodedig o dan awdurdodaeth gwladwriaethau eraill yr Ardal Economaidd Ewropeaidd (EEA) neu sydd o werth masnachol iddynt. Mae'r Adroddiad Sgrinio Trawsffiniol yn nodi'r potensial ar gyfer effeithiau o holl gyfnodau'r Datblygiad Arfaethedig, yn enwedig o effeithiau uniongyrchol ar bysgod o sŵn tanddwr a gynhyrchir yn ystod gwaith gosod seilbyst. <i>Mamaliaid Môr:</i> Effeithiau posibl ar famaliaid môr yn ystod adeiladu, gweithredu a datgomisiynu'r Datblygiad Arfaethedig sy'n nodweddion cymhwysol safleoedd dynodedig o dan awdurdodaeth gwladwriaeth EEA. Mae effeithiau posibl a nodwyd yn cynnwys sŵn tanddwr a gynhyrchir yn ystod gosod y sylfeini a gweithredu'r Generaduron Tyrbin Gwynt; colli cynefin silio/magu rhywogaethau ysglyfaeth neu darfu arnynt; ac effeithiau Maes Electromagnetig (EMF). <i>Adareg ar y Môr:</i> Effeithiau posibl yn ystod gweithredu'r Datblygiad Arfaethedig ar rywogaethau adar sy'n nodweddion cymhwysol safleoedd dynodedig o dan awdurdodaeth gwladwriaeth EEA. Mae effeithiau posibl a nodwyd yn cynnwys gwrthdaro â thyrbinau, dadleoli (h.y. effeithiau rhwystr) a tharfu ar rywogaethau ysglyfaeth.

	<i>Pysgodfeydd Masnachol:</i> Effeithiau posibl ar bysgodfeydd masnachol, gan gynnwys fflydoedd pysgota rhyngwladol yn ystod adeiladu, gweithredu a datgomisiynu'r Datblygiad Arfaethedig. <i>Morgludiant a Mordwyaeth:</i> Effeithiau posibl ar forgludiant masnachol a mordwyaeth, gan gynnwys fferïau teithwyr masnachol rhwng Lerpwl a Dulyn (Gweriniaeth Iwerddon) yn ystod gweithredu'r Datblygiad Arfaethedig. Ar y tir Ni nodwyd unrhyw effeithiau yn yr Adroddiad Cwmpasu, yr Adroddiad Sgrinio HRA na'r Adroddiad Sgrinio Trawsffiniol. Ar yr adeg hon, o ystyried y wybodaeth sydd ar gael, mae'r Arolygiaeth o'r farn bod y gweithgareddau ar y tir sy'n gysylltiedig â'r Datblygiad Arfaethedig yn annhebygol o gael effeithiau trawsffiniol arwyddocaol.
Hyd a lled	Ar y môr <i>Prosesau Ffisegol:</i> Gallai effeithiau ddigwydd ar brosesau ffisegol y tu allan i Barth Economaidd Neilltuedig (EEZ) y DU. Fodd bynnag, mae'r Adroddiad Sgrinio Trawsffiniol yn nodi y byddai'r ffeithiau wedi'u cyfyngu i ddyfroedd Ynys Manaw. Ni fyddai unrhyw wladwriaeth EEA yn cael ei heffeithio. <i>Pysgod a Physgod Cregyn:</i> Mae'r Adroddiad Sgrinio Trawsffiniol yn nodi'r potensial i darfu ar ymddygiad pysgod ymestyn i mewn i Barth Economaidd Neilltuedig (EEZ) Gweriniaeth Iwerddon. <i>Mamaliaid Môr:</i> Mae'r Adroddiad Cwmpasu a'r Adroddiad Sgrinio HRA yn nodi effeithiau trawsffiniol posibl ar famaliaid môr sy'n gysylltiedig ag Ardaloedd Cadwraeth Arbennig (ACA) o dan awdurdodaeth Gweriniaeth Iwerddon a Ffrainc. Noda'r Arolygiaeth fod yr Adroddiad Sgrinio Trawsffiniol yn cynnig canolbwyntio ar ACAau o fewn EEZ Gweriniaeth Iwerddon. <i>Adareg ar y Môr:</i> Mae'r Adroddiad Cwmpasu a'r Adroddiad Sgrinio HRA yn nodi effeithiau posibl ar wylanod coesddu sy'n gysylltiedig ag AGAau o dan awdurdodaeth Gweriniaeth Iwerddon. Yn ogystal, mae'r Adroddiad Cwmpasu yn nodi bod poblogaethau môr-wenoliaid bach sy'n gysylltiedig ag Ardal Gwarchodaeth Arbennig (AGA) Bae Lerpwl ac AGA Aber Dyfrdwy yn symud yn rheolaidd rhwng nythfeydd yn y DU a Gweriniaeth Iwerddon. <i>Pysgodfeydd Masnachol:</i> Fel y nodwyd uchod, mae'r Ymgeisydd wedi nodi effeithiau posibl ar rywogaethau pysgod o bwysigrwydd masnachol. Mae'r Adroddiad Sgrinio Trawsffiniol yn datgan y gallai effeithiau groesi

	ffiniau rhyngwladol gan ddisgwyl effeithiau ar fflyd bysgota Gweriniaeth Iwerddon yn bennaf. <i>Morgludiant a Mordwyaeth:</i> Noda'r Arolygiaeth fod yr Adroddiad Sgrinio Trawsffiniol yn datgan bod effeithiau ar forgludiant yn debygol o fod yn gyfyngedig i EEZ y DU. Fodd bynnag, fel y nodwyd uchod, mae'r potensial gan y Datblygiad Arfaethedig i effeithio ar wasanaethau fferi masnachol sy'n rhedeg rhwng Lerpwl a Dilyn.
Maint	Ni nodwyd maint effeithiau posibl ar y cam hwn. Bydd yr Ymgeisydd yn asesu hyn ymhellach yn ystod y broses AEA.
Tebygolrwydd	Nid yw'r tebygolrwydd y bydd effeithiau trawsffiniol posibl yn digwydd wedi'i werthuso'n llawn ar y cam hwn. Fodd bynnag, mae'r Adroddiad Sgrinio Trawsffiniol, yr Adroddiad Sgrinio HRA a'r Adroddiad Cwmpasu yn nodi bod tebygolrwydd uchel y gallai sŵn tanddwr effeithio ar bysgod a mamaliaid môr yn ystod y cam adeiladu. Disgrifir bod tebygolrwydd uchel hefyd y bydd dadleoli a risg gwrthdaro yn ystod y cyfnod gweithredu yn effeithio ar adar môr. Mae'r Arolygiaeth o'r farn, o ystyried y wybodaeth a ddarparwyd yn yr Adroddiad Cwmpasu, yr Adroddiad Sgrinio HRA, a'r Adroddiad Sgrinio Trawsffiniol mai effeithiau ar bysgod a physgod cregyn, mamaliaid môr, adareg ar y môr a morgludiant a mordwyaeth sy'n fwyaf tebygol o achosi effeithiau trawsffiniol arwyddocaol.
Hyd	Nid yw hyd effeithiau trawsffiniol posibl wedi cael ei werthuso'n llawn ar y cam hwn.
Amllder	Nid yw amllder effeithiau trawsffiniol posibl wedi cael ei werthuso'n ar y cam hwn. Fodd bynnag, mae'r Adroddiad Cwmpasu yn nodi bod effeithiau o sŵn tanddwr yn ystod y cyfnod adeiladu yn debygol o fod yn ysbeidiol. Mae effeithiau ar adar môr yn ystod gweithredu yn debygol o fod yn barhaus.
Gwrthdroadwyedd	Nid yw gwrthdroadwyedd effeithiau trawsffiniol posibl wedi cael ei werthuso'n llawn ar y cam hwn. Fodd bynnag, mae'r Adroddiad Sgrinio Trawsffiniol yn awgrymu y gallai effeithiau gweithredu ar famaliaid môr ac adareg ar y môr fod yn wrthdroadwy ar ôl datgomisiynu'r Datblygiad Arfaethedig.
Effeithiau cronol	Ar y môr Mae'r Adroddiad Cwmpasu yn datgan y bydd yr asesiad o effeithiau cronol yn ystyried y mathau canlynol o brosiectau: • datblygiadau ynni adnewyddadwy; • datblygiadau olew a nwy ar y môr; • datblygiadau piblinellau a cheblau; • gweithgareddau porthladd a harbwr; • safleoedd gwaredu morol; a • safleoedd treillio morol. Ar y tir

	Mae'r Adroddiad Cwmpasu yn nodi nad oes unrhyw weithgareddau ar y tir wedi cael eu hamlygu a allai arwain at effeithiau ar wladwriaeth EEA, ac mae'n dod i'r casgliad, felly, na allai fod unrhyw effeithiau trawsffiniol cronol. Nid yw'r Ymgeisydd wedi cynnal asesiad o effeithiau cronol eto, felly nid yw wedi amlygu unrhyw effeithiau cronol trawsffiniol arwyddocaol tebygol ar y cam hwn.
<u>Sgrinio trawsffiniol a gynhaliwyd gan yr Arolygiaeth ar ran yr Ysgrifennydd Gwladol</u> O dan Reoliad 32 Rheoliadau Cynllunio Seilwaith (Asesu Effeithiau Amgylcheddol) 2017 (Rheoliadau AEA 2017) ac ar sail y wybodaeth sydd ar gael gan yr Ymgeisydd ar hyn o bryd, mae'r Arolygiaeth o'r farn bod y Datblygiad Arfaethedig yn debygol o gael effaith arwyddocaol ar yr amgylchedd mewn Gwladwriaeth EEA. Wrth ddod i'r casgliad hwn, mae'r Arolygiaeth wedi defnyddio'r ymagwedd ragofalus (a esbonnir yn ei Nodyn Cyngor Deuddeg: Effeithiau Trawsffiniol) ac wedi ystyried y wybodaeth a gyflenwyd gan yr Ymgeisydd ar hyn o bryd. <u>Cam gweithredu:</u> Mae angen hysbysu am faterion trawsffiniol o dan Reoliad 32 Rheoliadau AEA 2017. Rhaid hysbysu'r gwladwriaethau canlynol: • Gweriniaeth Iwerddon; a • Ffrainc. O ran Gweriniaeth Iwerddon, mae'r rhesymau dros hysbysu'n ymwneud ag effeithiau posibl ar boblogaethau pysgod a physgod cregyn, poblogaethau o bwysigrwydd cadwraeth (pysgod, mamaliaid môr ac adar môr) a morgludiant masnachol. O ran Ffrainc, mae'r rheswm dros hysbysu'n ymwneud ag effeithiau posibl ar boblogaethau mamaliaid môr sydd o bwysigrwydd cadwraeth. Dyddiad: 24/09/2021 Sylwer: Mae dyletswydd yr Ysgrifennydd Gwladol o dan Reoliad 32 Rheoliadau AEA 2017 yn parhau drwy gydol proses y cais.	

Nodyn:

Mae'r Arolygiaeth wedi sgrinio materion trawsffiniol yn seiliedig ar yr ystyriaethau perthnasol a nodir yn yr Atodiad i'w Nodyn Cyngor Deuddeg, sydd ar gael ar ein gwefan yn <https://infrastructure.planninginspectorate.gov.uk/cy/legislation-and-advice/advice-notes/>

Transboundary screening undertaken by the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) for the purposes of Regulation 32 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations)

Project name:	Awel y Môr Offshore Wind Farm (OWF)
Address/Location:	To the west of, and immediately adjacent to, the Gwynt y Môr Offshore Wind Farm. The array area would be located approximately 10.6km off the coast of North Wales with the offshore export cable making landfall on the north east coast of Wales extending to a substation located in Bodelwyddan.
Planning Inspectorate Ref:	EN010112
Date(s) screening undertaken:	24/09/2021

FIRST TRANSBOUNDARY SCREENING

Document(s) used for transboundary Screening:	Environmental Impact Assessment (EIA) Scoping Report ('the Scoping Report') – dated March 2020. Habitat Regulations Assessment (HRA) Screening Report ('the HRA Screening Report') – dated March 2020. Volume 1, Annex 3.2: Transboundary Screening Report ('the Transboundary Screening Report') – dated March 2021.
Screening Criteria:	The Inspectorate's Comments:
Characteristics of the Development	The Scoping Report states the Proposed Development will consist of up to 107 Wind Turbine Generators (WTGs) and cover an area of approximately 106.4km². The array area is located off the north coast of Wales and the offshore ECR search area surrounds the existing Rhyl Flats OWF. The transmission technology chosen for the Proposed Development is High Voltage Alternating Current (HVAC). The Scoping Report provides an indicative design envelope to be refined during the EIA process. Subsequently, the Scoping Report refers to '<i>search areas</i>' within which the offshore array, offshore export cable route (ECR), onshore ECR and onshore substation would be located. Offshore Components: • up to 107 WTGs with a foundation footprint of up to 2,827m² and total array area of up to 106.4 km²;

- rotor diameter up to 300m with a maximum blade tip height above Mean High Water Springs (MHWS)/Lowest Astronomical Tide (LAT) of 332m and a minimum lower blade tip height of tip height of 22m above MHWS;
- a met mast installed on a monopile with a maximum diameter of 5m;
- up to two offshore substation platforms (OSP), footprint per foundation of up to 2,827m², maximum topside height of 115m above LAT, maximum topside width of 50m and maximum topside length of 80m;
- inter-array cables with a maximum length: 228km, total footprint of seabed disturbance during installation of up to 33km²;
- scour protection – number: 107, total footprint: 4.387km²;
- cable protection; and
- up to two offshore export cables (HVAC) with a total length of 80km (40km per cable), total footprint of seabed disturbance of up to 1km².

The Scoping Report states that multiple foundation types remain under consideration for the WTGs and OSPs. These include:

- monopile;
- suction bucket monopile;
- gravity base monopile;
- pin piled jacket;
- suction bucket jacket; and
- gravity base jacket.

Multiple methodologies remain under consideration for the installation of inter-array and offshore export cables. These include:

- jet trenching;
- pre-cut and post lay ploughing (or simultaneous lay and plough);
- mechanical trenching;
- dredging;
- mass flow excavation;
- rock cutting; and
- burial sledge.

Cable protection may also be required if it is not possible to bury the inter-array and export cables, but the extent of any protection has still to be determined by the Applicant. The Scoping Report states that multiple types of scour protection (and associated installation methods) for WTG and OSP foundations remain under consideration. These include:

- rock or gravel placement;
- concrete mattresses;

	• flow energy dissipation devices; • concrete or high-density plastic aprons or coverings; and • bagged solutions. The maximum area of scour protection per foundation, including the structure footprint area would be around 41,000m². Onshore Components: • up to two onshore export cables with a total length of 30km (15km per cable); • Landfall and Transition Joint Bays (TJB) – number: 2, total footprint: 15,000m²; • onshore substation site area of up to 50,000m² consisting of 5 buildings with a maximum height of 15m, total footprint: 50,000m²; and • extension of National Grid Gas Insulated Substation (GIS) building and substation at the existing Bodelwyddan substation. The Scoping Report states that the installation of onshore export cables would be primarily through a combination of open cut method and horizontal directional drilling. The Development Consent Order (DCO) application for the Proposed Development is anticipated in 2022. The Scoping Report states construction of the Proposed Development is likely to commence in 2026 and be operational by 2028. The operational lifetime of the Proposed Development would be approximately 25 years.
Location of Development (including existing use) and Geographical area	Offshore Site and Surroundings The offshore components of the Proposed Development are in the Irish Sea off the north east coast of Wales, west of the River Dee and east of Conwy. The WTG array area is located 10.6km off the north coast of Wales. Awel y Môr OWF offshore ECR search area surrounds the existing Rhyl Flats OWF and coincides with OWF main export cables, gas pipelines and Eirgrid East-West Interconnector, which connects the electricity grids of Ireland and the UK. The Scoping Report identifies multiple existing uses for the offshore site and surrounding area which may be affected by the Proposed Development. These include: • recreational activities; • commercial fisheries; • marine aggregates dredging; • British Marine Aggregate Producers Association (BMPA) transit routes; and • shipping traffic, including maintenance vessels for Gwynt y Môr OWF and vessels operating out of Liverpool Harbour. The Scoping Report lists five operational OWFs neighbouring the Proposed Development which are:

	• Gwynt y Môr (adjacent to array area); • North Hoyle (11km east of the array area); • Rhyl Flats (coincides with offshore ECR search area); • Burbo Bank (26km east of the array area); and • Burbo Bank Extension (16km east of the array area). Onshore Site and Surroundings The onshore components of the Proposed Development are located on the north east coast of Wales, west of the River Dee and east of Conwy, within the counties of Denbighshire and Conwy. The precise location of the landfall and the onshore cable route is still being refined. However, the Scoping Report indicates landfall will occur at a location between Colwyn Bay and Prestatyn on the north coast of Wales. The Scoping Report identifies multiple existing uses for the onshore site and surrounding area which may be affected by the Proposed Development. These include: • tourism; • mineral safeguarding areas; • road network, including A55 North Wales expressway; and • railway network, including stations at Rhyl, Abergele and Prestatyn.
Environmental Importance	Offshore <i>Water quality:</i> • The Scoping Report identifies multiple Water Framework Directive (WFD) bodies within 2km of the Proposed Development. These include the North Wales WFD coastal water body and the Clwyd WFD transitional water body which coincide with the offshore ECR search area. The North Wales WFD coastal water body coincides with the offshore ECR search area. <i>Benthic Subtidal & Intertidal Ecology:</i> • Y Fenai a Bae Conwy/Menai Strait and Conwy Bay Special Conservation Area (SAC) is located adjacent to the offshore ECR search area and is designated for marine habitats including sandbanks, mudflats and reefs. • Aber Dyfrdwy/ Dee Estuary SAC is located 9.3km away from the offshore ECR search area and is designated for marine habitats including mudflats, <i>Salicornia</i> and other annuals colonising mud and Atlantic salt meadows. • Fylde Marine Conservation Zone (MCZ) is located 25.8km from the Proposed Development's array area and is designated for subtidal and subtidal mud habitats. <i>Fish and Shellfish Ecology:</i> • The Scoping Report identifies multiple spawning and nursery grounds for commercially important species within the fish and shellfish study area including sand eel, cod and king/queen scallop.

- Migratory fish species which may be present in the Scoping Report study area are stated to include twaite shad, allis shad, sea lamprey, Atlantic salmon, sea trout and European eel. These species are also qualifying features of several designated sites including the Aber Dyfrdwy/Dee Estuary SAC, the Y Fenai a Bae Conwy and the Afon Dyfrdwy a Llyn/River Dee and Bala Lake SAC.
- The Scoping Report records commercial fishing activity within the array area for the Proposed Development including potting vessels and scallop dredgers.
- The designated habitats in Y Fenai a Bae Conwy/Menai Strait and Conwy SAC may provide spawning habitats for sand eel which is a key prey species for harbour porpoise.

Marine Mammals:

- The Scoping Report identifies the potential presence of harbour porpoise, grey seal, bottlenose dolphin, Risso's dolphin, short-beaked common dolphin and minke whales within the marine mammal study area for the Proposed Development.
- Due to the mobile nature of marine mammals the Scoping Report and HRA Screening Report identify potential connectivity between the marine mammal study area and several SACs designated for grey seal, harbour seal and/or harbour porpoise under the jurisdiction of European Economic Area (EEA) states, including the Republic of Ireland and France.

Offshore Ornithology:

The Scoping Report and the HRA Screening Report identify potential connectivity between the offshore area and SPAs including:

- Bae Lerpwl/Liverpool Bay Special Protection Area (SPA) overlaps with the offshore ECR search area. The SPA's designated features include red-throated diver, common scoter, and an assemblage of migratory species.
- Aber Dyfrdwy /Dee Estuary SPA and Ramsar site is located adjacent to the offshore ECR search area. The SPA's designated features include black tailed godwit, curlew, common tern and an assemblage of waterbirds.
- Several SPAs designated for kittiwake under the jurisdiction of the Republic of Ireland.

Shipping/offshore infrastructure:

- The Scoping Report identifies five operational OWFs near Awel y Môr OWF array area including Gwynt y Môr and Rhyl Flats. The export cables for these OWF overlap with the offshore ECR search area. The Scoping Report also notes the presence of other active cables within the ECR search area but does not provide any further detail.
- Gas pipelines running from Liverpool Bay to the Point of Ayr and from Morecambe Bay gas fields to Walney are stated to be immediately adjacent to the offshore ECR search area.

- The Eirgrid East-West Interconnector, which connects the Irish and British electricity grids, is located within the offshore ECR search area and adjacent to the array area.
- The Scoping Report identifies commercial shipping in the area including four passenger ferry routes and tanker traffic.

Archaeological remains:

The Scoping Report identifies the potential for preserved prehistoric features. Features already known from the area include:

- Three submerged forests and intertidal peat beds within the study area for the Proposed Development.
- 22 shipwreck sites ranging in age from the post-medieval to the twentieth century including one protected wreck site.

Military and Civil Aviation:

- The Scoping Report identifies military and civil aviation receptors, including radar systems located in proximity to the Proposed Development.

Onshore

Terrestrial ecology:

The Scoping Report lists a number of designated sites in the vicinity of the onshore study area for the Proposed Development. Within the study area the following features have been recorded:

- Coedwigoedd Dyffryn Elwy/Elwy Valley Woods SAC designated for *Tilio-Acerion* forests of slopes, screes and ravines.
- Bryn Euryn Site of Special Scientific Interest (SSSI), designated for grassland communities and plant species on limestone crag outcrops.
- Mynydd Marian SSSI, designated for limestone grassland communities and a colony of the silver studded blue butterfly.
- Llanddulas Limestone and Gwyrch Castle Wood SSSI designated for limestone grassland, heath and woodland communities, populations of vascular plants, bryophytes, butterflies and moths and a lesser horseshoe bat roost.
- 117 Local Wildlife Sites (LWS).
- Habitats of Principal Importance including traditional orchards, wood pasture, wet woodland and coastal and floodplain grazing marsh.

Historic environment:

- The Scoping Report identifies a number of historic features in the vicinity of the onshore ECR. These include the Castles and Town Walls of Edward I World Heritage Site (1.5km away), 23 Scheduled Monuments within approximately 11km, 626 Listed Buildings and 18 Conservation Areas within 10km of the onshore ECR.

Potential impacts and Carrier	Offshore <i>Physical Processes:</i> Potential impacts upon the hydrodynamic regime during operation of the Proposed Development as a result of interaction between waves and WTG foundation structures, including those belonging to other OWFs. <i>Fish and shellfish:</i> Potential impacts on fish and shellfish which are features of designated sites under the jurisdiction of other EEA states or of commercial value to them. The Transboundary Screening Report identifies the potential for effects from all phases of the Proposed Development, particularly from direct effects on fish from underwater noise generated during piling. <i>Marine Mammals:</i> Potential impacts on marine mammals during construction, operation and decommissioning of the Proposed Development which are qualifying features of designated sites under the jurisdiction of an EEA state. Potential effects identified include underwater noise produced during foundation installation and WTG operation; loss of, or disturbance to prey species spawning/nursery habitat; and Electromagnetic Field (EMF) effects. <i>Offshore Ornithology:</i> Potential impacts during operation of the Proposed Development on bird species which are qualifying features of designated sites under the jurisdiction of an EEA state. Potential effects identified include collision with turbines, displacement (i.e. barrier effects) and disturbance to prey species. <i>Commercial Fisheries:</i> Potential impacts on commercial fisheries, including international fishing fleets during construction, operation and decommissioning of the Proposed Development. <i>Shipping and Navigation:</i> Potential impacts on commercial shipping and navigation, including commercial passenger ferries between Liverpool and Dublin (Republic of Ireland) during operation of the Proposed Development. Onshore None identified within the Scoping Report, HRA Screening Report or Transboundary Screening Report. At this point, given the information available, the Inspectorate considers that significant transboundary effects from onshore activities associated with the Proposed Development are unlikely.
Extent	Offshore <i>Physical Processes:</i> Impacts may occur on physical processes outside of the UK Exclusive Economic Zone (EEZ). However, the Transboundary Screening Report

	notes that the effects would be confined to Isle of Man waters. No EEA state would be affected. <i>Fish and Shellfish:</i> The Transboundary Screening Report identifies the potential for behavioural disturbance of fish to extend into the Republic of Ireland EEZ. <i>Marine Mammals:</i> The Scoping Report and HRA Screening Report identify potential transboundary impacts on marine mammals associated with SACs under the jurisdiction of the Republic of Ireland and France. The Inspectorate notes that the Transboundary Screening Report proposes to focus on SACs within the EEZ of the Republic of Ireland. <i>Offshore Ornithology:</i> The Scoping Report and HRA Screening Report identify potential impacts on kittiwake associated with SPAs under the jurisdiction of the Republic of Ireland. In addition, the Scoping Report notes that the little tern populations associated with the Bae Lerpwl/Liverpool Bay SPA and the Aber Dyfrdwy /Dee Estuary SPA regularly move between colonies in the UK and the Republic of Ireland. <i>Commercial Fisheries:</i> As noted above, the Applicant has identified potential impacts on fish species of commercial importance. The Transboundary Screening Report states that impacts may traverse international boundaries with effects primarily expected on the Republic of Ireland fishing fleet. <i>Shipping and Navigation:</i> The Inspectorate notes that the Transboundary Screening Report states that effects on shipping are likely to be limited to the UK EEZ. However, as noted above the Proposed Development has the potential to affect commercial ferry services running between Liverpool and Dublin.
Magnitude	The magnitude of potential impacts has not been identified at this stage and will be assessed further by the Applicant during the EIA process.
Probability	The probability of potential transboundary effects occurring has not been fully evaluated at this stage. However, the Transboundary Screening Report, HRA Screening Report and the Scoping Report note the high probability of underwater noise impacts affecting fish and marine mammals during construction. The probability of displacement and collision risk during operation affecting seabirds is also described as high. The Inspectorate considers that, given the information provided in the Scoping Report, HRA Screening Report and Transboundary Screening Report impacts on fish and shellfish, marine mammals, offshore ornithology and shipping and navigation are most likely to result in significant transboundary effects.

Duration	The duration of potential transboundary effects has not been fully evaluated at this stage.
Frequency	The frequency of potential transboundary effects has not been fully evaluated at this stage. However, the Scoping Report notes that impacts from underwater noise during construction are likely to be intermittent. Effects on seabirds during operation are likely to be continuous.
Reversibility	The reversibility of potential transboundary effects has not been fully evaluated at this stage. However, the Transboundary Screening Report suggests operational effects on marine mammals and offshore ornithology may be reversible following decommissioning of the Proposed Development.
Cumulative impacts	Offshore The Scoping Report states that the cumulative impact assessment will consider the following project types: • renewable energy developments; • offshore oil and gas developments; • pipelines and cable developments; • port and harbour activities; • marine disposal sites; and • marine dredging sites. Onshore The Scoping Report notes that no onshore activities have been identified which could lead to effects on an EEA state and concludes that there could not therefore be any cumulative transboundary effects. The Applicant's cumulative impact assessment has not yet been undertaken so the Applicant has not identified any likely significant transboundary cumulative effects at this stage.
<u>Transboundary screening undertaken by the Inspectorate on behalf of the SoS</u> Under Regulation 32 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations) and on the basis of the current information available from the Applicant, the Inspectorate is of the view that the Proposed Development is likely to have a significant effect on the environment in an EEA State. In reaching this view the Inspectorate has applied the precautionary approach (as explained in its Advice Note Twelve: Transboundary Impacts) and taken into account the information currently supplied by the Applicant. <u>Action:</u> Transboundary issues notification under Regulation 32 of the 2017 EIA Regulations is required. States to be notified: • Republic of Ireland; and • France.	

For the Republic of Ireland, the reasons for notification relate to potential impacts on populations of fish and shellfish, populations of conservation importance (fish, marine mammals, and seabirds) and commercial shipping. For France, the reason for notification relates to potential impacts on marine mammal populations of conservation importance.

Date: 24/09/2021

Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.

Note:

The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at <http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3.3 Appendix G3: Regulation 32 Response (Republic of Ireland)



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30 September 2021

**RE: Proposed Application by Awel y Môr Offshore Wind Farm Limited (the Applicant)
for an Order Granting Development Consent for the Awel y Môr Offshore Wind Farm
(the Proposed Development)**

Dear Ms. Lancaster,

I refer to your letter dated 24 September 2021, giving formal notification in relation to the above-mentioned proposed new Wind Farm, which is at pre-application stage in the UK's development consent procedure.

I note in the screening statement prepared on behalf of the Secretary of State, the Planning Inspectorate is of the view that the proposed development is likely to have significant effect on the environment in Ireland.

I wish to confirm, on behalf of the Minister for Housing, Local Government and Heritage, that the State accepts your invitation to participate in the transboundary EIA consultation procedure in relation to the proposed development.

Noting that the application is at the pre-application stage, we await further notification of when the transboundary EIA procedure officially begins. Please ensure that any communications in this regard are also issued to [REDACTED]



Declan Grehan

Assistant Principal

EU & International Planning Regulation

Department of Housing, Local Government and Heritage

Ireland

4 Appendix H: Section 42 and 47 Reponses and Applicant Regard

4.1 Appendix H1: Responses Received from Section 42 Consultees and Applicant Regard

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_001_07092021	S42	N/A	No Objection	This has been noted and welcomed by the Applicant.	yes	no
PrB_002_10092021	S42	N/A	Thank you for your consultation. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee on Nationally Significant Infrastructure Projects. The Canal & River Trust have reviewed the consultation documentation and has no comment to make on the proposals as the works would not impact any assets which are owned or maintained by the Trust	This has been noted and welcomed by the Applicant.	yes	no
PrB_003_20092021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	I refer to your letter dated 27th August 2021 regarding the Proposed Development. This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG). NGG has no apparatus within the consultation area.	This feedback has been noted by the Applicant.	yes	no
PrB_003_20092021	S42	Volume 3, Chapter 6: Ground Conditions and Land Use	Due to the proximity of some electricity transmission assets to the proposed scheme, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed. In respect of existing NGET infrastructure, this will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within proximity of its apparatus in order to safeguard the integrity of our apparatus and to remove the requirement for objection. Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGET's apparatus, this will require appropriate protection and further discussion on the impact to its apparatus and rights. NGET requests to be consulted to ensure that the most appropriate protective provisions are included within the DCO application National Grid infrastructure within / in close proximity to the order boundary	This has been noted. The Applicant will continue consultation with NGET as the project progresses as appropriate.	yes	no
PrB_003_20092021	S42	Volume 3, Chapter 6: Ground Conditions and Land Use	National Grid Electricity Transmission has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation form an essential part of the electricity transmission network in England and Wales. Substation • Bodelwyddan 400kV Sub Station. • Associated overhead and underground apparatus including cables. Overhead Lines 4ZB 400kV OHL - Bodelwyddan - Deeside - Pentir 1 Bodelwyddan - Deeside - Pentir 2 GM Route 400kV OHL Bodelwyddan - Deeside - Pentir 2 Cable Apparatus • Pentre-Mawr Cable Compound • Deeside - Pentir 1 Cable • Bodelwyddan4 St Asaph 132kv Cable Sections 01 And 02 I enclose a plan showing the location of National Grid's apparatus in the Bodelwyddan area as follows: - overhead lines; - the substation; and - underground cables.	This has been noted by the Applicant.	yes	no
PrB_003_20092021	S42	Volume 8, Document 3.1: Outline CoCP	National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset • Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004). • If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances. • The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance. • Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.	This has been noted by the Applicant	yes	no
PrB_003_20092021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	The outline LEMP (application ref: 8.13) proposes enhancement to achieve a structurally diverse, species rich neutral grassland (that is low in height) in this area	yes	yes
PrB_003_20092021	S42	Volume 8, Document 3.1: Outline CoCP	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above. • National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place. • Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	The outline Construction Method Statement sets out how the Applicant will liaise with utilities and services providers. RWE is also involved in ongoing discussion with National Grid regarding proposed works required to connect to existing National Grid infrastructure.	yes	no
PrB_004_27092021	S42	N/A	As no concerns have been raised, the RYA will not comment at this time.	This has been noted by the Applicant.	yes	no
PrB_005_27092021	S42	N/A	Having consulted the colleague who works with me on these applications we have concluded that we have no comment from the Cruising Association so you can take it that we are content.	This has been noted by the Applicant.	yes	no
PrB_006_30092021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	DBA and walkover survey – The methodology presented in the PEIR is broadly OK. The results so far present little that is new to us and this is largely due to the fact that the majority of the onshore cable corridor and substation location are within agricultural pasture or arable fields where surface archaeology has been largely erased with the exception of some better preservation in small woodland areas. We have concerns about the lack of complete coverage of the cable route corridor during the walkover survey with approximately 70% coverage completed. There is time between now and the submission of the ES to complete the walkover coverage of the missing 30% and this should be done so that we have a complete and accurate evidence base to work from in terms of suggesting mitigation and assessing the significance of any identified impacts.	A small proportion of the ECC route was unavailable for access at the time of the walkover survey. In conjunction with the data collection for the Geophysical Survey, approximately 95.49% of the (accessible) route has been covered and this is considered to provide a robust evidence base for assessment. Details of coverage can be found in both the desk-based assessment (Volume 5, Annex 8.1: Archaeological Desk-Based Assessment, Figures 16 and 17, (application ref 6.5.8.1)) and geophysical Detailed Gradiometer Survey Report (Volume 5, Annex 8.3: Detailed Gradiometer Survey Report, (application ref 6.5.8.3)) .	yes	no
PrB_006_30092021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	It is unclear whether features which can clearly be seen in the inter-tidal area on the DBA photographs (possible tree stumps, timber uprights, patches of stone) have been accurately described and mapped. If not then this should be completed with a re-visit and accurate mapping. We raised this issue at the 4/8/21 meeting and pointed to new evidence from surveys for the Central Prestatyn Coastal Defence Scheme (CPAT for JBL Consultants on behalf of Denbs CC) including a foreshore survey in April 2021 for JBL Consulting which identified significant archaeological deposits on the beach including potential prehistoric footprints, prehistoric tree stumps and lenses of peat deposits with artefact and paleoenvironmental potential. There is a high potential for significant direct impacts in the inter-tidal area during construction and the nature and extent of the archaeology is poorly understood. In 8.4.2 Fig. 6 it seems clear that the non-designated assets shown do not include the CPAT foreshore survey results or the features which can be seen in the DBA foreshore photographs. It is clear in 8.6 (41, 42) that the DBA is predictive only and that the condition and distribution of assets is poorly defined. In 8.7 (45) it is incorrectly stated that there are no recorded assets in the inter-tidal area of Section A – B.	A walkover survey of the inter-tidal area was undertaken in December 2021. Features within the inter-tidal area were photographed, described and mapped. The results are presented within Volume 5, Annex 8.1: Archaeological Desk-Based Assessment (application ref: 6.5.8.1) and incorporated into this chapter.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_006_30092021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Recommendations – Clearly the DBA and particularly the walkover survey are currently lacking in detail for the inter-tidal area, and this should be addressed with regard to the points raised above. It would be preferable if any current surface features with archaeological potential could be mapped and described as features which may show now could be different to those recorded in April 2021 due to the rapidly shifting sand cover in this area. It would be preferable if the sub-surface potential of the inter-tidal area could be evaluated now by a geo-archaeological specialist using a transect of boreholes and/or sample pits to recover a core profile of deposits and samples for dating and content appraisal. This would help to understand the potential impact here and provide more information leading to informed mitigation rather than the current best-guess scenario. The completion of the walkover survey over the rest of the 30% of the corridor which was not accessible for various reasons should be attempted. Where access is still not possible the locations should be identified and mapped and the reasons should be clearly stated.	A small proportion of the ECC route was unavailable for access at the time of the walkover survey. In conjunction with the data collection for the Geophysical Survey, approximately 95.49% of the (accessible) route has been covered and this is considered to provide a robust evidence base for assessment. Details of coverage can be found in both the desk-based assessment (Volume 5, Annex 8.1: Archaeological Desk-Based Assessment, Figures 16 and 17, (application ref 6.5.8.1)) and geophysical Detailed Gradiometer Survey Report (Volume 5, Annex 8.3: Detailed Gradiometer Survey Report, (application ref 6.5.8.3)) .	yes	no
PrB_006_30092021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Geophysics – The methodology for the geophysics survey is fine. We have concerns about the lack of complete coverage of the agricultural pasture and arable fields with approximately 65% covered so far. We will be wholly dependant on the results of the geophysics for identifying any sub-surface archaeological potential and it is therefore of critical importance that we obtain as near to 100% coverage as possible of accessible fields. The current coverage of 65% is not acceptable and will not allow a fully informed assessment of the potential direct impacts. In the meeting on 4/8/21 it was stated that potential legal powers of entry would be needed to access fields where access has currently been denied by landowners and this should be explored further to achieve maximum geophysics coverage.	A small proportion of the ECC route was unavailable for access at the time of the walkover survey. In conjunction with the data collection for the Geophysical Survey, approximately 95.49% of the (accessible) route has been covered and this is considered to provide a robust evidence base for assessment. Details of coverage can be found in both the desk-based assessment (Volume 5, Annex 8.1: Archaeological Desk-Based Assessment, Figures 16 and 17, (application ref 6.5.8.1)) and geophysical Detailed Gradiometer Survey Report (Volume 5, Annex 8.3: Detailed Gradiometer Survey Report, (application ref 6.5.8.3)) .	yes	no
PrB_006_30092021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	We are concerned that the geophysical survey will not be followed up by appropriate pre-consent ground-truthing of the results by investigative trenching to identify features which have archaeological or perhaps geological/geomorphological, or more recent origins. Both TAN 24 (May 2017) and Planning Policy Wales (Feb 2021) are quite clear about pre-determination evaluation (including investigative trenching) being required where direct archaeological impacts are predicted or identified. Intrusive investigation will allow us to quantify the nature, extent, date, level of preservation, importance and relationship of features identified in the geophysics results and provide an informed mitigation response. We have reservations about leaving this intrusive phase of assessment until the post-consent construction stage and do not consider that we have reliable guarantees that there will be no construction timing issues at the post consent stage which lead to a less thorough investigation and mitigation phase.	Targeted archaeological trial trenching was attempted between December 2021 and February 2022. However due to poor weather and ground conditions the trial trenching could not be carried out. It was agreed with CPAT that this trial trenching exercise could be incorporated into the post-consent works and as such the method statement is appended to the Outline Written Scheme of Investigation (application ref: 6.5.8.5)	yes	no
PrB_006_30092021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Recommendations – Complete coverage of 100% geophysics of all accessible fields along the cable corridor should be attempted. Where access is still not possible the locations should be identified and mapped and the reasons should be clearly stated. Ground-truthing of the geophysics results should be attempted in accordance with Tan 24 and PPW guidance to provide an accurate and informed evidence base for a mitigation framework. The trenching should target all significant anomalies with a predicted archaeological origin and some of those where the origin is uncertain. Consideration should be given to extending the period between the receipt of the PEIR consultation replies and the submission of a finalized ES with the DCO application so that the further assessments recommended above are given enough time to be properly completed, the results discussed and an informed set of mitigation statements included in the ES.	The data collected as the baseline for this assessment is considered to be adequate and a delay to programme would be disproportionate when considered in the context of the Welsh and UK Governments targets for renewable energy. Notwithstanding this please see responses to associated comments regarding the final achieved survey coverage and site visits.	yes	no
MOP_005_01102021	S44	N/A	The proposed route affects the designated KSS land (Key Strategic Site) for development, our clients have several interested parties that are looking at this site to develop. The post completion access and maintenance routes fall directly within the KSS option land and will have a significant impact on the development. Due to an existing windfarm connection cable this additional cable route increases the sterilization of land. Security is a significant concern, and our clients are seeking additional assurances that all measures and steps will be taken to protect their business and property, throughout the project.	The PEIR boundary in this location was widened to consider land both in and out of the KSS site. Three different cable route corridors were presented within the PEIR, the various constraints the Applicant has to consider, some of which are; A55 crossing, the proposed solar farm, the KSS site and the presence of underground utility apparatus. One of the cable routes provided at section 42 avoided the KSS site and instead crossed the A55 from a section of woodland to the north, the other 2 cable routes crossed the KSS given that there is no current planning consent granted for development of the KSS. There is a preference to reduce the impact of the Project on the KSS. However, given a number of constraints including existing utility apparatus and existing woodland, it is not possible to entirely remove any interaction with the area. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation from development will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_005_01102021	S44	N/A	It is requested the cable route be so placed on the East side of the land as shown on Plan A. This connects directly onto the lower south parcel of neighbouring land at the centre line route. And accommodate the alterations sought by the owners at Pengwern. By placing the route at this point you also remove the post construction access through the KSS land, as access can be taken directly off the public highway through agreed gate ways. It is requested the cable route be so placed on the East side of the land as shown on Plan A. This connects directly onto the lower south parcel of neighbouring land at the centre line route. And accommodate the alterations sought by the owners at Pengwern. By placing the route at this point you also remove the post construction access through the KSS land, as access can be taken directly off the public highway through agreed gate ways.	The PEIR boundary width in this location was widened to consider land both in and out of the KSS site. 3 different cable route corridors were presented at section 42 consultation given the various constraints the Applicant has to consider, some of which are; A55 crossing, the proposed solar farm, the KSS site and both large and small underground utility apparatus. One of the cable routes provided at section 42 avoided the KSS site and instead crossed the A55 from a section of woodland to the north, the other 2 cable routes crossed the KSS given that there is no current consent granted for development of the KSS. The chosen route has been selected as a compromise between all constraints in the region. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation from development will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	yes
MOP_006_01102021	S44	N/A	The proposed route affects the designated KSS land (Key Strategic Site) for development, our clients have several interested parties that are looking at this site to develop. The post completion access and maintenance routes fall directly within the KSS option land and will have a significant impact on the development. Due to an existing windfarm connection cable this additional cable route increases the sterilization of land. Security is a significant concern, and our clients are seeking additional assurances that all measures and steps will be taken to protect their business and property, throughout the project.	EIA impacts on Princes' Gorse woodland are significant in respect of tree felling, bats, badgers, potential flood impact and LVIA impact. Hence a project preference not to use the Eastern Route. There is a preference to reduce the impact of the Project on the KSS. However, given a number of constraints including existing utility apparatus and existing woodland, it is not possible to entirely remove any interaction with the area. An existing buried water pipe in the KSS sterilises a strip of land from development. The current design aligns with this strip, minimising the impact on the KSS. The TCC has been placed as far North as possible to leave the remaining land parcels free for development. Note that the TCC works only cause temporary severance. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land and sterelisation from development will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_006_01102021	S44	N/A	It is requested the cable route be so placed on the East side of the land as shown on Plan A. This connects directly onto the lower south parcel of neighbouring land at the centre line route. And accommodate the alterations sought by the owners at Pengwern. By placing the route at this point you also remove the post construction access through the KSS land, as access can be taken directly off the public highway through agreed gate ways. PIER Boundary issues, as the two key landowners are seeking to alter the route and as part of this consultation response, we consider that it has limited effect on the boundary, we also note that our clients would be willing to enter private negotiations to secure the route. However, we also note that there is some existing flexibility in the PIER boundary. We also wish to note that the altered route in conjunction with Pengwern farm, places the route of the cable a significant distance from a major watercourse and hedge row, which we consider to be an environmental benefit see Plan B, although the alternative is near a water course there is a public highway which severs the environmental corridor.	EIA impacts on Princes' Gorse woodland are significant in respect of tree felling, bats, badgers, potential flood impact and LVIA impact. Hence a project preference not to use the Eastern Route. Longer HDDs increase risk of technical issues with the installation and increase the noise impact of the trenchless installation works, using larger equipment for a longer period and increase the total duration of works in this area including 24hour working to complete trenchless crossing safely. The chosen route has been selected as a compromise between all constraints in the region. Matters relating to environmental mitigation and enhancement are contained within 6.3.5 Onshore Biodiversity Chapter.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_007_30092021	S44	N/A	The preference would be for the scheme not to impact the subject land as a proposed easement, within the cable corridor ,will sterilise a significant proportion of parcel and also reduce the prospects for any long term development potential for the remainder of the enclosure . In the event of the scheme proceeding -: our client would object to any trees being felled ;and 2.Based on the detail of the consultation drawing (indicating the cable corridor and the Temporary Construction Compound) it is envisaged that it would not be practical to farm the entire field during the project ; 3.Our client would be concerned that the productive agricultural land is reinstated in as good a condition ,in so far as is reasonably possible, as existed in advance of the works commencing .	The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use and manage the land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land on a proven loss basis. Commitment made to retain tree South of Glascoed road. Referenced in the crossing register as SSS-EOX-1. Matters relating to environmental mitigation and enhancement are contained within 6.3.5 Onshore Biodiversity Chapter.	yes	no
MOP_009_5102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The RWE/AWEL Y MOR Offshore Wind Farm project has created a new and real threat to the existence of Rhyl Golf Club. Having successfully navigated the recent issues from the Welsh Gov/DCC Sea Defence programme, this new challenge will pose a more definite end to the Club as we know it. From recent meetings, conducted by representatives of the Golf Club and RWE/AWEL Y MOR, two likely options are possible and have been outlined: Plan A: RWE/AWEL Y MOR want to place two “transition jointing boxes” on two 20 metre by 5 metre concrete slabs in the middle of the course (across the 4th, 5th & 6th fairways). The construction, although not too unsightly when completed, will require access rights and with this being a National Significant Infrastructure Project, will have rights over the land with constant disruption. The initial disruption to build the units will be at least 10 months and will cover 2 golfing seasons. Similar to the above but placed half a mile inland on the other side of the Lyons Robin Hood camp and railway line by the Dyserth Bends. Obviously, Plan B would mean that the Golf Club would just need to contend with the main Sea Defence work and we can play golf around this limited disruption. For RWE/AWEL Y MOR, this would mean possibly more cost and some logistics challenges but not insurmountable. The work for Plan A plus the Sea Defence work would mean continued disruption for up to 6 years. It would mean closure of the course for their works to be safely undertaken. The course would be partially unplayable and alternatives for our existing Members would need to be sought. The uncertainty and disruption will be too much for our members to contend with. This, in reality, would just be unsustainable for Rhyl Golf Club and we would see no viable financial future (members will leave and we are at break even now). The impact on Rhyl, it’s residents, the golfing community and all aspects around our history will be catastrophic. As a result, if the decision is to go with Plan A, we will look to close the club permanently from April 2022 (start of the new tax year). The impact on RWE reputation and public relations in the region will also be negatively impacted. We hope that Plan B should be given greater consideration and for it to be taken up, saving Rhyl Golf Club.	The applicant has revised the project details since PEIR and the landfall design has been amended to avoid above-ground permanent works within the Rhyl Golf Club .	Yes	yes
MOP_010_5102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The onshore cable route impacts several parcels of land currently occupied by Mr Beech and will cause considerable disruption to the farm business. Item No. 1 refers to the temporary construction compound to the north of Abergele Road. This area, along with the construction corridor, will remove over half of this parcel of land from production and any efforts to reduce the area of compound will be beneficial. Item No. 2 on the plan refers to land tenanted on a Farm Business Tenancy from Mr R B Webster. This is affected by both the temporary construction compound on the cable construction corridor, reducing the size of the construction compound will minimise the loss of productive land to farming operation. In addition, a parcel of land to the east will be severed by the construction corridor and will be left unfarmable unless temporary crossing points are installed.	TCC North of Abergele road to be progressed. The northern option avoids Geophysical returns in the southern area. By removing the Southern TCC option, the total landtake required has reduced. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to crop or graze the land or to manage weeds during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land on a proven loss basis	yes	no
MOP_010_5102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Item No. 3 refers to the access track located to the west of the HTM Business Park, it is vital that this remains open at all times during the works to allow access to the unaffected parcel of land. Item No. 4 refers to Gypsy Lane. This is a primary access route for the unaffected land, located office route, which is bordered by a temporary construction compound. It is vital that this remains open at all times so that access for checking livestock is available. The land benefits from a scheme of land drains and it is vital that these are not interrupted. Details of a pre and post land drainage scheme are required. Finally, the land surrounding Bryn Carrog farm has potential for future residential and commercial development and the cable easement will sterilise a significant area of this land.	Access will be provided to all areas outside of the Applicant orderlimit during the works. Access to land and property beyond the Applicant orderlimits will be retained or an alternative access provided. The landowner has the benefit of entering into a voluntary agreement which provides provision to undertake extensive drainage enhancement both inside and outside of the Applicant orderlimit. Pre and post construction drainage matters will be incorporated into the detailed design The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land and steralisation from development will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_010_5102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Items No. 1 & 2 on the attached plan relate to the temporary construction compound. Any reduction in the size of these construction compounds will reduce the impact on the farming operation and allowing Mr Beech to mitigate his losses. The compound area also located next to hard standing access tracks is vital for accessing the remaining land and these routes are to remain open at times for farming operations	The Applicant has consulted on a wider area of landtake at PEIR that is required for submission, the Applicant will take the minimum it requires for the construction and/or operation of the cables at submission. TCC North of Abergele road to be progressed. Decision was taken alongside the location of the other TCCs further down the route where we opted on balance to go to the North on them. The northern option avoids Geophysical returns in the southern area. By removing the Southern TCC option, the total landtake required has reduced. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_011_04102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Firstly, we note our client’s interest is on a Farm Business Tenancy (FBT). Having recently take occupation our client is undertaking a program of improvement works over the holding and bringing the land back into full commercial production for home grown feed supplies. They are or imminently progressing with soil improvements, in preparation for crop production, these works will take time to establish, and its it viewed that the timing of this proposal may coincide with land being in full quality production. •Scheme will enter the land at the time when the land will be at it’s best after having been improved and worked and producing an excellent high-quality crop. Thus, impacting of feed supplies. •The works will significantly put back what our clients have done to improve the land, thus they will have to restart all over again. •The affected parcels are small in comparison and the size of the proposal will completely take out of production a significant proportion of the holding. •The land is part of the historic floodplain, and our clients have genuine concerns as to the impact these works will have on the future flooding and land drainage. •Post works access off the River Embankment is not realistic as our clients are closing off the former gateways to improve safety. And prevent unauthorised access from a public footpath. •Future emergencies or cable works that may require drilling equipment be brought over the land. •Cable Joint / link boxes, Manholes / Chambers, as the HDD drill site will be some 10 to 15 meters back from the embankment our clients are very concerned that these will be installed with in the field, affecting production and managing the land.	The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land and steralisation from development will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis. Matters relating to construction works and flooding are contained within 8.13 Outline Code of Construction Parctice. The landowner has the benefit of entering into a voluntary agreement which provides provision to undertake extensive drainage enhancement both inside and outside of the Applicant orderlimit. A permanent access will be required across the property. The Applicant have proposed access routes using existing gateway and tracks. The landowner can agree alternative access route through the voluntary agreement. Placement of manholes and chambers will be provided at detailed design stage. See above for note on compensation which would cover above ground apparatus	yes	no

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MOP_011_04102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Design route amendments that are required. (Pengwern Home Farm). •The current route is proposed to dissect two parcels of land in half rendering them out of production and out of use, our clients are requesting the route be located to the eastern boundary see Plan D. •Post construction access is requested to be via the old former railway as shown on Plan E (Brown). This removes the need to pass and or re pass over what is essentially a flood defence embankment. And either installing a culvert crossing or ensure any installed crossings are safe and secure and mitigates any future responsibilities over any NRW main drains. •Cable Joints link boxes Manholes Chambers, we would wish to have the opportunity to have these not installed if possible, however if so needed then they are placed with in the proximity of the field margin. And the developer takes all measures to ensure the cable lengths are long enough to avoid joints / connections outside of the field margins. •Future drilling and or emergency works, our clients would ask that additional spare ducts are installed to mitigate against future drilling rigs being brought onto the land. Conclusion: •In altering the electric line, it not only allows for greater land use during construction but for any future maintenance or emergency works the effect will always be kept to the boundary, again maintaining the adjoining land as usable. •We feel the suggested amendments consider very realistic options and are reasonably achievable and will ensure the relationship is maintained and not impede or restrict the development in any way.	To realign the cable as requested would create Engineering challenges with a tight bend radius, creating issues when pulling cables. Maintaining the required cable bend radius results in the field parcel being dissected as shown. Alternatives have been explored but no improved design was identified. Regarding access, various alternatives have been explored but none found to be satisfactory in regards to property issues. Access will be provided to all areas outside of the Project orderlimit during the works. Access to land and property beyond the Project order limits will be retained or an alternative access provided. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
PrB_007_06102021	S42	N/A	Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes. In addition, Network Rail will wish to agree protection for the railway during the course of the construction works and otherwise to protect our undertaking and land interests. Network Rail reserves the right to produce additional and further grounds of concern when further details of the application and its effect on Network Rail's land are available. In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and stations. We have standard protective provisions which will need to be included in the DCO as a minimum therefore contact should be made to Lucia Delli-Compagni Lucia.Delli-Compagni@networkrail.co.uk to obtain a copy of the relevant wording In addition a number of legal and commercial agreements will need to be entered into, for example, asset protection agreements, method statements, connection agreements, property agreements and all other relevant legal and commercial agreements. This list is not exhaustive and will need to be reviewed once more details of the scheme are discussed between the parties. Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land. In addition, security of the railway boundary will require to be maintained at all times. In any event you must contact Network Rail's Asset Protection Engineers as soon as possible in relation to this scheme on the following e-mail address assetprotectionwales@networkrail.co.uk . Network Rail is prepared to discuss the inclusion of Network Rail land or rights over land subject to there being no impact on the operational railway, all regulatory and other required consents being in place and appropriate commercial and other terms having been agreed between the parties and approved by Network Rail's board. Network Rail also reserves the right to make additional comments once we have evaluated the proposals in more detail.	The Applicant has signed a BAPA with Network Rail and has achieved both Business and Technical Clearance. The Applicant is working closely with Network Rail to ensure the necessary documentaion is in place to protect the railway assets.	yes	no
PrB_007_06102021	S42	Volume 3, Chapter 6: Ground Conditions and Land Use	WIND TURBINES As with any structure to be erected adjacent to our property Network Rail is keen to ensure that promoters of such schemes consider the constructability, structural integrity and maintainability of the proposed turbine installations when planning the scheme. A wind turbine mast is considered to be a fixed structure which, subject to planning consent, could be constructed in close proximity to our property boundary. However, the wind turbine blades are clearly not fixed structures and their placement and operation needs to be considered as a specific issue. On the basis that Network Rail will not permit third party operation of turbine blades above our operational infrastructure we would require the mast to be situated a minimum distance of at least one blade length away from our property boundary. Any operator intending to construct new turbines in close proximity to the operational railway would then be expected to demonstrate how both the construction and operation of the wind turbine would be managed. This should include detailed consideration of successful erection of the mast, without disruption to rail operations, and then once operational how the risk of material fatigue would be managed for both the mast and movable parts. In the event of sudden mechanical/material failure we would also expect the operator to demonstrate the expected trajectory to ground of a detached turbine blade. We would not expect this failure zone to impact on Network Rail owned/managed property. When asked to comment on any new proposal we would therefore consider the minimum Wind Turbine Setback distance to be related to the proposed mast height and blade length. As mast heights and blade lengths will vary between installations we view it as appropriate that Network Rail consider each detailed proposal on a case-by-case basis.	The turbines will be at sea rather than near the railway line so there won't be any oversail or proximity issues.	yes	no
PrB_007_06102021	S42	Volume 3, Chapter 6: Ground Conditions and Land Use	FENCING Because of the nature of the proposed developments, the boundary measure/fence line must not be disturbed to accommodate any of the proposed construction aspects (particularly relevant for landfall locations 3&4 and the landfall compound zone 5).	This has been noted by the Applicant.	yes	no
PrB_007_06102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	DRAINAGE There is potential for drainage issues to arise. Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels – if altered, to be such that water flows away from the railway. Drainage is not to show up on Buried service checks.	The Construction Method Statement that is provided as part of the CoCP (application ref 8.13.1), proposes that drainage will be directed away from Network Rail land and no drainage works will be designed within 5m of the Network Rail boundary.	Yes	yes
PrB_008_06102021	S42	Volume 2, Chapter 1: Offshore Project Description	•We would welcome your earliest possible consultation regarding proposed layouts, as this project should not adversely affect the current lines of orientation at the operational Gwynt-Y-Mor OWF site. •Ehave attached our most recent standard navigation conditions (used for projects in English waters), which we would expect to be provided for either within your DCO or through your future Marine Licence application to NRW. •Noting the revised red line boundaries, could you please forward the relevant shape files for this project?	Preliminary consultation has been undertaken with both MCA and THLS with regard to layout, and it is anticipated that agreement of the final layout will be conditioned within the marine licence. This is detailed within the NRA (application ref: 6.4.9.1).	yes	yes

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_009_07102021	S42	Volume 2, Chapter 10: SLVIA	“The ZTVI diagrams confirm that the both the Scenario A (48 x 332m blade tip height) and Scenario B (91x 252m height) proposals will be visible from a substantial area of the AONB. When viewed from the AONB the proposed windfarm will visually connect the existing Rhyl Flats and Gwynt Y Mor wind farms to create a much larger, continuously developed skyline/seascape across much of the horizon. One of the special qualities of the AONB is the opportunity to experience wide ranging panoramic views, including those out to sea, and the Joint Committee is becoming increasingly concerned that the protected landscape is being visually ‘hemmed in’ by both onshore and offshore windfarm development to the detriment of this special quality. Views from the AONB will be increasingly characterised by wind farm dominated landscapes and seascapes. The AONB viewpoints (24 Graig Fawr, 26 Prestatyn Hillside Viewpoint Car Park, and 54 Y Foel, Dyserth) selected for assessment in the SLVIA are representative of the impact on key views from the northern part of the AONB but the committee would emphasise that, given the scale of the proposals, the development will be visible from a much larger area of the protected landscape. A critical consideration in relation to the potential visual impact of the development will be whether Scenario A (48 x 332m turbines) or B (91x 252m turbines) is pursued. The SLVIA viewpoint diagrams illustrate Scenario A, but it may be that the greater number of smaller turbines proposed in Scenario B would have less impact overall on views out to sea given that less turbine would be visible above the horizon. In this context the AONB would suggest that SLVIA viewpoint diagrams/photomontages should also be produced to illustrate Scenario B. The onshore proposals do not directly affect the AONB but the committee would emphasise the need to reinstate all landscape features removed (trees/woodlands/hedges) to accommodate the export cables and/or compensatory planting with a view to retaining and strengthening the characteristic Vale of Clwyd landscape when viewed from the higher ground of the AONB.” Please note that these are initial comments at this stage and cannot necessarily be taken to commit the AONB Joint Committee and Partnership when they formally comment on the proposals later in the application process.	MDS A and MDS B scenarios are shown in the visualisations for VP 24. This was agreed through ETG consultation in advance of the PEIR and confirmed for ES. The effects on the Special Qualities of the Clwydian Range and Dee Valley AONB are assessed in Volume 2, Chapter 10 (application ref: 6.2.10. The ES chapter also sets out the further mitigation of SLVIA effects that have been included in the MDS following consultation. The review of the SLVIA undertaken by LUC on behalf of the North Wales Planning Authorities and the landscape officer at NRW both concur with the findings of the SLVIA in relation to the effects on the AONB which although adverse are assessed as Non-significant.	yes	yes
MOP_014_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Areas of Concern •The proposed route cuts across valuable high yielding arable land, the land to the west of Erw’r Gaseg woods is some 11 acres, the proposal will take out the entire parcel of land, during construction and for some time post works. •The land at Pengwern has been extensively drained in the recent years at great expense and the section this route will cut through has extensive and important land drains. •The eastern side of the woods is prime arable high-quality land. Which provides home grown feed stocks for dairy herd, the proposal will reduce production heavily, and has the potential to affect winter feeds. •One of the concerns raised by our client was the alterations that are being proposed to the South of the holding and would in turn send the route up the west side of Nant y Faenol road which they are adamant they do not wish to happen. They are open to alternative routes however the only option on that basis is to thrust bore the cable as shown in Plan B. •Cable/s joint locations and inspection chambers / manholes, these cause significant disruption if located incorrectly and have long lasting effects on production and management of the land. •Our clients have a genuine concern over the stability of the Pengwern ridge becoming unstable, due to the impact of these works more so to deep mechanical excavations and the use of large excavators. As the ridge runs close to residential properties. •Our clients also note the concerns over the potential use of Nant y Faenol road, they are seeking assurances that no large construction traffic would be taken along its length, in fact the local authority made several restrictions over this relating to other projects and our client provides confirmation of notes and minutes that relate to previous consultations please see annex Note D.	The project has committed to a trenchless crossing of Erw Gaseg woodland. The haul road will continue around the woodland and down the next fields to enable construction vehicle access to the next section of the cable route without construction vehicles using Nant y Faenol Road. A long trenchless installation in this location will not reduce above ground impacts, given that there will be a haul road in this location anyway. The chosen route has been selected as a compromise between all constraints in the region Regard has been given to wider decisions with respect to Princes’ Gorse (ID188), which conflict with this design change request. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	yes
MOP_014_07102021	S44	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Design route amendments that are required. (Pengwern Home Farm) •As the cable route is being drilled from the Bodelwyddan road crossing at Fferm, our clients are requesting the drill be extended to cross below Nant Y Faenol Road to the lower end of the Erw’r Gaseg woods and continue under Erw’r Gaseg woods and continue into Ty Mawr, see Plan B & C. This enables the alterations at Ty Mawr and accommodates Mr Huw Jones requirements. It removes the need for an additional road crossing, removes the environmental impact of open cutting near the sensitive water courses.	The Applicant has committed to a trenchless crossing of Erw Gaseg woodland. The haul road will continue around the woodland and down the next field to enable construction vehicle access to the next section of the cable route without construction vehicles using Nant y Faenol Road. A long trenchless installation in this location will not reduce above ground impacts, given that there will be a haul road in this location anyway. Routing to the East of the consultees land would be a longer cable route, which would go against the golden rules used throughout site selection. Regard has been given to wider decisions with respect to Princes’ Gorse (ID188), which conflict with this design change request.	yes	yes
MOP_014_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	As noted by our clients the lower end of the Erw’r Gaseg woods has little or no building or bunkers, having held the land for over 100 years. •With regards the PIER boundaries its noted that the parties affected by such amendments are willing and would enter meaningful talks to accommodate the proposals made by our clients and adjoining landowners. •During previous Renewable projects that have fallen across our clients land they have been requested to provide suitable locations and the developer took measures to ensure cable lengths were appropriate or took steps to ensure our clients requests were acted upon. •Utilising alternative installation methods (HDD) is a less intrusive method, reduces the physical mechanical excavation disruption to the ground and removes the potential ground issues as noted over the Pengwern Ridge, as no large excavators would be continuously disturbing the ground in this area. •HDD methods would also mitigate against the land loss/use, protect the cover crops and production, avoid the costly land drainage replacement, as the cable can be drilled well below the land and our client’s have detailed drainage plans to accompany such works. •Its accepted there will be works required for the entry and exit points, however they are minimal in comparison to full open cut. •A further request would be to establish spare ducts especially under the road crossings and under the woods, it would be appreciated if additional ducts were installed over the HDD revised option, in the event future cable faults or alterations were required, it would remove the need to excavate, just a matter of opening and pulling through replacement cables.	The chosen route has been selected as a compromise between all constraints in the region. A long trenchless installation in this location will not reduce above ground impacts, given that there will be a haul road in this location anyway. Longer HDDs Increase risk of technical issues with the installation. Longer HDDs also Increase the noise impact of the trenchless installation works, using larger equipment for a longer period and may increase the total duration of works in this area including additional 24hour working to complete the trenchless crossings It is not accepted practice to install additional cable ducts. A localised failure should be capable of being repaced within the existing duct. The Applicant is only to seek the minimum amount of land and rights necessary to construct and operate the Project for its lifetime. Compulsory Powers will only be granted on land that is required as necessary for the Project. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	yes
MOP_014_07102021	S44	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Conclusion •The route amendments would elevate total land loss during construction and environmental disturbance and maintain environmental corridors to the water course.	The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation of land will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis. Additional areas neighbouring the cable corridor have been included to mitigate environmental impacts. The areas will include an ability to enhance the land for environment and wildlife purposes. Matters relating to environmental mitigation and enhancement are contained within 6.3.5 Onshore Biodiversity Chapter.	yes	yes
MOP_014_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	•Remove the potential risk of disturbing the Pengwern Ridge. •Allow our clients to still have full access to the East side of the woods and a significant portion of land to the West. And the land will not have to be reworked to bring in back into full condition.	Matters relating to construction methodology and mitigation are contained within the Outline Code of Construction Practice 8.13. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use and manage the land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land on a proven loss basis.	yes	yes

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MOP_014_07102021	S44	Volume 3, Chapter 9: Traffic and Transport	•We consider these reasonable and deliverable and of benefit to the wider community and reduce vehicular disruption access over Nant y Faenol Road, which is single track lane with deep side ditches and a single turning back point at the far end. A major concern for our client's is the wellbeing especially of Mrs A Jones, being an older person and having daily time sensitive visits and long-term medical needs. There are 9 other properties on the road, of which 3 are businesses one operating constantly 24hrs a day and requiring unfettered access. And amendments also reduce the effects and improve the wellbeing of the effected residents. •The above would ensure the overall relationship between parties is a much more positive one.	Construction access is proposed down a servicable haul road contained with the cable route corridor. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use and manage the land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land on a proven loss basis.	yes	yes
MOP_015_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The onshore cable corridor has a significant impact on the farming business of E & F Thomas and Sons and affects a considerable area of their farmland. Item No. 1 on the attached plan refers to the construction north of Dyserth Road. The cable route and compounds here cut straight through a mains water connection to the farm and this will be required to be diverted in advance of the works. As you can see from the attached plan the cable route runs through the middle of a large plot of land used for grazing and forage production. To maintain access to both parcels of land, crossing points will need to be installed at Point 2 on the plan. Capable of accommodating large farm machinery such as forage harvesters with header attached.	Matters relating to construction methodology and mitigation are contained within the Outline Code of Construction Practice 8.13. Enabling works will deal with any relocation of private services. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use and manage the land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land on a proven loss basis.	yes	yes
MOP_015_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The fields to the south of the holding, as indicated by Item No. 3 on the attached plan are primarily used for the grazing of livestock after first and second cuts of silage are taken. The construction corridor will be adequately fenced with livestock proof of fencing, consisting of wooden posts, stock netting and need two strands of barbed wire to ensure that livestock cannot stray into the working area. In addition, livestock are currently able to drink from the stream running through the fields and impacted by the construction corridor by walking down to concrete pads specifically installed for this purpose. No interruption is to be caused to the watering of the livestock. If this is affected by the works, alternative provisions are required, such as the provision of temporary water bowser. Item No. 4 on the attached plan concerns the works and construction compound at the side of Dyserth Road. This is a narrow country lane and access is required down it at all times, particularly during harvest time and it is essential that construction of a cable route does not impact on this. Item No. 5 on the attached plan refers to the cable route immediately south of Dyserth Road, this is a long narrow field, and the cable route runs right through the middle. The remaining areas either side will be left unfarmable and it would be beneficial if the route was kept to the eastern or western side of the boundary. This area also contains the farm access track to the fields located further to the south and this is to remain open to farm traffic at all times.	Matters relating to construction methodology and mitigation are contained within the Outline Code of Construction Practice 8.13. Enabling works will deal with any relocation of private services and/or access points for livestock to cross the works. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use and manage the land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land on a proven loss basis. Construction access is proposed down a servicable haul road contained with the cable route corridor.	yes	yes
MOP_015_07102021	S44	Volume 3, Chapter 1: Onshore Project Description	Temporary Construction Compounds (TCCs) will be required at points along the Onshore ECC. The TCCs will provide secure, fenced and potentially lit, storage locations for heavy duty plant, cables, optical fibres, ducts and other supplies required to complete the onshore works, as well as site management offices, welfare and first aid points. They will be restored to their original condition after completion of the relevant works. Fifteen potential TCC zones are shown along the Onshore ECC (please refer to Chapter 3.1 of the Preliminary Environmental Information Report (PEIR) for more information). With your input, we intend to select up to nine zones within which TCCs will be located.	Error in transcription resulted in this being included in the log, but is not a response to the consultation, retained for completeness.	yes	yes
MOP_015_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The land of E & F Thomas and Sons contains a compound located to the south of Dyserth Road. The construction area occupies a large area of land used for silage production to feed the dairy herd. Any reduction in size will be beneficial in helping mitigate the losses to the farm.	Northern TCC at B5119 Dyserth Road taken forward, request acknowledged. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	yes
MOP_016_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	As can be seen on the attached annotated plan, the proposed routes have a major impact on the land at Cwybr Bach and further information is required. Item No. 1 on the plan refers to the two routes which have yet to be proposed routes. We require confirmation as to which is the preferred route as soon as possible. This land is located between two areas currently outlined for future development in the Denbighshire local development plan and has a strategic value. Either route will run through the middle and potentially sterilise the land from any future developments. It is requested that which ever route be chosen is moved to as far North on the holding as possible to leave the majority of the land unaffected. We have also been advised that it is likely that an inspection chamber and concrete pad or similar apparatus will likely be installed at the joint of the cable before it passes under the road, this will lead to a further sterilisation of land and inconvenience to the landowner, we request that any such apparatus is located off the holding. Furthermore, confirmation is required as the extent of the permanent easement corridor in this area as we are lead to believe that it may extend to 60m which will sterilise a significant area of land opposite the A525 roundabout which would be a key entry point for future development of the land.	Northern of two initial cable corridor options was selected , based on ecology, noise, public rights of way and other constraints on the southern alignment. Options to move the cable further north within this cable corridor were explored. The area is constrained by the road crossing, a line of trees, an overhead utility, a woodpole, ecology and land use. The final cable route is a compromise between all of these constraints. Placement of manholes and chambers are yet unknown. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	yes
MOP_016_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Item No. 2 refers to the temporary construction compound on the land. This takes a considerable area of agricultural land out of production. It is requested that the area used for the compound be reduced as much as possible or, move to an alternative location, off the land, so as to minimise disruption, further details are required as to the extant location and size of the compound, however it is preferred that the compound be located to the north of the holding as far as possible. Item No. 3 on the plan refers to the various areas of land that will be severed during construction and are either too small or have no access to be farmed during construction. Temporary crossing points will be required on the working aera, and it is requested that any compound and route be adapted so as to minimise and reduce the area of farmland being left that is inaccessible during construction.	The PEIR boundary width in this location was widened to consider 2 corridor routes with only one being selected for submission. The boundary was widened as a result of constraints the Project has to consider, including LDP land, mitigation and environmental land, properties, overhead and underground utility apparatus. The TCC has been updated to move as far North within the holding as practical, however, the request to move the TCC into a separate field parcel cannot be accomodated due to the presence of overhead lines. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to crop or graze the land or to manage weeds during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land.	yes	no
MOP_016_07102021	S44	Volume 3, Chapter 9: Traffic and Transport	Item No. 4, refers to the temporary construction haul road located off the A547. There are concerns that this will disrupt access to the land, we would like the project to consider relocating the access to the North on the A525 Round about opposite the retail park “The Sainsburys Roundabout” detailed in item 5. In addition, the haul road in item 4 will require a new temporary access to be created to access the compound and haul route, we would be agreeable to this entrance being made permanent which would also offset to a small degree the inconvenience suffered by the impact of the scheme.	TCC has been updated to move as far North within the holding as practical, however, the request to move the TCC into a separate field parcel cannot be accomodated due to the presence of overhead lines. These lines would limit available space for the TCC. The TCC is remaining within the same field parcel. Hence the current access point option would minimise EIA impacts. The chosen route has been selected as a compromise between all constraints in the region.	yes	no

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MOP_016_07102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The temporary construction compound highlighted in Item No. 2 on the attached plan occupies almost one third of the available land at Cwyr Bach. It is requested that this be moved to an alternative location off site, so as to reduce the impact on the agricultural operations on land. If this cannot be done, then it is to be reduced in size, and moved to the north of the holding so as to reduce the amount of agricultural land taken and care should be taken to ensure that it leaves as little as possible land severed and unfarmable during its operation as possible.	The PEIR boundary width in this location was widened to consider 2 corridor routes with only one being selected for submission. The boundary was widened as a result of constraints the Project has to consider, including LDP land, mitigation and environmental land, properties, overhead and underground utility apparatus. TCC has been updated to move as far North within the holding as practical, however, the request to move the TCC into a separate field parcel cannot be accommodated due to the presence of overhead lines. These lines would limit available space for the TCC. The TCC is remaining within the same field parcel. Hence the current access point option would minimise EIA impacts. The chosen route has been selected as a compromise between all constraints in the region The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_016_07102021	S44	N/A	Item 5 on the plan shows an alternative access point and location for the temporary construction compound, we request that this location be considered as an alternative, which will also impact less on nearby residential properties which are faced with the negative impact the compound will have, in particular, the noise, dust and light pollution being caused by such a major project and we require details of how this will be mitigated.	TCC has been updated to move as far North within the holding as practical, although still within the same field parcel. However, the request to move the TCC into a separate field parcel cannot be accommodated due to the presence of overhead lines. These lines would limit available space for the TCC. Matters relating to construction methodology and mitigation are contained within the Outline Code of Construction Practice 8.13	yes	no
MOP_017_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The potential area required for land fall and the HDD compound and temporary construction compound will take a considerable area of land as outlined on Item No. 1 on the attached plan. Mr Wynne-Davies preference is for the land fall compound to be located to the north of the A548 coast road and not on his land. As a worse case scenario, if it were to be located on his land the area should be moved to the north and border the railway line as close as possible to minimise the land take and maximise the remaining farmable area. It should be noted that due to the land's strategic location, it has a significant potential for future development for residential, commercial or leisure use and the presence of the cable and associated apparatus will sterilise a significant area.	The Applicant has selected the TJB South of the railway and rejected the golf course TJB based on a balance of consultation feedback. It is not possible to move the TJB any closer to Network Rail as a substantial standoff is required to achieve Network Rail's crossing tolerances. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation from development will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis	yes	no
MOP_017_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The route of the onshore cable impacts three parcels of land, both owned and occupied by Mr Wynne-Davies and his farming operations are severely impacted. Item No. 2 on the attached plan concerns the temporary construction compound located off Dyserth Road. This removes a whole field from production used for production of forage for Mr Wynne-Davies livestock enterprise. The route also crosses a water main servicing the neighbouring farm. The cable route in this area also severs several fields, detailed in Item No. 5 will lead to many small unfarmable areas being left during the construction period. Item No. 3 on the attached plan concerns a parcel of land which is tenanted by Mr Wynne-Davies as part of his farming enterprise. This parcel of land is used for the production of forage for Mr Wynne-Davies livestock enterprise. It is severely impacted by whichever route is chosen. The Southern route would be most preferable however, if the northern leg is chosen, Mr Wynne-Davies would prefer that the temporary construction compound be moved to an alternative location, as indicated on the plan, which would leave a further field free for cropping and unimpacted by the scheme. Item No. 4 on the plan relates to land north of the sewage works. This area of land is severed by the construction corridor and will require a temporary crossing point to be provide during construction so that it can continue to be farmed. It should be noted that due to the land's strategic location, it has a significant potential for future development for residential, commercial or leisure use and the presence of the cable and associated apparatus will sterilise a significant area	TCC has been updated to move as far North within the holding as practical, although still within the same field parcel. However, the request to move the TCC into a separate field parcel cannot be accommodated due to the presence of overhead lines. These lines would limit available space for the TCC The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land	yes	no
MOP_017_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The construction compound highlighted in Item No. 2 in the plan, north of Dyserth Road, removes a large portion of land from production and any reduction in this area will enable Mr Wynne-Davies to continue farming his land and mitigate his losses. Item No. 3 on the plan details the temporary construction compound off the A547 at the north-east of the A547 roundabout or this area removes a considerable area of farmable land from Mr Wynne-Davies farming business. Any reduction in size will be of benefit and allow him to mitigate his losses. If the northern leg is chosen it would be beneficial and mitigate Mr Wynne-Davies losses if the compound could be moved to field indicated as Item No. 3 on the attached plan.	Northern TCC at B5119 Dyserth Road taken forward based on balance of consultation responses and EIA. Size of TCC minimised as far as practical. Regarding the water pipe: Water supplies will be maintained. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use and manage the land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land on a proven loss basis. The TCC area has been reduced as far as is practicable. The TCC must have the benefit of connectivity to the cable corridor, the haul road and the highway.	yes	no
MOP_019_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The route of the onshore cable has a major impact on the property of Helen and Richard Proffitt, the details of which are as follows: Item No. 1 refers to the access of the property Fferm. At present the plans show the cable route is passing directly through the entrance to the property. We require that this section of the route be bored underground and that there will be no disruption to the access of the property, which is required to be maintained 24/7. The entrance also benefits from electric gates and no disruption or damage is to be inflicted on these gates. No access to the construction compound will be permitted down the property's driveway. It is believed that a section of roadside hedge will need to be removed to create a new entrance to the construction compound, we require further details of this to be provided by the project. Furthermore, the presence of heavy plant and machinery operating in the temporary construction compound will stop the use of the farm driveway being used to hack out horses onto the Nant y Faenol Road and further afield, no alternative route is available, and construction will inhibit the use of the driveway for 3-4 years potentially, the removal of the temporary construction compound is required from this land.	Access will be provided to all areas outside of the Applicant orderlimit during the works. Access to land and property beyond the Applicant orderlimits will be retained or an alternative access provided. Commitment made to HDD the access road to Fferm. Access to the proposed TCC is off the highway directly into the land and all other access is proposed down a servicable haul road contained with the cable route corridor. A permanent access will be required across the property to maintain the cables and any other apparatus. The Applicant have proposed access routes using existing gateway and tracks. The landowner can agree alternative access route through the voluntary agreement. Matters relating to construction methodology and mitigation are contained within the Outline Code of Construction Practice (Application ref: 8.13)	yes	no
MOP_019_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Item No. 2 on the attached plan refers to the route of the cable through the horse paddocks surrounding the property. These paddocks are used by Mr and Mrs Proffitt, as well as their daughters and grandchildren for keeping their horses on, being used for both grazing and riding lessons. Due to the presence of heavy plant and machinery involved in the construction, as well as large lorries travelling up and down the haul road, this will no longer be able to take place due to fear of the horses spooking and injuring the children. The disturbance caused by the machinery will also spook the horses and these paddocks will be unable to be used for grazing the horses whilst works are taking place, the surrounding land is not suitable for alternative grazing for the horses as it has no direct access from the farm.	The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis. Matters relating to construction methodology and mitigation are contained within the Outline Code of Construction Practice (Application ref: 8.13)	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_019_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Item 3 on the attached plan details of the remaining land that is to be severed during the construction of the scheme, this represents a considerable percentage of the property and access across the working area will need to be provide 24/7 so that it can continue to be farmed. The land benefits from existing land drains and these will require to be reinstated after the works. Details of the pre and post works land drainage scheme are required. Furthermore, the construction of the route will have a major impact on the family's enjoyment of the land, the grandchildren, who are 9 years old use the fields surrounding the house to drive their 4x4 buggy and their friends visit to enjoy and experience the farm and countryside as well as ride the ponies, due to the construction of the cable route and presence of the compound, this will be unable to take place.	The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to crop or graze the land or to manage weeds during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land. The landowner has the benefit of entering into a voluntary agreement which provides provision to undertake extensive drainage enhancement both inside and outside of the Project orderlimit. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_019_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	In addition, the fields are used by the Flint and Denbigh Pony Club for events for their members which will not be able to take place due to health and safety concerns arising from the presence of the construction equipment and associated noise and flashing lights spooking the ponies and horses. Finally, the presence of the cable route and temporary construction compound on the land surrounding the farmhouse will have an adverse impact on the wellbeing of Mr and Mrs Proffitt as they will be unable to have quiet enjoyment of their property with such a large construction project in close proximity, an alternative route away from the property is requested.	Relevant mitigation for impacts is covered in the Outline Code of Construction Practice (Application ref: 8.13). The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_020_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	1. Faenol Bropor farm extends to some 150 acres (60.70 hectares or thereabouts). 2. It is understood that Faenol Bropor has been in our clients' family since the 1920s, when Mr JB Evans grandfather farmed the agricultural unit. 3. The farm accommodates, and sustains, 2 households. 4. Faenol Bropor farm is noted for its stock rearing productive capacity, and its quality agricultural land is classified by the Welsh Government as principally Grade 3a. 5. From the detail of the drawings received it is estimated that over 91% of the farm (approximately 136 acres) is proposed to be either permanently or temporarily affected by the above scheme. 6. The proposed scheme, as outlined to us (as illustrated on the accompanying Site Plan) will decimate Faenol Bropor Farm as a viable agricultural unit.	The Applicant notes the comment. The PEIR boundary was created by merging several proposed works, including that of the environmental mitigation zone which . Further refinement of the substation and supporting apparatus has identified a refined mitigation zone, reducing the permanent land take to 85 acres.	yes	no
MOP_020_08102021	S44	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	7. In addition, there is significant concern as to the adverse impact of the scheme on Faenol Bropor homestead consisting of a period farmhouse, together with a range of relatively modern and traditional outbuildings ,part of which are of significant historical interest (including the 'Barn' which is listed Grade II). 8. A significant portion of the land allocated for mitigation ,and as an indicative substation / construction zone ,is of historical importance given it medieval ridge and furrow characteristics which are clearly visible on site inspection and ,accordingly, warrant protection .	The impact at Faenol Bropor is assessed from heritage significant perspective the ES chapter (application ref: 6.3.8). Assessment will be reviewed as a precaution. Re second point, ridge and furrow presence is noted and has been considered. Some recording has been agreed with the LPA and included in mitigation proposals.	yes	yes
MOP_020_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The extent of the substantial area allocated for construction of the substation and mitigation (which we are led to believe shall involve a degree of required screening) is questioned in respect of its justification . Also, given its Grade 3a productive versatility & capacity it has been suggested to RWE's representative on 27th September, whether an alternative agricultural parcel could potentially be utilised instead of the land allocated at Faenol Bropor, for the draft mitigation area, which would be contiguous to other land to the south of Coed y Gors that is similarly earmarked . 10. Furthermore, it is noted there is an area proposed for 'draft mitigation' (to the south east of the homestead) which would be severed from the remainder of the farm by a 'mitigation' zone. Naturally, there is, accordingly, concern as to how one would access the 'draft mitigation area' to be able to farm and undertake agricultural operations. Such concern would also apply to land directly adjoining ,to the north of, Coed y Gors. 11. Moreover, (on the basis made available from other locations as part of the Consultation web -facility) it would be helpful to have sight, in advance, of illustrations outlining the visual aspect of the substation from Faenol Bropor homestead- as without this information it is not possible to duly consider the full extent of the scheme implications on the homestead (including, the enjoyment of the farmhouse & residential curtilage).	A revised landscape and ecological mitigation plan (LEMP) accompanies the application at application ref: 8.4, and accounts for the refined design of the substation and the associated compensation and mitigation areas. A final LEMP will be agreed with Denbighshire County Council following detailed design of the substation (post consent) Visualisations provided to the landowner and their agent in relation to the substation land in the form of the PEIR LVIA images from the 'Greenlane Bridleway' and private road leading to the property. Further information and visual aids provided to the landowner and his agent prior to submission of the application. These visuals have provided the owner and their agent a potential outlook from the 'Greenlane Bridleway' whilst including some of the proposed screening, allowing the owner and agent to begin negotiations in relation to the diminution of the retained holding. Negotiations ongoing. Compensation will be provided to the landowner through Compulsory Purchase Act 1965 and/or Land Compensation Act 1971 if acquiring the land through a Compulsory Acquisition. The landowner will also have the ability to enter into a voluntary agreement which will provide the landowner with fair reasonable and appropriate compensation. It is proposed that the voluntary commercial consideration includes the diminution of the retained land to consider Severance and Injurious Affection.	yes	no
MOP_020_08102021	S44	N/A	12. If the scheme proceeds, the proposal for one of a multiple of ,what is understood to be permanent access facilities, as shown between A to B on the accompanying Site Plan , is not acceptable (given that it would traverse directly adjacent to the rear of the farmhouse residential curtilage). It is considered that it would be sufficient for permanent access to be via Glascoed Road [having direct entrance point(s) from the public thoroughfare as indicated on the accompanying Site Plan]. Otherwise, the aforesaid will cause significant detriment to Faenol Bropor farm in respect of impact on privacy, together with noise and other forms of pollution. If it was entirely substantiated that a permanent access facility was also required via this locality then it should be amended to extend from point A along, as close as practicable to, the easterly perimeter of our client's subject property (so that it is as far away as possible from the homestead). Similarly there should be due mitigation arranged (to benefit the farmstead) in respect of any temporary access facilities required.	Comments duly noted. Access to construct the northern cable corridor will be required regardless of reducing the permanent access to a single route. The Applicant was minded to take the landowners feedback on board and as such the Southern route was selected for both temporary and permanent access.	yes	no
MOP_020_08102021	S44	Volume 3, Chapter 7: Hydology and Flood Risk	13. There is concern that the proposed development may adversely impact natural drainage and enhance the potential for flooding which will need to be duly addressed.	Drainage issues have been discussed with the owners. Pre and post construction drainage matters will be dealt with at detailed design stage. The landowner has the benefit of entering into a voluntary agreement which provides provision to undertake additional drainage work both inside and outside of the Project orderlimit.	yes	no
MOP_020_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	14. Furthermore, as a significant proportion of Faenol Bropor land was previously subject to an option to extend the development of St Asaph Business park, the proposed scheme will result in such an opportunity no longer being feasible. 15. Given that the proposed scheme would have a devastating impact on our clients' farm property and livelihood, Mr & Mrs Evans (together with their son Emyr) have considered there is no alternative but to object ,in the strongest terms, to the proposal.	Existing due diligence indicates that any options for purchase of the property have expired. The Applicant has consulted with The National Assembly for Wales, formally known as the Welsh Development Agency who benefited from the expired Options. It is understood by the Applicant that there is no further proposal to extend the St Asaph Business Park into the retained land at Faenol Bropor. Furthermore, there is undeveloped land contained within the St Asaph business park. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis. The Applicant notes the objection.	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 1: Onshore Project Description	The proposed cable route will have a major impact on the businesses operated at Cwybr Fawr, which appears to be the severely affected property along the route of the cable. Item No. 4 on the attached plan shows land to the south of the A525 roundabout and this could be an alternative cable route, which would minimise disruption to the business.	Options to relocate the crossing of the A525 further South have been explored. However, this would create wider EIA impact in respect to residential properties and watercourses whilst also increasing the technical risks of the trenchless crossings of these roadways. This request is not possible as it is not compatible with the onshore cable route further East, where the Northern option has been selected. The chosen route has been selected as a compromise between all constraints in the region. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no

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MOP_021_08102021	S44	Volume 3, Chapter 9: Traffic and Transport	Item No. 1 on the attached plan, referred to access for the construction compound. The owners wish for the field entrance directly on to the A525 to be used and not the main driveway to the Cwybr Fawr business, so as to reduce disturbance and inconvenience to the day-to-day operation, daily access required by tenants, horse livery clients and those storing caravans on the site as well as holidaying caravanners.	Access will be taken directly from A525 taken forward as requested. The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use or to manage land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land. A permanent access will be required across the property to maintain the cables and any other apparatus. The Applicant have proposed access routes using existing gateways and tracks. The outline code of construction practice sets out the applicants approach to general construction impact mitigation (application ref: 8.13).	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Item No. 2 and 3 refers to the presence of a large construction compound on the property which, we believe to be required for a period of 18 months however, this may be for longer. This is located directly opposite residential properties, of which there are 21 and are let out to residential tenants, in addition to a caravan and camping touring field with 19 seasonal pitches and 5 permanent pitches. There is a major concern that the impact of the noise, dust and light pollution will directly impact on the ability to let the properties and operate the camping and caravan enterprise. There are also major concerns that the dusts created by the works will lead to health problems for the residents, further information is required as to how these impacts will be mitigated.	The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis. Matters relating to noise and dust are duly noted by the Applicant. The outline code of construction practice sets out the applicants approach to general construction impact mitigation (application ref: 8.13).	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 3: Socioeconomics	Item No. 2 – the compound area indicated in Item 2 is also the area used for a travelling circus during the summer holidays. This provides a major source of income for the business and has been attending the site for over 60 years since the first show in the 1960's. The circus will not be able to operate whilst the cable route is being constructed and will have to find an alternative site for a minimum of 2 to 3 years. This may cause the circus not to return to Cwybr Fawr and as such will result in a loss of income to the business as a result of the new cable, we request that an alternative site be found. Items No. 5 and 6 on the attached plan relate to the equine livery enterprise, which currently has capacity for 36 liveries renting stables. The presence of the construction compound and associated traffic will likely hinder access early in the mornings and evenings to liveries entering the site. The proposed cable route affects the majority of the horse grazing paddocks and owners of horses will not be able to be kept on site if they do not have outdoor grazing available, resulting in liveries leaving the site. The few unaffected paddocks are located alongside the construction route and it is feared that the presence of large plant and machinery will spook the horses, resulting in potential injury and associated vets' costs and likely resulting in the remaining liveries removing their horses from the yard to a quieter facility. A reduction in the working corridor will reduce the impact of the scheme on the business.	The chosen route has been selected as a compromise between all constraints in the region. Reductions in TCC and working corridor sizes are not possible. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.. The outline code of construction practice sets out the applicants approach to general construction impact mitigation (application ref: 8.13). Specific concerns have been discussed directly with the landowners and their agents and discussions are ongoing.	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Item No. 7 refers to the hard standing area used for the commercial storage of caravans and has capacity for 480. At this point of the route the land available for construction route is very narrow with the northern boundary formed by the bund containing the caravan storage site which was a requirement for the grant of planning permission. The southern boundary being the Afon Fyddion river. Any open cut trench in this area will have an immediate impact and it is requested that best endeavours be made for this section of the cable to bored underground rather than open cut trench. Item 8 details approximately 15.5 acres (6.3 hectares), access to this field will be severed during the construction of the cable route. Access will be required to be maintained to this field throughout the duration of the works.	Decision to maintain wide corridor and have the option of either going around the caravan storage or else using a trenchless technique under the caravan storage.	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Item No. 9 on the attached plans indicates additional land owned by the family, Ty Isa Farm. The presence of the construction compound to the north and south, as well as the cable route means that the small area of the land left untouched will be severed and unfarmable for the duration of the project, a reduction on compound size would limit the impact of the scheme on the farming enterprise. In addition there are 3 residential properties at Ty Isa Farm let out on residential tenancies, the partners are concerned that the impact of the noise, dust and light pollution from the compound will directly impact on the ability to let the properties	The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use or to manage land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land.	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	The land at Cwybr Fawr is also outlined for future development in the Denbighshire Council local development plan and the presence of the cable will sterilise a significant area. It is requested that, if the cable passes through the land, for it to be located as close to the boundary of the property as possible and the easement be reduced to the minimum area required. Furthermore, the impact on the agricultural land across the holding will severely impact upon the farming tenants, who will lose land and as a result will have to reduce livestock numbers as no alternative land is available	Request acknowledged and 40m cable route runs as close to the 100m boundary as possible. HDD angle must be considered and is a limiting factor in adjusting the 40m corridor route. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for any sterilisation from development will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	Yes	no
MOP_021_08102021	S44	Volume 3, Chapter 7: Hydology and Flood Risk	The land benefits from existing land drains and details of pre and post works drainage scheme are required.	Drainage issues have been discussed with the owners. Pre and post construction drainage matters will be dealt with at detailed design stage. The landowner has the benefit of entering into a voluntary agreement to undertake drainage works both inside and outside of the Project order limit.	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 3: Socioeconomics	The presence of the compound indicated in Item No 2 on the attached plan will have a severe impact on the business, the field affected is used as the location for a travelling circus during the month of August through to early September and provides a significant income to the business, the circus has been in residence for 60 years. This will not be able to take place during the construction and afterwards whilst the land returns to its pre-condition state. It is likely that as a result of the works the circus will seek an alternative location and will not return to the site, resulting in a significant loss of income to the business.	The chosen route has been selected as a compromise between all constraints in the region. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_021_08102021	S44	N/A	The new construction compound is also directly opposite a number of residential properties, let to tenants and the caravanning and camping touring field. The noise, light and dust pollution created by this compound is also likely to have a significant impact on the quality of the tenants lives for the duration of the scheme and will also prohibit the land being used by tourist for camping and caravanning, further impacting on the income the business is able to generate. Relocating the compound to an alternative site would relieve this burden.	The chosen route has been selected as a compromise between all constraints in the region. It is not viable to further reduce the size of the temporary construction compound in this location or indeed move it elsewhere. Matters relating to noise and dust are duly noted by the Applicant. The outline code of construction practice sets out the applicants approach to general construction impact mitigation (application ref: 8.13). The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_021_08102021	S44	Volume 3, Chapter 9: Traffic and Transport	The owners wish access to the compound to be through the field gates, detailed in Item No. 1 on the attached plan and do not consent to the main driveway being used by construction traffic. This is the only access the site for all clients whether they be tenants, those who have a horse on the livery yard or store their caravans there. We would like the project to consider any alternative sites which would impact the property less.	The chosen route has been selected as a compromise between all constraints in the region. Access directly from A525 taken forward as requested	yes	no
MOP_021_08102021	S44	N/A	Item No. 9 on the attached plan shows the construction compound at Ty Isa Farm which will take a considerable area of land out of production during reconstruction of the scheme. The dust, noise and light pollution will also have an adverse impact upon the residents of the 3 residential properties adjacent to the compound during construction. A reduction in size of the compound or alternative location is required.	It is not viable to further reduce the size of the temporary construction compound in this location or indeed move it elsewhere. Matters relating to noise and dust are duly noted by the Applicant. The outline code of construction practice sets out the applicants approach to general construction impact mitigation (application ref: 8.13). Compensation will be provided to the landowner through Compulsory Purchase Act 1965 and/or Land Compensation Act 1971 if acquiring the land through a Compulsory Acquisition. The landowner will also have the ability to enter into a voluntary agreement which will provide the landowner with fair reasonable and appropriate compensation	yes	no

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PrB_010_08102021	S44	Volume 3, Chapter 1: Onshore Project Description	I have reviewed the proposals and provide comments for SP Energy Networks who operate and manage the electricity network up to 132kV on behalf of the licenced network operator, SP Manweb, for the area including the application site. In general, SP Energy Networks has no objection in principle to the proposed development subject to required measures to protect SP Manweb network assets and ensure safe working around the affected network. It is suggested the application plans include a plan showing this network to enable further advice to be provided in terms of where particular care will need to be taken to avoid these assets. Where SP Manweb assets are affected, there will need to be protective provisions in place to ensure construction and operations which directly affect the network or are in close proximity do not undermine the safe operation of this network. Until the protective provisions are drafted and discussed and agreed with SP Manweb, then objection is raised to there being no provision in the application to such measures. It is noted works package 33 includes reference to associated electricity supply works and it needs to be clarified if these works cover all necessary diversions of existing assets and new connections network to provide the required supply. Required works should then be included in the Works Plans. It is noted that the works plans do not appear to refer to works package 33 in the correct locations for where SP Manweb assets may be affected. Further studies and proposals for avoiding or diverting SP Manweb assets are required and should be referenced in Volume 3 of the PEIR Chapter 1.	The Applicant has reviewed draft protective Provisions from SP Energy and included a marked up version in the DCO. The Applicant is aware there is likley to be a need to discuss the drafting further now that the design has been further refined.	yes	no
PrB_010_08102021	S44	Volume 3, Chapter 6: Ground Conditions and Land Use	Furthermore, SP Manweb assets will be installed with appropriate land rights and these will need to be reviewed as part of new rights being sought and SP Manweb will be a land interest in this matter which to date has not been the case.	Protective Provisions and/or side agreements	yes	no
PrB_010_08102021	S44	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Mitigation proposals will also need to take account of SP Manweb assets and the operational requirements.	Protective Provisions and/or side agreements	yes	no
PrB_011_08102021	S44	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Climate change poses the single biggest threat to the places we look after. We are already actively adapting to and managing coastal change and the impacts of severe weather on many of our places. We also acknowledge that whilst we need to continue to reduce and decarbonise our own energy use, we also need to support the rest of the country to do the same. If the UK is to achieve net zero emissions by 2050 (or 2045 which the National Trust has called for), then major expansion in renewable energy will be required. The National Trust (NT) acknowledges that larger scale renewable projects are now required to meet the country's net zero targets, and to reduce carbon emissions to halt climate change. We will welcome renewable schemes that that are holistically designed to consider the effects on the environment including wildlife, landscape, seascape and cultural heritage.	This has been noted by the Applicant.	Yes	no
PrB_011_08102021	S44	N/A	National Trust supports the principle of the Awel y Mor project, with the need to bring forward renewable energy generation at larger scale. We support the work undertaken to date in seeking to understand the impacts of the scheme, early engagement and discussion with stakeholders and effective consultation as issues move forward. We await the detailed outcomes of the September 2021 consultation, as the project moves forward to submission and consideration.	This has been noted by the Applicant.	Yes	no
PrB_011_08102021	S44	Volume 2, Chapter 4: Offshore Ornithology	We note the ongoing work to assess offshore ornithology. A further discussion of offshore ornithology would be helpful to help NT take an informed opinion on the response from its partner eNGO's to the 2021 public consultation. A joint workshop with NWWT and RSPB might be a useful way forward later in the year, this proved helpful during early Wylfa Newydd discussions with other eNGO's, prior to submission and finalisation of application documentation. National Trust owns land at Cemlyn, one of the most important breeding sites for Sandwich Tern in the UK. We note the conclusions in the consultation in relation to this species and await further considerations by our partner eNGO's on potential issues	SPAs are considered in detail within Report 5.2: Report to Inform Appropriate Assessment (application ref: 5.2). Within the Awel Y Mor array area No Sandwich terns were recorded within the 24 months of aerial digital surveys and therefore there are no impacts from potential collision risk to be apportioned back to Cemlyn Bay.	yes	no
PrB_011_08102021	S44	Volume 3, Chapter 2: LVIA	The LVIA information and visualisations provided to date have been useful in considering the visual impact of the scheme. We welcome the reduction in size of the offshore array area to 88km2 and reduction in the maximum number of turbines to 91. We note, however, the scale of change to landscape and seascape that this application brings forward, particularly to some of our coastal communities in North-West Wales. National Trust owns and manages a diverse range of land on the North Wales coast that will be impacted by the proposed scheme from Graig Fawr in the east to North Anglesey in the west. It is our properties at Great Orme and Penrhyn Castle that will be impacted most by the scheme-our land at the top of Great Orme will have the most significant change in view for our visitors to consider. The nature of change and harm to the wider setting of the Great Orme Heritage Coast is a further factor in our deliberations. Night lighting adds further to our consideration of landscape and seascape change from National Trust property	This feedback has been noted by the Applicant. Consideration of these points has been given in Volume 2, Chapter 10: SLVIA (application ref: 6.2.10).	yes	no
PrB_011_08102021	S44	Volume 3, Chapter 4: Tourism and Recreation	National Trust hope that progress can be made on more specific tourism and recreational mitigation prior to submission and note the concerns expressed by our local authority partners in relation to this particular issue.	This has been noted by the Applicant.	yes	no
PrB_011_08102021	S44	N/A	We appreciate that this is the first significant public consultation on the proposed scheme detail, we welcome the on-site discussions that you have been able to take forward during September. During autumn we look forward to reviewing the feedback you have received from both the online platform and in response to the public open events you have been able to undertake during this public consultation	Comments are noted.	Yes	no
PrB_011_08102021	S44	Volume 3, Chapter 2: LVIA	National Trust supports the principal of the Awel y Mor project and the increased capacity of renewable energy generation in moving forward this area of the Irish sea in terms of scale, size, and location. We also note since the start of the consultation that further detail has been provided on the adjoining Morgan and Mon offshore wind projects. We would hope further cumulative impact assessment could be provided in the final LVIA submission in relation to this adjoining scheme.	The Round 4 leasing areas are considered in the CEA in Section 10.13 of the SLVIA chapter (application ref: 6.2.10). However, since the projects have not yet submitted scoping reports, it is considered that there is too limited information in the public domain to conduct a meaningful cumulative assessment of these projects.	yes	no
PrB_011_08102021	S44	Volume 1, Chapter 4: Site Selection and Alternatives	National Trust note and support the work completed to date on offshore cable route, landfall, and grid connection. We note the work undertaken to avoid Constable Bank and the selection bringing forward the shortest onshore cable route. There are no NT properties in proximity to the landfall, cable route or proposed grid connection point	The Applicant notes this response.	yes	no
LA_002_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	At a meeting of the town council's Finance and General Purposes Committee held on 6th October 2021, a letter from Rhyl Golf Club was received and considered, advising of the detrimental impact 'Option A' would have on the course, due to the proposed location of two large transition jointing boxes in the middle of the course. The letter goes on to explain that this would effectively and permanently close the course. Members expressed strong support for the expansion of green energy infrastructure as a much needed alternative to the continued reliance on fossil fuels, and of course welcomed any skilling and employment opportunities Awel y Mor would bring to the local area. Options A and B were briefly outlined to members, and I was instructed to convey their strong objection to option A. Rhyl Golf Course has been in existence for 130 years and is therefore a firmly established facility and attraction here in Rhyl. One that proved of particular and significant benefit to local residents during the Covid-19 lockdown periods, as one of the few outdoor activities available to us during the various restrictions. As such, it provided opportunity for exercise within a safe, peaceful and beautiful coastal setting, contributing massively to residents' well-being in what was a uniquely challenging time for us all. This has led to a membership increase across all golf clubs, thanks to the benefits the sport provided then and no doubt will do in the future. To this end, the selection of Option A, would be a particularly cruel blow.	The Applicant notes the concerns raised. As a result the Applicant has: Removed the option to have above ground infrastructure within Rhyl Golf Club; Reduced the overall footprint of the substation zone, and included mitigation measures in response to concerns raised with regards the onshore substation; Reduce the horizontal spread of the array by reducing the total number of turbines from a maximum of 91 to 50. These changes are addressed in further detail within the Site Selection and Alternatives chapter (application ref: 6.1.4).	Yes	no
LA_002_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	Furthermore, the club is a popular part of the local community, and provides good quality room hire and catering for the full range of private functions. The town council would like to register its strong objection to Option A and its support for Option B to allow Rhyl Golf Club and all of the advantages the sport and the venue brings, to continue to be offered to the people of Rhyl and to its visitors for many more years to come.	The applicant has revised the project details since PEIR and the landfall design has been amended to avoid above-ground permanent works within the Rhyl Golf Club .	Yes	yes
LA_002_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	The town council also considered the potential impact on both the existing and proposed coastal flood defence scheme in the vicinity of the Option A land fall. The East Rhyl area was subject to extensive flooding in 2012 when the sea defence failed in this area and the town council is concerned that Option A would undermine the extensive works already completed and those in the process of being delivered both at significant cost to the public purse and particularly the Welsh Government. For this reason also the town council objects to Option A.	Option A is no longer being taken forward as part of the AyM proposals	Yes	yes

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_002_11102021	S42	Volume 3, Chapter 3: Socioeconomics	In addition, members noted that Awel y Mor was not offering anything in terms of community funds to the areas impacted by the wind farm, which had been enjoyed by Rhyl as part of other wind farm projects in recent years, and wonders if this is something that could be considered?	The project has undertaken an early stage consultation on the Community Benefits in early 2022, though it should be noted the Community Benefits package sits outside the scope of the Development Consent Application	Yes	no
LA_003_11102021	S42	N/A	The DCO application would be accompanied by an Environmental Impact Assessment, and the PEIR indicates the topics to be assessed which are considered to be comprehensive. The proposal does not appear to involve any land take in Flintshire. The only impacts on Flintshire appear to be related to transport and transportation and seascape/landscape and visual impact. There could also be community benefits that could arise that Flintshire Communities could benefit from which are noted in the Council's response.	Comments are noted . The project has undertaken an early stage consultation on the Community Benefits in early 2022, though it should be noted the Community Benefits package sits outside the scope of the Development Consent Application	Yes	no
LA_003_11102021	S42	Volume 1, Chapter 2: Policy and Legislation	The Climate Change Act 2008 places a duty on the UK Government to ensure its net carbon account and greenhouse gas emissions are reduced by 80% relative to 1990 levels by 2050. In 2019, the UK Government increased its target reduction to 100% (net zero carbon emissions). The central objective of UK Government policy is to ensure the security of energy supply, whilst responding to the challenge of climate change by reducing carbon emissions. To meet its objectives, more renewable energy infrastructure is required, with an increased emphasis on generation from renewable and low-carbon sources, including offshore wind. The UK's commitment to renewable energy generation is captured through the publication of the NPSs for Energy, Renewable Energy and Electricity Networks Infrastructure (NPS EN-1, 3 and 5, respectively). From an energy perspective the Council are supportive of the scheme given the proposed 1,100MW electricity generating capacity of the proposed development. As detailed within the PEIR Vol. 1 Chapter. 2 Section 2.3 the development would provide substantial renewable electricity generation that will aid in reducing carbon emissions and mitigating the impacts of climate change, as underpinned by the various policies and targets alluded to, as well as Welsh Government's target for 70% of the nation's electricity to be generated from renewable sources by 2030. Proposals such as this will be required for the UK to meet the climate change reduction targets set out in the Paris Agreement. National Grid's latest Future Energy Scenario's publication highlights the key role that offshore wind will play in the decarbonisation of the grid – with the electrification of both heat and transport anticipated it is predicted that between 34GW and 77GW of new wind and solar generation could be required to meet demand by 2030, in three of its four scenarios National Grid proposes that offshore wind represent the largest proportion of electricity generation. With the windfarm to be operational by 2030 this would also contribute to meeting the Sixth Carbon Budget, in which the Committee on Climate Change recommends the 'UK electricity production is zero carbon by 2035' and that 'offshore wind becomes the backbone of the whole UK energy system.' From a Flintshire perspective, whereas we are limited in our capability to develop large scale wind power generation given aircraft safeguarding restrictions, it would be therefore be beneficial to support development of offshore wind opportunities.	Comments are noted.	Yes	no
LA_003_11102021	S42	Volume 3, Chapter 9: Traffic and Transport	In relation to highways impacts, the traffic and transport implications of the onshore aspects of the project are described in Chapter 9, Volume 3 of the PEIR; this identifies that anticipated impacts will be restricted to highways under the control of Welsh Government, Denbighshire County Council and Conway County Borough Council. Significant impact on highways within Flintshire is not anticipated and therefore the Highways Authority have already stated that they do not intend to provide highway comment in regard of onshore operations. However, there appears to be some uncertainty regarding how the components would be transported ready for assembly offshore, and if the highway would be used, or if it would be rail based, and/or with involvement from the use of the Port of Mostyn. As such, the traffic and transport implications of the offshore works do not appear to have been considered. It is understood that a decision hasn't yet been made on which Port would be used for transporting the off-shore components. If the Port Of Mostyn continues to be used as a construction base for offshore construction works, there is potential for any associated increase in vehicular movements or the transport of long loads, to generate highway impacts within Flintshire. That also brings a wider question about whether Mostyn Docks will act as a wider base for these works. There may also be indirect highways impacts and traffic generation as a result of the Port of Mostyn being used in association with the offshore assembly of the windfarm. Therefore, the Council respectfully requests further information regarding the number/frequency/size of additional vehicular movements to/from the Port Of Mostyn in association with the direct and indirect vehicular movements associated with this proposed development and would welcome further engagement and discussions relating to this matter.	Any port development that might be required for delivery of AyM does not form part of either the DCO or marine licence applications, and any port upgrade works that may be required would be delivered through separate requests for consent and/or Harbour Revision Orders.	yes	no
LA_003_11102021	S42	Volume 2, Chapter 10: SLVIA	The proposed development site is over 20km from Flintshire and only likely to be visible from the very western coastal strip in Flintshire and also from higher ground; particularly the Clwydian Range and Dee Valley AONB. Therefore, due to the distance the proposed development is from Flintshire, the development is unlikely to have any direct visual or seascape/landscape effects on Flintshire. The LUC report commissioned by the North Wales Planning Authorities to undertake a detailed review of the SLVIA on behalf of the North Wales Authorities concludes that overall, the SLVIA is thorough and contains a comprehensive assessment of the key seascape, landscape and visual receptors. It is considered that the SLVIA methodology is sound and comprehensive. The SLVIA identifies 60 assessment viewpoints, two of which are within Flintshire. These viewpoints have been reviewed and impacts on the receptors identified are assessed to be non-significant which are considered to be appropriate by LUC. LUC agree with the judgements in the SLVIA in relation to the viewpoints from Flintshire, concluding that the proposed development would result in no significant effects on the landscape and visual receptors within Flintshire. Due to the distance the proposed development is in relation to Flintshire, it is considered that the visual impact on Flintshire and its receptors would not be significant. The Flintshire County Council agrees with both the conclusions of the SLVIA for the proposal with regards to the viewpoints within Flintshire, and the conclusions of the LUC report.	The agreement with the assessment findings has been noted by the Applicant.	yes	no
LA_003_11102021	S42	Volume 2, Chapter 10: SLVIA	The Officers of the North Wales Planning Authorities have considered the review of the SLVIA prepared by LUC, and have produced a combined report providing a collective regional response of the offshore impacts on the seascape, landscape and visual impact which has been submitted as part of the consultation. Whilst Flintshire County Council are in agreement that the visual impact on Flintshire, and its receptors would not be significant, it is noted that the SLVIA does identify significant effects on seascape and landscape and visual receptors throughout the North Wales region. Furthermore, in relation to designated landscapes in the region, and the National Park, the LUC report queries the level of effect on some of these and identifies additional receptors where effects are judged significant, and/or more widespread than predicted in the SLVIA. As stated above, both the SLVIA and LUC report confirm that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscapes of North Wales and the National Park.	This has been noted by the Applicant. See detailed responses to NRW specifically in relation to effects on receptors within the IoA AONB.	yes	no
LA_003_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	This in turn, may have an indirect negative effect on tourism for the region as a result of the offshore arrays and the potential significant impact from certain key tourist destinations in North Wales, particularly parts of the Isle of Anglesey, Snowdonia National Park, Gwynedd with its recent status of World Heritage Status, and parts of Conwy. This may have an indirect negative impact on the number of visitors travelling to North Wales. Many travelling to North Wales will need to travel through Flintshire on the A55 so this may have an indirect impact on tourism and other shops and services.	The PEIR assessment concluded that the project would not have a significant effect on the tourism economy in Flintshire, either in terms of visitors visiting destinations in Flintshire or travelling through the county borough to other destinations along the coast. The consultee response doesn't provide any evidence to vary this conclusion. This response has been noted by the Applicant.	yes	no
LA_003_11102021	S42	Volume 3, Chapter 3: Socioeconomics	In relation to community benefits, it is understood that RWE has a long history of supporting affected local communities and that RWE plan to hold a public consultation on this matter in early 2022. At this stage FCC would like to have another opportunity to comment on this consultation. The Council has a Social Value Officer who works with developers, contractors and suppliers to ensure that FCC maximises social value and community benefits through procurement. The Council would therefore wish to be consulted on this element of the project so that the Social Value Officer will have an opportunity to provide comments on behalf of the Council. As you may also be aware, the Council also is a dedicated officer who is directly involved with the grants panel for the neighbouring Gwynt y Môr Offshore Windfarm. Therefore, FCC would hope that similar grants would be available to communities in Flintshire should they be affected by the Awel y Môr project should it receive consent. Our Officers would like to be kept informed in relation to the consultation associated with the community benefits or grants that may be available as a result of the development of this project	The project has undertaken an early stage consultation on the Community Benefits in early 2022, though it should be noted the Community Benefits package sits outside the scope of the Development Consent Application	Yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_003_11102021	S42	Volume 3, Chapter 9: Traffic and Transport	The proposed development site is over 20km from Flintshire and only likely to be visible from the very western coastal strip in Flintshire and also from higher ground. Therefore, due to the distance the proposed development is in relation to Flintshire, it is considered that the visual impact on Flintshire and its receptors would not be significant. However, it is noted that the SLVIA does identify significant effects on seascape and landscape and visual receptors throughout the North Wales region. Furthermore, in relation to designated landscapes in the region, and the National Park, the LUC report queries the level of effect on some of these and identifies additional receptors where effects are judged significant, and/or more widespread than predicted in the SLVIA. Both the SLVIA and LUC report confirm that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscapes of North Wales and the National Park. This may, in turn have an indirect negative effect on tourism for the region.	The evidence base to support this conclusion assessment (and associated limitations) is presented in Section 4.7.4 of the Tourism and Recreation Chapter of the ES (application ref: 6.3.4)	yes	no
LA_003_11102021	S42	Volume 3, Chapter 3: Socioeconomics	Finally, it is noted that there could also be community benefits that could arise that Flintshire Communities could benefit from. The Council would welcome further engagement and consultation next year when it's understood that RWE will hold a further public consultation event in relation to community benefits	The project has undertaken an early stage consultation on the Community Benefits in early 2022, though it should be noted the Community Benefit package sits outside the scope of the Development Consent Application	Yes	no
LA_004_11102021	S42	N/A	Reference is made to your email which gave notice of the formal pre-application consultation period and invited comments on draft Development Consent Order and Preliminary Environmental Information Report (PEIR) in accordance with the provisions of Section 42 of the Planning Act 2008. Comments on behalf of Denbighshire County Council ('the Council') take the form of an observations report which follows this preface. The response incorporates comments from the Council's planning and technical officers and elected Members of the Council. Please note; reference is made only to sections of the consultation documents which the Council wish to offer comment on. We advise that comments are provided on a without prejudice basis, based on the information available. The draft Consultation Response was presented to Denbighshire County Council Planning Committee on 6 October 2021. The draft response has been amended in light of issues raised at Planning Committee, and the final response has been agreed with the elected Members. Any queries should be directed to Denise Shaw, Planning Officer: Tel: 01824 706724 Email: denise.shaw@denbighshire.gov.uk	No response required	Yes	no
LA_004_11102021	S42	N/A	B.6 GENERAL COMMENTS ON THE PROPOSED DEVELOPMENT The Council does not object to the principle of the development, however there are significant concerns with regards to works proposed at the landfall location in relation to the interaction with existing and proposed flood defences and the operation and future viability of Rhyl Golf Club; and in relation to the location, siting and scale of the proposed onshore substation. The Council also have concerns with the scale of the offshore windfarm proposed and the impacts it would have on regional interests. With respect to the landfall location, the Council would advise that, in addition to existing coastal flood defences, a programme of new and improved defences are proposed along the Denbighshire coast. This includes the East Rhyl coastal defence project which is currently under construction; proposed improved sea defences in central Rhyl; and a proposed coastal embankment at Rhyl Golf Club (please see response to 1.3.1 below which sets out projects to be included in cumulative assessment).	The applicant has revised the project details since PEIR and the landfall design has been amended to avoid above-ground permanent works within the Rhyl Golf Club . The Applicant has had regard to the existing and proposed flood defence works and is satisfied all schemes can co-exist. The Applicant is satisfied that through consultation and design refinement the Councils concerns with regards to impacts of the Rhyl Golf Course have been addressed.	yes	no
LA_004_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	It is noted that the landfall location proposed is at Rhyl Golf Club, and therefore there is the potential for the proposal to directly impact upon existing and proposed coastal flood defences and the function and viability of Rhyl golf club. With respect to the onshore substation, whilst the Council accepts the need for the substation to be sited close to the National Grid substation, the Council would question the site selection, give the chosen substation site is an open agricultural field which is rural in character and close to residential properties. The Council would question why alternative sites on or adjacent to the business park or to the south of Glascoed road, which are less visually conspicuous were not selected. Whilst the offshore array has limited significant effects on Denbighshire interests, from a regional perspective, the Council has concerns about the number of significant effects identified in the SLVIA, and the effect an offshore windfarm of the scale proposed would have on regional seascape and landscape character, visual amenity and the regional visitor economy.	The Applicant notes the concerns raised. As a result the Applicant has: Removed the option to have above ground infrastructure within Rhyl Golf Club; Reduced the overall footprint of the substation zone, and included mitigation measures in response to concerns raised with regards the onshore substation; Reduce the horizontal spread of the array by reducing the total number of turbines from a maximum of 91 to 50. These changes are addressed in further detail within the Site Selection and Alternatives chapter (application ref: 6.1.4).	yes	no
LA_004_11102021	S42	Draft DCO	C.8 COMMENTS ON DRAFT DCO In addition to consent for the construction and operation of an offshore windfarm, the draft DCO includes provision for secondary powers for 'associated development', including streetworks and compulsory acquisition powers. Owing to the large geographic area affected by the onshore works, the Council has concerns about the wide remit of secondary powers, and in particular the proposed powers for temporary stopping up or restriction on the use of streets, and the temporary stopping up or diversion of public rights of way, as it would remove strategic control from the local highway authority to manage the highway and public rights of way network effectively for the benefit of users. Any closures or diversions must be agreed within the local highway authority, and should be diverted / closed for the minimum possible time necessary. The Council is also an effected landowner, and has concerns regarding the impact on Council interests, in particular at the landfall location. It is should be noted that there are existing coastal defences at the landfall, and the Council has a programme of coastal defence scheme improvements in the pipeline which may be impacted by the proposal.	Given the stage of the project, the rights and powers included within the draft DCO were necessarily broad. as the project design is refined following s42 feedback, AyM will be able to identify where they would be a need for public rights of way to be temporarily stopped up for the construction of the proposed development. In addition, any diversions will be identified and included within the application DCO. In addition, any restrictions / stopping up of public rights of way will be subject to the 'public rights of way strategy' which has been submitted by the Applicant (see application ref: 8.13 <i>et seq</i>). Any public rights of way to be temporarily stopped up will be subject to adequate alternatives which will need to be to the reasonable satisfaction of the local highway authority (see Article 12). Any restrictions or temporary stopping up of public rights of way will be for the minimum time necessary.	yes	no
LA_004_11102021	S42	Draft DCO	The Council also has the following comments to make on the specific sections of the draft DCO: PART 3 Streets Public rights of way 11.(1) It is not clear what is meant by 'public rights of way strategy'. The Rights of Way Improvement Plan is the only statutory strategy a Council would have and its purpose is not to set design or specification standards for path reinstatement, and therefore this clause does not have any meaning, as there are no pre-defined standards to adhere to. The Highways Act is applicable with regards to issue of design and that would mean the developer would need to provide a new surface at least to the standard of the original path in agreement with the Highway Authority's own standards not any strategy.	As a result of the project design it is not necessary to permanently stop up public rights of way. A Public Access Management Plan (application ref: 8.13 <i>et seq</i>) accompanies the application.	yes	no
LA_004_11102021	S42	Draft DCO	11 (2) This section only refers to footpaths, however bridleways and byways will also be affected by the development proposal. Is this an omission, or is the intention that this clause should only apply to footpaths? It is essential the local highway authority have adequate advance notice and indication of the sections being stopped up and details of what it is to be replaced with, and stopping up period should be as short and commodious to satisfy the existing statutory tests in law for the replacement of public rights of way.	Article 12 deals with any other public rights of way which are to be temporarily stopped-up subject to an adequate alternative being provided. A Public Access Management Plan accompanies the application alongside the CoCP at application ref: 8.13.	yes	no
LA_004_11102021	S42	Draft DCO	Temporary stopping up of public rights of way 12. (2) As above, this clause is meaningless as Rights of Way Improvement Plans do not specify to this level of detail standards for replacement paths. Each case is site specific and depends on the existing condition of the right of way and the nature of use, and detailing cannot be standardised, and needs approval of the local highway authority.	The Public Access Management Plan accompanies the application. It sets out the standard for any alternative right of way to be created. The article also mentions that the alternative route should be to the reasonable satisfaction of the local highway authority.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_004_11102021	S42	Draft DCO	PART 5 Powers of Acquisition The Council is an effected landowner, in particular at the landfall location. The Council has significant concerns regarding the proposed compulsory acquisition powers, and consider the needs of development should not override or conflict with other landowner interests, or undermine other developments which are to be carried out, in particular strategic improvements to coastal flood defences. The Council consider existing and planned flood defence infrastructure at the landfall must take precedence over the windfarm development, and as such the Council cannot agree to powers of acquisition unless amendments to the windfarm scheme are made to ensure no adverse impact on flood defences. The Council also consider the siting of a construction compound and permanent siting of Transition Joint Bays at Rhyl Golf Course would impact on the functionality and long term viability of the golf course. The Council consider the powers of acquisition sought would take away any agency from the golf club to influence the siting of infrastructure within the golf course grounds, which is unacceptable given the potential implications for the future of the club. Further dialogue with the Council's property section and flood risk engineer, Rhyl Golf Club and other affected landowners should be undertaken so they fully understand the scope of powers sought.	In response, the Applicant has committed to no above-ground infrastructure in the Rhyl Golf Club.	yes	no
LA_004_11102021	S42	Draft DCO	SCHEDULE 2 REQUIREMENTS Requirement 7. The Council do not agree with this Requirement. Full details of substation siting, design, scale and layout, and appearance of buildings should be included in the application in order that assessment of effects is robust and understood. At a last resort, should any details of the substation be subject of the Requirement, then it is essential that the upper limits for the substation are clearly defined and embedded in the requirement. E.g. site area shall not exceed XX,XXX m2 / external equipment shall not exceed height of 18m / number of buildings shall not exceed 8 / buildings shall not exceed height of 15m etc.). Details of vehicular access, internal roads, parking and turning areas, boundary treatments and lighting should also be itemised. Requirement 11. The Code of Construction Practice should also include provision of a communication plan outlining how the local community will be informed about construction activities, set out a commitment to provide a single point of contact and complaints management and resolution procedure.	This was noted, and it was clarified that the design will be finalised post-consent, noting the need for flexibility at this stage. The Applicant has developed a Communications Plan (application ref: 8.3.13) which outlines the communications measures that may be implemented by the Applicant during the construction of the onshore works.	yes	no
LA_004_11102021	S42	Draft DCO	Requirement 16. The Council have concerns with the proposed hours of working, and do not agree to 7am – 7pm working hours in locations close to residential receptors. Where working areas are close to residential receptors, hours of operation should be restricted to 8am – 6pm Monday to Saturday only, with no working on Sundays or Bank Holidays. In relation of 16 (2). The Council has no objection to inclusion of a provision which allows for works to be carried out outside of agreed working hours in exception circumstances. However the clause should make it clear that requests need to be made in writing to the Council at least 48 hours in advance, and should include an explanation why works cannot be carried out during agreed working hours and an outline of works proposed to be undertaken. The communications plan (referred to under Requirement 11 above) should also include a provision for a mechanism to notify affected communities of out of hours work in advance of them being undertaken. Requirement 18. Should include a clause which requires land condition to be recorded prior to commencement of development, and land to be restored to same or better standard than original. Requirement 19. This requirement is not precise. The maximum noise levels from the substation site at the nearest noise sensitive receptors must be clearly defined and embedded in the Requirement.	With regards the working hours the Applicant has undertaken a detailed assessment across all technical areas, assuming working hours of 0700-1900. Appropriate mitigation measures are included in the revised CoCP and associated annexes (application ref: 8.13 et seq) which mitigate likely significant effects. With regards the DCO wording, the DCO (application ref 3.1) has been revised following this feedback.	yes	yes
LA_004_11102021	S42	N/A	DOCUMENTS ON PEIR LAYOUT OF THE REPORT The Council wish to raise the issue of file size; the consultation documents are numerous and very large in size, and Officers and Councillors have had difficulty accessing documents from the project website. It is also likely that members of the public and other interested parties would struggle to open / download the files and navigate consultation documents. Therefore consideration should be given to ensure the file size is reduced as far as practical at submission stage.	Noted. The Applicant has sought to break the documentation down into individual documents or meaningful subdivisions to ensure that download is possible, without producing an unwieldy number of documents.	yes	no
LA_004_11102021	S42	Volume 1, Chapter 2: Policy and Legislation	VOLUME 1: INTRODUCTORY CHAPTERS AND ANNEXES: 1.2 CHAPTER 02: POLICY AND LEGISLATION The Council support the principle of new renewable energy generation and recognise the contribution the proposed windfarm would make towards meeting Welsh Government renewable energy targets and tackling climate change. However, new wind energy development should not be brought forward at any cost. It is noted that a large number of significant effects have been identified in the PEIR across a range of topic areas. The design process is iterative and full consideration should be given to scaling back the geographic spread of the windfarm and the size of the turbines, which may help mitigate the range and extent of significant effects identified, whilst still contributing to renewable energy and climate change goals.	Noted and considered in the Policy and Legislation chapter of the ES (application ref: 6.1.2) and the Site Selection and Alternatives chapter of the ES (application ref: 6.1.4)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	1.3.1 ANNEX 3.1: CUMULATIVE EFFECTS ASSESSMENT It is noted that necessary enabling works at the National Grid substation would fall outside of the DCO and would be undertaken by National Grid. Whilst enabling works are not yet defined and would be carried out separately by the National Grid, they are nevertheless essential works to be undertaken in association with the proposed development, and the parameters of the works are at least known. The Council consider the enabling works at the National Grid substation should therefore be included in the cumulative assessment, and a worst case scenario should be assumed. All existing substations and energy related infrastructure should be included in the cumulative assessment and in particular in relation to the proposed onshore substation site.	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	Furthermore, the list of projects included in the cumulative assessment appears to omit a number of major schemes within Denbighshire. The major schemes below which are located within the North of the County should be included in the cumulative assessments: Major applications consented since 01/01/2018: 40/2017/1232 - Erection of 7 no. industrial units with associated parking, landscaping, access road and external storage areas. Land North of Edmund Prys, St Asaph Business Park. Granted 27/07/2018 43/2020/0843 - Demolition of former library building, erection of a new three and half storey building to contain 2 no. commercial units at ground floor and 14 no. one- bedroom residential apartments on the upper floors and associated works. Former Prestatyn Library, Nant Hall Road, Prestatyn. Granted 16/03/2021. 43/2017/1121 - Use of land for the siting of an additional 65 touring caravan pitches and 39 timber camping pods, storage building and associated works. Ffrith Beach, Victoria Road West, Prestatyn. Granted 23/05/2018 43/2018/0900 - Demolition of existing dwelling and erection of 15 no. unit residential apartment block; construction of a new vehicular access and associated works. 1 The Dell and land to rear of, The Dell, Prestatyn. Granted 12/12/2018	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	43/2020/0023 - Erection of a retail store with garden centre, servicing and car parking areas and associated works. Market Site, Gas Works Lane, Prestatyn. Granted 11/08/2020 43/2017/0848 Erection of 41 affordable dwellings and associated works. Market Site, Gas Works Lane, Prestatyn. Granted 11/08/2020 44/2018/0855 - Details of access, appearance, landscaping, layout and scale of 99 dwellings submitted in accordance with condition number 1 of outline permission code 44/2015/1075 (reserved matters application). Land East of Tirionfa, Meliden Road, Rhuddlan. Granted 13/03/2019 44/2020/0346 - Change of use of agricultural land to form extension to existing touring caravan site; siting of 3 no. glamping pods and camping facilities; construction of toilet, shower and laundry blocks and associated works. Abbey Farm Caravan Park, Abbey Road, Rhuddlan. Granted 15/10/2020 45/2020/0096 - Change of use and alterations to former offices to form a 61 bed, 6 ward hospital for residential nursing and health care. 64 Brighton Road, Rhyl. Granted 17/06/2020	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	45/2021/0040 - Hybrid Planning application (Full details and outline) for the redevelopment of 0.93ha of land known as Queens Market, incorporating the following elements: Full Details: -Demolition of the Bright Spot building on the corner of West Parade and High Street -Demolition of 2-6 High Street Queens Market, Sussex Street, Rhyl. Granted 13/09/2021	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	45/2020/0865 - Demolition of existing dwellings, erection of 13 no. dwellings and associated works. 3- 23 Edward Henry Street, Rhyl. Granted 30/03/2021 45/2020/0725 - Conversion of existing offices to form 12 self-contained apartments, including demolition of extension to rear, erection of car port and sprinkler tank compound, landscaping and associated works. Llys Anwyl, Churton Rd, Rhyl. Granted 06/01/2021 45/2020/0498 - Development of land in connection with existing hospital including the erection of a four storey community hospital. Royal Alexandra Hospital, Marine Drive, Rhyl. Granted 06/11/2020 45/2018/1215 - Erection of 109 dwellings and associated works (Phase 5). Land at Rhyl South East between Bro Deg and Dyserth Road, Rhyl. Granted 12/08/2021 45/2017/1164 - Demolition of existing school buildings and erection of replacement school accommodating 920 pupils incorporating playgroup, nursery, primary and secondary places with associated play space, grass pitch, all weather pitch. Land at Blessed Edward Jones High School and Ysgol Mair Primary School, Cefndy Road, Rhyl. Granted 21/02/2018	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	45/2018/1197 - Construction of coastal protection scheme, incorporating; interlocking rock revetment and recurved upstand sea wall to replace existing, raising of walkway, new and amended accesses and associated works (East Rhyl coastal defence improvement scheme). The coastal frontage of East Rhyl, adj to Garford Road, Rhyl. Granted 25/04/2019 45/2018/0263 - Demolition of existing building and redevelopment of land by the erection of 18 apartments and associated works. Victoria Business Park, Victoria Rd, Rhyl. Granted 12/03/2019 45/2018/0123 - Erection of a retail unit with associated parking, access, servicing and landscaping. Marina Quay Retail Park, Wellington Rd, Rhyl. Granted 12/07/2018 45/2018/0822 - Construction of 41 housing association apartments for local residents over 55 years of age together with new and altered vehicular and pedestrian accesses, associated parking provision, and related work. 41-42 East Parade, Rhyl. Granted 14/11/2018 45/2021/0265 – Change of use of land to “Skyflyer Balloon” tourist attraction including the installation of concrete platform, mounting winch and associated Skyflyer Balloon and basket, siting of toilet and reception buildings, landscaping and associated works. Former Sun Centre Site, East Parade, Rhyl. Granted 13/09/2021 40/2021/0796 - Erection of a detached storage building. Commscope, Unit 1, Kimmel Park, Bodelwyddan. Granted 24/09/2021.	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	Major applications pending determination: 40/2021/0730 - Demolition of dwelling and erection of 28 new dwellings including new vehicular access, internal access road and associated works. Land at Bryn Morfa, Bodelwyddan. PENDING 40/2021/0309 - Erection of a 198 bed Registered Care Home (Use Class C2), landscaping, parking facilities and associated works (Resubmission). Plot C7 St Asaph Business Park, St Asaph. PENDING 40/2021/0825 - Erection of 106 dwellings, construction of a new vehicular access and associated works. Land opposite Glan Clwyd Hospital, Rhuddlan Rd, Bodelwyddan. PENDING 43/2020/0521 - Erection of 102 affordable dwellings, associated roads, open space, landscaping and infrastructure (re-submission of planning application 44/2019/0629). Land adj to Alexandra Drive, Prestatyn. PENDING 43/2020/0773 - Erection of 35 no. dwellings and associated works. Land adj to Plas Morfa Farm, ffordd Penrhwyfla, Prestatyn. PENDING 43/2016/0356 - Development of 2.4 hectares of land for residential development (outline application - all matters reserved) (resubmission of previously refused application under Code No. 43/2014/1166/PO). Land off Warren Drive, Prestatyn. PENDING	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	45/2021/0187 - Change of use of land and erection of a Further Education Engineering Centre building, formation of a new vehicular access, construction of an internal site access road and car park, together with landscaping and associated works. Llandrillo College, Cefndy Road, Rhyl. PENDING 45/2021/0738 - Retrospective application for the change of use of dwelling (Use Class C3) to form a house of multiple occupancy (Use Class C4) for 4 people. 7 Llys Walsh, Rhyl. PENDING 45/2020/0858 - Conversion and alterations to hotel to form 10 no. self-contained apartments. 16 East Parade, Rhyl. PENDING 46/2019/0806 - Development of 0.75 ha of land for residential purposes (outline application including access). Bod Haulog, The Roe, St Asaph. PENDING	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	46/2021/0159 – Hybrid planning application for the redevelopment of 6.9ha of land incorporating the following elements: Hybrid planning application (full details and outline) for the redevelopment of 6.9ha of land incorporating the following elements: Full Details: -Erection of a commercial vehicles sales unit (sui generis) -Formation of associated parking area, landscaping and associated works Outline Planning application for the erection of 5 No. business buildings (Use Class B1 and B2) with all other matters reserved for further approval. Vista Site, Glascoed Road, St. Asaph. PENDING	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	Pre-application major schemes: There is also a programme of coastal defence scheme improvements in the pipeline, and EIA screening and scoping opinions for the following schemes have been issues, and which should be included in the cumulative assessment as applications are likely to come forward over the next 6-12months. 45/2021/0092. EIA screening and scoping opinion request for the proposed Central Rhyl Coastal Defence Scheme. Central Parade, Rhyl. Positive EIA Screening Opinion issued 26/04/2021. 45/2020/0899. EIA screening opinion request for the proposed Central Prestatyn/Rhyl Golf Club Coastal Defence Scheme. From the slipway at Rhyl Golf Club eastwards to Green Lanes dunes. Negative EIA Screening Opinion issued 01/10/2019 The Council would also advise similar coastal defence improvement schemes are being progressed in other North Wales authority areas, and which should also be scoped in to the cumulative assessment. (Please contact other planning authorities for details).	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	Other Major Infrastructure Projects (NSIP and DNOs) in Denbighshire: DNS application (PINS Ref: DNS/3247619). Elwy Solar Energy Farm. Land at Gwernigrn Farm, The Roe, St. Asaph. Application submitted and accepted by Planning Inspectorate Wales (Now Welsh Government Planning and Environment Decisions Wales). Pending determination.	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no
LA_004_11102021	S42	Volume 1, Annex 3.1: Cumulative Effects Assessment	Renewable energy allocated sites: Future Wales: The National Plan (2040) is the national development framework for Wales and has development plan status. The Council consider it is a material consideration in the determination of NSIP proposals in Wales to be afforded weight. Future Wales has defined ten ‘Pre-Assessed Area for Wind Energy’ and Policy 17 to the National Plan states “in Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18”. Pre-Assessed Areas for Wind Energy no. 1 and no. 2 lie within the 50km ZTV. PINS Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects, advises sites allocated in adopted development plans should be included in cumulative assessment as Tier 3 project. Pre-Assessed Areas for Wind Energy no. 1 and no. 2 as defined in Future Wales should therefore also be included in the cumulative assessment.	The Cumulative Effect Assessment has been updated to account for all new projects and available project information and in accordance with the Cumulative Effects Methodology document (application ref: 6.1.3.1)	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_004_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	1.4 CHAPTER 4: SITE SELECTION AND ALTERNATIVES The options appraisal doesn't clearly explain why a smaller site area for the array, or smaller turbines have been discounted. The design envelope therefore needs to be fully justified, and the reason why smaller turbines / smaller array area have been discounted needs to be fully explained.	The Site Selection and Alternatives chapter, and Planning Statement (application refs; 6.1.4 and 8.1 respectively) provide further information with regards the design pipeline and smaller turbines. The Applicant has, since receipt of this feedback reduced the array area, and reduced the maximum number of turbines from 91 to 50. The rationale behind this is presented in the Site Selection and Alternatives chapter.	yes	no
LA_004_11102021	S42	Volume 2, Chapter 1: Offshore Project Description	VOLUME 2: OFFSHORE CHAPTERS: 2.1 CHAPTER 01: OFFSHORE PROJECT DESCRIPTION As the development has not been fully defined, the PEIR confirms the Rochdale Envelope shall be applied for the purposes of the EIA, with assessments being based on the worst case scenario within the design envelope. The maximum design scenarios (MDS) are as follows: Large WTGs – The largest WTGs within the design envelope. For the purposes of assessment this is assumed to be up to 48 of the largest possible WTGs with a Rotor Diameter (RD) of up to 300 m; and Small WTGs – The greatest number of WTGs within the design envelope. For the purposes of assessment this is assumed to be up to 91 smaller WTGs with a RD of up to 220 m. The Council has no objection to the application of the Rochdale Envelope, however given the scale of significant effects identified in the PEIR, the options appraisal doesn't clearly explain why a smaller site area for the array, or smaller turbines have been discounted. This needs to be fully explored and justified, especially given that a reduction in the array area or height of turbines may mitigate significant effects identified. The design envelope therefore needs to be fully justified, and the reason why smaller turbines / smaller array area has been discounted needs to be fully explained.	This response has been noted by the Applicant. The relevant ES chapters have been updated with this information.	yes	no
LA_004_11102021	S42	Volume 2, Chapter 10: SLVIA	2.10 CHAPTER 10: SEASCAPE, LANDSCAPE AND VISUAL IMPACT ASSESSMENT Land Use Consultants (LUC) have been commissioned to independently review the Seascape, Landscape and Visual Impact Assessment on behalf of the seven North Wales Planning Authorities, and the Authorities collectively have significant concerns regarding the impact of the proposal on the regional interests. A copy of the LUC SLVIA Review is attached, and the Council fully endorses the findings and recommendations. The turbines proposed in the array are significantly larger than those comprised in the existing Rhyl Flats, North Hoyle or Gwynt y Mor offshore windfarms, and owing to siting and scale, the AyM offshore windfarm would be will be noticeable and distinct from existing developments, and would be viewed as an entirely new windfarm, rather than an extension to existing.	This is noted. Volume 2, Chapter 10 (application ref: 6.2.10) provides a detailed assessment of the potential impacts to seascape, landscape and visual amenity, including cumulatively with other wind farm projects.	yes	no
LA_004_11102021	S42	Volume 2, Chapter 10: SLVIA	The PEIR concludes no significant effects on Denbighshire interests, however the Council is in disagreement with the assessment on the following receptors: •No significant effects are reported for any Denbighshire viewpoints in the SLVIA. This is not agreed for viewpoint 23 at Rhyl Aquarium it is considered that there will be significant effects. The addition of AyM OWF turbines on the horizon will fill in gaps, accentuate the differences between existing and proposed developments and result in greater incidence of stacking and visual clutter. •No significant effects are reported in the SLVIA for any of the Denbighshire settlements along the coast. This is not agreed and it is considered that there will be significant effect at Rhyl along the sea front promenade. •The SLVIA identifies no significant effect for SCA C Vale of Clwyd. This is not agreed and it is considered that significant effect would be likely here due to the prominence of the turbines in views from the coastal parts of this SCA.	As detailed in Volume 2, Chapter 10, further mitigation of SLV effects have been included in the AyM MDSs following consultation. The Applicant has reviewed the assessments for VP 23, for the town of Rhyl and for SCA C – Vale of Clwyd and considers that the effects would be Non-significant	yes	yes
LA_004_11102021	S42	Volume 2, Chapter 10: SLVIA	The Council also has concerns regarding the impact of the proposal on the Clwydian Range and Dee Valley AONB has been underestimated. The ZTVI diagrams confirm that the both the Scenario A (48 x 332m blade tip height) and Scenario B (91x 252m height) proposals will be visible from a substantial area of the AONB. When viewed from the AONB the proposed windfarm will visually connect the existing Rhyl Flats and Gwynt Y Mor wind farms to create a much larger, continuously developed skyline/seascape across much of the horizon. One of the special qualities of the AONB is the opportunity to experience wide ranging panoramic views, including those out to sea, and the Council and the AONB Joint Committee is becoming increasingly concerned that the protected landscape is being visually 'hemmed in' by both onshore and offshore windfarm development to the detriment of this special quality. Views from the AONB will be increasingly characterised by wind farm dominated landscapes and seascapes.	This has been noted by the Applicant and Volume 2, Chapter 10 has been updated to take account of the feedback, including discussion at ETGs. MDS A and MDS B scenarios are shown in the visualisations for VP 24. This was agreed through ETG consultation in advance of the PEIR and confirmed for ES. The effects on the Special Qualities of the Clwydian Range and Dee Valley AONB are assessed in the ES chapter. The ES chapter also sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	no
LA_004_11102021	S42	Volume 2, Chapter 10: SLVIA	The AONB viewpoints (24 Graig Fawr, 26 Prestatyn Hillside Viewpoint Car Park, and 54 Y Foel, Dyserth) selected for assessment in the SLVIA are representative of the impact on key views from the northern part of the AONB but, given the scale of the proposals, the development will be visible from a much larger area of the protected landscape. A critical decision in relation to the potential visual impact of the development will be whether Scenario A (48 x 332m turbines) or B (91x 252m turbines) is pursued. The SLVIA viewpoint diagrams illustrate Scenario A, but it may be that the greater number of smaller turbines proposed in Scenario B would have less impact overall on views out to sea given that less turbine would be visible above the horizon. It would have therefore been beneficial to be presented with illustrations for Scenario A and B for comparison purposes. Whilst the offshore array has limited significant effects on Denbighshire interests, from a regional perspective, the Council has concerns about the number of significant effects identified, and the effect a proposal of the scale proposed would have on regional seascape and landscape character and visual amenity.	The review of the SLVIA undertaken by LUC on behalf of the North Wales Planning Authorities and the landscape officer at NRW both concur with the findings of the SLVIA in relation to the effects on the AONB which although adverse are assessed as Non-significant.	yes	no
LA_004_11102021	S42	Volume 2, Chapter 10: SLVIA	LUC Review indicates disagreement with a number of the conclusions in the PEIR, which raises concerns that the significance of effect has been underplayed. LUC have recommend the following areas are explored: •The application of magnitude of change criteria to the assessments of effects on views. LUC particularly note the emphasis in the SLVIA that the AyM OWF will 'intensify' the existing effect of operational wind farms. LUC have advised this does not accurately reflect the appearance of the AyM OWF and the contrast in scale between it and the operational schemes. •The extent to which significant effects are found to occur across receptors. There is emphasis throughout the SLVIA on effects being localised. While in many cases this is justified, in some instances the LUC review indicates that significant effects may extend further than stated in the SLVIA. •This point is particularly the case in the assessment of effects on settlements, where sea views may be affected across the built up area, not just at the sea front. Similarly, sea views from routes may be affected even where the route is not immediately coastal in location.	This has been noted by the Applicant. See responses below to the LUC report.	yes	no
LA_004_11102021	S42	Volume 2, Chapter 10: SLVIA	In terms of mitigation, it is acknowledged that no mitigation of the significant effects of the offshore wind farm is feasible, other than further changes to the design. Whilst the extent of the turbine array has been reduced to reduce the effects on Anglesey interests, a reduction in turbine height has not been discussed in the SLVIA as a means of mitigating impacts. The SLVIA has assessed two alternative turbine heights as set out in the MDS. The LUC review of the SLVIA indicates that findings of significant effect do not vary according to which MDS is considered. This suggests that turbines of 252m in height would have the same spread of significant effects as turbines of 332m, and that turbines would have to be substantively smaller to achieve effective mitigation. At PEIR stage, it is accepted that mitigation proposals are at a relatively early stage, and therefore reduction in height of turbine should not be discounted at this stage. The Council consider further development of this mitigation section will be required for the ES.	A reduction in WTG height from the maximum 332m (above MHWS) to blade tip is not proposed as mitigation, as set out in the ES chapter. In the absence of a reduced turbine height the Applicant has introduced a reduction from 88km2 at PEIR to 78km2 for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application. The Applicant is not able to further avoid or minimise the project, and as such is seeking consideration of landscape enhancement as compensation, as provided for within SOC_06 of the Welsh National Marine Plan (WNMP).	yes	yes
LA_004_11102021	S42	Volume 2, Chapter 11: Offshore Archaeology and Cultural Heritage	2.11 CHAPTER 11: OFFSHORE ARCHAEOLOGY Please see CPAT comments set out under 3.8 below.	Noted. See responses below.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_004_11102021	S42	Volume 3, Chapter 1: Onshore Project Description	VOLUME 3: ONSHORE CHAPTERS: 3.1CHAPTER 1: ONSHORE PROJECT DESCRIPTION Landfall: The Council has significant concerns that the proposed works at Rhyl Golf Course would significantly impact upon proposed new flood defences which are proposed in this location, and the Council consider flood defences must take precedence over the windfarm. The proposed works at the landfall location therefore need to be re-considered to ensure they are compatible with existing and proposed flood defence infrastructure. The Council also has significant concerns with the potential impact of the landfall works on Rhyl Golf Course, and in particular the siting of a construction compound on the eastern section of the golf course and the permanent siting of Transition Joint Bays within the golf course, which are proposed to be installed across fairway 4, 5 and 6. The works proposed would have a significant, detrimental impact on the golf course during construction and operational phases, and in particular the Transition Joint Bays would likely result in the closure of the golf course as two areas of 100m2 concrete hardstanding would destroy the fairway and would make it unfeasible for the golf course to continue to operate from the site.	The Applicant can confirm that the option for above ground infrastructure within the Rhyl Golf Course has been removed from the project design in response to stakeholder concerns. See the Site Selection and Alternatives Chapter of the ES for further information (application ref: 6.1.4).	yes	yes
LA_004_11102021	S42	Volume 3, Chapter 1: Onshore Project Description	The Council therefore object to the siting of Transition Joint Bays at the Golf Course, and instead consider they should be installed on land along the North Coast railway line. The Council would also object to any open trenching at the landfall, and every effort should be made to ensure cables can be installed by HDD or trenchless techniques. However, due to close proximity to residential properties, HDD activity must be carefully controlled and restricted to normal working hours to mitigate impact on residential properties.	The Applicant is no longer taking forward the option for TJBs within the golf course, which will instead be located to the south of the railway. As set out in the Onshore Project Description Chapter (application Ref: 6.3.1), the cables will be installed beneath the golf course and sea defences using HDD or other trenchless installation techniques. The impact of the landfall HDD works on local residents is assessed in the Airborne Noise and Vibration chapter of the ES (application ref 6.3.10)	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 1: Onshore Project Description	Cable Corridor: The Council has concerns regarding the need to temporarily stop up or divert public rights of way along the cable corridor. Every effort should be made to minimise closures, and where they are necessary, rights of ways should be re-opened at the earliest opportunity. As open cut trenches are proposed to lay cables, it is also noted that extensive sections of hedgerow and trees are proposed to be removed. The Council has concerns with the extent of hedgerow that would be removed, and further assessment is needed to demonstrate why trenchless ducts cannot be utilised to lay cables under existing hedgerow and trees in order to minimise the loss of important and biodiverse trees and hedgerow.	The final arrangements for managing the interaction between onshore elements of AyM and PRoW will be agreed with DCC via a Public Access Management Plan (PAMP), and outline version of which is provided within the CoCP within the DCO application. The PAMP sets out the principles for how interaction between construction and PRoW would be managed. Temporary management measures proposed within the PAMP include: •Appropriately fenced (unmanned) crossing points; •Manned crossing points; •Temporary closures with diversions; and •Temporary closures without (formal) diversions The scheme design has sought to minimise loss of hedgerows and trees through careful routing and selection of cable installation technology. HDD will be used to install cables beneath areas of woodland and many areas have been offset from hedgerows to reduce impacts. Where temporary hedgerow loss is proposed, compensation will be provided by re-instating native, species-rich hedgerows with trees, and including ditches where these were also present originally. Hedges will be reinstated at their original location and comprise a locally appropriate mixture of at least seven woody species and including heavy standard trees at a 3:1 ratio for any lost (noting that trees will not be planted above the Onshore ECC itself). Further details, including proposals for ecological enhancement, are provided in the outline LEMP (application ref: 8.4)	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 1: Onshore Project Description	Substation: The substation is proposed to be sited on agricultural land, which does not form part of the St Asaph Business Park and is set away from existing substations and electricity infrastructure. The Council do not support the proposal to site a substation in this location. Further commentary on the substation site is set out in section 3.2 below. The substation design has not been defined at this stage and it is proposed to be either a GIS or AIS. The Council consider the type of substation needs to be confirmed at application stage, and full details of siting, scale, layout and design should be included in the application to ensure the impacts can be fully assessed. The Council does not therefore agree to the substation detailing being subject of a requirement.	The choice of AIS or GIS will be part of the detailed design process and a decision will be made post-consent prior to construction commencing. The use of the design envelope approach has been recognised in the Overarching National Policy Statement (NPS) for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3). This established approach has been used in the majority of offshore wind applications.	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 1: Onshore Project Description	However, should the final design be subject to change, this needs to be clearly explained in the application documents and the maximum parameters for the substation must be clearly defined and upper limits for the substation site should be embedded in the requirement. I.e. maximum area, maximum height of external infrastructure and buildings, maximum number of buildings etc. Details of landscaping, appearance of buildings, boundary treatments, vehicular access, roads, parking and turning should also be clearly defined. It is noted at 1.7.5 that necessary enabling works at the National Grid substation would fall outside of the DCO and would be undertaken by National Grid. Whilst enabling works are not yet defined, they are nevertheless essential works to be undertaken in association with the proposed development, and the parameters of the works are at least known. The Council consider the enabling works should therefore be included in the cumulative assessment, and a worst case scenario should be assumed.	A description of the proposed onshore substation is provided in the Onshore Project Description ES chapter (application ref 6.3.1), and the maximum design envelope used within the EIA has been clearly stated in the various topic chapters. The Applicant has provided a Design Principles Document (application ref 8.8) that sets out the design and landscaping parameters that the Applicant proposes to apply to the substation when undertaking detailed design. Such details would be provided to Denbighshire County Council (DCC) for approval prior to the commencement of construction works. A description of the National Grid enabling works is provided within the Project Description Chapter.	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 1: Onshore Project Description	As stated under 2.10 above, at PEIR stage, it is accepted that mitigation proposals are at a relatively early stage, and therefore reduction in height of turbines and size of array cannot be discounted at this stage. Should the design be revised to reduce the size of the array and / or height of turbines, the Council would query if the landtake required for the substation would also be reduced, and if so would alternative sites previously discounted due to site area, be reconsidered? The Council consider the site selection for the substation should not remain fixed, but should be re-assessed as the design is refined and changed.	The Applicant can confirm that whilst the number of WTGs has been markedly reduced to minimise impacts on visual receptors, the substation parameters remain appropriate for the scale of project. As such the Applicant has brought forward proposed planting and mitigation (OLEMP, application ref: 8.4) which seek to mitigate the predicted effects associated with the proposed substation designs; this includes mitigating for either a GIS or AIS layout, which remains an essential area of flexibility.	yes	yes
LA_004_11102021	S42	Volume 3, Chapter 2: LVIA	3.2CHAPTER 2: ONSHORE LANDSCAPE AND VISUAL The Council accept adverse visual impacts associated with landfall and cable corridor will be restricted to the construction phase, and subject to landscaping being carried out to restore and enhance land after completion of works, this element of the onshore works will not have any permanent significant effects. However, the Council has significant concerns with the proposed location of the substation, which is located on agricultural land to the north of Glascoed Road, and to the west of St. Asaph Business Park and immediately west of Glascoed nature reserve. Whilst the site selected is close to the St Asaph business park, it is rural in character and it is clearly distinct from the St Asaph Business Park and is set away from existing substations and electricity infrastructure; the Council consider the rural character of the site has been underplayed in the PEIR, and that the proposal would result in industrial development encroaching into the open countryside. It is noted that the impact on the Eastern Lowland (Cefn Meiriadog Vale Slopes) landscape area is identified as significant during construction and 1 year post construction, but not significant longer term as it is assumed landscaping would have become established by this stage.	Acceptance of the temporary effects of the cable route noted. Useful to have DCC agreement on this point. In relation to the second point the PEIR concluded that the rural character would be altered within the locality of the site and is therefore in agreement with DCC . The ES chapter (application ref: 6.3.2) reflects this. The landscape planting is regarded to have a mitigating effect on the character of the Eastern Lowland (Cefn Meiriadog Vale Slopes) as it would moderate the effect on key characteristics of the wider area but also within the localised area immediately surrounding the site. Please see the OLEMP (application ref: 8.4) for further information on the proposed landscape planting.	yes	no
LA_004_11102021	S42	Volume 3, Chapter 2: LVIA	Landscaping is put forward as necessary mitigation, and the substation site has in part been selected as it provides sufficient area around the site to allow for landscaping. At this stage, the substation type is yet to be selected and the landscaping details have not been defined. However, from visualisations provided, owing to the likely height of substation infrastructure, it is clear that the landscaping would not fully screen the views of substation and adverse impacts cannot be fully mitigated. Until the substation type is defined a landscaping scheme is developed, the Council cannot agreed that the effects will not be significant in the longer term. It is also not clear if operation lighting has been factored into the LVIA assessment of effect. Significant effects are also identified for a number for visual receptors, including a number of residential properties along Glascoed Road, and again until the substation type is finalised and landscaping defined, the Council cannot agree that significance of effect upon residential receptors will be mitigated longer term.	The refinement of the design at ES stage has brought with it a more focussed understanding of the mitigating effect of landscape planting to the effect of the proposed substation. This will include the mitigating effect on properties on Glascoed Road. The SoS agreed that the effects of operational lighting of the OnSS should be scoped out of the assessment, the LVIA has therefore scoped it out. The effects of construction lighting are included in the LVIA. Please see the ES Chapter (application ref: 6.3.2) and the Outline Landscape and Ecological Management Plan (application ref: 8.4) for further reference.	yes	yes

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_004_11102021	S42	Volume 3, Chapter 2: LVIA	The substation site is also opposite the Denbighshire Memorial Park and Crematorium, and the Council has concerns a substation in this location would affect the tranquil setting currently afforded to the crematorium. The Council therefore do not support the proposal to site a substation in this location, and instead consider the substation should be re-located to a site which better relates to the Business Park and existing substations and electricity infrastructure. In terms of impact on the Clwyd Range and Dee Valley AONB, the onshore proposals do not directly affect the AONB but the Council would emphasise the need to reinstate and enhance all landscape features removed (trees/woodlands/hedges) to accommodate the export cables and/or compensatory planting with a view to retaining and strengthening the characteristic Vale of Clwyd landscape when viewed from the higher ground of the AONB.	There is no disagreement re the adverse visual effects on the crematorium, the assessment of Glascoed rd considers this in the ES Chapter (application ref: 6.3.2)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 3: Socioeconomics	~~3.3~~ CHAPTER 3: SOCIOECONOMICS No specific observations to make.	No response required	yes	no
LA_004_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	~~3.4~~ CHAPTER 4: TOURISM AND RECREATION The turbines proposed in the array are significantly bigger than those in the existing Rhyl Flats, North Hoyle and Gwynt y Mor windfarms, and owing to the scale and siting, the AyM windfarm would be viewed as an entirely new offshore windfarm, rather than an extension to existing. The Council considers the windfarm would have a significant effect on views from Rhyl along the promenade. Rhyl is a coastal visitor destination, and the proposal would detriment coastal views currently enjoyed by visitors to Rhyl. The proposal could have an adverse impact on North Wales as a region and its ability to attach tourists to the area, as a further windfarm development would detriment the quality of the seascape currently experienced, and may deter visitors from the area. The Council therefore considers the assessment on the tourism economy must be scoped in.	The evidence base (and associated limitations)to support the assessment is presented in Section 4.7.4. of the ES Chapter (application ref: 6.3.4)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	As referred to under 3.1 above, the Council have significant concerns with the potential impact of the landfall works on Rhyl Golf Course, and in particular the siting of a construction compound on the eastern section of the golf course and the permanent siting of Transition Joint Bays on the fairway. The Council consider the works proposed would have a significant, detrimental impact on the golf course during construction and operational phases, and may result in the golf course having to permanently close. A full assessment of impact on the viability of the golf course needs to be undertaken, and the Council would strongly object to any works which have a detrimental impact on the functionality or viability of the golf course.	The Applicant has removed the option for above ground infrastructure within the Rhyl Golf Course, please see the Site Selection and Alternatives Chapter of the ES for further information (application ref: 6.1.4).	yes	no
LA_004_11102021	S42	Volume 3, Chapter 4: Onshore Biodiversity and Nature Conservation	~~3.5~~ CHAPTER 5: ONSHORE BIODIVERSITY AND NATURE CONSERVATION The Council are general satisfied that the appropriate surveys and assessments have been undertaken, however it is essential that developer continues to engage with the Council' Ecology Officer and NRW on the development of necessary mitigation and compensation measures to ensure they are sufficient to offset identified significant and adverse effects. The Council also wish to stress that, Planning Policy Wales (PPW 11) makes clear that “planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity” (Section 6.4.5). PPW also draws attention to the contents of Section 6 of the Environment (Wales) Act 2016, which sets a duty on Local Planning Authorities to demonstrate they have taken all reasonable steps to maintain and enhance biodiversity in the exercise of their functions. It is important that biodiversity and resilience considerations are taken into account at an early stage when considering development proposals (Section 6.4.4).	This is noted and further engagement with NRW and DCC has taken place since Statutory Consultation. The Applicant has consulted upon proposals for ecological enhancement with NRW and DCC, and the proposals are provided in the outline LEMP (application ref: 8.4)	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 4: Onshore Biodiversity and Nature Conservation	In additional to mitigation and compensation measures, the proposal is also required to demonstrate a net biodiversity gain, and therefore enhancement measures should also be embedded into the development. As open cut trenches are proposed to lay cables, it is noted that extensive sections of hedgerow and trees are proposed to be removed. The Council has concerns with the extent of hedgerow that would be removed, and further assessment is needed to demonstrate why trenchless ducts cannot be utilised to lay cables under existing hedgerow and trees in order to minimise the loss of important and biodiverse trees and hedgerow. It is noted that the substation site would result in the direct loss of Great Crested Newt habitat. Any loss of habitat must be fully compensated for and the Council would defer to NRW with respect to impact on protected species.	The scheme design has sought to minimise loss of hedgerows and trees through careful routing and selection of cable installation technology. HDD will be used to install cables beneath areas of woodland and many areas have been offset from hedgerows to reduce impacts. Where temporary hedgerow loss is proposed, compensation will be provided by re-instating native, species-rich hedgerows with trees, and including ditches where these were also present originally. Hedges will be reinstated at their original location and comprise a locally appropriate mixture of at least seven woody species and including heavy standard trees at a 3:1 ratio for any lost (noting that trees will not be planted above the Onshore ECC itself). Further details, including proposals for ecological enhancement, are provided in the outline LEMP (application ref: 8.4)	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 6: Ground Conditions and Land Use	~~3.6~~ CHAPTER 6: GROUND CONDITIONS AND LAND USE No specific observations to make.	This is noted	yes	no
LA_004_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	~~3.7~~ CHAPTER 7: HYDROLOGY AND FLOOD RISK The Council would defer to NRW as statutory floor risk authority in terms of flood consequences assessment. In terms of flood defence infrastructure, the landfall site is close to existing sea defences and the cable would need to be installed underneath it via HDD. The installation of the underground cable must not compromise sea defences. The Council is also progressing a programme of sea defence improvements along the Denbighshire Coast line, which includes a proposed new coastal embankment at Rhyl Golf Course. The works at the landfall location as currently proposed would be in incompatible with the proposed new coastal embankment, and the developer should therefore fully engage with the Council's Flood Risk Engineer as the proposal is refined to ensure the proposal does not compromise existing and planned for coastal defences.	The Applicant confirms that the cables will be installed beneath the existing (and proposed) sea defences using trenchless crossing techniques such as HDD. The Applicant will continue to engage with DCC regarding the proposed AyM works and proposed flood defence works	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	~~3.8~~ CHAPTER 8: ONSHORE ARCHAEOLOGY AND CULTURAL HERITAGE The Council have concerns regarding the siting and scale of the proposed substation development on the nearby historic assets. Whilst impact on Bodelwyddan Castle has been considered, an assessment of effect on the Bodelwyddan Castle Registered Historic Park and Garden does not seem to have been undertaken. The fields where the substation is proposed to be located immediately abuts the Bodelwyddan Castle Registered Historic Park and Garden, and an assessment of impact upon the Historic Park and Garden in its own right needs to be undertaken.	The significance of the registered landscape has been considered as it lies in its value as the setting for the castel. No part of the registered area will be directly harmed but there is some change in setting, but I don't believe that causes any real harm to the significance of the park. The ES has been updated to include a specific statement on the park separately (but noting its primary significance derives from the relationship with the castle).	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	The Council also consider the impact on other heritage assets, including listed buildings in close proximity to the substation site has been underplayed, and the Council consider the substation would have a detrimental visual impact on the setting of the Listed Bodelwyddan Castle and in particular it's Registered Historic Park & Garden. There are also other Listed Buildings and structures within reasonably close proximity to the proposed sit which it will also affect. With respect to archaeological impacts, CPAT have provided a copy of their comments to the Council.	The significance of the registered landscape has been considered as it lies in its value as the setting for the castel. No part of the registered area will be directly harmed but there is some change in setting, but I don't believe that causes any real harm to the significance of the park. The ES has been updated to include a specific statement on the park separately (but noting its primary significance derives from the relationship with the castle).	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	For completeness, the Council have copied CPAT's observations below and the Council fully endorse and support comments made: CPAT have advised the following: Comments 1)ØBA and walkover survey – The methodology presented in the PEIR is broadly OK. The results so far present little that is new to us and this is largely due to the fact that the majority of the onshore cable corridor and substation location are within agricultural pasture or arable fields where surface archaeology has been largely erased with the exception of some better preservation in small woodland areas.	See response to CPAT within this log, and updated chapter and associated annexes (application ref: 6.3.8)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	We have concerns about the lack of complete coverage of the cable route corridor during the walkover survey with approximately 70% coverage completed. There is time between now and the submission of the ES to complete the walkover coverage of the missing 30% and this should be done so that we have a complete and accurate evidence base to work from in terms of suggesting mitigation and assessing the significance of any identified impacts.	See response to CPAT within this log, and updated chapter and associated annexes (application ref: 6.3.8)	yes	no

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LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	It is unclear whether features which can clearly be seen in the inter-tidal area on the DBA photographs (possible tree stumps, timber uprights, patches of stone) have been accurately described and mapped. If not then this should be completed with a re-visit and accurate mapping. We raised this issue at the 4/8/21 meeting and pointed to new evidence from surveys for the Central Prestatyn Coastal Defence Scheme (CPAT for JBL Consultants on behalf of Denbs CC) including a foreshore survey in April 2021 for JBL Consulting which identified significant archaeological deposits on the beach including potential prehistoric footprints, prehistoric tree stumps and lenses of peat deposits with artefact and paleoenvironmental potential. There is a high potential for significant direct impacts in the inter-tidal area during construction and the nature and extent of the archaeology is poorly understood. In 8.4.2 Fig. 6 it seems clear that the non-designated assets shown do not include the CPAT foreshore survey results or the features which can be seen in the DBA foreshore photographs. It is clear in 8.6 (41, 42) that the DBA is predictive only and that the condition and distribution of assets is poorly defined. In 8.7 (45) it is incorrectly stated that there are no recorded assets in the inter-tidal area of Section A – B.	See response to CPAT within this log, and updated chapter and associated annexes (application ref: 6.3.8)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Recommendations – Clearly the DBA and particularly the walkover survey are currently lacking in detail for the inter-tidal area, and this should be addressed with regard to the points raised above. It would be preferable if any current surface features with archaeological potential could be mapped and described as features which may show now could be different to those recorded in April 2021 due to the rapidly shifting sand cover in this area. It would be preferable if the sub-surface potential of the inter-tidal area could be evaluated now by a geo-archaeological specialist using a transect of boreholes and/or sample pits to recover a core profile of deposits and samples for dating and content appraisal. This would help to understand the potential impact here and provide more information leading to informed mitigation rather than the current best-guess scenario. The completion of the walkover survey over the rest of the 30% of the corridor which was not accessible for various reasons should be attempted. Where access is still not possible the locations should be identified and mapped and the reasons should be clearly stated.	See response to CPAT within this log, and updated chapter and associated annexes (application ref: 6.3.8)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	2)Geophysics – The methodology for the geophysics survey is fine. We have concerns about the lack of complete coverage of the agricultural pasture and arable fields with approximately 65% covered so far. We will be wholly dependant on the results of the geophysics for identifying any sub-surface archaeological potential and it is therefore of critical importance that we obtain as near to 100% coverage as possible of accessible fields. The current coverage of 65% is not acceptable and will not allow a fully informed assessment of the potential direct impacts. In the meeting on 4/8/21 it was stated that potential legal powers of entry would be needed to access fields where access has currently been denied by landowners and this should be explored further to achieve maximum geophysics coverage.	See response to CPAT within this log, and updated chapter and associated annexes (application ref: 6.3.8)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	We are concerned that the geophysical survey will not be followed up by appropriate pre-consent ground-truthing of the results by investigative trenching to identify features which have archaeological or perhaps geological/geopmorphological, or more recent origins. Both TAN 24 (May 2017) and Planning Policy Wales (Feb 2021) are quite clear about pre-determination evaluation (including investigative trenching) being required where direct archaeological impacts are predicted or identified. Intrusive investigation will allow us to quantify the nature, extent, date, level of preservation, importance and relationship of features identified in the geophysics results and provide an informed mitigation response. We have reservations about leaving this intrusive phase of assessment until the post-consent construction stage and do not consider that we have reliable guarantees that there will be no construction timing issues at the post consent stage which lead to a less thorough investigation and mitigation phase.	See response to CPAT within this log, and updated chapter and associated annexes (application ref: 6.3.8)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Recommendations – Complete coverage of 100% geophysics of all accessible fields along the cable corridor should be attempted. Where access is still not possible the locations should be identified and mapped and the reasons should be clearly stated. Ground-truthing of the geophysics results should be attempted in accordance with Tan 24 and PPW guidance to provide an accurate and informed evidence base for a mitigation framework. The trenching should target all significant anomalies with a predicted archaeological origin and some of those where the origin is uncertain. Consideration should be given to extending the period between the receipt of the PEIR consultation replies and the submission of a finalized ES with the DCO application so that the further assessments recommended above are given enough time to be properly completed, the results discussed and an informed set of mitigation statements included in the ES.	See response to CPAT within this log, and updated chapter and associated annexes (application ref: 6.3.8)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	3)Indirect Impacts – We would agree that, based on current information, there are no significant indirect visual impacts to non-designated archaeology within the cable construction corridor.	No changes required.	yes	no
LA_004_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	4)Post consent – In relation to discussions and suggestions made at the meeting on 4/8/21 with Wessex Archaeology we would agree that with regard to post-consent mitigation outline WSI’s for further mitigation must be included in the ES and DCO commitments and archaeological methods and practices should be included in a Code of Construction Practice (CoCP) to ensure time for the full implementation of mitigation as set out in the WSI’s.	The Applicant has included an updated CoCP (application ref: 8.13) with the application, and a WSI (application ref: 8.3.8.4) which have regard to this feedback.	yes	no
LA_004_11102021	S42	Volume 3, Chapter 9: Traffic and Transport	3.9CHAPTER 9: TRAFFIC AND TRANSPORT Impact on Public Rights of Way Based on the Works Plan, the following paths would be directly impacted by the proposal: •Footpaths 3, 4, 5, 7, 11, 13, 15, 18, 20, 22, 23, 29, 40, 41, 46 Rhuddlan; •Footpaths 7, 12 Bodelwyddan; •Bridleways 15a Rhuddlan; •Bridleways 9 Bodelwyddan; •Byway 44 Rhuddlan. It is not clear from the plans if any paths are to be stopped up permanently. The Council would object to any proposal to permanently stop up any right of way.	The final arrangements for managing the interaction between onshore elements of AyM and PRoW will be agreed with DCC via a Public Access Management Plan (PAMP), and outline version of which is provided within the CoCP within the DCO application. The PAMP sets out the principles for how interaction between construction and PRoW would be managed. Temporary management measures proposed within the PAMP include: •Appropriately fenced (unmanned) crossing points; •Manned crossing points; •Temporary closures with diversions; and •Temporary closures without (formal) diversions The outline PAMP lists PRoW that intersect the construction works and include suggested management measures for each.	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 9: Traffic and Transport	The area of Denbighshire affected by the proposal suffers from the lowest density by area and population of public paths in the whole County despite having the highest population density, and therefore the few paths there are in the north of the County are very important. Even temporary closures will have a significant effect of the local network, although it is accepted the indicative onshore cable corridor proposed seems to have done its best to avoid public paths, the construction phase will still impact on some key rights of way. This is of particular significance with the bridleways which are in extreme short supply in this area and stopping up even temporarily should be avoided or kept to the shortest possible period. As such, the Council has concerns with the proposed streetworks powers proposed to be embedded in the DCO, as it would remove control from the Council to carefully manage right of way closures at a strategic level.	The final arrangements for managing the interaction between onshore elements of AyM and PRoW will be agreed with DCC via a Public Access Management Plan (PAMP), and outline version of which is provided within the CoCP within the DCO application. The PAMP sets out the principles for how interaction between construction and PRoW would be managed. Temporary management measures proposed within the PAMP include: •Appropriately fenced (unmanned) crossing points; •Manned crossing points; •Temporary closures with diversions; and •Temporary closures without (formal) diversions	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 9: Traffic and Transport	One of the biggest issues that have arisen in the County in the past with such works is when grass land is reinstated within field parcels, fences are then erected to protect re-seed growth, which has resulted in the temporary closure being applied much longer than the Council consider necessary. The Council would want to see the paths reinstated as soon as possible after any excavation and kissing or hand gates to be erected with no stiles on any temporary boundaries crossed by the cable corridor and that authorisation for any such new fences receives consent from the highway authority under S147 of the Highways Act 1980 or will be treated as unlawful and removed once any temporary traffic restriction order closing the path expires. The Council has concerns that, streetworks powers proposed in the draft DCO would not require rights of way to be brought back into use as soon as practical to do so, and paths may remain closed until all construction works have been completed, which will have a significant impact on the users during the construction phase.	The final arrangements for managing the interaction between onshore elements of AyM and PRoW will be agreed with DCC via a Public Access Management Plan (PAMP), and outline version of which is provided within the CoCP within the DCO application. The PAMP sets out the principles for how interaction between construction and PRoW would be managed. Temporary management measures proposed within the PAMP include: •Appropriately fenced (unmanned) crossing points; •Manned crossing points; •Temporary closures with diversions; and •Temporary closures without (formal) diversions	Yes	no
LA_004_11102021	S42	Volume 3, Chapter 9: Traffic and Transport	Were powers to remain with the local highway authority, the Council do not consider any disruption or delay would be arise by the need for the Council to make the orders under the provisions in the Highway Act, and it would enable the Council to retain strategic oversight over the wider public rights of way which would have clear benefits to rights of way users. The Wales Coastal Path and National Cycle Network Route 5 run along the coastal promenade which is not a public highway. Whilst there appears no obvious mechanism in the DCO to suspend these routes, it should be avoided and it appears to be the case as the cable will be thrust bored through the sea front under the defence structure and that access along the top will not need to be controlled by restriction other than in exceptional circumstances. Preference would be for rights of way to not be used for construction or operational site access, and instead easements with private landowners away from rights of way should be pursued.	The proposals do not seek to close the Wales Coastal Path and NCN, although a small number of AyM construction vehicles would use a short section of this route to access/egress the beach. Proposals to manage this interaction will be agreed with DCC via a Public Access Management Plan (PAMP), an outline version of which is included within the outline CoCP. The outline PAMP was provided at PEIR and has been provided separately for comment to the Access team at DCC	Yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_004_11102021	S42	Volume 3, Chapter 10: Noise and Vibration	3.10CHAPTER 10: AIRBOURNE NOISE AND VIBRATION Due to the proximity of construction compounds and working areas to residential areas and individual properties, the Council has concerns the construction phase has the potential to generate adverse noise and vibration. Noise is stated to be minor to major significance, and vibration from HDD is a particular concern, particularly at the landfall which is in close proximity to residential areas. Noise and vibration needs to be fully assessed and abatement plans must be included in the Code of Construction Practice subject of proposed Requirement 11, which should be devised in consultation with the Council's Public Protection department.	A full assessment of the potential noise impacts arising during the construction and operation of AyM on residential receptors is provided in the Airborne Noise and Vibration Chapter of the ES (application ref: 6.3.10). The outline COCP includes an outline Noise and Vibration Management Plan (NVMP), that will be approved by DCC prior to the commencement of construction. A draft of the outline NVMP was provided alongside the PEIR	Yes	no
LA_004_11102021	S42	Volume 3, Chapter 10: Noise and Vibration	The Council do not agree to the working hours of 7am -7pm in locations close to residential properties, and working hours should instead be restricted to 8am – 6pm where working areas are close to residential receptors, with no working on Sundays or Bank Holidays. Where exceptional circumstances require construction works to be carried out outside of approved hours of operational, this should be agreed in writing by the local planning authority at least 48 hours in advance and such provision should be embedded in the Requirements (please see comments above on draft DCO Requirements).	The Applicant has submitted the DCO application on the basis of onshore construction hours of 7 am - 7 pm from Monday to Saturday with no activity on Sundays or Bank Holidays. Works outside of these hours would only be undertaken with agreement of DCC. The EIA has been undertaken on the basis of these construction hours and includes assessment of 24 hour working for the landfall, A55 and River Clwyd HDD crossings.	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 10: Noise and Vibration	The Council also consider community engagement should be a priority throughout the construction phase. A communications plan should be required to be submitted as part of the Code of Construction Practice, which should set out a protocol for communicating with affected local communities throughout the construction phase, including proposals to notify affected residents in advance of noise / vibration generating works commencing, and a complaints management and resolution procedure should be established. A single point of contact should be provided for the local community to contact throughout the construction phase. In terms of operational noise from the substation, the noise levels at the closest noise sensitive receptors need to be clearly assessed, and maximum noise levels needs to be clearly defined and embedded in requirements.	An outline Construction Communication Plan is provided within the CoCP. The Outline Construction Communications Plan sets out the communication measures which may will be implemented by the Applicant, its contractors and subcontractors during the construction of the onshore works.	Yes	yes
LA_004_11102021	S42	Volume 3, Chapter 11: Air Quality, Health and Climate Change	3.11CHAPTER 11: AIR QUALITY, HEALTH AND CLIMATE CHANGE The Council agree that the proposal would not generate significant effects with respect to air quality, however localised adverse effects may arise during the construction phase, and therefore the Council agree that a dust assessment is necessary and that a dust abatement plan should be included in the Code of Construction Practice.	A dust assessment is provided in Chapter 11: Air Quality (application ref 6.3.11), of the ES with dust mitigation proposals outlines in the Air Quality Management Plan which forms part of the COCP (application ref 8.13)	yes	no
LA_004_11102021	S42	Volume 3, Chapter 12: Public Health	3.12CHAPTER 12: PUBLIC HEALTH Potential harm to human health would arise during the construction phase, and in particular noise is identified to be of minor to major significance. As stated under 3.10 above, the Council do not agree to 7am – 7pm hours of working where working areas are close to residential areas. Where works are close to residential receptors, hours of working should be restricted to 8am – 6pm with no working on Sundays or Bank Holidays. Public health assessment should also have regard to cumulative effects from exposure to multiple major construction activities on a locality, particularly at the landfall, which is close to coastal defence improvement schemes which are under construction and proposed, and other planning and consented major developments in the vicinity of the landfall. The substation is also close to proposed and consented major development schemes in and around St Asaph Business Park and Bodelwyddan, and an assessment needs to be undertaken to ascertain if construction activities are likely to overlap with other major schemes, and resultant cumulative effects on public health, residential and public amenity needs to be fully considered.	An assessment of the potential noise impacts arising during the construction and operation of AyM on residential receptors is provided in the Airborne Noise and Vibration Chapter of the ES (application ref: 6.3.10). The assessment includes consideration of cumulative developments that include the proposed coastal protection scheme. Further consideration of the potential effects on public health are summarised in the Public Health chapter (application ref: 6.3.12).	yes	no
LA_004_11102021	S42	Volume 3, Chapter 13: Onshore Conclusions	3.13CHAPTER 13: ONSHORE CONCLUSIONS Please refer to topic specific comments above.	This is noted	yes	no
LA_004_11102021	S42	N/A	E. COMMENTS RAISED AT PLANNING COMMITTEE The draft consultation response was presented to Denbighshire County Council Planning Committee on 6 October 2021 and the resolution of Committee was for the draft comments to be submitted, subject to amendments being made to the response to emphasis significant concerns with the impact of the proposed landfall works on Rhyl Golf Club and the size, scale and siting of the proposed onshore substation. Committee recognised the environmental benefits of wind energy generation and the contribution the proposed development will make to tackling climate change, and therefore did not object to the principle of a new offshore windfarm, however, the Committee raised particular objection to the siting of Transition Joint Bays on land at Rhyl Golf Course and with regarding the siting of the substation on agricultural land.	The applicant has revised the project details since PEIR and the landfall design has been amended to avoid above-ground permanent works within the Rhyl Golf Club .	yes	yes
LA_004_11102021	S42	N/A	The Committee felt the Transition Joint Bays should be located on land to the south of the North Coast railway line, and not within Rhyl Golf Course. The Committee also felt the substation site should be re-considered, and it should be re-located to a site which is better related to existing electrical infrastructure and commercial development. For example, on land to the south of Glascoed Road close to the existing National Grid and windfarm substations. The Council also resolved to contribute to a joint regional response to be submitted on behalf of the North Wales Planning Authorities to collectively raised concerns with the scale of the development proposed and the impact it will have on regional interests. The Committee also noted the short time period for consultation comments to be made given the volume of documents which need to be reviewed, and concern was also raised with the size of consultation documents, with some Members experiencing difficulty in downloading them from the project website.	The applicant has revised the project details since PEIR and the landfall design has been amended to avoid above-ground permanent works within the Rhyl Golf Club. The TJBs will be located on land to the south of the North Coast railway line as per DCC's consultation response. The AYM substation location has been identified through a comprehensive site selection process. Consultation was undertaken through the ETG process of which DCC was a participant. The land to the south of the Glascoed Road was considered as part of this process but was ruled out following consultation at the short list stage due to stakeholder feedback on potential archaeology in this area, impact of residential receptors in regards to visual amenity due to the challenge of mitigating a substation at this location because of local topography constraints.	yes	yes
MOP_022_011102021	S44	Volume 1, Chapter 4: Site Selection and Alternatives	Our clients are of the opinion that the proposed cable route will have a significant detrimental effect on the property due to the visual impact of the substation site from the main residents, the loss of potential development value on adjoining land and from detrimental impacts to their farming operations. We are therefore instructed to oppose the route that has been proposed and would request that consideration is given to an alternative route that is more direct and would impact less on the property.	The Site Selection and Alternatives chapter (application ref 6.1.4) provides further information with regards the design rationale of the onshore substation. The substation zone has reduced as a result of feedback received, and the Applicant has introduced a planting scheme within the outline Landscape and Ecological Management Plan which reduced the potential impacts of the project.	yes	yes
PrB_012_11102021	S44	Volume 3, Chapter 10: Noise and Vibration	As you will be aware, the University is leaseholder of, and has legal interest in, the building and land known as Optic Technology Centre ("Centre") located at Ffordd William, St Asaph Business Park, St Asaph, LL11 0JD. The Centre is operated by Glyndwr Innovations Limited ("GIL"), a subsidiary of the University and leading provider of innovative product development, engineering, and technology consulting. Further and fuller background as to the work of GIL and the Centre's operations can be found at www.glyndwrinnovations.co.uk. It follows that a substantial part of the work undertaken at the Centre concerns a wide range of commercial and non-commercial activities in relation high-level opto-electronics and precision optical systems which utilises metrology and relies heavily on vibration-sensitive machinery. Having now had opportunity to review the Preliminary Environmental Information Report produced in this matter, in particular Volume 3 Chapter 10 (Noise and Vibration), the University has significant concerns regarding the potential detrimental impact that prolonged, ground-born, low frequency (sub-micron level) vibrations arising from any subsequent onshore development, including that pertaining to the proposed substation and cable corridor within close proximity of the Centre, may have on foregoing and GIL's wider undertakings. The University would therefore ask that the above be taken into consideration as part of the consultation process.	Discussion with Glyndwr University, following statutory consultation, confirmed that concerns were primarily regarding vibration associated with construction. Engagement with the University also highlighted the importance of early communication with users of St Asaph Business Park (SABP) regarding the scheduling construction activity. Subsequent to engagement with the University in October 2021, the decision was made to select the westernmost crossing of the A55, which would place HDD (or other trenchless technology techniques), equipment further to the west and away from the SABP. In addition, an outline construction communications plan has been included within Appendix 12 of the outline CoCP (application ref: 8.13.12), through which RWE would provide early notice of indicative construction programmes near SABP to allow early scheduling of vibration sensitive activities. Regular updates will be provided to SABP users of the timing and type of construction activities in the vicinity during the construction period.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_012_11102021	S44	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Volume 5, Annex 8.2, presents a Designated Heritage Asset Scoping Exercise (Wessex Archaeology report 231901.02, June 2021) which aims to describe the process and rationale by which assets were selected for assessment. The exercise significantly reduced the number of assets to be assessed from the full list that might theoretically have experienced impact based on a simple ZTV radius, and in the main the decisions are sensible. However, in some cases, the scoping appears to have prejudged the outcome of assessment, filtering out assets at the first stage that, by the author's own criteria, clearly have potential for impact. Specifically, we consider that Bangor Pier (Grade II* listed building ref. 3987) and Menai Bridge (Grade I listed building ref. 18752) should be scoped in to assessment. In both cases, the scoping exercise notes clear maritime associations and the importance of the coastal setting, and acknowledges that the proposed turbines would be visible. This is confirmed in Volume 6 Annex 10.5 – SLVIA Visualisations, Figures 36 (Viewpoint 9 – Bangor Pier, south end) and 73 (Viewpoint 49 - Menai Suspension Bridge). In both cases, the contribution of setting to the significance of the listed structures has not been sufficiently identified and analysed to be able to discount them from assessment. It is clear that there will be some impact, and the report must establish the nature, magnitude and significance of this to determine whether it is significant in EIA terms, bearing in mind the high grade of the two structures.	Bangor Pier and Menai Bridge have been included in the assessment presented in section 8.11.2. of the Onshore Archaeology and Cultural Heritage Chapter (application ref: 6.3.8)	Yes	no
PrB_012_11102021	S44	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Where assets have been taken forward for assessment, the approach taken is in places limited in scope, such that not all relevant factors have been considered or afforded appropriate weight. Cadw guidance 1 explains that “The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape.” A number of factors are listed as possible contributors to setting including: views to, from and across the historic asset or place; the prominence of the historic asset in views throughout the surrounding area; views associated with the aesthetic, functional or ceremonial purpose of the asset, for example, defensive sites, beacons or designed landscapes; and historical, artistic, literary, place name, cultural or scenic associations. These align with the values set out in Conservation Principles2 , which, in addition to evidential and historical values, include aesthetic and communal values. Both guidance documents include fortuitous and modern views as well as intentional, designed and functional visual relationships. However, the current assessment (as set out in Volume 3 Chapter 8) focusses on static, functional and intentional views from, with little to no consideration of aesthetic, cultural and communal values or aspects such as sense of arrival/approach and views towards and across assets.	The relevant aspects of setting as it contributes to significance have been presented in section 8.11.2. of the Onshore Archaeology and Cultural Heritage Chapter (application ref: 6.3.8)	Yes	no
MOP_023_11102021	S44	Volume 3, Chapter 9: Traffic and Transport	1.The land is situated adjacent to Junction 26 of the ASS Expressway, a significant primary junction which serves the St Asaph Business Park. A crossing of the ASS at this location will cause considerable unnecessary disruption to existing businesses.	The crossing of the A55 is using Horizontal Directional Drilling underneath the highway and would not affect the operation of the highway network. EIA impacts on Princes' Gorse woodland are significant in respect of tree felling, bats, badgers, potential flood impact and LVIA impact. Hence a project preference not to use the Eastern Route.	yes	no
MOP_023_11102021	S44	Volume 3, Chapter 3: Socioeconomics	Our clients' land received planning approval for commercial/ business development from Denbighshire County Council, who recognise the site as having strategic importance for the continues development of the ASS corridor. The proposals will have a significant detrimental effect for future economic development of the area. 3.We are currently in discussions with a large national/global Company seeking to create a large number of permanent full-time jobs on the site with the opportunity to develop further land for employment purposes. The proposed scheme would significantly disadvantage these proposals and would prevent job creation. 4.The existing junction onto the ASS will, in all probability, provide a link road to Ysbyty Gian Clwyd, whilst offering further residential and commercial development opportunities as agreed with Denbighshire County Council in their planning strategy for the area.	The AyM site selection process has been manged in consultation with DCC to minimise any impact on the Key Strategic Site (KSS) at Bodelwyddan through sensitive placement and alignment of the proposed (underground) onshore export cable with existing infrastructure such that it will be possible to integrate it within the allocations of green and open space.	Yes	yes
MOP_023_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	It is therefore our opinion that two of the proposed access routes through our clients' land will have a significant detrimental effect on the future development of this key strategic site due to the sterilisation of the central land area, thereby preventing development and employment opportunities. We would therefore recommend that these routes should be discounted, thereby ensuring that the site is not lost for future economic development.	The Site Selection and Alternatives chapter (application ref 6.1.4) provides further information with regards the design rationale of the onshore cable route. The final route has been optimised to minimise any impact on future economic development, including aligning with existing underground infrastructure in order to minimise impacts on areas such as the Key Strategic Site at Bodelwyddan.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Overall NRW are happy with the Physical Processes Assessment in the PEIR but have the following comments and recommendations to make to make.	This is noted. See responses below to specific points.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Overall, the baseline description of physical processes for the study area (Annex 2.1) was well researched and clear. There only remains one area that requires further investigation: In Figure 2, Conceptual understanding of regional scale marine physical processes it is referenced that “there is possible sediment transport links between Constable Bank/Rhyl Flats and the adjacent coastline driven by combined tidal and wave forcing but poorly understood”. Volume 2, Chapter 2 under Seabed Geomorphology also acknowledges the importance of the sediment transport links to the adjacent coast by stating “The offshore sand banks of Constable Bank and Rhyl Flats are located immediately to the south of the array and are crossed by the offshore ECC. They are understood to have an important influence on the geomorphology of the adjacent coastline, through the possible exchange of sediments and potential impacts on hydrodynamics.” Further consideration of the transport links between Constable Bank/Rhyl Flats and the coast is therefore needed.	Further information on baseline sediments transport on and around Constable Bank and Rhyl Flats (as well as adjacent nearshore waters) has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	2.10.3 Potential changes to Constable Bank/Rhyl Flats, designated sites and the adjacent coast arising from dredging/disposal induced bed level changes and associated modification of waves, tides and sediment transport – Para. 81 states “The actual shape and thickness of the seabed deposit resulting from the release of material from the dredger at the water surface cannot be predicted accurately in advance and in any case is likely to vary. A range of possible configurations of area and thickness are presented in Volume 4; Annex 2.3 and could realistically be in the order of several metres high immediately beneath the dredger. This will greatly limit the extent to which the transmission of wave energy may be modified” . It is not clear what exactly is meant by this last statement “this will greatly limit the extent to which the transmission of wave energy may be modified”?	Further information on baseline sediments transport on and around Constable Bank and Rhyl Flats (as well as adjacent nearshore waters) has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Vol. 2, Ch2, section 2.10.3 Potential changes to Constable Bank/Rhyl Flats, designated sites and the adjacent coast arising from dredging/disposal induced bed level changes and associated modification of waves, tides and sediment transport – Para 82 states “It will also be the case that the dredged material will comprise coarse grained (primarily) sandy material which is known to be highly mobile under baseline conditions (Volume 4; Annex 2.1). The material in the spoil mounds is expected to be readily remobilised by the action of waves and tidal currents and fairly rapidly re- incorporated into the mobile surficial sediment unit. Accordingly, the mounds are not expected to become persistent seabed features” . The modelling conducted (Vol 4. Annex 2.3) to determine the fate of the dredge spoil only details the SSC passive phase of the plume and the subsequent sediment deposition from the passive phase which makes up only 10% of the spoil disposal. It is not clear if a thorough assessment has been conducted to determine the time it will take for the dredge spoil mounds (deposited under the hopper constituting up to 90% of dredge spoil) to reach background seabed levels under prevailing hydrodynamic conditions. If the sediment dredged along the ECC is composed of predominantly gravel (which will be informed by the cable route burial assessment) it may be possible for the spoil mound to become a persistent seabed feature which as a result would alter the prevailing morphodynamics of the seabed. Further investigation is required to assess the recoverability of these spoil mounds before NRW can agree with the suggested predicted magnitude of impact as being negligible. Please note that this comment only refers to increase in bed level caused by dredge spoil and not to reduction in bed level caused by dredging of sand waves.	An assessment of the degree to which any spoil mounds will persist on the seabed has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Vol 2 Ch2 Section 2.10.6 Potential for long term changes to the coast arising from use of cable protection at the landfall. Paragraph 118 The magnitude of impact has been assessed as negligible and assumes that if cable protection in the form of concrete mattresses is to be used at the landfall it will remain buried for the lifetime of the project. However, there is a degree of uncertainty in this assessment as to whether the cable protection will remain buried, particularly given the potential for larger waves to reach the coast in the future due to sea level rise and an increase in storminess. NRW advise that in the event that cable protection is used at the landfall it should be monitored post construction and over the life time of the project following an adaptive management approach so that any exposure of the protection will be reburied to ensure it will not cause morphological alteration to beach processes through potential interaction with waves and currents and causing a barrier to alongshore sediment transport in either direction.	Noted. It is suggested that a Cable Management Plan be secured as a condition of the marine licence, including details of the need, type, quantity and installation methods for cable protection, with the detail to be determined post-consent during the detailed design phase.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Vol. 2 Ch2. Section 2.10.7 Potential for long term changes to the coast arising from cable protection within nearshore areas Paragraph 121 states “the rock berm is expected to have ~15.2 m base width, 1.4 m overall height and sloped sides up to a 4.5 m wide berm crest. The exact location of the rock berms and orientation relative to the beach is presently unknown”. Paragraph 122 further states “whilst it can reasonably be expected to be the case that there will be some localised change to waves and hydrodynamics immediately within the vicinity of the rock berms, the potential for wider morphological change to the beach at the landfall is considered to be limited”. Paragraph 125 then states “The (probable) shore-normal orientation of the rock berms could in theory, temporarily intercept the longshore movement of sediment. However, regular re-working by waves at lower states of the tide is likely to mean that this material would be rapidly re-distributed and could easily pass over the obstacle in suspension.” The assessment of impact caused by presence of the rock berms is all based on expert judgement and no quantitative analysis has been conducted to determine the potential for wave focussing (proximity to shore, water depth, wave height etc) caused by the presence of the berm and whether over time prolonged wave focussing could cause areas of the beach to erode (depending on the stability of the beach face and sediment composition) potentially resulting in long term lowering and the requirement for beach management intervention. Depending on its location in the intertidal/subtidal, the presence of the berm will also determine the magnitude of impact to down drift locations caused by interruption to sediment transport alongshore which will depend on the rate of sediment transport, orientation of the berm and length of the berm which has not been provided. NRW advise that the potential impacts to the coast caused by the presence of the rock berms should be re-assessed following a more detailed analysis of potential alteration to the hydrodynamics and sediment transport processes (see NRW comments above).	Further assessment of the potential for rock berms to interfere with sediment transport and beach morphology has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Volume 2 Chapter 2 Section 2.11.3 Potential for changes to Constable Bank/Rhyl Flats, designated sites and the adjacent coast arising from modification of the wave regime As detailed above, a better understanding of the transport links between Constable Bank/Rhyl Flats and the coast is required before NRW can agree on the outcomes of the environmental assessment for waves. It is acknowledged that wave action over the sand banks limit the height of the banks by mobilising the sediment into suspension as noted in paragraph 190 which states “Water depths shallow to ~ 5 m below LAT over Constable Bank and 1 m below LAT over Rhyl Flats and therefore they have the potential to frequently interact with waves”. Section 2.11.5 paragraph 188 also states “Interaction of waves with Constable Bank and Rhyl Flats is understood to play an important role in controlling wave climate long the adjacent coastline between Great Orme and Prestatyn, affecting patterns of beach morphology, coastal evolution and flood risk (Halcrow, 2010). Accordingly, any morphological change to either feature arising from the Project is potentially of concern.” The fate of the sediment from Constable Bank through wave interaction and the sediment transport links towards the coast is presently not understood. Wave suspended sediment could hypothetically either settle in the lee of the bank or potentially be transported towards the coast by the wave orbital velocities. The numerical wave modelling has shown that there will be long term reduction in wave height and wave energy (albeit only 5%) over the operational period of the wind farm. NRW advise consideration should be given as to how the sand bank will behave in response to this long term reduction in wave energy and its potential impact on the sediment transport links towards the coast before we can agree with the outcome of the environmental assessment being that the magnitude of change to Constable Bank and Rhyl Flats is assessed as negligible (Vol 2. Ch2 paragraph 169).	Further assessment of the potential for rock berms to interfere with sediment transport and beach morphology has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Section 2.12 Environmental Assessment – Decommissioning Phase There is no inclusion in the assessment of the decommissioning activities caused by removing scour protection and/or cable protection. It is not clear if the rock protection used for scour protection and cable protection will remain on the seabed following decommissioning.	An assessment of the potential impacts associated with the removal of rock protection around infrastructure during the decommissioning phase has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 15: Offshore Conclusions	Volume 2 Chapter 15 Offshore Conclusions Table 1 may alter in response to comments made above on Volume 2 Chapter 2 Marine Geology, oceanography and Physical Processes.	This is noted. The final conclusions table has been updated in line with the final conclusions of the relevant offshore ES chapters.	yes	no
PrB_018_11102021	S42	Document 8.1: Schedule of Mitigation	Volume 8 Document 8.1 Schedule of Mitigation Comment 1 Embedded Mitigation/Vol 2 Ch. 2/ offshore/Scour Protection Management Plan NRW advise that the scour protection management plan should detail the time frame for monitoring the turbine foundations and export cable route for evidence of scour which may require protection.	This is noted. It is suggested that the Scour Protection Management Plan be secured as a condition within the marine licence.	yes	no
PrB_018_11102021	S42	Document 8.2: Schedule of Monitoring	Volume 8 Document 8.2 Schedule of Monitoring Under Geophysical Monitoring – “Geophysical monitoring across the area in which construction takes place, with a suitable buffer to be determined in agreement with NRW post-consent. Geophysical monitoring will be used to determine the effectiveness of cable burial and cable protection” Geophysical monitoring should be used to determine the spatial extent and depth of scour around foundations (primary scour and secondary scour around cable protection).	This is noted and it is suggested that this be secured as a condition in the marine licence.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Embedded Mitigation/Offshore/Vol2 Ch2/Project Design Cable Protection NRW would welcome the opportunity to provide advice on the type of scour protection and amount to be used when options are considered.	It is suggested that a Cable Management Plan be secured as a condition of the marine licence, including details of the need, type, quantity and installation methods for cable protection, with the detail to be determined post-consent during the detailed design phase.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	The Bathing Waters analysis is not sufficient and therefore NRW cannot agree the conclusions withing the Water and Sediment Quality chapter.	The assessment of impacts to bathing waters has been updated following further consultation. See also the Water Framework Directive Assessment (application ref: 6.4.3.1) and the following rows.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	NRW note that GPP5 Works in or near water has been recognised by the applicant (Volume 4, Chapter 3, Table 2, pg 29, row 1). However it is not mentioned in other places in PEIR documents related to potential spills and working near water.	Text has been added to the ES noting Guidance for Pollution Prevention 5 (GPP5).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	Paragraph 6 pg 14 contains errors and requires clarification.	Noted. Minor amendments made.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	The legend on the maps on Figure 6 (pg 59) is difficult to read as it only has two numbers and 3 markings on it; NRW advise considering lengthening the legend and adding markings to ease reading the contour plot.	Noted. This figure has been updated.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	NRW agree that the sediments within the array (Holocene sands and gravels) are unlikely to contain elevated levels of anthropogenic contaminants (paragraph 72 pg 64).	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	NRW note that only at one station (12) are the concentrations of 3 PAHs above the Canadian Threshold Effects Level (Table 9, pg 68). NRW also note that TELs are only marginally exceeded and that the site is outside the array area and other infrastructure zone (Figure 10, pg 67). NRW have no concern with respect to this site and note that all metal concentrations are below their CEFAS action level 1 definitions within the array area.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	With reference to the cable corridor, NRW note that all PAH and metal concentrations were below their respective levels (Tables 11 and 12, pgs 75-77).	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	In paragraph 93 pg 78 it is stated that Marine Lake Rhyl is not connected to the sea. To clarify, it is connected to the sea via the Afon Clwyd estuary and could be filled with sea water if the tidal gates were operated to allow water to enter on the flooding tide.	Marine Lake Rhyl has now been included in the assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	The sentences in the second paragraph of row 2 under “Justification” on pg 88 do not make sense. Clarification is needed. For example, it is not clear what “one fifth” refers to considering the volume presented here is 3,570 m3 which is considerably smaller than the 8,000,000 m3 presented on pg 85. Furthermore, NRW advise that the worst case scenario must be evaluated and it is not clear whether this is the case here.	Text in the ES has been amended to ensure clarity.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	NRW note that oil filled cables will not be used (pg 89).	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	NRW note that a Pollution Environment Management Plan (PEMP) will be produced and will contain the Marine Pollution Contingency Plan. NRW understand this will be secured as part of the marine license and welcome the opportunity to view the PEMP.	It is suggested that a PEMP be included as a condition of the marine licence to be agreed post-consent during the detailed design phase. This has been discussed with NRW during post-PEIR consultation via the Evidence Plan process.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	Suspended Sediment Concentrations (SSC) are presented in section 3.10.1 starting pg 98 from modelling work shown in Volume 4 Appendix 2.3. Near-bed plumes generated from the Mass Flow Excavator is predicted to result in concentrations 5-10 mg/l after a tidal cycle and 1-2 mg/l after 3 days (paragraph 103). There is no detail here regarding how the modelling has been conducted (e.g. the percentage of fines vs sands) but this information is presented in the modelling Appendix; it would therefore be useful if a cross reference could be added around the modelling strategy. With reference to the TSHD (Trailing Suction Hopper Dredge) (paragraph 104) there is no mention of what depth the sediment is released though this is mentioned in the modelling appendix. However, NRW note that concentrations are predicted to reach 50-100 mg/l after 1 day and 2 mg/l after 3 days. The drill arisings release indicates concentrations of 5-10 mg/l after a half tidal cycle (paragraph 107) though again the percentage of fines modelled or the depth of release are not presented.	Details regarding SSC modelling are provided within the physical processes ES chapter and associated annexes.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	While NRW agree that no nutrient pathways have been identified (paragraph 110 pg 101), the potential impact of elevated Suspended Sediment Concentration (SSC) has been missed in the discussion around “Magnitude of Impact”. Paragraph 111 goes on to discuss how 100 mg/l would be ranked as intermediate by UKTAG but says no more. There should be further discussion on this topic in relation to phytoplankton.	The ES has been updated to consider potential impacts to phytoplankton due to increased turbidity.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	Paragraph 113 (pg 102) presents the magnitude of impact for bacteria. NRW agree that any bacterial increases in the water column will occur for a matter of days before returning to background levels. NRW also agree that elevated values are likely to be similar to those found in storm events, noting that the storm event shown was recorded in February 2005, ie not a summer event as would occur during the Bathing Season (15th May to 30th September). However, Bathing Waters at Rhyl, Rhyl East and Prestatyn are subject to Water Quality Prediction models which warn people not to swim when water quality is likely to deteriorate as a result of elevated rainfall (i.e. a storm) in order to protect human health. Daily prediction models are not available for predicting elevated SSC as a result of construction works. In the first instance, it would be useful to be presented with an understanding of how far the plumes are likely to reach in respect of the Bathing Waters. Furthermore, it would be beneficial to understand the timing of any developments occurring which may impact the Bathing Waters. As a result NRW cannot agree the conclusions in paragraphs 115 or 138 (pg 108). NRW also, therefore, cannot agree that impacts on the Bathing Waters will be Minor Adverse.	Additional consideration has been given in the ES to the potential impacts to bathing waters from plumes generated during construction, including from uplift and release of drilling fluid.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	NRW agree with the comments in paragraph 135 (pg 107).	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	Paragraph 149 states there is no pathway to impact the Bathing Waters from oil and grease. Whilst the presence of oil or grease will not result in deterioration of the Bathing Water in terms of its classification, it can result in the declaration of an Abnormal Situation which will close the beach for as long as it takes to clear up the pollution event, which in turn may have an impact on tourism.	The ES has been amended to reflect the potential for an 'abnormal situation' at bathing waters due to the presence of oil/grease as a result of accidental spillage.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	The statements in paragraphs 150 and 151 (pgs 110-111) are not correct and do not represent the purpose of the WFD. NRW recommends revision of the wording in these paragraphs to better reflect the aim of the WFD to get all waterbodies to Good status. NRW agree, however, that the sensitivity is low.	The ES has been amended to reflect the objectives of the WFD, with additional referencing to the WFD Assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 3: Marine Water and Sediment Quality	In paragraph 158 it would be useful to have a full reference for Chapter 2, for example citing page numbers. It would be worth mentioning within this paragraph that sediment contaminants were observed to be at low levels and cross-reference to where those data are shown. NRW agree that impacts are likely to be negligible.	This is noted. Additional referencing has been made to the physical processes assessment.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	We note that the Afon Clwyd estuary will be crossed via Horizontal Directional Drilling or other trenchless method (Table 6, pg 40). We look forward to understanding the methodology to be used.	A description of the HDD methodology is provided within the Project Description Chapter. The Applicant will provide a final Construction Method Statement (CMS), an outline version of which is provided as Appendix 2 (application ref 8.13.2) of the outline CoCP (application ref 8.13)), in which it is proposed to include the final detailed design and approach to watercourse crossings. The Final CMS, will be submitted (as part of the final CoCP), to DCC in consultation with NRW, for agreement prior to construction, as secured in the DCO.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Paragraphs 96-97 (pg 52) describe waterbodies of note to the development. Clwyd transitional water does not appear to have been included. The Afon Clwyd is set to be crossed by the development and receives inputs from the Afon Gele for example. Table 7 pg 54 also appears to miss the Clwyd transitional water.	Reference to Clwyd transitional waters is provided in Section 7.7.5 and Section 7.7.9 of the hydrology, hydrogeology and flood risk ES chapter (application ref 6.3.7)	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Prestatyn Bathing Water, which is actually the closest to the development, is missing from the assessment (paragraph 98, pg 52).	Reference to Prestatyn Bathing Water is provided in Section 7.7.5 and Section 7.7.9 of the hydrology, hydrogeology and flood risk ES chapter (application ref 6.3.7).	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Paragraph 100 (pg 53) appears to show no details of discharge consents.	Details regarding the discharge of consents have now been included.	Yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	In paragraph 23 it is stated that NRW collects 20 samples per year for each bathing water site. This was historically true but now NRW collect at least 8 per annum.	The ES has been amended to reflect the annual bathing water sampling regime by NRW.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Note that OGN072 has since been updated and no longer includes the phrase “longer than a spring/neap tidal cycle” when considering water clarity, temperature, salinity, bacteria, etc (paragraph 49 pg 60). These parameters should be considered at any timescale and a decision will be made via evidence whether they may impact the receptor.	The WFD assessment has been updated to reflect the updates to OGN72.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	The applicant states that while activities may be temporary, the impacts on ecology may be longer lasting (paragraph 58 pg 63). This is the case for bacteria also, specifically in terms of the monitoring which occurs. Should the monitoring pick up elevated bacterial counts, those results are kept in the system for four years and will impact the Bathing Water classification for those four years.	This is noted. Text has been added to reflect potential longer-term impacts to bathing water classifications.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	In the water quality section of Table 9 (pgs 99-100), NRW agree that most of the sediment would remain localised and any suspension would be short-lived. However, some of the finer grained sediment will stay in suspension for several tidal cycles. It was stated in Volume 2 Chapter 2 (pg 52) that the residual sediment transport is eastwards and as such, we believe that some assessment on the impact to Prestatyn Bathing Water should also be conducted. It would be useful to see the distances from the Bathing Waters to the landfall area.	This is noted. Text has been added to reflect potential longer-term impacts to bathing water classifications. Prestatyn Bathing Water has also been included in the assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Bentonite appears to have been scoped in under EQSD in Table 9 of the WFD assessment; however, Table 3 of Volume 2 Chapter 3 (pg 42) suggests that there was agreement that non-turbidity impacts on water quality can be scoped out.	Text has been added to the WFD assessment to clarify the potential for accidental spills and pollution events.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	NRW agree that no impact assessment is needed for contaminants released from sediment (Table 9 pg 101).	This is noted.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	See note regarding a spring-neap tidal cycle with regards to water quality considerations (paragraph 154 pg 12).	This is noted, see comments below and in relation to the marine water and sediment quality chapter (application ref: 6.2.3).	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	See comments for Volume 2 Chapter 3 paragraph 110 regarding phytoplankton status.	Text has been added to the WFD assessment in relation to phytoplankton status.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Key comments •The Dee Estuary SAC should be screened into the WFD assessment •Cumulative and in-combination effects have not been assessed appropriately •NRW agree with the conclusions of the WFD assessment in that there will be no deterioration in the ecological status of the Clwyd transitional waterbody from the development to biological habitats. •NRW agree with the conclusions of the WFD assessment in that there will be no deterioration in the ecological status of the North Wales waterbody from Marine Invasive Non-Native species.	This is noted, see responses to detailed comments below.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Section 5.7 Protected areas screening – The Dee Estuary SAC also falls within the North Wales coastal waterbody as highlighted in Figure 8. The site will need to be screened in to the assessment as there is the potential for changes in suspended sediment concentration to impact the “mudflat and sandflats not covered by seawater at low tide” feature of the Dee Estuary SAC (Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes and Volume 2, Chapter 5: Benthic Subtidal and Intertidal Ecology).	The Dee Estuary has been included as part of consideration of WFD protected areas, and further reference has been made to the RIAA (application ref: 5.2).	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Paragraph 113 “Within the proximity of the offshore ECC, there are– Mussel beds, Sabellaria alveolata (distance to offshore ECC approximately 400 m)” – It is not clear if this includes the Sabellaria that was found during the ECC survey. NRW note the Sabellaria found during the survey is considered further under the biological habitats assessment but are uncertain on whether it is highlighted here as well.	Text has been added to the ES to highlight the presence of Sabellaria observed during the ECC survey.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Table 9 “The proposed development is not within 500 m of any Higher Sensitivity habitats for the North Wales coastal body – see Figure 5. However, the proposed development is with 500 m of saltmarsh habitats in the Clwyd waterbody. A consideration to lower sensitivity habitats is also proposed to be considered in the impact assessment” – As noted by the applicant in section 7.1.2, the proposed development also falls within 500m of other sensitive habitats: Mussel beds and Sabellaria alveolata reef. NRW advise this is reflected in Table 9 and assessed accordingly.	The higher sensitivity habitats (mussel beds and polychaete reef) have been added to the assessment and assessed.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Table 10 INNS – “During all phases of AyM, there is the potential for the introduction and spread of INNS. However, as presented in Volume 3, Chapter 5: Biodiversity and Nature Conservation, due to the time that will have elapsed since the last project specific surveys and the possibility that INNS could have changed in the intervening period.” – NRW advise this wording is revised as it is currently unclear what the applicant is trying to convey.	The ES has been amended to reflect this.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	“If avoidance is not possible a detailed mitigation plan will be produced and agreed as part of the CEMP to ensure compliance with the relevant legislation.” – Please also note further mitigation includes the production and adherence to a Biosecurity Risk Assessment as discussed in Volume 2, Chapter 5: Benthic Subtidal and Intertidal Ecology.	Text has been added to the ES referring to the provision of a biosecurity plan.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Table 12 “Considered in table 7” – Table number references need revising i.e. Table 7 refers to “Bathing water status” not the potential risk to receptors.	Noted. Cross references have been checked and updated throughout.	yes	no

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PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Table 14 Summary of the potential for Adverse effect from AyM Alone and In- combination for Liverpool Bay SPA- This table needs revising. As NRW understand from paragraph 212, this table is a summary of the conclusions on the potential for adverse effect on integrity (AEoI) from the project on the screened in European sites. However, the title of the table refers to impacts on Liverpool SPA only and the assessment on the Menai Strait and Conwy Bay SAC is repeated. Furthermore as noted in an earlier comment, the Dee Estuary SAC should also be assessed as there is the potential for the development to impact features of the SAC through changes in suspended sediment concentration.	Duplication of the Menai Strait and Conwy Bay SAC has been removed and replaced with reference to the Dee Estuary SAC.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Section 7.5 Cumulative effects –Cumulative and in-combination effects have not been appropriately assessed in the WFD assessment. Whilst cumulative effects were assessed for each specialisms in the relevant EIA chapters and the assessments concluded that potential effects were negligible, negligible adverse or minor adverse, NRW still expect a summary of these conclusions and of the activities that have the potential to act in- combination with the proposal to be presented in the WFD assessment. The EIA does not assess whether the activity may act cumulatively and impact a WFD water body and as such it is important to consider the in combination and/or cumulative effects of pressures in the WFD assessment to ensure impacts on the water bodies have been appropriately assessed.	The CEA has been updated to reflect the potential impacts to WFD waterbodies.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Paragraph 130. States “Rock berm within the nearshore: height of 1.4 m, total width of 15.2 m. Of note is that current expectations are that the rock berm will be buried to depths greater than the winter storm depth and as such will not result in any changes to the existing hydromorphological regime.” Please note that this statement is incorrect. Burial of the cable protection refers to the cable mattress protection and not the rock berm which will remain exposed above the seabed.	Text amended in the ES to reflect this.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Volume 2 Chapter 2 Marine Geology, oceanography and physical Processes Paragraph 121 states “the rock berm is expected to have ~15.2 m base width, 1.4 m overall height and sloped sides up to a 4.5 m wide berm crest. The exact location of the rock berms and orientation relative to the beach is presently unknown”. Paragraph 122 further states “whilst it can reasonably be expected to be the case that there will be some localised change to waves and hydrodynamics immediately within the vicinity of the rock berms, the potential for wider morphological change to the beach at the landfall is considered to be limited”. Paragraph 125 then states “The (probable) shore-normal orientation of the rock berms could in theory, temporarily intercept the longshore movement of sediment. However, regular re-working by waves at lower states of the tide is likely to mean that this material would be rapidly re-distributed and could easily pass over the obstacle in suspension.” NRW agree that the potential for wider morphological changes caused by interruption to sediment movement in the nearshore caused by presence of the rock berms is unlikely to measurably affect the form and function of the seabed locally or regionally. However, NRW reiterate (from Marine and Coastal Physical Processes comments) that the assessment of impact caused by presence of the rock berms on the hydrodynamics (waves and currents) is all based on expert judgement and no quantitative analysis has been conducted to determine the potential for wave focussing (proximity to shore, water depth, wave height etc) caused by the presence of the berms and whether over time prolonged wave focussing could cause areas of the beach to erode (depending on the stability of the beach face and sediment composition) potentially resulting in long term lowering and the requirement for beach management intervention. NRW advise that the potential impacts to the coast caused by the presence of the rock berms should be re- assessed for WFD following a more detailed analysis of potential alteration to the hydrodynamics and sediment transport processes. As such NRW cannot yet agree with the conclusion in paragraph 135 which states “As such there is not predicted to be a deterioration in the hydromorphology status of the North Wales coastal waterbody. The proposed development is therefore considered to be compliant with the WFD requirements and therefore would not result in a deterioration of the current status of the North Wales coastal waterbody”.	Further assessment of the potential for rock berms to interfere with sediment transport and beach morphology has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Vol. 2 Ch2. Section 2.10.7 Potential for long term changes to the coast arising from cable protection within nearshore areas Paragraph 121 states “the rock berm is expected to have ~15.2 m base width, 1.4 m overall height and sloped sides up to a 4.5 m wide berm crest. The exact location of the rock berms and orientation relative to the beach is presently unknown”. Paragraph 122 further states “whilst it can reasonably be expected to be the case that there will be some localised change to waves and hydrodynamics immediately within the vicinity of the rock berms, the potential for wider morphological change to the beach at the landfall is considered to be limited”. Paragraph 125 then states “The (probable) shore-normal orientation of the rock berms could in theory, temporarily intercept the longshore movement of sediment. However, regular re-working by waves at lower states of the tide is likely to mean that this material would be rapidly re-distributed and could easily pass over the obstacle in suspension.” The assessment of impact caused by presence of the rock berms is all based on expert judgement and no quantitative analysis has been conducted to determine the potential for wave focussing (proximity to shore, water depth, wave height etc) caused by the presence of the berm and whether over time prolonged wave focussing could cause areas of the beach to erode (depending on the stability of the beach face and sediment composition) potentially resulting in long term lowering and the requirement for beach management intervention. Depending on its location in the intertidal/subtidal, the presence of the berm will also determine the magnitude of impact to down drift locations caused by interruption to sediment transport alongshore which will depend on the rate of sediment transport, orientation of the berm and length of the berm which has not been provided. NRW advise that the potential impacts to the coast caused by the presence of the rock berms should be re-assessed following a more detailed analysis of potential alteration to the hydrodynamics and sediment transport processes (please see comments above and in the Marine and Coastal Physical Processes section).	Further assessment of the potential for wave attenuation through the array area to affect Constable Bank and the surrounding seabed and coastline has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 2: Marine Geology, Oceanography and Physical Processes	Section 2.12 Environmental Assessment – Decommissioning Phase There is no inclusion in the assessment of the decommissioning activities caused by removing scour protection and/or cable protection. It is not clear if the rock protection used for scour protection and cable protection remain on the seabed following decommissioning.	An assessment of the potential impacts associated with the removal of rock protection around infrastructure during the decommissioning phase has been presented in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	NRW would normally expect the full 2 year dataset to be used in the assessment of ornithological impacts for the PEIR. However, it is noted that the PEIR is based on only 18 months of data and the additional 6 months of data will be fully integrated in the final ES submission. NRW note that the figures presented in the PEIR for the assessments of displacement and collision risk are subject to change following the addition of this data. Therefore, all assessments and conclusions will need to be revisited once the full data set is available. Thus, NRW reserves the right to revise the advice provided on the PEIR document based on the best available evidence presented.	The ES has been updated with the full 24 months of data and all assessments revised to account for the full 24 months of data.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	NRW does not agree with the current screening process and various components of the current methodology used for assessment (see detailed comments below), and therefore cannot currently agree with the conclusions of the reports. NRW would welcome future discussions with the applicant to discuss how best to carry out further assessments.	Displacement analysis for red-throated diver has been undertaken out to 8 km within the ES, using the approach set out in post-PEIR ETG consultation.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 56; Table3: Here the document fails to acknowledge the agreed use of an 8km buffer in “Awel y Môr Offshore Wind Farm: Ornithological Approach to Assessment Position Paper” “Gradient approach for red-throated diver displacement analysis 1.1.2.16 For red- throated diver, APEM proposes considering abundances in buffer zones in steps of 1 km, out to 8 km to the south (agreed with Natural Resources Wales and in line with the asymmetric survey design: IR0485 GyM Extension Aerial Baseline Surveys, Innogy Renewables UK Ltd. APEM Ref: P00003481, Date: November 2019.). This would enable a graduated approach to displacement analysis, with different displacement rates applied to the array area and each subsequent buffer.” NRW agree to the use of a study area with a 4 km buffer and an 8 km buffer to the south of the array, for Red-throated diver, as mentioned within the Non-technical Summary (Pg 37; 6.3; 97). NRW also acknowledges the reference in Table 3 that you would “welcome(s) further discussion on how best to use existing site-specific data to devise appropriate displacement rates”. NRW is happy to discuss further.	Red-throated diver displacement assessment has been updated to consider a gradient approach out to 8 km	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 61-62;4.3.3; 19: Here the document lists potential receptors (although inclusion of Sandwich tern is inconsistent, and should also be included in Table 8), but it omits species that were stated as being present such as Puffin, Shag, Black guillemot, Red-breasted merganser and Great-crested grebe. Clarification is needed here to explain why these species are not being further considered.	Table 8 provides an overview of the bird species recorded in the site-specific aerial digital surveys, whilst those listed on page 61-62 are those considered to be at potential risk of impacts. The exclusion of some species recorded in site-specific surveys, but not included in the impact assessments is due to them being found in trivial numbers within the array area and appropriate buffer and not considered to be sensitive to any activities relating to the construction, operation and decommissioning of an offshore wind farm.	yes	no

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PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 63 – 67; Table 4: States that displacement analyses will only be undertaken on Common scoter, Guillemot, Razorbill, Red-throated diver and Gannet. However, as stated on the 22nd April 2021 in NRW comments on the Awel y Môr: Ornithological Approach to Assessment Position Paper, other birds have been known to be displaced, “for example Manx shearwaters have been shown to avoid the windfarm at North Hoyle in Liverpool Bay (Dierschke et al, 2016)” Also it is not clear why there is no consideration of Sandwich tern, Puffin, Black guillemot, Red-breasted merganser and Great-crested grebe for displacement analysis as suggested in the SNCB guidance note (2017). This document should clarify the reason for the exclusion from the assessment of some species that are noted as being present in the surveys.	Displacement analysis has also been carried out for Manx shearwater within the ES on a precautionary basis. All species recorded within the 24 months of site-specific surveys have been considered for assessment, with rationale for a receptor’s inclusion for displacement assessment provided in Table 15.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 63 – 67; Table 4: Lists a number of species for collision risk modelling (CRM): Kittiwake, Great black-backed gull, Herring gull and Gannet, but fails to state why they aren’t doing CRM on Common gull, Lesser Black-backed gull, Sandwich tern, Common and Arctic tern and Fulmar. It would be useful to provide a detailed rationale early on in this ornithology section for excluding certain bird species in the assessment. NRW advises that CRM should be undertaken on Fulmar, Common gull and Lesser black-backed gull for assessment and CRM for tern species, most probably through the SOSS migration model or APEM’s MigroPath tool.	Rationale for a receptor’s inclusion within the collision assessment is provided in Table 15. Collision risk for common gull, Sandwich tern, common tern and Arctic tern have been considered in relation to migratory bio-seasons, as detailed in Volume 4, Annex 4.4 (application ref: 6.4.4).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 74; Key Results; 34: states “A number of species were only recorded in the study area in trivial numbers or numbers determined by expert judgement to be too low to warrant detailed species accounts”. Clarity is needed on what is referred to as trivial to make this judgement. It would be helpful if the densities were included written down here so they can be checked.	Rationale for a receptor’s inclusion within the assessment is provided in Table 15, including densities.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 75; Table 8: Only states that the species in bold should be considered further, but NRW need to see where species such as the Great-crested grebe and Red-breasted merganser were detected to be able to make this judgement, as these birds were seen in surveys and both are features of Traeth Lafan SPA. Waders species should be looked at using the SOSSMAT or APEM migration tools as these can be missed on surveys. Sandwich terns and Commic terns should be looked at in terms of collision if they were seen in the array area, however the assessment isn’t presented to confirm this. They are also a feature of Anglesey Terns SPA.	Table 8 within the PEIR has been superseded by the rationale for a receptor’s inclusion within the assessment provided in Table 15. Migratory collision risk modelling has been undertaken for species including terns with details provided Section 4.12 and in Volume 4, Annex 4.4 (application ref: 6.4.4.4).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 77; 4.5.3: NRW welcomes the use of BDMPS.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 78; 41: NRW would like to see all the impacts considered by each bio-season and added together for a year and then assessed against the largest seasonal BDMPS for an annual impact for the EIA. This method was advised by NE for previous windfarms.	This is the standard method of assessment and will be followed for all offshore ornithology assessments in the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 80; Table 11: The calculation for kittiwake “Potential Total Regional Baseline Population During Non-Migratory Breeding Bio-Season” is incorrect as it is not a sum of the “Breeding population at colonies within mean-max foraging range” and “Juvenile, immature and non-breeding individuals”. Clarification is needed for these calculations.	Calculations have been revised with amended regional populations presented in Section 4.10 of the offshore ornithology chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 80; Table 11: The calculation of “Juvenile, immature and non-breeding individuals” column (expected to be “BDMPS return migration population size” multiplied by the “Proportion of juvenile, immature and non-breeding individuals”) is either not correct or the methodology is currently unclear and needs clarification. There are then cascading issues to other columns and tables elsewhere. It is also unclear how “The potential total regional baseline population during non-migratory breeding bio-season” has been reached. Explanation of these calculations is needed.	Calculations have been revised with amended regional populations presented in Section 4.10 of the offshore ornithology chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 81; Table 11 The great black-backed gull “BDMPS return migration population size” used is non-breeding (needs ** added within table).	This has been noted and the final ES has been amended to reflect this.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 82; Table 11 Fulmar – The value for “BDMPS return migration population size” for Migration seasons (Sept-Oct and Dec-Mar) should be 828,194 according to Furness 2015.	This has been noted and the final ES has been amended to reflect this.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 82; Table 11 Red-throated diver – The “Proportion of juvenile, immature and non- breeding individuals” value used in table is 0.43. However Furness (2015) states that the “model population comprised 60% adults”. This proportion should be corrected to 0.4.	Calculations have been revised with amended regional populations presented in Section 4.10 of the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 81; Table 11 Sandwich tern is not within this table (but is in Table 12).	This has been noted and the final ES has been amended to reflect this.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 83; Table 12: In this table (note *1) it states that the biogeographic population for Common scoter is based on the populations of Liverpool Bay SPA, Carmarthen Bay SPA, Ribble and Alt Estuaries SPA and Solway Firth SPA. However there is a sizeable population of scoters in North Cardigan Bay which could be included in this.	North Cardigan Bay SPA has now been included with the biogeographic population for common scoter (see Section 4.10).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 83; Table 12: The values for “Migration-free breeding” do not correspond to those in Table 11 for some species (i.e. Kittiwake, Great black-backed gull, Lesser black-backed gull, Razorbill).	Calculations have been revised with amended regional populations presented in Section 4.10.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 83; Table 12: The herring gull value for breeding does not match that used in Table 11.	Calculations have been revised with amended regional populations presented in Section 4.10.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 85; Table 13: Clarification is needed on the source of the figures for the demographic rates and population age ratios.	Further information regarding the source of demographic data is provided in Section 4.10.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 85; Table 13: The average mortality value for Red-throated diver of 0.143 given in this table is not used in any further calculations, but a value of 0.233 is used throughout this document (while a value of 0.2 is used within the RIAA). Clarification is needed on the method used for calculating these values, and use should be consistent.	The mortality value for red-throated diver of 0.233 is the average mortality across age classes as shown in Section 4.10. This has been reviewed and used consistently throughout the ES and RIAA (Report 5.2: application ref: 5.2).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 87; Table 13: All Sandwich tern values are copy pasted from Table 12 and don’t appear to be appropriate here.	Sandwich tern values have been reviewed and revised in Section 4.10.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 104- 135; Environmental assessment: construction phase: All of the assessments in this section have been made only on the impact of the construction phase on its own. The assessment should also consider this cumulatively with the displacement and collision risk from the constructed project, as well as the cable laying.	Predicted mortality for each species is calculated per year, and not as an overall impact number for the combined phases of the project. Therefore, it is not appropriate to combine impacts across construction, O&M and decommissioning. Also, the impacts are different for each phase and therefore, need to be addressed in isolation.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 104- 68; Displacement assessments: Currently the displacement assessments only consider mean peak seasonal abundances, as per the SNCB note (2017). However, to consider the variability in the underlying population estimates the upper and lower 95% confidence intervals around the abundance could be presented in the final submission. Displacement matrices could be presented for the mean peak bird population estimates and the upper and lower confidence limits of these. Natural England have asked for this to be presented since the Hornsea Three case.	Mean peak seasonal abundances have been presented with the ES and Volume 4, Annex 4.2 (application ref: 6.4.4.2) following the SNCB note (2017). APEM do not consider it applicable to use 95% confidence intervals for assessment of AyM given the level of precaution already inherent within the assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 106; Table 20: NRW advise that Manx shearwater should be included in this assessment of displacement. They have been shown to avoid the windfarm at North Hoyle in Liverpool Bay (Dierschke et al, 2016) and are features of both SSSIs and SPAs within Wales. Therefore, NRW advises that these should be assessed, especially as this will need to be looked at to add to other impacts at this project and other projects in the cumulative assessments. The range of 30-70% displacement and a range of 1-10% mortality could be used to assess the Manx shearwater displacement from the project.	Manx shearwater has been included within the ES on a precautionary basis and an assessment of potential disturbance and displacement presented in Sections 4.11 & 4.12.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 107; 77: NRW agrees that an estimate of displacement during construction can be assessed as being half that during operation.	This is noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 108; 78: States that “For red-throated diver and common scoter, the evidence-based approach suggests that displacement should be considered for the array area plus a 4 km buffer.” However there is considerable evidence that suggests that Red-throated diver has been displaced to a much greater distance in the past. This is the reason why the buffer extends down to the south of the windfarm by 8 km. For example, in the German North Sea, using both visual aerial and boat-based surveys, Mendel et al. (2019) reported a 94.5% decrease in Red-throated diver density within 3km from OWFs, decreasing to 83.7% at 10 km. Using a combination of digital aerial survey and telemetry data, Heinänen et al. (2020) reported similar displacement rates, i.e. >90% within 5km from OWFs. In the UK, Webb et al. (2007) estimated a 83% decrease in density within the Lincs, Lynn & Inner Dowsing OWF based on visual and digital aerial surveys, decreasing to 55% at 4 km and 34% at 8 km. Estimates reported by Percival et al. (2010) using boat-based surveys indicated a 95% displacement rate within the Kentish Flats OWF site, decreasing to 63% at 3 km. Therefore NRW advise that displacement for red-throated diver should be estimated out to 8 km. This new evidence has been considered and is informing a new draft SNCB note, which will be recommending that a 10 km buffer and displacement analysis should be used in future. However this was formulated after NRW’s original advice for a 8km buffer, so NRW accepts that the 8km buffer will suffice. Also any evidence of displacement or not by Gwynt y Mor could potentially be looked at to inform this process as it is a wind farm in a similar area within Liverpool Bay.	Displacement analysis for common scoter and red-throated diver has been undertaken out to 4 or 8 km within the ES respectively, using the approach set out in the ETG process post-PEIR.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 108; 78: NRW agree with the use of a displacement rate Gannet of 60-80%, however the applicant needs to present a range of mortalities for this species from 1-10% mortality as was used in Hornsea 4. The results for Gannet need to be shown for the array and the 2km buffer as the SNCB note stipulates (JNCC, 2017).	Gannet displacement has been assessed out to 2 km within the ES and Volume 4, Annex 4.2 (application ref: 6.4.4.2). It should be noted that mortality of 1% has been considered acceptable for many recent OWF applications, although a range of 1-10% is presented in Volume 4, Annex 4.2: (application ref: 6.4.4.2)	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	NRW agree with the presentation of a range of displacement from 30-70% for Guillemot & Razorbill presenting a range of mortalities from 1-10% for the array area plus 2 km buffer. The use of the SNCB preferred mortality rate of 10% of displaced birds is referred to within the operation displacement section (193 Guillemot, 206 Razorbill), but not clearly presented for construction or operational displacement. However, NRW note that the matrix tables within Annex 4.2 cover the full ranges of up to 100% displacement and 100% mortality, so the figure for the NRW preferred worst case scenario of 100% displacement and 10% mortality can be assessed.	This is noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	NRW agrees when looking at displacement of Common scoter that they should look at 100% displacement in a 4km buffer with 10% mortality.	The full range of displacement and mortality rates for common scoter have been presented in Volume 4, Annex 4.2: (application ref: 6.4.4.2). Evidence for the Applicant's position is provided in Section 4.12.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	NRW agrees when looking at displacement of Red-throated diver that they should be looking at 100% displacement within 4km with a mortality of 10%, however displacement needs to be looked at out to 8km as stated in the Awei y Môr Offshore Wind Farm: Ornithological Approach to Assessment Position Paper, March 2021, Revision 1. However this might not be the case beyond the 4km and a reduced displacement could potentially be used. Also the assessment needs to bring to bear local evidence of displacement or not from previous windfarms in Liverpool Bay. NRW suggest the use of a range of 30-70% displacement and a range of 1-10% mortality to assess the Manx shearwater displacement as a result of the proposal.	Displacement analysis for red-throated diver has been undertaken out to 8 km within the ES, using the approach set out at ETG #5. Local evidence of potential avoidance behaviour has been provided in Section 4.12 and in Volume 4, Annex 4.1 (application ref: 6.4.4.1). A range of 30-70% displacement and a range of 1-10% mortality has been applied within the assessment of Manx shearwater displacement (Section 4.12 and in Volume 4, Annex 4.1 Report (application ref: 6.4.4.1)).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 109 - 126: See comments above about use of a larger displacement buffer for red- throated diver. This analysis does not currently include a large enough buffer.	Displacement analysis for common scoter and red-throated diver has been undertaken out to 4 to 8 km within the ES respectively, using the approach set out at ETG #5.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 128; 138- 140: States that "As this species is not connected with a significant number of designated sites within the UK Western Waters BDMPS or wider bio-geographic population scales, but is Amber listed in BoCC, this species is afforded a feature importance level of "local" to reflect that." Gannet is a feature of Grassholm SPA, which is within the mean max foraging range of this site.	The conservation value of all potential receptors has been revised in line with the assessment methods set out in Section 4.8.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 131; 147-149: NRW agrees with the assessment for displacement of Red-throated diver from cabling looking at a 2km buffer with 100% displacement and 10% mortality. Also the applicant could bring to bear local evidence of displacement or not from previous cable laying in Liverpool Bay for this assessment. This potential mortality needs to be added to the other mortality from construction and operation and the combined impacts considered alone and cumulatively with other relevant sources of impacts (e.g. other offshore wind farms).	Additional evidence regarding the Applicant's position with regard to red-throated diver displacement and mortality rates has been presented in Section 4.12. The Applicant has undertaken assessment of displacement in keeping with the most recent consented projects in UK waters. As such, predicted mortality for species is calculated per year, and not as an overall impact number for the combined phases of the project. This is due to combining impacts not being considered to be appropriate across the construction, O&M and decommissioning phases, as they have different scales both temporally and spatially. These potential impacts are also different for each phase and therefore, need to be addressed in isolation. It is also apparent that there would be a level of double counting should construction phase potential impacts within the array area be combined with cable laying, as an element of displacement is already accounted for outside from the array area extending over the cable laying area within the buffers being assessed for species such as red-throated diver. As no clear guidance is available or methods agreed as being appropriate for this type of additional assessment the Applicant considers that sufficient precaution is provided for displacement impact assessments in this chapter for all phases of the project lifecycle.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 131; 148: There is inconsistency in the mortality rate used, both within this document (0.143 in Table 13, and 0.233 used widely in the text) and the mortality rate used in the RIAA (0.217).	Average mortality rates used within the ES are presented in Section 4.10 and the ES and RIAA (Report 5.2; application ref: 5.2) revised to ensure consistency.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg133; 153 – 157: NRW agrees with the assessment for displacement of Common scoter from cabling looking at a 2km buffer with 100% displacement and 10% mortality. These values are however not currently used within the RIAA (Pg 198 & 199), where a 1 km buffer and 1% mortality is explicitly mentioned. This potential mortality needs to be added to the other mortality from construction and operation and the combined impacts considered alone and cumulatively with other relevant sources of impacts (e.g. other offshore wind farms).	Additional evidence regarding the Applicant's position with regard to common scoter displacement and mortality rates has been presented in Section 4.12. The ES and RIAA (Report 5.2; application ref: 5.2) have been revised to ensure consistency.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 133; 154: Although a 2 km buffer is proposed, the quoted range of total number of Common scoter displaced here is actually for a 1 km buffer. An area of 6.28 km2 has been used (i.e. 99.22 x 6.28 km2 = 623.10) rather than the 25.13 km2 area of a 2 km buffer, which would displace between 2493.4 and 3473.7 Common scoter.	Noted. The assessment has been revised accordingly in Section 4.11.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 134; 156 & 157: There is inconsistency in the mortality rate used in Volume 2, Chapter 4 of 0.238 (Table 13, Horswill & Robinson 2015) and the mortality rate used in the RIAA of 0.217 (Robinson, 2017).	Average mortality rates used within the ES, along with the source of these estimates, are presented in Section 4.10.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 146; 189: States that there is good evidence to use a displacement rate of 50% for auks. However, like NE, NRW would still advise that a range of displacement and mortalities should be displayed as we stated previously. Table 28 only displays the 1% mortality and not the 10% mortality, and although the range of displacement of 30-70 % is within parenthesis, these values are not referred to in the main text, and only the 50% level is discussed.	A range of displacement and mortality rates has been presented within Volume 4, Annex 4.2 (application ref: 6.4.4.2). The assessment has focused on the Applicant's evidence-led position in Section 4.12, with due cognisance of the SNCBs position.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 157; 226: NRW does not agree with the use of only a 4km buffer for Red-throated diver, as stated previously	Displacement analysis for red-throated diver has been undertaken out to 8 km within the ES, using the approach set out at ETG #5.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 158; Table 30: For this, and all other displacement estimate tables, NRW advise the use of clearer descriptions within the legend and/or column headings of what values within parenthesis represent. An alternative would be to have a separate table for the values for 1% and 10% mortality.	APEM will review and amend to provide further clarity for the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 164; 252: NRW advise that a range of mortality (1-10%) should be presented as well as the displacement to make an assessment by.	Displacement estimate tables have been revised to ensure clarity of data presented.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 165; Table 31: It is not clear what the table is based on. The document needs to show a range of displacement and mortality. It would appear that it is only showing the mortality of 1%. If range of estimated number of individuals (for 60-80% displacement) are being displayed it is not consistent with other tables when showing range (0 and 1 are 0-0 and 1- 1).	A range of displacement and mortality rates has been presented in matrix form within Volume 4, Annex 4.2 (application ref: 6.4.4.2).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 167; 262: States that "As this species is not connected with a significant number of designated sites within the UK Western Waters BDMPS or wider bio-geographic population scales, but is Amber listed in BoCC, this species is afforded a feature importance level of "local" to reflect that." Gannet is a feature of Grassholm SPA, which is within the mean max foraging range of this site.	A range of displacement and mortality rates has been presented in matrix within Volume 4, Annex 4.2 (application ref: 6.4.4.2).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 170; Table 32: NRW advise that CRM should be undertaken for Fulmar, Common gull, Lesser black-backed gull, Commic tern and Sandwich tern, so that this can be looked at cumulatively with other windfarms.	Common gull, 'commic' tern and Sandwich tern were all recorded in the migratory bio-seasons and have therefore been included within migratory collision risk modelling (Volume 4, Annex 4.4: application ref: 6.4.4.4). Fulmar and lesser black-backed gull were scoped out from collision risk modelling on the basis of the rationale presented in Table 15.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 184; 302 For great black-backed gulls "The addition of 9.77 (0.41 – 33.52) mortalities will increase the mortality relative to the baseline mortality rate by 0.592% (0.025 – 2.032%) under BO2" is high and so NRW need to see what effect this would have on the regional population. NRW agree with using the more precautionary collision risks for GBBG of Band Option 2 from Table 35.	Following design changes between PEIR and ES, great black-backed gull collision risk has reduced (Table 9). Further assessment of how predicted great black-backed gull collision is likely to affect the regional population has been presented in Section 4.12.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 192; 328: NRW advise the use of bespoke modelling using APEM's MigroPath model or the SOSS migration model so that a quantitative assessment can be made against protected sites as well as populations and they have stated that they will do this in the ES. This will also need to be done for the HRA assessments.	Migratory collision risk modelling using APEM's MigroPath model has been undertaken and is presented in Section 4.12 and in Volume 4, Annex 4.4 (application ref: 6.4.4.4).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 193; 330: NRW welcomes an assessment of Common tern migration in the upcoming ES but we advise this assessment is expanded to other terns (i.e. Arctic terns, Sandwich terns and Roseate tern) within Wales and Welsh SSSI's and SPAs.	Tern species been included within migratory collision risk modelling (Volume 4, Annex 4.4: application ref: 6.4.4.4) with the results presented in Section 4.12 of the ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 199; 348: Pen y Gogarth/Great Ormes Head SSSI only has features of Razorbill, Guillemot and kittiwake and therefore should only be assessed for these species. The potential casualties from displacement and collision risk need to be allocated through the SNH apportionment tool and this SSSI as well as other potentially effected such as Carreg y Llam which is a SSSI for these two features and within Woodward et al. (2019) mean max + SD foraging range needs to be assessed as well. The assessment made previously in this report is for the biogeographic population and therefore does not suffice as an assessment for a protected site such as Pen y Gogarth/Great Ormes Head SSSI.	Detailed assessment of razorbill, guillemot and kittiwake has been provided within Section 4.12 of the ES. While no detailed apportionment has been carried out given that these sites do not form the national site network (see the Report 5.2; application ref: 5.2), impacts will be split between the various colonies and non-breeding birds approximately in proportion to their contribution to the regional population. Therefore, it is expected that the conclusion of a magnitude of impact of negligible will apply to each individual colony.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 199; 352: The Little Ormes Head SSSI only has a feature of Cormorant and therefore won't be adversely affected by this project.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 200; 356: The Dee Estuary SSSI needs to be assessed using the APEM or SOSS tool looking at the effect of collision on migration of waterfowl and waders as well as for the breeding Common tern which is a feature.	Migratory waterfowl, waders and terns have been considered in Volume 4, Annex 4.4 (application ref: 6.4.4.4), with assessment of the features of the Dee Estuary SPA (which encapsulates the SSSI) included in the RIAA (Report 5.2; application ref: 5.2)	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 202; 359: Puffin Island SSSI only has cormorant as a feature and therefore won't be adversely affected by this project.	This is noted.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 203; 364: Arfordir Gogledd Penmon SSSI has features of cormorant and black guillemot and therefore won't be adversely affected by this project.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 203; 367: The Skerries SSSI has features of Common, Arctic and Roseate tern only. These tern features need to be assessed looking at CRM most probably through the SOSs or APEM tool apportioning out potential collisions. The applicant should also look at Cemlyn SSSI as well as Ynys Feurig SSSI. Cemlyn SSSI has features of Sandwich tern and Arctic tern whilst Ynys Feurig has features of Arctic tern and Roseate tern. These will need to be looked at in terms of collision.	Tern species have been considered in Volume 4, Annex 4.4 (application ref: 6.4.4.4), with assessment of the features of SPAs with potential connectivity to AyM included in the RIAA (Report 5.2; application ref: 5.2)	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 205; 373: NRW agree that any effects of decommissioning are likely to be similar to those generated during the construction phase. However further consultation regarding decommissioning activities will be required with SNCBs to allow any best practice to be incorporated to minimise potential impacts.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 210; 393: Here the effects of the different impacts need to be added together e.g. such as collision and displacement for Gannet and construction and operation to provide a quantitative assessment seeing the total effect of this project rather than a qualitative assessment (see RIAA pg 319; 696 for addition of operational effects).	A combined assessment of collision and displacement for gannet is provided in Section 4.12 & 4.16.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 214; Table 39: NRW welcomes the inclusion of projects in operation in the cumulative assessment.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 215; 405: Here the mean-max foraging range (rather than mean max + 1SD) from Woodward et al 2019 is used. So instead of 315.2 km being the largest foraging range, it would be 509.4 km for Gannet. A 500 km ZOI is detailed in 1.3.1 for offshore energy projects.	The ZOI has been amended accordingly.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 241; 418: The cumulative effects such as aggregate dredging and dredging and disposal and cable laying may need to be considered in terms of birds such as common scoter and Red-throated diver which are sensitive to disturbance, especially in context of HRA issues for Liverpool Bay SPA.	Aggregate dredging, dredging and disposal, and cable laying have all been considered within the long-list (Volume 1, Annex 3.1; application ref: 6.1.3.1) and were screened out on the basis of the following criteria: ☐The plan/ project has already been accounted for within the offshore ornithology baseline; ☐There is no conceptual effect-receptor pathway between plans/ projects; ☐There is no physical effect-receptor overlap between plans/ projects; ☐There is no temporal overlap between plans/ projects; or ☐The plan/ project is ongoing and is part of the current baseline; or ☐There is low data confidence or data are not available.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 244; Table 43: This table seems to miss out the potential collisions with Morlais that have been predicted through the CRM and ERM modelling.	Potential impacts from the West Anglesey Demonstration Zone (Morlais) have been examined for all relevant receptors within Section 4.16.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 245; Table 44: This table seems to miss out the potential collisions with Morlais that have been predicted through the CRM and ERM modelling.	Potential impacts from the West Anglesey Demonstration Zone (Morlais) have been examined for all relevant receptors within Section 4.16.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 247; Table 45: This table shows what was estimated. Post construction data relating to displacement from Gwynt y Mor and Burbo Bank Extension as well as potentially other wind farms in Liverpool Bay may provide additional evidence to consider here.	Consideration of Gwynt y Môr post construction data has been undertaken and is presented for red-throated diver in Section 4.12.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 248; 437: NRW advise that the applicant needs to make the assessment here on 10% mortality for red-throated diver.	Predicted mortality rates of both 1% and 10% are presented for transparency. The assessment has been undertaken based on the Applicant's position, the evidence for which is provided in Section 4.12.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 257; 465: NRW advise that the applicant needs to make the assessment here on 10% mortality for red-throated diver.	Predicted mortality rates of both 1% and 10% are presented for transparency. The assessment has been undertaken based on the Applicant's position, the evidence for which is provided in Section 4.12.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 258 – 268; Cumulative collision risk: Currently only the mean of collisions (e.g. Kittiwake from Table 34) are used in the cumulative assessments (e.g. kittiwake Table 50). NRW advise that the range of collisions (minimum and maximum) should also be included here within the cumulative assessment table.	The range of predicted collisions is only available for AyM, and this is now presented in Table 4.16.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 260-265; 479,484,490,496: Here Tables 50 – 53 are described in the text as “the expected number of birds displaced from each other development” but these refer to collision mortalities.	This has been amended in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 262; 486: GBBG 2.3% increase in baseline mortality is quite high so it would be good to see what potential effect that would have on the regional population. This further consideration could be through the use of population modelling (e.g. Population Viability Analysis PVA), to assess the sustainability of the impact.	Following design changes between PEIR and ES, great black-backed gull collision risk has reduced (Table 44). Further assessment of how predicted great black-backed gull collision is likely to affect the regional population has been presented in Section 4.16.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 265; Table 53: This table seems to miss out the potential collisions with Morlais that have been predicted through the CRM and ERM modelling.	Potential impacts from the West Anglesey Demonstration Zone (Morlais) have been examined for all relevant receptors within Section 4.16.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 274; 508 & 509: NRW welcomes the integration of the final 6 months of aerial survey data with the first 18 months of data to allow a baseline for assessment that is characterised by a full 24 months of data and an update of all assessments.	The assessment has been updated based on the inclusion of the full 24 months of digital aerial survey data.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 274; 510: NRW welcomes the proposal to undertake model-based assessments of the potential collision risk to migratory seabirds and non-seabirds.	This has been provided in Volume 4, Annex 4.4 (application ref: 6.4.4.4).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Pg 274; 511: Here the applicant suggests that further work will include “A review of available evidence including site-specific data will be conducted in order to inform a site- specific approach to displacement rates, with particular regards to red-throated diver and common scoter.” NRW welcomes further work on the displacement rates used, particularly for Red-throated diver within the 4-8 km buffer area.	The displacement approach to red-throated diver was agreed at post-PEIR ETGs.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 7; 2.2.1: Here the report fails to mention that Little gull is a feature of Liverpool Bay SPA.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 21; Correction for availability bias: states that “The correction factors used to multiply the relative abundance estimate of guillemots, razorbills and puffins sitting on the sea surface are 1.311, 1.211 and 1.165, respectively.” However, the values that NRW would advise are used are those from a previous examination (East Anglia One), which were 1.316 for guillemot and 1.204 for razorbill (figures from a report by Sophy Allen for the hearing; JNCC 2013). Clarification is needed on where these figures have come from.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 21(restarted page numbering); Figure 6: NRW advise the 4km buffer is shown as well as 8 km buffer on this map.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 41; Table 22: NRW advise the abundance is shown for the array and 2km buffer which the assessment will be made against. As well as on Figure 13.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 44-46; Table 26 &28: NRW advise the abundance is shown for the array and 2km buffer which the assessment will be made against. As well as on Figure 14.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 49; 4.10: The displacement of Red-throated diver needs to be undertaken to 8km as mentioned in previous comments about Volume 2, chapter 4. The displacement needs to be evaluated all the way to where survey took place for this species.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 56; 4.12: This section needs to show the data of the array and 2km to assess the potential displacement of Manx shearwater, as well as illustrating the 2km buffer on Figure 17.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Pg 59; 4.13: This section needs to show the number of Gannets potentially displaced in the array and 2km buffer as well as the amount of Gannets just inside the array for displacement assessment.	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.2: Offshore Ornithology Displacement	A displacement matrix without buffers (array only) should be included within the annex for each species as per the Joint SNCB Interim Displacement Advice Note (2017)	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.2: Offshore Ornithology Displacement	Pg 1; 1.2: NRW advise this analysis is done for Manx shearwater for both EIA and HRA. NRW stated on the 22nd April 2021 in comments on the Awel y Môr: Ornithological Approach to Assessment Position Paper, other birds have been known to be displaced by windfarms, “for example Manx shearwaters have been shown to avoid the windfarm at North Hoyle in Liverpool Bay (Dierschke et al, 2016)”.	Displacement analysis has now been undertaken for Manx shearwater.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.2: Offshore Ornithology Displacement	Pg 1; 1.2: states that “These species, together with the approach to displacement assessment, have been presented for agreement with Natural Resources Wales (NRW), Royal Society for the Protection of Birds (RSPB) and Joint Nature Conservation Committee (JNCC) through the Evidence Plan (EP) process, with Offshore Ornithology Expert Topic Group Meetings held on 25/03/2021 and 29/03/2021” However at the time NRW hadn't seen the data and stated that Manx shearwater needed to be evaluated for displacement.	This has been reviewed and updated in the final ES.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 4, Annex 4.2: Offshore Ornithology Displacement	Pg 2; 2.1: states “The scale of potential displacement applied is in response to guidance in the literature (SNCBs, 2017) and comments received to date from NRW and JNCC through the EP process (see Section 4.2 in Volume 2, Chapter 4). Following the same generic guidance (SNCBs, 2017), this annex presents displacement matrices that consider gannet, guillemot, razorbill, common scoter and red-throated diver. These matrices present abundances for Gannet within the AyM array area only; for guillemot and razorbill within the AyM array area plus a 2 km buffer, and for common scoter and red-throated diver within the AyM array area plus a 4 km buffer.” However the use of an 8km buffer had already been agreed in “Awel y Môr Offshore Wind Farm: Ornithological Approach to Assessment Position Paper” where it states “Gradient approach for red-throated diver displacement analysis; 16. For red-throated diver, APEM proposes considering abundances in buffer zones in steps of 1 km, out to 8 km to the south (agreed with Natural Resources Wales and in line with the asymmetric survey design: IR0485 GyM Extension Aerial Baseline Surveys, Innogy Renewables UK Ltd. APEM Ref: P00003481, Date: November 2019.). This would enable a graduated approach to displacement analysis, with different displacement rates applied to the array area and each subsequent buffer.” Therefore, NRW didn’t agree with the use of a 4km buffer as there is a lot of evidence that suggest that red-throated diver has been displaced to a much greater distance in the past. For example, in the German North Sea, using both visual aerial and boat-based surveys, Mendel et al. (2019) reported a 94.5% decrease in red-throated diver density within 3km from OWFs, decreasing to 83.7% at 10km. Using a combination of digital aerial survey and telemetry data, Heinänen et al. (2020) reported similar displacement rates, i.e. >90% within 5km from OWFs. In the UK, Webb et al. (2007) estimated a 83% decrease in density within the Lincs, Lynn & Inner Dowsing OWF based on visual and digital aerial surveys, decreasing to 55% at 4km and 34% at 8km. Estimates reported by Percival et al. (2010) using boat-based surveys indicated a 95% displacement rate within the Kentish Flats OWF site, decreasing to 63% at 3km. Therefore, NRW advise that displacement for red-throated diver is estimated out to 8km. This is the reason why the survey area extended down to the south of the windfarm by 8km. This new evidence has been considered and is informing a new draft SNCB note, which will be recommending that a 10 km buffer and displacement analysis should be used in future. However this was formulated after NRW’s original advice for a 8km buffer, so NRW accepts that the 8km buffer will suffice. Also any evidence of displacement or not by Gwynt-y-Mor could potentially be looked at to inform this process as it is a wind farm in a similar area within Liverpool Bay.	Red-throated diver displacement assessment has been updated to consider a gradient approach out to 8 km (see Section 4.11 & 4.12).	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.2: Offshore Ornithology Displacement	Pg 3; 2.2: Here the applicant states “For guillemot, razorbill, common scoter and red-throated diver, only “sitting” birds (including birds observed diving, landing and taking off) were included in the displacement analysis, as flying birds of those species are not actively foraging and therefore not at risk from the loss of foraging area.” However, the SNCB guidance clearly advises that this needs to be done on both sitting and flying birds (JNCC, 2017).	Displacement analysis has also been carried out for Manx shearwater within the ES on a precautionary basis. All species recorded within the 24 months of site-specific surveys have been considered for assessment, with rationale for a receptor’s inclusion for displacement assessment provided in Table 15.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.2: Offshore Ornithology Displacement	Pg 5; 3.1: The results for Gannet need to be shown for the array and the 2km buffer as the SNCB note stipulates (JNCC, 2017).	This has been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.2: Offshore Ornithology Displacement	Pg 16; 3.5: As stated previously Red-throated diver displacement needs to be shown out to 8km.	Red-throated diver displacement assessment has been updated to consider a gradient approach out to 8 km (see Section 4.11 & 4.12).	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	Pg 1; 1.2: NRW comments about which species to take through to CRM from “Awel y Môr Offshore Wind Farm: Ornithological Approach to Assessment Position Paper, March 2021, Revision 1.” Was, “We cannot agree to only looking at the species mentioned as we have yet to see the data to see what birds are potentially at collision risk. Even if Lesser black-backed gull and terns species are in small numbers CRM should be done for these species so that cumulative assessments can be made.” Terns only occurred outside of the breeding season so these species could be looked at using the SOSS or APEM tool, this can be the same analysis for waders and wildfowl. A CRM should be undertaken for Fulmar, Common gull and Lesser black-backed gulls to be used in the assessments including cumulative assessments.	Rationale for a receptor’s inclusion within the assessment is provided in Table 15, including densities.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	Pg 6; Table 4: NRW advised that these avoidance rates could be used but it would be better to use the more up to date avoidance rate from Appendix 2, Table A2 Cook et al (2021) in the final EIA and HRA.	Following advice from NRW, the sCRM has been run deterministically for the PEIR, given that new avoidance rates for use with this model are yet to be agreed. This follows recent advice received from Natural England for other recent OWF projects.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	Pg7; 2.1.1.4: states that “The minimum CRM scenario applied a mean - SD density estimates while the maximum CRM scenario applied a mean + SD density estimates for all species.” Clarity is needed on how the SD for the monthly density estimates that go into the CRM models were determined.	Mean densities have been presented in addition to minimum (-SD) and maximum (+SD) densities around the mean. A full methodology outlining the calculation of species densities (+/-SD) has been presented in Volume 4, Annex 4.3 (application ref: 6.4.4.3).	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	Pg7; 2.1.1.4: Here the applicant states that “For species which were subject to apportionment, the upper and lower confidence intervals of flying birds were estimated assuming the ratio between the mean and the upper/lower confidence limit remained the same between unapportioned and apportioned estimates for flying birds” NRW seek clarity on what is meant by this sentence.	While no detailed apportionment has been carried out given that these sites do not form the national site network (see the Report 5.2; application ref: 5.2), impacts will be split between the various colonies and non-breeding birds approximately in proportion to their contribution to the regional population. Therefore, it is expected that the conclusion of a magnitude of impact of negligible will apply to each individual colony.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	Pg7; 2.1.1.5: NRW advise that the proportions of PCH used within the Band Option 2 and 3 models should be shown in a table. As the sCRM Shiny app is able to provide inputs and outputs to models, then could these be provided in an appendix in the ES. Outputs of different CRM need to be presented (e.g. all combination of nocturnal activity factors) to help clarify which values of parameters went into each table of results and ensure the most precautionary CRM can be identified.	Migratory CRM has been undertaken and is detailed in Volume 4, Annex 4.4.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 113; 86: NRW agrees with the rule set out that “Where the assessment alone concludes a zero contribution from AyM to an effect, it therefore follows that there can be no contribution from AyM to any in-combination effect and no further assessment is required.” However, NRW disagrees that this is set at “<1 individual contribution from AyM to an effect, a reasoned judgment is taken to the potential for any contribution to an in-combination effect.” Where the predicted impact is 0 due to no birds of that species being recorded or no birds recorded in the PCH then it is fine to conclude no contribution to an in-combination effect. Also the applicant could potentially use the threshold of an increase of less than 1% of the mortality in terms of scoping out cumulative/in-combination thresholds. However, all these assessments need to be looked at against the conservation objectives of the site in question and the current state of the population, not just in terms of abundance, but also the other measures of the conservation objectives such as availability of habitat.	Alone and in-combination assessments, Section 10.3 and 11.3, respectively, have been updated for all species with >0 contribution. All relevant conservation objectives have been discussed in Section 10.3 for all relevant features.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 121; 12.3; 101: As this assessment has been undertaken using only 18 months of the 24 months of survey NRW cannot yet agree with the conclusions of the report. NRW does not agree with the screening out of “species in more than very small numbers or more than very infrequently during the 18 consecutive months of baseline characterisation surveys within the AyM survey area (this covered AyM array and the area covered by a distance of 4 km projected around the proposed array) (further information on the surveys is provided within Annex 4.4.1);” The assessment also needs to include those small numbers of birds to see what effect this might have on a site both on its own and cumulatively. Also the assessment for red-throated diver displacement needs to be done on a 8km buffer to the south of the windfarm as described in “Awel y Môr Offshore Wind Farm: Ornithological Approach to Assessment Position Paper” which states “Gradient approach for red-throated diver displacement analysis 16 For red-throated diver, APEM proposes considering abundances in buffer zones in steps of 1 km, out to 8 km to the south (agreed with Natural Resources Wales and in line with the asymmetric survey design: IR0485 GyM Extension Aerial Baseline Surveys, Innogy Renewables UK Ltd. APEM Ref: P00003481, Date: November 2019.). This would enable a graduated approach to displacement analysis, with different displacement rates applied to the array area and each subsequent buffer.”	The assessment of ornithological receptors has now been updated using 24 months of survey data in all relevant documents (Section 10.3 and 11.3 for ornithological alone and in-combination assessment, respectively). Alone and in-combination assessments, Section 10.3 and 11.3, respectively, have been updated for all species with >0 contribution. The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 121; 12.3; 101: NRW disagrees with undertaking displacement work only on those species that have “been identified as sensitive to displacement and disturbance in relevant guidance (e.g. Bradbury et al., 2014; Furness and Wade, 2012; Furness et al., 2013);” There is evidence to show that Manx shearwaters have been displaced “for example Manx shearwaters have been shown to avoid the windfarm at North Hoyle in Liverpool Bay (Dierschke et al., 2016)” and NRW advise that this displacement is analysed to be able to make assessments on Manx shearwater SPAs.	Manx shearwater quantitative alone assessment is discussed in Section 10.3 for the relevant SPAs.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 121; 103: Where species are considered only within the RIAA, and don’t appear within the CRM and Displacement Analysis Annexes, there needs to be improved explanation in the text of the origin of the demographic rates used (e.g. age ratio, mortality rates). Clearer explanation for use of and calculation of “a generic population age ratio” throughout (i.e. at document locations 422, 451, 458, 465, 471, 506)	Information on the source and rationale of data used in the apportioning analysis has been discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 121; 104: Currently the potential mortality impacts are only presented separated by timing (e.g. construction, O&M) and cause (e.g. displacement, collision), not allowing for a full assessment of total impacts on SPA features against the Conservation Objectives of the site. We advise that these impacts are treated additively and compared against the SPA population mortality baseline.	Combined impacts within phases of the development are discussed in Section 10.3 for the relevant features. The Applicant acknowledges the request for combining impacts across phases of the development. The predicted mortalities for each species are given per annum for each phase of the development. These phases are not expected to overlap, therefore, it is not deemed suitable to combine impacts across development phases.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 121; 104: The document needs to include the calculations for the SNH (2018) apportioning approach to sites. It is not clear if this included large colonies and not just SPAs.	The apportioning approach is outlined within Annex 5 (application 5.2.5).	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 88; 67: NRW welcome the use of Woodward et al (2019) mean max foraging range plus 1SD as a metric for informing the consideration of SPA screening during the breeding season.	The screening results are presented in Annex 2 (application ref: 5.2.2).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 93-98; Table 5: •Dee Estuary SPA – Redshank are only mentioned as wintering feature, not passage. •Burry Inlet SPA – Whimbrel and greenshank are not SPA features. •Grassholm SPA – Gannet in this table both construction and decommissioning "Direct disturbance and displacement", whereas in 5.1.2. Annex 2 it is "No LSE". •Skomer, Skokholm and Seas off Pembrokeshire SPA– Kittiwake and Lesser black- backed gull are also listed as non-breeding features.	Updates to SPA features screened in during assessment are presented in Table 5.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 124; 109: The Conservation Objectives of the features of welsh SPA sites are currently not accurate within Annex 3, see below section on 5.1.3 AyM PEIR RIAA Annex 3: European Site Information for details and for links to appropriate sources.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Liverpool Bay SPA: The applicant needs to consider the assemblage feature of Liverpool Bay as well. Red- breasted merganser is part of this assemblage and not a separate feature in its own right.	Red-breasted merganser has been assessed as an assemblage feature within the alone assessment, Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 133;142: These are not the conservation objectives for Liverpool Bay SPA. The Reg 37 package (old reg 35) is the legal document explaining conservation advice for Liverpool Bay SPA https://naturalresources.wales/media/678824/liverpool-bay-bae-lerpwl-spa- conservation-advice.pdf . At the moment this is in the process of being updated to include the new features brought in during 2017. NRW advise that the features of Liverpool Bay SPA must be assessed against the conservation objectives which for red-throated diver are: (i)The size of the red-throated diver population is at, or shows only non-significant fluctuation around the mean population at the time of designation of the SPA. to account for natural change; (ii)The extent of the supporting habitat within the site is maintained. And for common scoter are: (i)The size of the common scoter population is at, or shows only non-significant fluctuation around the mean population at the time of designation of the SPA to account for natural change; (ii)The extent of the supporting habitat within the site is maintained. And for the waterbird assemblage are: (i)The size of the waterbird assemblage population shows only non-significant fluctuation around the mean at the time of designation to allow for natural change; (ii)The extent of the waterbird assemblage supporting habitat within the site is maintained.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	13.1.3 Dee Estuary Ramsar, SPA and SAC. Pg 145; 178: The conservation objectives for the features of the Dee SPA can be found here: https://naturalresources.wales/media/673576/dee-estuary-reg33-volume-1-english- 091209_1.pdf	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 183; 284: As stated previously NRW does not agree with the screening process used. The PEIR therefore fails to assess a number of Welsh SPAs that should have been included. All the features of Liverpool Bay (including the assemblage)that could be displaced need to be assessed. The effect on displacement of the Manx shearwater features of Skomer, Skokholm and the Seas off Pembrokeshire SPA and Glannau Aberdaron ac Ynys Enlli / Aberdaron Coast and Bardsey Island SPA need to be assessed. Guillemot and Razorbill displacement and mortality need to be assessed and apportioned back to the seabird assemblage feature of Skomer, Skokholm and the Seas off Pembrokeshire SPA. NRW can only advise on Welsh sites, but sites from other countries may also need assessing.	The screening table including updates discussed in the AyM ETG are in Table 5 from the RIAA (application ref: 5.2) and Annex 2 (application ref: 5.2.2).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 184; 285: As stated in the PEIR, there is potential for displacement and mortality during construction. NRW therefore advise this should be assessed in a similar way as in Preliminary Environmental Information Report; Volume 2, Chapter 4: Offshore Ornithology. This considered that construction was less than operation and therefore a 50% reduction in disturbance could be used in this assessment looking at various ranges of mortality.	Displacement during the construction and decommissioning phase for relevant species are provided in Section 10.3 using a 50% reduction in displacement rate compared to operation and maintenance phase.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 185; 288: The features of Liverpool Bay SPA that have previously been mentioned by NRW and the applicant for disturbance and displacement will also need to be assessed for visual and/or noise disturbance (as this is how disturbance and displacement occurs).	Visual and/ or noise disturbance have been assessed for relevant features in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 186; 291: NRW does not agree with the screening process and therefore does not agree with this list of sites. All the features of Liverpool Bay, including the assemblage, that could be displaced need to be assessed. The effect on displacement of the Manx shearwater features of Skomer, Skokholm and the Seas off Pembrokeshire SPA and Glannau Aberdaron ac Ynys Enlli / Aberdaron Coast and Bardsey Island SPA need to be assessed. Guillemot and Razorbill displacement and mortality need to be assessed and apportioned back to the seabird assemblage feature of Skomer, Skokholm and the Seas off Pembrokeshire SPA. NRW can only advise on Welsh sites but there may be sites from other countries which need assessing.	The screening table including updates discussed in the AyM ETG are in Table 5 from the RIAA (application ref: 5.2) and Annex 2 (application ref: 5.2.2).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 187; Collision Risk: NRW is unable to agree to any results until full survey has been analysed.	The assessment of ornithological receptors has now been updated using 24 months of survey data in all relevant documents (Section 10.3 and 11.3 for ornithological alone and in-combination assessment, respectively).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 187; 295: NRW does not agree with the screening process and therefore does not agree with this list of sites. Common and Arctic tern need to be assessed for Anglesey tern SPA, Lesser Black-backed gull feature and kittiwake need to be assessed (as part of the assemblage feature) for Skomer, Skokholm and the Sea off Pembrokeshire SPA. NRW can only advise on Welsh sites but there may be sites from other countries which need assessing, for instance the applicant may need to consider SPAs for Common gull and Fulmar.	The alone assessment for Anglesey Terns / Morwenoliad Ynys Môn SPA is discussed in Section 10.3. The alone assessment for lesser black-backed gull and kittiwake, as part of the seabird assemblage feature for Skomer, Skokholm and the Seas off Pembrokeshire SPA are discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 189; 298: This should also include the Common and Arctic tern features of Anglesey tern SPA in terms of assessing potential barrier effects.	The alone assessment for Anglesey Terns / Morwenoliad Ynys Môn SPA is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 190; 300: Red-breasted merganser is part of the assemblage feature and needs to be considered as such not separately.	Red-breasted merganser has been assessed as an assemblage feature within the alone assessment, Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 190; 301-302: These are not the legal conservation objectives for the features of Liverpool bay SPA. See previous comment and comments in 5.1.3 AyM PEIR RIAA Annex 3: European Site Information for details.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 192; 306: NRW agrees with the assessment assuming that there will be 100% displacement within a 2km buffer.	The assessment is presented in Section 10.3 for common scoter during cable installation.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 194; 311: The document should show 1 - 10% mortality rates to allow for an assessment of this. Here the document needs to include mapped aggregations of Red- throated diver in the cabling area and clearer calculations. NRW request a GIS file of the cabling area.	The presentation of a range of mortality rates is discussed in Section 10.3. Red-throated diver aggregations in the cable area are presented in Figure 6.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 194; 314: There needs to be an 8km buffer to the south of the windfarm. NRW agrees with 50% displacement from the windfarm for 4km, looking at a range of mortality from 1 – 10%, then there will be a need to discuss the levels of displacement on a 1km gradient out to 8km as the applicant has already said they would do.	The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3. The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 195; 317: NRW does not agree with the displacement methodology.	Red-throated diver displacement assessment has been updated using a gradient methodology agreed by NRW. Updates to the red-throated diver assessment is presented in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 196; 320: As all the data has not yet been analysed and NRW does not agree with the assessment variables, NRW is unable to agree with the conclusion for Red-throated diver in Liverpool Bay SPA. All the potential displacement from this project need to be added together to look at the combined effect on the SPA.	Updates to the red-throated diver assessment are presented in Section 10.3. Impacts have been combined within phases in Section 10.3. The Applicant acknowledges the request for combining impacts across phases of the development. The predicted mortalities for each species are given per annum for each phase of the development. These phases are not expected to overlap, therefore, it is not deemed suitable to combine impacts across development phases.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 197; 325: The displacement of common scoter from the cabling should be looked at using a 2km buffer, as has been done in the PIER Volume 4, Chapter 2 with 100% displacement and looking at a range of mortality from 1% to 10%.	Common scoter alone assessment is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 198; 328: This comment is assuming that birds do not fly or swim away and are just placid with the movement of the tide. If the boat is effectively static then this conflicts with the statement about birds being able to come back after it has moved.	The boat will be moving during cable laying activity so birds will be able to return to any specific area once the vessel has moved through. However, the speed of the boat is at a pace where it will look as if it is stationary for the majority of the time to birds due to tidal movements, minimizing any flushing response. NRW welcomed this explanation and agrees with the approach (see the Evidence Plan Report (application ref: 8.2)	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 199; 330: A clearer explanation is needed that the maximum of scoter mortality of 8.7 has been calculated with a 1% mortality rate. However a 10% mortality rate should also be presented, as is done in 333 & 358.	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 199; 330: This section needs to show mapped distribution of Common scoters and the cabling area and clearer calculations. NRW request a GIS file of the cabling area.	Common scoter alone assessment is discussed in Section 10.3. Common scoter aggregations in the cable area are presented in Figure 7 of the RIAA.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 199; 330: The mortality rate for Common scoter used here (0.217 (Robinson, 2017)) is inconsistent with what is used within Volume 4, Chapter 2 (0.238).	The baseline mortality rates for each species and rationale is discussed and updated as relevant in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 194; 313: There is inconsistency in the mortality rate used for Red-throated diver, both within this document 0.2 here and 0.217 at point 331 and within volume 2 chapter 4 (0.143 in Table 13, and 0.233 used widely in the text).	The baseline mortality rates for each species and rationale is discussed and updated as relevant in Section 10.3.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 200; 333: During construction NRW is happy for Common scoter displacement to be assessed at 50% displacement and a mortality rate of 10% out to 4km.	Common scoter alone assessment is discussed in Section 10.3 with a range of mortality rates presented.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 200; 334: As all the data hasn't yet been analysed and NRW does not agree with the assessment variables, NRW is unable to agree with the conclusion for Common scoter in Liverpool Bay SPA. All the potential displacement from this project need to be added together to look at the combined effect on the SPA.	Updates to the common scoter assessment are presented in Section 10.3. Impacts have been combined within phases in Section 10.3 of the RIAA. The Applicant acknowledges the request for combining impacts across phases of the development. The predicted mortalities for each species are given per annum for each phase of the development. These phases are not expected to overlap, therefore, it is not deemed suitable to combine impacts across development phases.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 202 -212: The headings and paragraphs in this section need some re-arranging for clarity. 13.3.5 Operation and Maintenance shouldn't be a numbered heading here (all others are the SPAs). Currently Pg 208; 357 appears to be under operation vessel disturbance and not under operation and maintenance. NRW suggest following the structure seen on pages 222 -224; 404-409 (e.g. barrier effects for red-throated diver followed by common scoter etc).	Report formatting has been updated for the relevant paragraphs in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 203; 343: The increase in boat traffic to do with the operation and maintenance of the project will need to be assessed properly to understand the increased disturbance/displacement on the red-throated diver feature of the site and the cumulative effect on this with the other disturbance/displacement issues. Therefore NRW disagrees with the statement that this will not have adverse effect on the feature.	There are currently no planned vessel routes, therefore a quantitative assessment cannot be undertaken alone or in-combination for this impact on any feature. Potential vessel management mitigation is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 204; 345: states "The approach undertaken for red-throated diver assessment at AyM is using 100% displacement up to 4km and a 1% mortality rate during the operation and maintenance phase and 50% displacement, 1% mortality during construction and decommissioning (see Displacement Appendix, Annex 4.4.2). This is more precautionary than the already precautionary approach given by Vattenfall (2019)." As stated previously NRW does not agree with this methodology and this seems contrary to what was shared with NRW regarding the original plan to assess red-throated diver in Liverpool Bay.	The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 207; 355: The increase in boat traffic related to the operation and maintenance of the project will need to be assessed properly to understand the increased disturbance/displacement on the common scoter feature of the site and the cumulative effect on this with the other disturbance/displacement issues. Therefore NRW disagrees with the statement that this will not have an adverse effect on the feature.	There is currently no planned vessel routes, therefore a quantitative assessment cannot be undertaken alone or in-combination for this impact on any feature. Potential vessel management mitigation is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 208; 357: NRW agrees with a using a buffer of 4km with a displacement rate of 100% and a mortality rate of 10% for common scoter.	Common scoter assessment is discussed in Section 10.3 with a range of mortality rates presented.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Page 205; 347: For Red-throated diver a 10% mortality rate and an 8 km buffer area should be presented.	The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 213; 378: We agree that these are the conservation objectives for the cormorant feature of Puffin Island SPA. Please amend the relevant section in 5.1.3 AyM PEIR RIAA Annex 3: European Site Information to reflect this.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 216; 387: These are not the conservation objectives for the features of The Dee Estuary SPA. See below section on 5.1.3 AyM PEIR RIAA Annex 3: European Site Information for details.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 219; 395: Dee Estuary SPA and Ramsar features need to be assessed for collision during migration using the SOSS or APEM tool as described in the PEIR.	Migratory waterbirds assessment using APEM's Migropath Modelling and migratory terns assessment using 'broad front' modelling are discussed in Section 10.3. Details on the approach can be found in Annex 4.4. Migratory CRM (application ref: 6.4.4.4).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 221; 401: Anglesey Terns SPA - the legal conservation objectives in the management plan need to be used, found here: https://naturalresources.wales/media/674074/Cemlyn%20WES32%20plan%20English.pdf .	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 222; 402: The mean max from Woodward et al. (2019) needs to be used. NRW staff have personal experience using ribs to track Sandwich terns up to 40 km away from colonies.	Sandwich tern assessment is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 223: Use SOSS or APEM migration tool for tern features from this site. Also need to assess collision risk for Commic terns from this site.	Migratory terns assessment using 'broad front' modelling is discussed in Section 10.3 for relevant SPAs. Details on the approach can be found in Annex 4.4. Migratory CRM (application ref: 6.4.4.4).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 286; 597: The conservation objectives in the management plan need to be used - found here https://naturalresources.wales/media/673958/Skomer.Skokholm%20management%20plan%2007.pdf	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 286; 597: The potential mortalities for Guillemot and Razorbill (which are part of the assemblage feature) need to be considered at and look to see whether the potential mortality from displacement has an affect or not. Also needed is an assessment of Manx shearwater in terms of displacement for this site.	Guillemot and razorbill are not within the mean-maximum +1SD foraging range (Woodward et al., 2019) from Skomer, Skokholm and the Seas off Pembrokeshire SPA to AyM and have subsequently, due to no connectivity, have not been considered for assessment during the breeding season. Guillemot and razorbill potential mortalities, as part of the assemblage feature, have been considered during the non-breeding season at this SPA in Section 10.3. Manx shearwater quantitative alone assessment is discussed in Section 10.3 for this SPA.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 285; 597: The conservation objectives for the features of Skomer, Skokholm and the Seas off Pembrokeshire SPA can be found within https://naturalresources.wales/media/673958/Skomer.Skokholm%20management%20plan%2007.pdf .	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 287; 598: NRW agrees with the displacement analysis for puffin using a 2 km buffer and a 15-35% displacement rate during construction and decommissioning. However, SNCB advice is the presentation of 1-10% mortality rate for this species, only 1% is presented here.	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 287; 600: Clarification is needed on why a population age ratio for puffins of 0.49 has been used. Modelling within Furness (2015) suggests between a 0.82 and 1.08 value.	Furness (2015) suggests using 1.04 immatures per adult as the most appropriate ratio for puffin. This as a percentage equates to 49% of individuals being adults, which equates to 0.49 as a proportion.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 287; 602: Clarification is needed on how the annual background mortality of puffins within the SPA was calculated (Puffin are not within Table 13 of volume 2, chapter 4). The source of the mortality rate used in this calculation needs to be explained.	The source of mortality rate data used for puffin is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 288; 607: For storm petrels the data should be presented at the array plus 2 km buffer, rather than 4 km as presented here.	The storm petrel alone assessment is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 289; 609: NRW agree with the displacement analysis for puffin using a 2 km buffer and a 30-70% displacement rate during operation and maintenance. However, SNCB advice is the presentation of 1-10% mortality rate for this species, only 1% is presented here.	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 291; 613: The potential mortalities from all the displacement calculations need to be added together to then be able to assess whether there is a likely significant effect on a feature.	The Applicant acknowledges the request for combining impacts across phases of the development. The predicted mortalities for each species are given per annum for each phase of the development. These phases are not expected to overlap, therefore, it is not deemed suitable to combine impacts across development phases.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 293; 616: There is an erroneous reference to Manx shearwater here.	This reference has been corrected in the final RIAA.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 294; 622: This population age ratio of 0.53 is not consistent with that used in volume 2, chapter 4 (Table 13 – 0.488). Clearer explanation of how these values are reached and a consistent approach is advised.	Erroneous references have been updated to reflect correct ornithological features throughout the relevant sections in the RIAA (10.3 and 11.3 for alone and in-combination assessment).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 295; 623: The working out for apportioning needs to be shown. Clarification is needed as to whether it has included large colonies and not just SPAs.	Sources and rationale for species age ratios used in the assessment are discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 297; 628: Lesser black-gull collision for birds in the non-breeding season needs to be assessed and then apportioned back to colonies.	The apportioning approach is outlined within Annex 5 (application ref: 5.2.5).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 311; 675: These are not the Conservation Objectives for the Gannet feature of Grassholm SPA, which can be found in the management plan here https://naturalresources.wales/media/674134/grassholm-spa-management-plan-21-1-408-english.pdf (and see section on 5.1.3 AyM PEIR RIAA Annex 3: European Site Information for details).	The alone lesser black-backed gull non-breeding season assessment for Skomer, Skokholm and the Seas off Pembrokeshire SPA is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 312; 676: Mortality needs to be shown at 1-10% for Gannet from Grassholm SPA	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 312; 677: 95% confidence levels should also be shown, not just the mean peak abundance.	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 312; 677: The array area plus 2km buffer should be assessed.	95% CI have been presented in the abundances within the baseline annex. 95% CI have not been assessed as the data used in the assessment (mean peak abundance across seasons) is already precautionary. Mean peak abundance assumes that the peak for each species will be maintained across all months of each season for each species, however this is highly unlikely.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 319; 696: NRW welcomes the addition of the operational impacts of both displacement and collision on gannets at Grassholm and the assessment of this combined value against the SPA population. We also advise that the applicant needs to combine the potential mortalities from displacement during construction, operation and decommissioning to make a full assessment for this feature and needs to show the working for apportioning.	Gannet alone displacement assessment within the array plus 2km buffer is discussed in Section 10.3. Combined displacement and collision impacts for gannet during the Operation and Maintenance Phase are assessed alone and in-combination in Section 10.3 and 11.3, respectively. The Applicant acknowledges the request for combining impacts across phases of the development. The predicted mortalities for each species are given per annum for each phase of the development. These phases are not expected to overlap, therefore, it is not deemed suitable to combine impacts across development phases. The apportioning approach is outlined within Annex 5 (application ref: 5.2.5).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 319; 693: this needs to show the apportioning for potential collision of gannets from Grassholm SPA.	The apportioning approach is outlined within Annex 5 (application ref: 5.2.5).	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 320 – 323; 13.3.25 Manx Shearwater: NRW welcomes the assessment of Manx shearwater, but advise that quantitative displacement analysis of this species (within the array plus 2 km buffer, at 30-70% displacement during operation and mortality shown at the 1-10% level) is needed. The information provided here about this species should be placed within the SPA sections it is relevant to, which will make it consistent with the rest of the document structure.	Manx shearwater quantitative alone assessment is discussed in Section 10.3 for the relevant SPAs.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 321:702: The conservation objectives for Aberdaron coast and Bardsey Island SPA are available here https://naturalresources.wales/media/672092/glannau-aberdaron-plan-english.pdf and those for Skomer, Skokholm and the Seas off Pembrokeshire SPA are here https://naturalresources.wales/media/673958/Skomer.Skokholm%20management%20plan%2007.pdf	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 324; 705: NRW advise that effect of displacement from the array area by Manx shearwater needs to be considered. There is evidence to show that Manx shearwaters have been displaced “for example Manx shearwaters have been shown to avoid the windfarm at North Hoyle in Liverpool Bay (Dierschke et al, 2016)”	Manx shearwater quantitative alone assessment is discussed in Section 10.3 for the relevant SPAs.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 330; 710: NRW advise that bespoke modelling is undertaken using APEM’s MigroPath model or the SOSS migration model so that a quantitative assessment can be made against protected sites.	Migratory waterbirds assessment using APEM’s MigroPath Modelling and migratory terns assessment using ‘broad front’ modelling are discussed in Section 10.3. Details on the approach can be found in Annex 4.4. Migratory CRM (application ref: 6.4.4.4).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 331; 710: NRW welcomes the inclusion of migratory waterfowl and waders in the final HRA but also advise that tern features are similarly considered.	Migratory waterbirds assessment using APEM’s MigroPath Modelling and migratory terns assessment using ‘broad front’ modelling are discussed in Section 10.3. Details on the approach can be found in Annex 4.4. Migratory CRM (application ref: 6.4.4.4).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	In-combination assessments In terms of Welsh sites NRW are currently unable to advise fully what should be included in the cumulative assessment as the full 24 months of data have not yet been used and NRW does not agree with a number of the assessment levels used. However NRW is able to advise that Common scoter, Red throated diver and the waterbird assemblage feature for Liverpool Bay SPA will need to be cumulatively assessed.	The in-combination assessment, using 24 months of survey data, is discussed in Section 11.3 for all relevant features.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 386; Table 23: For the Red-throated diver and Common scoter features within Liverpool Bay SPA operational vessel movement during operation and maintenance needs to be include.	These have been included in the final RIAA.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 392 – 400; Table 25 & 26: These tables seem to miss out the potential collisions with Morlais that have been predicted through the CRM and ERM modelling.	There is currently no planned vessel routes, therefore a quantitative assessment cannot be undertaken alone or in-combination for this impact on any feature. Potential vessel management mitigation is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 403; Red-throated diver: When looking at cumulative impact for Red-throated diver in Liverpool Bay SPA, this needs to be assessed against the correct conservation objectives for this site but also, environmental statements and HRAs for previous projects and also data that has resulted from pre and post construction monitoring from other windfarms. For instance Gwynt-y-mor and Burbo Bank extension windfarms need to be considered.	The in-combination effect from all relevant plans and projects including Morlais is discussed in Section 11.3 for all relevant features.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 405; 827: Only a 1% mortality rate is used for red-throated divers here. SNCB advice is the use of a 10% mortality rate.	The in-combination effect on the red-throated diver feature of Liverpool Bay SPA is discussed in Section 11.3. Results from Gwynt y Môr monitoring is presented in Section 10.3. The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 406; Common scoter: When looking at cumulative impact for common scoter in Liverpool Bay SPA, this needs to be assessed against the correct conservation objectives for this site but also, environmental statements and HRAs for previous projects and also data that has resulted from pre and post construction monitoring from other similar wind farms e.g. Gwynt-y-mor and Burbo Bank extension windfarms.	The in-combination effect on the common scoter feature of Liverpool Bay SPA is discussed in Section 11.3.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	5.1.2. Aym PEIR RIAA Annex 2 HRA Screening Update Ornithology •Estuarine SPAs - NRW welcomes the assessment of all Welsh wintering estuarine SPAs including Traeth Lafan SPA, The Dyfi SPA, Burry Inlet SPA and Severn Estuary SPA. •Burry Inlet SPA – Whimbrel and Greenshank are not SPA features and therefore do not need to be included within the HRA. •Skomer, Skokholm and Seas off Pembrokeshire SPA – NRW has previously advised (28.8.2020) that the breeding bird assemblage should be screened in. Here only kittiwake of this assemblage has been screened in, while razorbill and guillemot have not. •Grassholm SPA – There is inconsistency here with RIAA, as Gannet are considered to have “direct disturbance and displacement” during construction and decommissioning in RIAA Table 5 etc, and “no LSE” here.	The screening assessment has been updated in Table 5 of the RIAA (application ref: 5.2) and Annex 2 (application ref: 5.2.2).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	5.1.3 Aym PEIR RIAA Annex 3: European Site Information It would be useful to provide information on whether SPAs are designated for wintering / breeding / passage features. Documentation for Conservation Objectives for the features of SPAs can be found on the NRW website via Natural Resources Wales / Find protected areas of land and sea (full address: https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/find-protected-areas-of-land-and-sea/?lang=en), searching for the protected area and under Management plans there are pdfs available.	SPA bio-season designations for each species can be found within the screening assessment in Annex 2 (application ref: 5.2.2). All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 42; 65 These are not the Conservation Objectives of the features of the SPA. The correct Conservation Objectives for the features of the Dee Estuary SPA should be taken from https://naturalresources.wales/media/673576/dee-estuary-reg33-volume-1-english-091209_1.pdf . Which is the document referenced on page 44; 69 (xxix).	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 59; 93 These are not the conservation objectives for Liverpool Bay SPA. The Reg 37 package (old reg 35) is the document that identifies the conservation objectives for Liverpool Bay SPA is here https://naturalresources.wales/media/678824/liverpool-bay-bae-lerpw-lspa-conservation-advice.pdf . At the moment this is in the process of being updated to include the new features added in 2017.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 62; 98 The conservation objectives of the features of Anglesey Terns SPA need to be used, and can be found here: https://naturalresources.wales/media/674074/Cemlyn%20WES32%20plan%20English.pdf	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 81; 141 The Conservation Objectives for the Features of Aberdaron Coast and Bardsey Island SPA haven’t been listed here, although they are within the document referenced (https://naturalresources.wales/media/672092/Glannau%20Aberdaron%20Plan%20Englis h.pdf). 142 & 143 are quotes from the Habitats Directive found in Box 1 of the above document.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 86; 150 Within Skomer, Skokholm and the Seas off Pembrokshire SPA designated features list Kittiwake is missing (is referred to within 5.1.2). Like Guillemot and Razorbill this species would also have an asterisk to denote that it is only recognised as part of the breeding seabird assemblage, and not as an individual species.	All designated features lists are updated within Annex 2 (application ref: 5.2.2).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 86; 153 The conservation objectives for the features of The Skomer, Skokholm and the Seas off Pembrokeshire SPA in the management plan need to be used, and are found here https://naturalresources.wales/media/673958/Skomer.Skokholm%20management%20plan%2007.pdf	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 100; 184 NRW agree that Conservation Objectives for the Gannet feature of Grassholm can be found in the document referenced (https://naturalresources.wales/media/674134/grassholm-spa-management-plan-21-1-408-english.pdf). However, the Conservation Objectives for Gannet haven’t actually been listed here and points 186 and 187 are quotes from the Habitats Directive found in Box 1 of the above document (also repeated on page 104, 108 and 111).	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 102; 188 & Pg 103: 191: These refer to documentation (cv and cvii) that relates to Puffin Island SPA in Ireland (site code: 004003), rather than Puffin Island SPA in the UK (site code: UK9020285). The correct documentation can be found via NRW’s website at (https://naturalresources.wales/media/674189/Ynys%20Seiriol%20SPA%20%20management%20Plan%2018%20April%20%20(English).pdf), which contains the conservation objectives for the cormorant feature of this SPA.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 104; 194-199: The Conservation Objectives for the features of Traeth Lafan SPA haven’t been listed here, although they are within the document referenced (https://naturalresources.wales/media/674184/Traeth%20Lafan%20SAC%20Plan%2021[1].4.08%20English.pdf). 198 & 199 are quotes from the Habitats Directive found in Box 1 of the above document.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 108; 203: NRW agree the Conservation Objectives for Dyfi Estuary SPA can be found within the referenced document (https://naturalresources.wales/media/671834/Dyfi%20SPA-Plan%20English.pdf). Points 205 and 206 are quotes from the Habitats Directive found in Box 1 of the above document.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 109; 208: Burry Inlet SPA designation includes a waterbirds assemblage, not a seabird assemblage.	SPA designations have been updated within Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 110; 210: NRW agree that the document referenced within this paragraph is the relevant source for Burry Inlet (https://naturalresources.wales/media/673515/Carmarthen%20Bay%20R33%20Advice%20February%202009.pdf), however the link provided (cxiv) should be updated as it currently shows a link to the Dyfi Estuary SPA documentation.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Pg 111; 212-213: No Conservation Objectives for the Burry Inlet SPA are listed here, and the generic text from Table 1 of the above document is again replicated here.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no

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PrB_018_11102021	S42	Report 5.1: RIAA	Pg 113; 217-218: These are not the Conservation Objectives of the features of the SPA. The Conservation Objectives for the features of the Severn Estuary SPA should be taken from https://naturalresources.wales/media/673887/severn-estuary-sac-spa-and-ramsar-reg-33-advice-from-ne-and-ccw-june-09.pdf, which is referred to in point 217, but no link provided.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Key Issues Overall NRW are happy with the Benthic Ecology Assessment in the PEIR but have the following detailed comments to make.	This is noted and welcomed by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	NRW were engaged in pre-application discussions early on and are satisfied that the comments raised throughout pre-application have been addressed in the PEIR. Overall the baseline description of benthic ecology for the study area was well researched and clear. NRW agree with the impacts that have been scoped in and assessed throughout the different stages of the development. NRW have a few minor comments discussed in further detail below that require consideration but should not change the conclusions of the assessment.	This is noted and welcomed by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Table 8 Data sources consulted for AyM- NRW are pleased to see the incorporation of the latest Gwynt y Mor post construction survey data following pre-application advice from NRW.	This is noted and welcomed by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Table 9 – NRW note that only qualifying features that are a primary reason for the selection of this site have been included. However, it should be noted that other Annex I habitats that are present as a qualifying feature (even if not a primary reason for selection of the site) should be included and assessed accordingly in the EIA. These include the “Large shallow inlets and bays” and the “Submerged or partially submerged sea caves” features of the Menai Strait and Conwy Bay SAC and the “Estuaries” feature of the Dee Estuary SAC.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Table 10 for VERs Sabellaria alveolata reef – NRW advise that UKBAP is no longer applicable to Wales following the the 'UK Post-2010 Biodiversity Framework', published in July 2012 which succeeded UK BAP. The conservation interest for Sabellaria alveolata habitat are: •Section 7 (Environment Wales Act 2016) •SPAR •Annex I outside SAC (Habitats Directive, considered under Article 2 which sets out general aim of conserving natural habitats and their restoration/ maintenance at favourable conservation status)	Reference to the UKBAP has been removed and amended to Section 7 Environment (Wales) Act 2016 through the Benthic Subtidal and Intertidal Ecology Chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Further reference throughout the report to UKBAP habitats should be amended accordingly to Section 7 Environment (Wales) Act 2016.		yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Paragraph 100-103 – NRW appreciate the PEIR taking into account potential effects of climate change in the marine environment and that changes that may occur during the construction, operation and decommissioning of AyM should be considered in the context of greater variability and sustained trends occurring at national and international scales.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Paragraph 148 “Model predictions show that there is no potential for increased SSC or deposition reaching the eastern boundary of Menai Strait and Conwy Bay SAC. The sandbank features are the closest features to the eastern boundary (and AyM) but are located c. 6 km to the further west (NRW, 2016b) the plume generated by the AyM construction activities will therefore not reach any of the benthic features for which the SAC has been designated” – As noted in comments above, the Menai Strait and Conwy Bay SAC is also designated for “Large Shallow inlets and Bays” and “Submerged or partially submerged sea caves” features. Potential impacts to these features from temporary increase in SSC should be assessed. However NRW note these features are circa 11km away from the array and it is therefore unlikely that the increased SSC or deposition plume will interact with these features given the model predictions presented in Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes but confirmation of this is required. In this regard, it would be helpful to present a figure showing the designated features of the Menai Strait and Conwy Bay SAC against the modelled suspended sediment concentration plume shown in Figure 3 of the Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes. This would make it easier to understand and visualise the spatial extent of the suspended sediment concentration plumes against the designated features and any potential interactions.	This has been considered in this chapter (see Section 5.11) and a figure presenting the designated feature and modelled SSC plume has been provided (Figure 8 – Menai Strait and Conwy Bay SAC and Figure 9 – Dee Estuary/ Aber Dyfrdwy SAC). Reference, in the context of the feature of the SAC, should also be made to the RIAA (Report 5.2 (application ref: 5.2))	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	The above advice also applies to the designated features of the Dee Estuary SAC. Note in this case potential impacts to the “Estuaries” designated feature of the Dee Estuary SAC from changes in suspended sediment concentration has not been assessed although we believe from the figures presented in Volume 2, Chapter 2 Marine Geology, Oceanography and Physical Processes there is no spatial overlap with the SSC plume and the feature. However, confirmation of this is required. A figure showing the designated features of the Dee Estuary SAC against the modelled suspended sediment concentration plume would be useful here as well.	As above.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Paragraph 183 “it is predicted that the sensitivity of the benthic subtidal habitats located across the AyM benthic ecology study area is at worst-case medium and the magnitude is low. The medium sensitivity and negligible adverse magnitude of the impact on benthic receptors could result in a minor adverse significance, which is not significant in EIA terms” The sensitivity of subtidal receptors has been assessed at a worse case scenario as high in paragraph 182 but as medium here. Furthermore the magnitude needs revising as it has been assessed as low in one sentence and negligible in the following sentence (and as neglible in paragraph 180). However NRW agree with the significance of the impact likely being minor and therefore not significant in EIA terms.	Noted. Errors have been amended in the ES in relation to lack of consistency for magnitude and sensitivity for subtidal habitats.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Paragraph 199 “The potential impact on biotopes and VER within the AyM benthic subtidal ecology study area is predicted to be of very low spatial extent, long term duration, continuous and irreversible. It is predicted that the impact will affect the receptors indirectly. The magnitude of this impact is considered to be negligible adverse. The sensitivity of the receptors is considered to be low, but irrespective of the sensitivity of the receptor, the significance of the impact is negligible adverse” – NRW advise the magnitude of impact should be considered Low as no biosecurity plan is fool proof and there is always going to be a risk of INNS being introduced. Nevertheless the significance of the impact would still be minor and therefore not significant in EIA terms. The above is also applicable to the cumulative effects assessment (paragraph 260).	Magnitude has been amended to low to reflect this. This revision has also been considered for the CEA.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 15: Offshore Conclusions	Table 1: Construction Potential changes to suspended sediment concentrations – magnitude and sensitivity of receptor are missing information. It currently reads “(pathway)”.	Noted. This has been updated based on the final ES chapter.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 129 “NRW (2018) reported that the potential for accidental introduction of INNS is a threat to the SAC. The example of the slipper limpet, accidentally introduced in 2006 to mussel lays in the Menai Strait and subsequently eradicated, is cited. Measures to prevent such occurrences in the future are focused on fishing and bait collection but include ‘the introduction of ‘Codes of Good Practice’ and other measures’, with the PEMP proposed for AyM fulfilling that requirement.” - NRW advise measures to prevent additional INNS arriving at the sites should be detailed in the Biosecurity Risk Assessment as highlighted in Volume 2, Chapter 5: Benthic Subtidal and Intertidal Ecology. The risk assessment and management plan should include consideration of all activities, vessels and equipment used as well as how the risk will be minimised through appropriate mitigation and adherence to best practice guidance and management measures. The risk assessment should include a review of all the available data in relation to the presence of marine INNS where applicable to the current proposal, and the potential risks associated to each species identified.	Text specific to the slipper limpet has been added into paragraph 131 within section 10.1.1. This document now aligns with the assessments and conclusions drawn in the benthic chapter in relation to INNS.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 178 Conservation objectives for the Dee Estuary SAC – NRW advise the conservation objectives should be taken from the Regulation 33 advice package as these are the agreed conservation objectives for the site between NRW and Natural England. Please note there are different conservation objectives for each feature i.e. the conservation objectives for the “Estuaries” feature are not the same as those for the” Mudflats and sandflats not covered by seawater at low tide” feature.	The reference has been amended to the Regulation 33 advice package which contains details on the features and objectives for this site.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 198 “Measures to prevent additional INNS arriving at the sites will be detailed within the proposed PEMP for AyM.” – As noted above, NRW advise measures to prevent additional INNS arriving at the sites should be detailed in the Biosecurity Risk Assessment as highlighted in Volume 2, Chapter 5: Benthic Subtidal and Intertidal Ecology.	The text has been amended to include details on INNS measures following the above response. This document now aligns with the assessments and conclusions drawn in the benthic chapter in relation to INNS.	yes	yes

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PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Overall comments: The National Policy Statement for renewable energy states that the environmental assessment must specify species most at risk – i.e. Valued Ecological Receptors or VERs. NRW agreed in pre-consultation with the applicant in November 2020 and at subsequent ETG meetings that the list presented in the Fish and Shellfish baseline report in Table 2.3 & Table 3.3 adequately reflected the species likely to be present within the AyM study site and potentially be at risk from impacts of the development. NRW considers that the Fish and Shellfish report presents a thorough and comprehensive review of the fish data available at the site and draws robust conclusions on the fish VERs. The Fish and Shellfish Chapter 6 however, has not assessed the agreed VERs in a structured or transparent way with clear reference to the information contained in the baseline report. Some of the receptor species listed as VERs in the Fish and Shellfish baseline reports are not discussed in the Fish and Shellfish chapter noise assessment such as; allis and twaite shad (Annex II Habitats Directive species) and very sensitive to noise disturbance. Smelt, a Section 7 Environment (Wales) Act listed species recorded in rivers discharging within the AyM study site and also sensitive to noise disturbance and sprat another hearing sensitive species and a key forage species for marine birds and mammals. It would have been useful if Chapter 6 had included a table of the fish VERs, and for each listed the impacts pathways of concern, along with a discussion of the receptor’s sensitivity to each, with reference where appropriate to the information in the Fish and Shellfish baseline report.	The VERs highlighted in Volume 4, Annex 4.1, have been tabulated in Table 9 of Section 6.3 of this chapter. Reference has been made to individual VERs throughout the assessments in sections 6.10 - 6.12.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	p. 64-65, Table 9: Maximum design scenario. The way the spatial and temporal MDS are defined is not particularly helpful. NRW note that the spatial MDS is defined as the largest spatial extend of the noise impacts from concurrent piling of two monopile foundations with the largest separation distance between them (piling in NW and SE locations as used in the noise modelling scenarios), while the temporal MDS is defined by the largest number of piles potentially used. This corresponds with the one being a worst- case scenario on a spatial scale, while the other the worst-case scenario on a temporal scale, and is defined as such in para 68, p 81. However, in the subsequent assessment for each receptor group p. 88 onwards, both spatial and temporal MDS are presented and discussed as maximum ranges (in metres) from the noise source, while the temporal effect of maximum days of piling is not discussed for some receptors at all.	Sub-headings have been added for temporal and spatial assessments on each noise sensitivity group within the chapter. Further text has been added around implications of temporal MDS for non-locally spawning species.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	p.83. paragraph 74. NRW does not agree in all cases with the use of the modelling outputs for fleeting receptors as the assumptions made are not necessarily realistic or conservative and no evidence has been presented to support them. A swim speed of 1.5m/s would be considered unrealistically high for some receptors, e.g. herring or salmon smolts. In order to consider the ability of fish to move to outside various noise contours, and hence be considered fleeing receptors the maximum sustainable swim speed (termed Ums i.e. the speed which the fish will be able sustain for >200 minutes) should be used to calculate the distance the fish may move during the piling activity. He (1996) provides maximum sustained swim speeds for a number of marine commercial fish species, amongst them herring with were recorded as having swim speeds of 1.06 m/s while Huse and Ona (1996) recorded swim speeds of overwintering herring in a Norwegian fjord at various depth and found that a majority of the herring recorded were swimming at speeds around 0.25–0.35 m s-1. This is much lower than the 150 cm/s assumed in the report, furthermore it appears that the modelling assumes that a fish be travelling directly away from the noise source until it is outside the noise threshold, which is not realistic. NRW have therefore only considered the modelled impacts results on all receptors as static.	The swim speed of 1.5m/s has been informed by the Hirata (1999) paper. Assessment has already included a consideration of fleeing and stationary receptors as part of the noise modelling, which is deemed to provide a conservative range within which impact may occurring depending on individual fleeing speeds.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	p. 84, Table 11. As discussed above this table includes species for which the subsequent text does not discuss impact to, e.g. mackerel, or river and sea lamprey, or smelt. NRW would expect a rationale to be presented for why impacts to these species are not assessed, for instance with reference to the information discussed in the baseline report.	Underwater noise impacts on individual fish species have been assessed based on the hearing sens of the fish species, with species grouped dependant on the presence of absence of the swim bladder, and the role of the swim baldder in hearing. Increased signposting has been added to the table showing which VERs are within each hearing group.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	p. 88- 90 Group 1 Receptors: As discussed in above in ‘General comments’ it is not clear how the different vulnerability, recoverability or importance has been weighted or combined to produce an overall ‘low’ sensitivity of group 1 receptor species. For instance, sandeel are a Section 7 species, a key forage species for other receptors and has high intensity spawning grounds within the AyM study area, sandeel have very specific habitat requirements and are known to show site fidelity. Although NRW does not disagree that that sandeel have low sensitivity to noise, it is not clear how the other attributes have been considered or weighted to arrive at the Low Sensibility rating. Furthermore, when compared to subsequent evaluations for group 2 receptors these have also been ascribed a ‘low ‘sensitivity, despite having a higher value/importance and higher being more sensitive to noise impacts. Finally, group 1 receptors include a number of species, yet the spatio-temporal assessment only refers to effects on sandeel and sole, other Group 1 receptor species identified as VERs in the Fish and Shellfish baseline report, are not assessed either quantitatively or qualitatively.	Increased justification for the assignment of low sensitivity to VERs has been added to the chapter. Sub-headings have been added for temporal and spatial assessments on each noise sensitivity group within the chapter. Further text has been added around implications of temporal MDS for non-locally spawning species.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Paragraphs 81 – 84. It is not clear why, when the largest spatial effect, according to Table 9 and as illustrated in Figure 9 would be concurrent piling of monopoles at the NW and SE locations, the scenarios discussed in the text refers to predicted ranges for each location separately, rather than overall area within the threshold contour. Furthermore, as per previous comments it is unclear why ranges in metres are described here when the temporal impact should relate to the maximum piling duration, rather than affected area. The potential spatio-temporal effects on fish are described and quantified in paragraphs 83 and 84. NRW also note that the overall piling period is given as approximately 65 days over three construction years. However, in Vol 2, Chapter 1 Offshore Project Description, Figure 2: Indicative construction programme Foundation Installation has an indicative duration of 12 months in Year 3. It therefore seems that the piling activity has potential to occur during one spawning season, rather than three, as assessed in paragraph 83. Paragraph 84 discusses the use of the methodology applied for GyM, please provide further details of this methodology and how it has been applied to the assessment for AyM. In several places in the assessment it is stated that the potential extent (area) of spawning/habitat affected is minimal, however no assessment of the total area of available habitat used in the assessment or the rationale has not been provided. E.g. for sandeel the text in paragraph 84 states that the worst case temporal effect (see above on clarification on how spatial and temporal effects are defined) is <0.01% spawning potential, however it is not clear what has been considered the total available spawning grounds and why, and how this relates to the information presented in the Fish and Shellfish baseline report and spawning/nursery maps in Figures 2-6, in the Chapter itself. Based on the above comments we are therefore unable to agree or disagree with the conclusion of minor adverse significance for group 1 receptors.	The overall piling period has been revised in accordance with Volume 2, Chapter 1: Offshore Project Description.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Pages 90-91 Group 2 receptors: Paragraph 90 makes reference to the Fish and Shellfish report and states that Atlantic salmon and sea trout are unlikely to be within range of any injurious effects, based on them being more coastal/following the coast. NRW commented on this statement in November 2020 as part of review of the baseline report and do not agree that there is sufficient evidence to support this. However, given that the area within the threshold of >207 dB SPL peak or >210 dB SEL cum is relatively small, and that salmon and sea trout are widely dispersed at sea we can agree with the conclusion for Group 2 receptor that the likely significance of the effects will not exceed minor adverse.	This was noted by the Applicant.	yes	no

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PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Pages 91-92 Group 3 receptors: As per previous comments, in paragraph 92 group 3 receptors are given a sensitivity level of medium despite the group containing hearing specialist such as herring and cod. The text provides no rationale or evidence to support the sensitivity level for the various fish receptors considered and NRW is therefore unable to comment on whether it is considered appropriate. In paragraph 93 it states: ‘Group 3 receptors which have spawning grounds within the local vicinity of AyM (and so might be considered as stationary) include cod and whiting. All these species are pelagic spawners and so are not limited to specific sedimentary areas for spawning and consequently are considered likely to move away from injurious effects. It is not clear from this whether cod and whiting are considered as static receptors, or fleeting receptors. Furthermore, herring are described as being reactive to sound, when not engaged in spawning activity, indicating that they should therefore as static receptors when spawning, however this is not clear from the text. The Fish and Shellfish baseline report map of herring spawning areas and substrate suitability (page 30 of the pdf when viewed electronically) and further in Figure 11 shows suitable herring spawning area close to the array, and potentially within the 207 dB SPL peak/cum contour line. Finally, Vol 4, Appendix 6.2 Underwater Noise Technical Report, provides a worst case scenario in Table 34, p 32, for installation of monopile foundations in at both locations (In- combination area) of 240 km2 for stationary receptors within the 207 dB SELcum criteria for Group 3 receptors. However, this scenario does not appear to have been assessed. Based on the above comments we are therefore unable to agree or disagree with the conclusion of minor adverse significance for group 3 receptors.	A clarification note providing this justification was provided to NRW following post-PEIR ETG meetings. This information has also been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Page 92-93 Eggs and Larvae As indicated by the above comments NRW remain unclear on what area of fish VERs spawning grounds has been considered relevant in relation to the spatial and temporal MDS. It is also unclear how the in-combination area of simultaneous piling at two locations has been considered and how the temporal MDS of piling for 65 days (monopile) or 95 days (piled jackets foundations) as described in Table 9, p.64 has been considered in the assessment. NRW are therefore unable to agree or disagree with the conclusion of minor adverse significance for Eggs and Larvae.	Clarification on how the spawning potential conclusions were reached is provided in Section 6.10.1 of this chapter, and in the form of a clarification note, issued to the consultee on 26 November 2021(ETG Clarification Note: Fish Spawning Potential).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Pages 95-112 describe potential sub lethal effects to fish receptors from recoverable injury to behavioural effects. The issues described above on clarity relating to assessment of all fish VERs, quantifying what is considered as relevant spawning/nursery area and clarity on area affected applied equally to these assessments on sub lethal effects, and NRW are therefore unable to agree or disagree with the conclusions made.	As above.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Pages 113-117 assess the impacts of noise from cofferdam installation. As described above for receptor group 2 NRW do not agree with the statements made around the migration paths of sea trout and salmon, but do agree that the low levels of potential noise from cofferdam piling means that the risk to fish receptors from the activities can be considered as low.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Paragraph 181 appears to draw an overall conclusion for all noise related assessments in combination. As described above NRW are not able to agree or disagree with the conclusions made on individual hearing groups and are therefore also not able to agree with this overall conclusion. Furthermore, NRW would advise that the in-combination effects of direct loss of fish, loss of eggs/larvae and disturbance may be higher than the individual components, and this should be further discussed and evidenced for fish VERs to support the conclusion.	This was noted. Further information has been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Pages 115-117 Noise and vibration arising from UXO clearance. NRW note the intention to fully assess the impacts of UXO detonation as part of a marine license application at a later stage of the project. NRW welcome the use of mitigation methods, such as bubble curtains and low order detonation to provide added protection for fish and shellfish receptors.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Pages 118-123. NRW agree that the impact to fish due to temporary increases in SSC and sediment deposition is likely to be low but note however, that as for NRW's comments on the noise impact assessment, the text does not explain why only some receptors have been assessed (e.g. why sandeel but not sole?) and further contextualisation for the loss of habitat for the receptors could be provided to support the conclusion. I.e. what is considered the available spawning/ in the wider area, against which the loss is qualitatively assessed as being low?	This is noted, and additional justification for these conclusions has been added to the assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 14: Inter-relationships	Volume 2, Chapter 14: Inter-relationships Page 17-19, Table 4: Inter-related effects assessment – fish and shellfish ecology. Receptor led effect text. As NRW do not agree or disagree with the conclusions made on the impacts to fish and shellfish receptors from noise, NRW are unable to agree to the conclusions made for inter-related effects. Furthermore, NRW advise that further evidence and rationale is provided for the statements made in relation to inter-related impacts, such as effects being mutually exclusive and that fish displaced from areas due to noise impacts during piling will subsequently not be around to also be impacted by other pathways such as additional drilling or increases in SSC.	Further rationale has been added to the inter-relationships assessment (application ref: 6.2.15).	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.1: Fish and Shellfish Ecology Baseline	Volume 4, Appendix 6.1: Fish and Shellfish Baseline report NRW note that this report appears to still be in draft form. NRW commented on this report in its earlier draft form in November 2020, however it appears a number of our comments have not been addressed in the version submitted as part of the PEIR consultation: •NRW advised that Atlantic salmon, Sea lamprey and River lamprey are all Annex II features of Habitats Directive sites within the study area for AyM and should therefore be assigned as of ‘International Importance’, however they are remain listed as of ‘Regional importance in Table 3.2. •NRW raised concerns that there is a lack of evidence for migration routes for salmon and sea trout and therefore the statements made in the report regarding the presence of salmon and sea trout in the AyM area is not supported by evidence. NRW advise that these comments are incorporated in the final submission and that the text in Chapter 6, Fish and Shellfish is updated to reflect our comments.	The baseline report has been updated.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Page 9: NRW welcomes the approach of modelling fish as stationary receptors based on the lack of evidence for fish behaviour in response to noise and vibration but recognised that for some fish this may represent a conservative assumption. NRW has made comments above regarding the use of a fleeing speed of 1.5m/s, and advise the noise modelling is revised to incorporate more realistic and evidenced based fleeing scenarios, or that the modelling results based on fish as static receptors is adopted as a worst case scenario for impact assessment.	The swim speed of 1.5m/s used to inform the noise assessment on fleeing fish receptors was informed by the Hirata (1999) paper. The assessment (as presented in Section 6.10.1 of this chapter) included a consideration of fleeing and stationary receptors as part of the noise modelling. The approach is deemed to provide a conservative range within which impact may occur depending on individual fleeing speeds of fish receptors.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Page 15, section 4.2.1. Clarification is needed whether piling simultaneously at the NW and NE corner of the proposed array would have resulted in larger impact ranges as both these locations are in deeper water, i.e. does the scenario of concurrent piling at the two location NW and SE represent a realistic worst case scenario for noise modelling?	A design change has been adopted to remove the option of simultaneous piling at two foundation locations.	yes	yes
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	P. 19, paragraph 5, the text states that ‘After the full piling duration of 6 hours, the receptor will be over 32 km from the pile’. This is clearly based on unrealistic assumptions of fish swimming at 1.5m/s in a direct line away from the noise for 6 hours and demonstrates NRW concerns on the assumptions used for fleeing receptors.	Progressive changes in the flee speed, changes in direction, cannot be taken into account in the modelling. These sorts of adjustments can be done with the considerably slower and more complex individual or agent-based modelling, and this includes assumptions of its own. Individuals could also move to quieter areas or hide. The fleeing model represents one side of the spread of impact ranges provided, with the stationary model being the worst case.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Page 346, Table 18: Summary of the maximum modelled impact ranges for 15m diameter piles for Atlantic salmon and lamprey sp. NRW note that this appears to be referring to the MDS for the 15 large WTG monopiles assessed in the spatial MDS, rather than the temporal MDS for maximum number of smaller WTGs. In the response above on Chapter 6, NRW have asked for clarification on the scenarios assed under the spatial and temporal DMS, which also applies to this RIAA document. NRW also made comments regarding the assumptions made for fleeting receptors, and we do not consider it realistic to include salmon smolts as fleeting receptors, using the assumption of fleeing at a rate of 1.5m/s directly away from the noise source.	The ranges presented are the worst cast scenario ranges, which is deemed to be the maximum spatial extent. However, for the case of the assessments, both the maximum spatial and temporal extent has been considered based on the overal magnitude and sensitivity assessments. The assessment for salmon smolts is considered appropriate as while it is likely that the true impact range is somewhere between stationary and fleeing due to their reduced speed, it is noted that migratory instincts in the smolts will ensure that they act as a fleeing receptor.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Page 353, paragraph 739. NRW has made comments above on Chapter 6, and on the Fish and Shellfish baseline report that NRW do not agree there is sufficient evidence to support the statements made regarding salmon migratory routes being primarily coastal. Despite the comments made above NRW agree with the conclusion of no AEoS! to migratory fish features of the River Dee and Bala Lake/ Afon Dyfrdwy a Llyn Tegid SAC and Dee Estuary/ Aber Dyfrdwy (UK) (England/ Wales] SAC from the AyM development alone or in-combination with other relevant plans and projects.	The Applicant acknowledges the note that the evidence is anecdotal. The only evidence is the observational evidence from fishermen suggesting that they have a coastal route. However, there is no evidence to say that they to suggest the opposite, and ultimately the conclusions drawn from the assessment do not rely solely on this statement. The Applicant welcomes NRW's agreement in the conclusion of no AEoI	yes	no

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PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	PEIR Volume 2, Chapter 7: Marine mammals •NRW do not agree with the PTS sensitivity score of ‘negligible’ for grey seal, and believe it should be ranked ‘low’ •NRW do not agree with the PTS sensitivity score of ‘low’ for cetaceans, and believe it should be ranked ‘medium’ •NRW do not support the use of Effective Deterrent Ranges (EDRs) in assessment	Summary comments are addressed in ful in the rows below.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report •NRW do not currently consider concurrent piling at the NW and SE modelling locations to adequately represent the worst case scenario for noise generation from concurrent piling at two locations	A design change has been adopted to remove the option of simultaneous piling at two foundation locations.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation •NRW do not agree with the decision to scope common dolphin out of the EIA	Common dolphin have now been scoped into the assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.2: Outline MMMP	PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol •There is insufficient detail to consider the MMMP as effective mitigation of impacts from piling or UXO, and without additional detail it may not be possible to rule out AEOSI and potential for injury to EPS. This document will need significant development before NRW advisory can be confident that this risk will be fully mitigated and as such, pathways may require assessment as if unmitigated.	Noise abatement has been added as part of the suite of option available to mitigate underwater noise impacts.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Report 5.1 Report to Inform Appropriate Assessment •The MMMP currently offers insufficient detail to be considered adequate mitigation of impacts from PTS, and NRW cannot agree with the conclusion regarding the potential for Adverse Effect on Site Integrity. •Given NRW’s concerns regarding the use of an EDR approach to assess disturbance (UXO and piling), NRW cannot reach a conclusion regarding the potential for Adverse Effect on Site Integrity.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2). EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. It also explains why the piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Report 5.1 Annex 1 HRA screening update (non-ornithology) •NRW Advisory do not agree that there is no possibility for LSE at these sites from vessel collisions or disturbance from vessel activity from either construction, operation & maintenance, or decommissioning.	The Applicant acknowledges this feedback. The Project is making a commitment to minimise the risk of collisions. The adoption of best practice vessel handling protocols (e.g. following the Codes of Conduct provided by the WiSe Scheme, Scottish Marine Wildlife Watching Code or Guide to Best Practice for Watching Marine Wildlife) will minimise the potential for any impact. The final codes of conduct will be discussed and agreed with NRW and JNCC through the marine licence conditions.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.3Consultation and scoping page 29 Row; Mar 2021, Marine ecology and marine mammal ETG Based on the information supplied in the PEIR, it is clear that there is a substantial difference between the 6km buffer from the coastline and the 20m depth contour which was not clear from prior consultation. Figure 9 on page 98 demonstrates that a 6km buffer falls well beyond the draft order limits and array area, but Table 10 and Figure 6 of PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report highlights that the SE modelling location has a depth of 19.2m and the NW location 35.5m, demonstrating that the 20m depth contour passes through the array area. This results in a substantially different area covered by the two metrics, particularly in the context of modelled noise generation ranges which may have implications for the conclusions of assessments on bottlenose dolphin. Based on the information in the PEIR, NRW consider it not to be sufficient to use a 6km coastal buffer in which to capture the coastal area of greater bottlenose dolphin density as this will result in impacted areas of high density being erroneously excluded. As per the “Awel y Môr offshore wind farm application marine mammals evidence plan meeting minutes– 3 March 2020” NRW consider applying the wider Cardigan Bay density estimate of 0.035 dolphins/km2 (baseline report section 4.7, page 50 and 4.10 page 53) within the 20m depth contour to be the most robust approach. NRW supply additional comments on the bottlenose dolphin baseline, in particular the offshore density, in the comments on page 53 of PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation Section 4.10, (Bottlenose dolphin) summary.	The density surface has been revised as suggested. Described further in Volume 4: Annex 7.1: Marine mammal baseline.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.4.1Study area 13 Regional scale page 32 The MMMUs listed for the “Regional scale study area” in paragraph 13 align with NRW’s position on the use of Marine Mammal MMMUs (NRW 2020).	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.4.2Baseline Data Sources Paragraph 15 Detailed comments on the baseline characterisation for marine mammals are contained in the comments on the PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation document. As mentioned there, NRW consider there to be insufficient justification to scope out common dolphin from the EIA, and that they should be included in the assessment.	This is acknowledged in Volume 4: Annex 7.1: Marine mammal baseline. Other data sources have been used to supplement the baseline characterization.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.4.3Underwater noise modelling Paragraph 16 Detailed comments on the underwater noise modelling are contained in the comments on the PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report document.	Noted. These comments are addressed in other rows in detail.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Piling parameters – WTGs, page 36 The number of piling days listed in paragraphs 18 and 19 offer no contingency for delays or practical limitations in achieving the maximum piling capacity per day. Any delays may mean a greater number of piling days occurring, with less numbers of piles being installed per day. This would alter the duration and frequency of impacts and this could result in greater underwater noise impacts, particularly in the context of disturbance, which should be considered.	For the assessment of disturbance, it has been assumed that at a worst case, it could take up to three days to install one monopile, and two days to install a jacket foundation.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	PTS assessment Paragraph 24, page 39 Comments have been provided on swim speed in the comments on PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report section 2.2.1 Marine mammals and PEIR Volume 4, Annex 7.3: Marine Mammal Quantitative Assessment Assumptions 1.2 swim speed.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Disturbance assessment Paragraph 27, page 40 Either details of, or citations for, the “current best practise methodology” for assessing disturbance should be provided.	These have been provided in the final ES documents.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 28, page 41 A justification supported by evidence wherever possible, based on known similarities of behaviour, disturbance response and swim speeds should be used to support the approach that it would be precautionary to apply the harbour porpoise dose response curve to all cetacean species.	Additional information on dose response curves and applicability to other species is provided in 7.4.3 Underwater noise modelling (specifically paragraph 29 et seq.).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 29 Additional justification, based on comparisons of any other behavioural response data, should be supplied to justify the approach to apply the harbour seal dose response curve to grey seal. Cetacean species should be assessed separately for sensitivity to PTS, given the differing responses identified in the Booth & Heinis (2018) elicitation and wider literature. This is particularly relevant in the context of differing hearing ranges, foraging styles, and behavioural characteristics.	The final ES was updated to reflect this feedback.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.5.1Cetacean sensitivity to PTS Paragraph 39 The relation to human hearing is not relevant to the assessment and may be misleading in that humans do not rely on hearing in the same way marine mammals do so the implications or consequences of a similar PTS would differ.	The final ES was updated to reflect this feedback.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 40 For bottlenose dolphin, the elicitation noted that “Experts thought that foraging and foraging related communication might be affected as this may fall in the affected PTS band, leading to reduced foraging success and finally reduced body condition, thereby impacting fertility” and “calves were also dependent on the foraging success (and thus condition) of their mothers. In addition, experts noted the importance of social communication between mother and calf and because calves were naïve/inexperienced (leading to an increased risk of separation), the probability of an effect on survival was slightly increased over juveniles and mature females.” This demonstrates an impact on both fertility and survivability, and a greater sensitivity of bottlenose dolphins to a maximum 6dB PTS within a 2-10 kHz band that should be considered in the EIA sensitivity decision.	The final ES was updated to reflect this feedback.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 42 The sensitivity decision justifies a conclusion of ‘low’ by stating “there is currently no evidence that PTS at this specific frequency and at this specific magnitude will cause a significant impact on either survival or reproductive rates.” The sensitivity criteria in Table 10 makes no reference to the significance of an impact, instead describing the presence of any effect and the potential for adaptability. The elicitation suggests that a low but not negligible impact on fertility and survivability is present as described above for bottlenose dolphin (as per our comments on paragraph 40), and also stated that for harbour porpoise “experts felt there might be a small increase in effect on survival via reduced detection of predators or vessels/shipping”. NRW advise that the supporting evidence demonstrates that a change may be caused in both reproduction and survivability in bottlenose dolphin and harbour porpoise, that this change (the threshold shift) is not recoverable, and that the capacity for animals to adapt to or overcome the resulting change in survivability or fertility is unknown. Because of this NRW advise that the cetacean sensitivity to PTS, bottlenose dolphin sensitivity in particular, should be ranked ‘medium’ instead of ‘low’.	The final ES was updated to reflect this feedback. The sensitivity assessments were updated.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.5.2 Grey seal sensitivity to PTS, page 49 As for cetaceans, the cited elicitation does not state that ‘survival and reproductive rates are ‘not affected’, as is the criteria for a negligible sensitivity. They instead state and impact to be present, but “very low”. NRW consider that this justifies a sensitivity score of ‘low’ rather than ‘negligible’ for grey seal sensitivity to PTS.	The final ES was updated to reflect this feedback.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.5.11 Sensitivity summary, page 62 The final sensitivity judgement has been done separately for each species, whereas section 1.5.1 ‘Cetacean sensitivity to PTS’ evaluated cetaceans as a whole. If a judgement is to be made for each species, 1.5.1 should be separated by species as for disturbance.	The final ES was updated to reflect this feedback.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Table 12 Summary of key marine mammal sensitivity assessments, page 62 As mentioned in the comments on 1.5.1, NRW suggest the sensitivity of all species to PTS from piling is upgraded from the levels in Table 12.	The final ES was updated to reflect this feedback.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.7 Existing environment, page 63 Paragraph 79 NRW do not agree with the statement in PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation that “there was no evidence of common dolphin presence off North Wales.” In section 6.2 ‘GyM surveys’ on page 60 of the PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation, it is stated that “during the initial EIA, two groups of short-beaked common dolphins were recorded in the wider study area, with group sizes between 12-200.” In section 6.4 ‘SCANS’ on page 61, it is stated that “SCANS II project did cover the windfarm location, and the density of common dolphins was estimated at 0.018 common dolphins/km2, with an overall abundance estimate of 826 individuals.” NRW consider this clear evidence of common dolphin presence off North Wales, and sufficient justification for the inclusion of common dolphins in the EIA for Awel y Môr. Because of this, NRW do not agree with the scoping out of common dolphin from the assessment.	Further detail on the Sea Watch Foundation density estimate is provided in Volume 4: Annex 7.1: Marine mammal baseline. A density estimate of 1 porpoise/km2 (averaged across the coastal and offshore areas from the SWF report) has been presented in the impact assessment for context, however the caveats associated with this estimate are large.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Table 15 Maximum design scenario, page 70 As noted in the comments on ‘piling parameters’ on page 32, the number of piling days listed offers no contingency for delays or practical limitations in achieving the maximum piling capacity per day. Any delays may mean a greater number of piling days occurring, with less numbers of piles being installed per day. This would alter the duration and frequency of impacts from piling activity and should be considered.	For the assessment of disturbance, it has been assumed that at a worst case, it could take up to three days to install one monopile, and two days to install a jacket foundation.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.1 PTS from Piling, page 79 General comments which apply to multiple species Temporal extent of effect For all species (harbour porpoise on page 80 paragraph 93, Bottlenose and Risso’s dolphin on page 84 Paragraph 99, Minke whale on page 85 paragraph 102,) It is unclear if or how the accumulation of impacts from piling events over time has been considered when estimating the number of animals potentially exposed to PTS. For example, if the number of porpoise that could experience cumulative PTS is eight according to the JCP data as stated in paragraph 93, it is not explained if this is from one piling event or the entire piling schedule. The potential accumulation of impacts over time should be considered; it should be assumed, as per the JNCC piling guidance section 2.5 ‘Break in piling activity’ (JNCC 2010), that any break in operations longer than 10 minutes would introduce the possibility for animals to re-enter the area and experience an impact. As for single piling operations, it is not clear if or how the temporal extent of simultaneous piling works have been taken into account to calculate the estimated numbers of all marine mammals (harbour porpoise on page 80 paragraph 94, , Bottlenose and Risso’s dolphin on page 84 Paragraph 99, Minke whale on page 85 paragraph 103) expected to experience the onset of cumulative PTS. As per the advice on single piling operations, this should be considered and explained clearly within the assessment.	Assessment text specifies that the numbers presented are the number of animals that are expected to experience PTS-onset on each day of pile driving activities (see section 7.10.1)	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Area of impact for simultaneous piling. As mentioned in comments on PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report section 5.3 ‘Multiple location modelling’, the NW and SE modelling locations have been selected to represent the range of conditions which will impact modelling outputs, and thus may not represent the worst case scenario for the maximum impact range of simultaneous piling. If as asserted the difference in the modelling results between the NW and SE locations is mainly due to water depth, it would follow that concurrent piling at the NW location and also in the NE region of the project, which has a comparable depth the the NW modelling location, may present a larger combined area than concurrent piling at the NW and SW locations. The approach taken should be explained and justified in this context, and the appropriate worst case scenario used for the purposes of assessment. Based on the current evidence, NRW do not consider piling at the NW and SE locations to be the worst case scenario in terms of underwater noise generation from two concurrent piling activities. While it may be the case that “an animal will not be expected to swim away from one noise source and to another” (paragraph 94, page 80), it should be accounted for that animals in between two noise sources upon commencement of works may not have a clear direction in which to flee, which may delay their exit from the combined PTS range due to an sub- optimal travel path. This may be of particular importance if piling activities are not exactly simultaneous – for example if the piling operations were at different phases within the soft start ramp up phase, an animal may flee from one operating at a greater hammer energy and towards the other operating a lower energy until it reaches a proximity at which it alters its trajectory to flee the 2nd operation also.	A design change has been adopted to remove the option of simultaneous piling at two foundation locations.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Dose-response methodology As stated in the comments on PEIR Volume 4, Annex 7.3: Marine Mammal Quantitative Assessment Assumptions section 1.4 ‘Proportion impacted’, if a dose response methodology is being applied (as for harbour porpoise on page 80 paragraph 95, minke whale on page 85 paragraph 104) this should be explained in much greater detail to demonstrate the suitability of the approach to the specifics of this application.	Additional information on dose response curves and applicability to other species is provided in 7.4.3 Underwater noise modelling (specifically paragraph 29 et seq.).	yes	no

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PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Use of the MMMP (piling specific) as mitigation to justify no impact on EPS As per the comments on PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol section 4.7 'Marine mammal observers', the outline MMMP currently offers no observer coverage during weather of visibility conditions lower than 'good', within which marine mammal observers can operate. It also does not assess the amount of cover the MMMP can provide within the PTS ranges. The outline MMMP, and the final MMMP, must cover these aspects if it is to be considered robust mitigation sufficient to justify a conclusion of a negligible (adverse) impact on EPS (as is done for harbour porpoise on page 81 paragraph 96, minke whale on page 86 paragraph 105) .	Noise abatement has been added as part of the suite of option available to mitigate underwater noise impacts.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Sensitivity As per the comments on section 1.5.1 Cetacean sensitivity to PTS on page 47, NRW do not think there is sufficient justification for the low sensitivity ranking of cetaceans to PTS as is applied for harbour porpoise on page 81 paragraph 97, bottlenose and Risso's dolphin on page 84 paragraph 100, minke whale on page 86 paragraph 106 and grey seal on page 87 paragraph 109.	The sensitivity scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Impact significance Given the comments on the sensitivity to PTS, whether the conclusion of negligible (adverse) significance (as reached for harbour porpoise on page 81 paragraph 98, bottlenose and Risso's dolphin on page 84 paragraph 101 minke whale on page 86 paragraph 106 and grey seal on page 87 paragraph 110) is appropriate will depend on finalisation of the most appropriate sensitivity.	The sensitivity scores and subsequent significance scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Harbour porpoise, page 80 Paragraph 93 NRW recommend using the most precautionary value when assessing impact, which in this case would mean applying the JCP tool 0.13/km2 density to calculate a value of eight porpoise rather than using the value of five estimated from the 0.086/km2 SCANS III density.	Further detail on the Sea Watch Foundation density estimate is provided in Volume 4: Annex 7.1: Marine mammal baseline. A density estimate of 1 porpoise/km2 (averaged across the coastal and offshore areas from the SWF report) has been presented in the impact assessment for context, however the caveats associated with this estimate are large.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Cofferdam sheet piles, page 88 As for the piling for WTGs, it is unclear if or how the temporal extent of sheet piling activities for the cofferdam has been taken into account. This aspect should be considered and explained within the assessment.	As stated in Table 18 it is expected to take 81 piling days to install the cofferdam.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	PTS summary, page 89 As per the comments for each species, NRW do not currently agree with the sensitivity ratings of marine mammals, and therefore cannot agree with the final significance assessment.	Noted. The sensitivity scores and subsequent significance scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.3Disturbance from piling As per the comments on PTS from piling, NRW consider that the combination of piling operations at the NW and SE modelling locations may not represent the worst case scenario for the maximum impact range of simultaneous piling. Because of this, NRW cannot currently agree with the conclusions of the assessments of the number of each marine mammal species disturbed from simultaneous piling. Because the impact magnitudes are currently based on the number of individuals disturbed and the percentage of the MMMUs these represent, NRW cannot currently agree with the impact magnitude conclusions for disturbance from piling for any of the marine mammal species.	The Project Description no longer includes simultaneous piling (with the exception of two pins at the same location).	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Harbour porpoise, page 92 For completeness, the calculation of the number of harbour porpoise predicted to experience disturbance for concurrent piling and the relevant figure should be presented. Currently, the values for each contour (Table 26) and relevant map (Figure 8, page 95) are only presented for piling at the NW location only. If only the worst-case disturbance scenario is to be assessed, after the rationale for this choice of worst case is clearly evidenced, this is the scenario that should be presented in such figures.	The Project Description no longer includes simultaneous piling (with the exception of two pins at the same location).	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 115, page 93 While NRW has concerns regarding the suitability of concurrent piling at the NW and SE locations as the worst case scenario, NRW consider it unlikely that the recommended adjustments to this approach would require a change in impact magnitude.	The Project Description no longer includes simultaneous piling (with the exception of two pins at the same location).	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 116 As previously stated, NRW do not agree with the current sensitivity for harbour porpoise sensitivity to piling.	Noted. The sensitivity scores and subsequent significance scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 117 As previously stated, NRW do not agree with the current sensitivity for harbour porpoise sensitivity to piling. NRW acknowledge that should our recommendation for this to be changed to 'medium' be taken into account, this would still result in a significance score of 'minor (adverse)'.	Noted. The sensitivity scores and subsequent significance scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Bottlenose dolphin, page 96 As per the comments on PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation section 4.10, NRW are not content with the approach used as described.	Further detail on the Sea Watch Foundation density estimate is provided in Volume 4: Annex 7.1: Marine mammal baseline. A density estimate of 1 porpoise/km2 (averaged across the coastal and offshore areas from the SWF report) has been presented in the impact assessment for context, however the caveats associated with this estimate are large.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 118 Given NRW's position on the approach used to estimate the number of bottlenose dolphin disturbed using a coastal zone only, as per our comments on PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation section 4.10, alongside concerns about the locations used for simultaneous piling, NRW cannot currently agree with the conclusion regarding the number of bottlenose dolphins disturbed and the percentage this represents of the MMMU population. In addition, the paragraph states that the numbers of individuals disturbed was calculated from simultaneous piling at the NW and SE locations, but Figure 9 appears to show noise contours for the NW piling location only. This discrepancy should be clarified, and the worst case underwater noise scenario used (simultaneous piling) and displayed in the relevant figures. NRW's comments on the approach taken regarding bottlenose dolphin density assumptions and simultaneous piling should be taken into account. In addition, in line with NRW's position on the use of Marine Mammal MMMUs (MMMU's), as per the comments on Report 5.1 Annex 4 Bottlenose dolphin and grey seal additional information, NRW consider the area of the MMMU to be functionally linked with the SACs within it. Thus as was done for grey seal, rather than assuming 50% of the animals present are 'SAC animals', all animals present should be considered as a component of the sites. Should the approach be revised in the manners described, NRW recommend reframing the assessment to focus on the area of disturbance as a percentage of the MMMU outside of the protected site, the percentage of the MMMU population impacted, the proximity to the protected site, the temporal extent of the impact, and the objectives of the protected site. NRW do not anticipate this to substantially alter the conclusions of the assessment but consider it a more robust method by which to assess the impact.	Further detail on the Sea Watch Foundation density estimate is provided in Volume 4: Annex 7.1: Marine mammal baseline. A density estimate of 1 porpoise/km2 (averaged across the coastal and offshore areas from the SWF report) has been presented in the impact assessment for context, however the caveats associated with this estimate are large.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 120, page 96 Given the above concerns, NRW cannot agree with the current justification for the impact magnitude for disturbance from piling for bottlenose dolphin. However, it is feasible that a magnitude of medium (adverse) may remain appropriate should NRW's recommendations be taken into account.	Noted. The sensitivity scores and subsequent significance scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 122, page 97 NRW do not object to the final conclusion of minor (adverse) significance for the effect of disturbance from pile driving on bottlenose dolphin.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Risso's dolphin & Minke Whale NRW do not object to the final conclusion of minor (adverse) significance for the effect of disturbance from pile driving on Risso's dolphin or Minke whale.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Cofferdam sheet piles Paragraph 135, page 105 NRW agree with the conclusion of negligible (adverse) effect from disturbance from sheet piling, based on the figures presented in Table 31.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Disturbance Summary, page 106 It is unclear if this section applies to all piling for WTGs and the cofferdam as in previous sections these were assessed separately. This should be clarified.	Clarification was provided in the final ES chapter.	yes	no

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PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 141, page 108 As per the comments on paragraph 42, NRW do not agree with the reasoning or decision for marine mammal sensitivity to PTS.	Noted. The sensitivity scores and subsequent significance scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 142 As stated, NRW do not agree with the PTS sensitivity scores. However, NRW note that should these scores be changed in line with our recommendations, the conclusion of significance for PTS onset from other construction would change from negligible (adverse) to minor (adverse), and remain 'not significant' in terms of the EIA regulations. As such, NRW do not agree with the current significance, but do not disagree that this pathway is 'not significant' in terms of the EIA regulations.	Noted. The sensitivity scores and subsequent significance scores have been reviewed and updated in the final ES.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Disturbance Paragraph 146, page 11 NRW do not object to the significance listed for the effect of disturbance from non-piling construction activity for grey seal or cetaceans.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.5TTS and TTS-onset from UXO Paragraph 153, page 113 While the described approach to secure mitigation of the impact of UXO via a MMMP (UXO specific) is suitable in principle, the exact efficacy of the MMMP in mitigating this impact cannot be established until details are available. Full details are available in NRW comments on PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol.	Should EXO detonations be required, these will be sbject to a separate marine licence and may also be subject to a UXO-specific MMMP to be agreed with NRW.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.6Disturbance from UXO, page 116 Paragraph 155 NRW considers that there is still considerable uncertainty in the evidence underpinning the calculation of Effective Deterrent Range (EDR), especially in Welsh waters, and as such is not a signatory to the cited JNCC guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs (England & Northern Ireland). NRW therefore advise that applicants should calculate disturbance distances on a case by case basis using the latest published information and modelling procedures rather than EDRs (Sinclair et. al., 2021, in press). Given that a dose response approach has been used to assess impacts from other impulsive noise, NRW suggest it would be appropriate for a similar approach to be considered for disturbance from UXO as well. As such, NRW cannot agree with the conclusions of the assessment of the impact magnitude from disturbance from UXO for any marine mammal species. At this time, there is insufficient evidence for NRW to reach a conclusion regarding the magnitude of this impact.	A range of disturbance thresholds are presented in 7.10.6 Disturbance from UXO (EDRs alongside TTS-onset as a proxy for disturbance).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.7Collision risk from construction vessels Paragraph 163, page 121 NRW agree that the adherence to suitable codes of conduct for vessels such as those listed, will aid in mitigating the risk of collision between marine mammals and construction vessels. However, detail of precisely which codes will be followed and how this will be secured should be provided before this can be considered adequate justification for a negligible (adverse) magnitude.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 163 Until the codes of conduct are adequately described and secured to justify the magnitude score, NRW cannot agree to the conclusion regarding the significance of the effect of collision risk from vessels on marine mammals. Should these concerns be resolved, this conclusion will likely be appropriate.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.8Disturbance from construction vessels Paragraph 167, page 122 As stated for collision risk, the use of any codes of conduct to justify a decision needs to be appropriately described and secured. In addition, further detail is required regarding the combined number of vessels in the region, and how this will vary over time. Until this detail is provided, NRW cannot agree to the listed magnitude score for the effect of disturbance from construction vessels on marine mammals.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 173, page 124 Until the required detail is provided, NRW cannot agree to the listed magnitude score and thus the final significance for the effect of disturbance from construction vessels on marine mammals. However NRW consider it likely that an appropriate final significance, should these concerns be rectified, would also not be significant in terms of EIA regulations.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.9Change in water quality from construction activities Please see our response on water quality as a receptor for our detailed comments on impacts arising via changes in water quality.	Noted. The assessment has been reviewed against the final MWSQ assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.10.10Changes in fish abundance / distribution from construction activities Please see the NRW response on fish as a receptor for detailed comments on impacts arising on changes in fish abundance and distribution	Noted. The assessment has been reviewed against the final fish and shellfish assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.11.1Barrier effects from operation Paragraph 189 NRW do not object to the conclusion of negligible (adverse) significance of barrier effects on marine mammals.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.11.2Collision risk from O&M vessels, page 130 Paragraph 192 As stated for collision risk and disturbance from construction vessels, the use of any codes of conduct to justify a decision needs to be appropriately described and secured. In addition, further detail is required regarding the combined number of vessels in the region, and how this will vary over time. Until this detail is provided, NRW cannot agree to the listed magnitude score for the effect of collision risk from O&M vessels.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 194, page 131 Until the required detail is provided, NRW cannot agree to the listed magnitude score and thus the final significance for the effect of collision risk from O&M vessels on marine mammals. However NRW consider it likely that an appropriate final significance, should these concerns be rectified, would also not be significant in terms of EIA regulations.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.11.3Disturbance from O&M vessels As stated for disturbance from construction vessels, the use of any codes of conduct to justify a decision needs to be appropriately described and secured. In addition, further detail is required regarding the combined number of vessels in the region, and how this will vary over time. Until this detail is provided, NRW Advisory cannot agree to the listed magnitude score for the effect of disturbance from O&M vessels on marine mammals.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 173, page 124 Until the required detail is provided, NRW cannot agree to the listed magnitude score and thus the final significance for the effect of disturbance from O&M vessels on marine mammals. However NRW consider it likely that an appropriate final significance, should these concerns be rectified, would also not be significant in terms of EIA regulations.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.11.41.10.9 Change in water quality from operation Please see the NRW response on water quality as a receptor for detailed comments on impacts arising via changes in water quality.	Noted. The assessment has been reviewed against the final MWSQ assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.11.5Changes in fish abundance / distribution from operation Please see the NRW response on fish as a receptor for detailed comments on impacts arising on changes in fish abundance and distribution	Noted. The assessment has been reviewed against the final fish and shellfish assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.12.1TTS and disturbance from decommissioning Paragraph 207 Without detail of the decommissioning methodology and associated assessments of the impacts of underwater noise, NRW cannot come to a conclusion regarding the severity of impacts. To be precautionary, until evidence is presented to the contrary, equal degree of impact as for construction should be assumed. Please see NRW's comments on the assessment of impacts from construction for our position on what these would be.	The assessment assumes that impacts during decommissioning will be no greater than during construction, though it is noted that decommissioning will not include piling, which is typically the activity with the greatest potential for underwater noise generation.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.12.2Collision risk from decommissioning vessels Paragraph 210, page 136 As for section 1.10.7, the use of any codes of conduct to justify a decision needs to be appropriately described and secured. In addition, further detail is required regarding the combined number of vessels in the region, and how this will vary over time. Until this detail is provided, NRW cannot agree to the listed magnitude score for the effect of collision risk from O&M vessels.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 212 Until the required detail is provided, NRW cannot agree to the listed magnitude score and thus the final significance for the effect of collision risk from decommissioning vessels on marine mammals. However NRW consider it likely that an appropriate final significance, should these concerns be rectified, would also not be significant in terms of EIA regulations.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.12.3Disturbance from decommissioning vessels Paragraph 214, page 137 As stated for disturbance from construction vessels, the use of any codes of conduct to justify a decision needs to be appropriately described and secured. In addition, further detail is required regarding the combined number of vessels in the region, and how this will vary over time. Until this detail is provided, NRW cannot agree to the listed magnitude score for the effect of disturbance from O&M vessels on marine mammals.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 215 Until the required detail is provided, NRW cannot agree to the listed magnitude score and thus the final significance for the effect of disturbance from decommissioning vessels on marine mammals. However NRW consider it likely that an appropriate final significance, should these concerns be rectified, would also not be significant in terms of EIA regulations.	Detail on codes of conduct for vessels have been added to the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.11.41.10.9 Change in water quality from decommissioning Please see the NRW response on water quality as a receptor for detailed comments on impacts arising via changes in water quality.	Noted. The assessment has been reviewed against the final MWSQ assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.11.5Changes in fish abundance / distribution from decommissioning Please see the NRW response on fish as a receptor for detailed comments on impacts arising on changes in fish abundance and distribution	Noted. The assessment has been reviewed against the final fish and shellfish assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.13Environmental assessment: cumulative effects, page 139 To ensure sufficient assessment of cumulative impacts, it should be ensured that all projects with impact pathways that could act cumulatively are identified.	This is noted. The assessment has been reviewed against the final CEA long list.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 230, page 142 As in the previous comments, while the approach to mitigate impacts with an agreed MMMP is suitable in principle, there is insufficient detail in PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol to justify a conclusion that the impacts from the project have been fully mitigated.	The MMMP has been updated, re-consulted on and noise abatement has been added as part of the suite of option available to mitigate underwater noise impacts.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 232 Auditory injury (PTS): As per the comments on paragraph 230, NRW consider there to be insufficient information for auditory injury (PTS) to be considered mitigated. Collision with vessels: There is insufficient information on the “vessel management plans” used to justify the conclusion for vessel collision. Without these measures being sufficiently secured, rather than “expected”, it would not be precautionary to assume that any such plans would be put in place. Changes in water quality: Please see the response on water quality as a receptor for detailed comments on impacts arising via changes in water quality. Changes in prey availability: Please see the response on fish as a receptor for detailed comments on impacts arising on changes in fish abundance and distribution Barrier effects/ operational noise: insufficient evidence is presented to justify this conclusion in the context of cumulative barrier effects or operational noise within the relevant MMMU for each species.	Detail on codes of conduct for vessels have been added to the ES chapter. Noted. The assessment has been reviewed against the final MWSQ assessment. Noted. The assessment has been reviewed against the final fish and shellfish assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Table 40, Cumulative MDS for marine mammals, page 144 NRW advisory agree that the species relevant MMMU is the appropriate spatial scale for the assessment of these impacts.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 238, page 145 As per the comments on 1.10.6 ‘Disturbance from UXO’, NRW have not signed up to the JNCC noise guidance and do not support the use of EDRs due to insufficient supporting evidence. As such, NRW cannot agree with the conclusions of this cumulative assessment. There is currently insufficient evidence presented for NRW to reach a conclusion on this impact.	A range of disturbance thresholds are presented in 7.10.6 Disturbance from UXO (EDRs alongside TTS-onset as a proxy for disturbance).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 239, page 146 NRW recommend following the recommended density approaches for each mammal species as per the comments on PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation.	The marine mammal baseline report was updated.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Paragraph 240 No evidence is presented to support the numbers of seismic surveys assumed to occur. Until sufficient evidence is provided, NRW cannot agree that this method is suitable.	“The potential number of seismic surveys that could be undertaken is unknown”. Therefore, the inclusion of seismic surveys is illustrative only.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Harbour porpoise Paragraph 243, page 150 As per the comments on Paragraph 239, NRW recommend applying the density approached recommended in our comments on PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation. NRW do not anticipate this will make a substantial difference to the final conclusions of this part of the assessment but would consider this a more robust and precautionary approach.	Noted. The density approach in the marine mammal baseline report has been updated.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Bottlenose dolphin Paragraph 246, page 151 As per our comments on PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation, NRW do not agree with the approach currently used to estimate the number of bottlenose dolphin disturbed by project works. NRW recommend our advised approach is followed both for the assessment of impacts alone and also in this CEA. As per the comments on 1.10.6 ‘Disturbance from UXO’, NRW have not signed up to the use of EDRs due to insufficient supporting evidence. While it is likely that following NRW’s preferred approach for bottlenose dolphin density will increase the number of bottlenose dolphins disturbed, should our advice on Paragraph 118 regarding the reframing of the assessment be taken, it may be the case that the final conclusion of the assessment is comparable. Until an assessment following this advice is conducted, it is not possible to reach a final conclusion.	Noted. These comments have been addressed. Further detail on the Sea Watch Foundation density estimate is provided in Volume 4: Annex 7.1: Marine mammal baseline. A density estimate of 1 porpoise/km2 (averaged across the coastal and offshore areas from the SWF report) has been presented in the impact assessment for context, however the caveats associated with this estimate are large. A range of methods for assessment disturbance from UXO have been presented	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Risso’s dolphin Paragraph 250 It is unclear what is meant by “even though these North Sea projects are screened in, as they are within the Celtic and Greater North Sea MU, they are predicted to have no cumulative impact on the Risso’s dolphin MU.” NRW recommend use of the MMMU as the appropriate spatial scale to screen cumulative impacts. If projects have been screened in using the MMMU as impacts occur within it, then they should be considered as having an impact on that MMMU population and be considered cumulatively. If it is that there is no predicted impact on Risso’s dolphin from these projects, this should be clarified and explained. Until the approach taken is clarified, NRW cannot agree with the number of Risso’s dolphins estimated to be disturbed. It is unclear if any amendments to the approach to follow NRW recommendations will have a substantial impact on the conclusions of the CEA, although it is not anticipated.	Sea Watch Foundation data has been purchased for the north coast of Wales area. This is included in Volume 4: Annex 7.1: Marine mammal baseline.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Grey seal Paragraph 257, page 167 As per the comments on 1.10.6 ‘Disturbance from UXO’, NRW advisory have not signed up to the use of EDRs due to insufficient supporting evidence. Without further case- specific evidence, NRW consider it possible that the difference between the number of seals estimated to be disturbed by a dose-response approach and an EDR to vary on a case by case basis. An EDR may produce a more precautionary value than a dose response approach for the project, it is unknown how this may differ for the projects being considered in combination. However, given that the EDR value used in the CEA and this is suitably justified as a highly precautionary overestimate, NRW do not anticipate that using a different and more robust method will substantially impact the outcome of the CEA.	A range of disturbance thresholds are presented in 7.10.6 Disturbance from UXO (EDRs alongside TTS-onset as a proxy for disturbance).	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.13.2Disturbance from vessel activity Harbour porpoise, bottlenose dolphin and grey seal Paragraph 263, page 159 NRW acknowledge that at this time is not possible to conduct a quantitative assessment with projects at the scoping stage.	This is noted.	yes	no

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PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.14Inter-relationships, page 167 NRW comments on inter-relationships are contained in the comments on PEIR Volume 2, Chapter 14: Inter-relationships.	This is noted. See Volume 2, Chapter 14.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	1.15Transboundary effects, page 168 NRW's position on Marine Mammal MMMUs is to consider the area within it to be functionally linked to the protected sites within it (NRW 2020). Other Statutory Nature Conservation Bodies or relevant bodies should be consulted as appropriate for protected sites & species beyond Wales.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Table 51: Summary of effects, page 170 Please see the comments on each section for detailed response for each assessment.	Noted. See comments below.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 14: Inter-relationships	Table 5: Inter-related effects assessment – marine mammal ecology, page 20 As mentioned in the comments on PEIR Volume 2, Chapter 7: Marine Mammals section 1.5.1, NRW suggest the sensitivity of all species to PTS from piling is upgraded from the levels listed.	Noted. These have been updated following the updats to the marine mammal assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 15: Offshore Conclusions	Table 6: Summary of predicted effects on Marine Mammals, page 32 As mentioned in the comments on PEIR Volume 2, Chapter 7: Marine Mammals section 1.5.1, NRW suggest the sensitivity of all species to PTS from piling is upgraded from the levels listed. For clarity, the wording of the listed mitigation measure should be changed from to reflect that the MMMP is not yet finalised.	Noted. This has been updated based on the final outcomes of the ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	2Background to underwater noise metrics 2.2Analysis of environmental effects 2.2.1Marine mammals On page 6, it is stated that “a constant fleeing speed of 3.25 m/s has been assumed for the low-frequency cetaceans (LF) group”. Williams (2009) lists an average swim speed of 2.1 m/s for minke whale. The breadth of information available on swim speeds should be taken into account to identify a suitably evidenced and precautionary value for a flee speed sustainable over an extended period of time. “A constant rate of 1.5 m/s has been assumed for fleeing, which is a cruising speed for a harbour porpoise (Otani et al., 2000).” The data from Otani et al., 2000 is from the tracking of only one animal. Westgate et al. (1995) lists an average swim speed of 1.4 m/s for harbour porpoise. The breadth of information available on swim speeds should be taken into account to identify a suitably evidenced and precautionary value for a flee speed sustainable over an extended period of time. A justification for a consistently high swim speed and trajectory when fleeing should be provided, particularly in the context of larger PTS or TTS ranges where travel times are large (PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol describes “The maximum SELcum PTS range is 9.8 km and given a swim speed of 1.5 m/s, animals starting at the pile location would take 108.9 minutes to exit the 9.8 km SELcum PTS impact range.”) and energetic costs may cause a decrease in swim speed over time. Evidence should be provided to support a sustained speed of 1.5 m sec1 for extended periods of time in excess of 30 minutes, which is the time period covered by the Kastelein et al. studies.	Further justification for the referenced swim speeds used in the assessment has been included in the ES.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Section 4 Modelling methodology, page 14 The approach to utilise a modelling methodology that follows NPL Good Practice Guide 133 for underwater noise measurement (Robinson et al., 2014) is appropriate.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	4.1Modelling confidence, page 14 Figure 5 ‘Comparison between example measured impact piling data and modelled data using INSPIRE version 5.1’ appears to show a reasonably good model fit, but does demonstrate a tendency of the model to fit better at median distances around 1km from the noise source where, as described, the figure shows “the INSPIRE model data points sitting, more or less, in the middle of the measured noise levels at each range.” However, at the lower and upper limits of the distances modelled INSPIRE seems to show a trend of underestimating at greater distances by approximately 5-8db. How this trend will impact the results should be explained, particularly in the context of generating large scale (>1km) PTS or TTS ranges, where INSPIRE is demonstrated to underestimate. The potential for this range to be an underestimate, based on this INSPIRE performance data, should be evaluated.	A lower noise level as noted only occurred at one location: this was a prediction in shallow water. Much lower noise attenuations are predicted in deeper water, present here, especially for the worst case results.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	WTG foundation impact piling locations, page 15 The north-west (NW) and south-east (SE) modelling locations selected appear to cover a suitable range of conditions within the site for the purposes of identifying the range of noise propagation distances likely to occur from the works.	Noted.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Cofferdam sheet pile location, page 16 A rationale for the chosen location for modelling of the installation of sheet piles for a cofferdam using impact piling should be provided, particularly in the context of modelling two locations for WTG foundation piling to cover the range of conditions but electing to model only one for sheet piles. The rationale for the location choice should be related to the range of conditions in which sheet piles could be installed within the project design envelope.	The range of locations where sheet piling could occur is much smaller than for the wind turbine foundation piling, thus one representative example was deemed sufficient.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	5.1Marine mammal criteria 5.1.1Worst-case monopile foundations, page 24 Tables 16 to 23 present the maximum, minimum and mean ranges for PTS and TTS. The origin of these values is not explained – it should be clarified how they have been arrived at. For example, if the INPIRE model presents a predicted value with confidence limits which have been listed as these min / max / mean values. It is not stated, but it appears that the area provided in these tables is calculated from the mean range. For the purposes of assessment, the nature of this area value should be clearly stated and the worst case, i.e. area based on the maximum range, should be presented.	Max, min and mean are the greatest, smallest and mean average of the impact ranges on the 180 transects modelled. The area is not based on any of these, but the actual area within the contour	yes	no
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	5.3 Multiple location modelling, page 29 While the NW and SW modelling locations cover a range of the conditions within the project area, these two locations may not represent the worst case for multiple location modelling. If as asserted the difference in the modelling results between the NW and SE locations is mainly due to water depth, concurrent piling at the NW location and also in the NE region of the project area may present a larger combined area than concurrent piling at the NW and SW locations, owing to a greater distance between the two points and a larger PTS or TTS range from the 2nd noise source thanks to a water depth more comparable to the NW location. Justification should be provided for using the NW and SE locations for concurrent piling given this, and present an analysis of the total area of effect with concurrent piling locations the maximum possible distance apart within the project area, and with the worst- case combined PTS and TTS ranges from each individual point.	A design change has been adopted to remove the option of simultaneous piling at two foundation locations.	yes	yes
PrB_018_11102021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	6.3 UXO clearance 6.3.2 Estimation of underwater noise propagation On page 44 it is stated that “Where animals are swimming near the surface, the acoustics can cause the noise level, and hence the exposure, to be lower.” Additional explanation and evidence should be provided to support this statement, and explanation should be provided regarding if and how this phenomenon has been applied to modelling or assessment.	There are a number of reasons why this effect occurs, but none have been applied to the modelling, to provide a worst case. This point is simply noted as a principle. 1. The UXO is situated on the sea bed, and a component of the sound at range is transmitted through the sea bed. This contribution of course is greatest at the sea bed. 2. There will be reflections of the sound near the sea bed, which lead to constructive interference and an increased sound level near the sea bed.. 3. The sea surface is a 'pressure relase boundary', as the surface is free to move it cannot support an acoustic pressure and thus the noise level tends to zero close to the surface. 4. The higher proportion of bubbles close to the sea surface reduce noise.	yes	no

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PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	1.1 Study Area, page 9 Two MUs have been listed for grey seal; OSPAR Region III: Celtic Seas (interim MU, proposed by NRW 2020) & Within the Wales MMMU and adjacent to the Northwest England MMMU (SCOS 2020) but it appears the NRW preferred option of OSPAR Region III has been used to screen in protected sites in section 1.2 Protected sites “There are many protected areas for marine mammals within their respective MMMUs.... 21 grey seal SACs in the OSPAR Region III: Celtic Seas MU” so NRW advisory are content with this approach.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	Table 1 Marine mammal protected areas within the relevant MMMU for each species, page 9 NRW are content that all of the SACs in Welsh waters with marine mammal features are included.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	3.12 Summary, page 41 NRW are content with the approach to present both SCANS III and JCP III density values in the assessment. NRW recommend applying the most precautionary value (i.e., the highest density estimate, usually JCP III) to quantitative estimates during the assessment.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	4.10 Summary, page 53 NRW agree that “a block wide uniform density estimate is unsuitable for this species and will not be reflective of the true expected distribution and resulting predicted impact numbers.” However, NRW have the following concerns with the approach taken.	Noted. Responses to specific concerns are given below.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	Inshore density As per the comments on page 29 of PEIR Volume 2, Chapter 7: Marine Mammals section 1.3 Consultation and scoping, NRW are not satisfied with the approach used to assume greater bottlenose dolphin density within the 6km buffer around the coastline. NRW recommend that the approach is revised to follow our previous advice and to apply the wider Cardigan Bay density estimate of 0.035 dolphins/km2 (baseline report section 4.7, page 50 and 4.10 page 53) within the 20m depth contour, as this is considered the most robust approach.	This suggested density has been applied.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	Offshore density The data presented in section 4 establishes bottlenose dolphin presence in a range of locations, including beyond 6km from shore. In section 4.3 it is described that during the Gwynt y Môr surveys “Between 2003-2019, nine confirmed groups of bottlenose dolphins were recorded in the windfarm region.” In section 4.4 the Welsh marine atlas grid cells presenting survey data (Figure 28) encompass the coast and the project area, and the modelled distributions (Figure 29) appear to show distribution extending from the coast out into the project area also. This baseline evidence does not appear to support the approach to assume a zero density beyond the ‘Bottlenose Dolphin Area of Usage’ presented in Figure 9. Section 4.9 states that “most of the individuals photographed for the [Manx Whale and Dolphin Watch Surveys] ID catalogue have also been photographed in Cardigan Bay.” While, per the comments above, there is evidence that bottlenose dolphins occur in higher densities in some areas of Welsh waters in close proximity to the coast NRW do not consider there to be sufficient evidence to support our position on the area of sea within a MMMU to be linked to the SACs within it (NRW 2020) and assume bottlenose dolphin occurrence beyond the coastal zone. NRW do not agree with the use of the approach to assume zero density beyond the coastal zone and consider that it would result in an underestimate of the number of individuals impacted. This will have implications for the conclusions of any assessments on impacts on bottlenose dolphin. We recommend applying a lower density value, such as the SCANS III estimate, to the region beyond the 20m depth contour. This will adequately reflect that this population will likely occur in greater density in inshore waters, but as noted above will still occur in the wider region and that the SAC’s are functionally linked with the area of sea within the MMMU.	The density surface has been revised as suggested. Described further in Volume 4: Annex 7.1: Marine mammal baseline.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	5.1 Risso’s dolphin 5.9 Summary NRW agree that at this time the SCANS III density estimate represents the best available quantitative density estimate for Risso’s dolphin in the region and that it is appropriate for them to be scoped into the assessment.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	6.7 summary, page 63 NRW do not agree with the conclusion that “Given the lack of sightings or available data on this species, it is recommended that common dolphins are scoped out of the impact assessment for AyM.” The baseline presents sufficient evidence, including the following, that common dolphin occur in the project area; 6.2 GyM surveys page 60 “during the initial EIA, two groups of short-beaked common dolphins were recorded in the wider study area, with group sizes between 12-200.” 6.4 SCANS page 61 “SCANS II project did cover the windfarm location, and the density of common dolphins was estimated at 0.018 common dolphins/km2, with an overall abundance estimate of 826 individuals.” 6.6 MWDD sightings page 62 “13 opportunistic sightings were reported, comprising 2.6% of opportunistic sightings (Clark et al. 2019).” Given the presence of common dolphins in the project area in the baseline data sources, the location of the project within the MMMU boundary NRW consider that common dolphin should not be scoped out of the assessment. In the absence of detailed local abundance data, approaches such as the suggested “block wide uniform density estimate”, such as SCANS II block O, should be considered when selecting the most appropriate baseline density estimate.	Common dolphin have now been scoped into the assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	7.7 Summary, page 67 NRW agree that the SCANS III density estimate represents the best available quantitative density estimate for Minke whale in the region and that it is appropriate for them to be scoped into the assessment.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	8.6 Grey seal NRW note there is no ‘summary’ section for this species, and recommend one is included for clarity and consistency with the other species.	This has now been added to the chapter.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	8.6 Seal at-sea distribution, page 73 NRW agree that the Carter et al. (2020) data represent the best estimates of the at-sea densities of grey seals in the region and is suitable for use in the assessment.	This was noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	9.0 Conclusions, page 75 NRW do not consider the statement that “There was no evidence for common dolphin presence off north Wales” is accurate, as per our comments on section 6.7. On this basis, we do not consider there to be sufficient justification for scoping out this species from the assessment. NRW consider that this species should be scoped in alongside other cetacean species.	Common dolphin have now been scoped into the assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.2: Outline MMMP	NRW appreciate that finalising an MMMP without the final details of the project infrastructure can present challenges. However, with the level of information currently provided, the outline MMMP does not fully consider how potential injury for marine mammals will be monitored and mitigated. There is insufficient detail to consider the MMMP as effective mitigation of impacts from piling or UXO, and without additional detail it may not be possible to rule out AEOSI and potential for injury to EPS. This document will need significant development before NRW advisory can be confident that this risk will be fully mitigated and as such, pathways may require assessment as if unmitigated.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2).	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
			4.1Introduction, page 20 Noise abatement techniques such as the use of bubble curtains are not listed in the options for mitigation measures in paragraph 16, but in ‘4.2 Mitigation zone’ paragraph 20 states that “One of the potential mitigation measures that may be considered at this point, will be the use of at-source noise reduction measures in order to reduce the potential for cumulative PTS-onset risk to negligible levels. For example, bubble curtains and double bubble curtains could be used if required to reduce predicted impact ranges.” Noise abatement techniques should be included in the list of potential mitigation measures and considered from the outset.			
PrB_018_11102021	S42	Volume 4, Annex 7.2: Outline MMMP	NRW support the approach to have the final specific mitigation measure (or suite of measures) that will be implemented during construction approved by NRW prior to works commencing.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2). Noise abatement measures are included as part of the suite of options available for mitigation.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.2: Outline MMMP	Paragraph 19 Due to the lack of a single ‘limitations’ section, the relevant sections of the underwater noise modelling report (PEIR Volume 4, Annex 6.2) should referenced in support of each point made regarding the limitations of SELcum modelling for clarity.	This has been provided in Volume 4, Annex 47.3: Marine Mammal Quantitative Assumptions (application ref: 6.4.7.3).	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.2: Outline MMMP	Paragraph 23 If it is the case that “little research has been conducted on the response of bottlenose dolphins to ADDs”, justification and evidence to support the assertion that “if the ADD is effective for LF and VHF species then it is also likely to be effective on VHF species such as bottlenose dolphins” should be provided. The maximum effective area of an ADD, in relation to the mitigation zone (defined in section 4.2 paragraph 19 as “the maximum potential instantaneous PTS-onset impact ranges. The maximum cumulative PTS zone is 12.4 km for monopiles and 11.4 km for pin piles (minke whale under the simultaneous piling scenario”) needs to be considered in the final MMMP when applying ADDs as mitigation measures. Any difference between the maximum effective radius of an ADD and the mitigation zone may result in an ‘unmitigated’ area where animals will not be deterred from before piling commences. NRW are not currently aware of any ADD’s capable of mitigating a range of 12.4km.	This has been provided in Volume 4, Annex 47.3: Marine Mammal Quantitative Assumptions (application ref: 6.4.7.3) and is referenced in the outline MMMP (application ref: 6.4.7.2).	yes	yes
PrB_018_11102021	S42	Volume 4, Annex 7.2: Outline MMMP	4.7 Marine mammal observers page 26 Marine mammal observers are only effective in good weather conditions granting sufficient visibility and have a limited detection range depending on the height of the observation platform. The effective detection range from the chosen platform needs to be considered when applying marine mammal observers as a mitigation measure, as any difference between the detection radius of an observer and the mitigation zone / PTS radius will result in an unmonitored area where animals will not be detected before piling commences. The applicant should consider the use of Passive Acoustic Monitoring (PAM) to detect animals in the mitigation zone in adverse weather conditions where visibility is reduced or when works take place at night, as outlined in the Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise (JNCC 2010).	The MMMP (application ref: 6.4.7.2) has been updated to include reference to PAM.	yes	yes
PrB_018_11102021	S42	Volume 4, Annex 7.3: Marine Mammal Quantitative Assumptions	Section 1 Assumptions, Limitations and Uncertainties, page 3 Reference is made to the Subsea Noise Technical Report, which is presumably an error in referencing PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report. This should be corrected or clarified.	Noted. The final report has been updated to account for this feedback.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.3: Marine Mammal Quantitative Assumptions	1.2 Swimming speed While there may be evidence to support the statement that “These recent studies have demonstrated porpoise and minke whale fleeing swim speeds that are greater than that used in the fleeing model here, which makes the modelled speeds used in this assessment precautionary” for peak flee speed for porpoise and Minke whale, this should be considered in the context of animals tiring over extended flee times. The cited evidence is also specifically for porpoise and minke whale, and not for bottlenose dolphin or grey seal, so the evidence to support the use of this speed for those species is lacking. The range of data available for all species, or lack thereof, should be clearly presented and evaluated, as per NRW’s comments on PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report section 2.2.1 ‘Marine mammals’.	Additional information on swimming speed is presented in paragraph 24 of the marine mammals chapter.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.3: Marine Mammal Quantitative Assumptions	1.4Proportion impacted This section contains the first reference to any dose-response curve approach. If this method is being used, this should be explained. A dose-response approach has not been applied in PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report where all animals within PTS ranges have been assumed to flee consistently.	Additional information on dose response curves and applicability to other species is provided in 7.4.3 Underwater noise modelling (specifically paragraph 29 et seq.) of the marine mammals chapter.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 7.3: Marine Mammal Quantitative Assumptions	1.5Exposure to noise It is stated that “These assumptions lead to a conservative determination of the impact ranges; and SMRU Consulting considers that the calculated SELcum PTS-onset impact ranges are highly over-precautionary and unrealistic, and therefore the draft MMMP (PEIR Volume 4, Annex .2: Outline Marine Mammal Mitigation Protocol) will focus on mitigating the onset of instantaneous PTS only.” However, the MMMP states that “this outline MMMP focuses on mitigating only the “cumulative” SELcum PTS-onset impact ranges.” These statements appear contradictory; the MMMP describes mitigating cumulative SELcum PTS onset, not instantaneous. While values used should be precautionary, this does not preclude them from being used to develop mitigation. The worst case scenarios have been selected based on the project design, and so an evidenced explanation of why these values were considered an appropriate worst case for use in underwater noise modelling and yet are considered ‘unrealistic’ for developing mitigation should be provided. In the absence of any contradictory evidence, the established worst case should be applied consistently.	The limitations of the calculations for cumulative PTS are further detailed in Volume 4, Annex 7.3: Marine Mammal Quantitative Noise Impact Assessment – Assumptions, Limitations and Uncertainties. The impact assessment presents the SELcum impact ranges but the illustration provided in Volume 4, Annex 7.3 highlights the precaution in these estimates.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Table 1, page 45 Row: Pre-Scoping Offshore Ornithology and Marine Mammals Evidence Plan Meeting minutes – 25/11/19 Consultees: NRW, RSPB, JNCC, Denbighshire District Council, TWT, WDC NRW agree that our comments regarding the use of MMMUs has been taken into account. Row; Cumulative Effects Assessment NRW comments 21/12/2020 NRW agree that our comments regarding the use of MMMUs has been taken into account.	This is noted by the Applicant.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Table 3: embedded mitigation Marine mammals, page 80 Row; Marine Mammal Mitigation Protocol (MMMP) As per NRW’s comments on PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol, the current outline MMMP presents insufficient detail to be considered effective mitigation of impacts from piling and UXO. NRW also note that the MMMP does not appear in Document 8.1: Schedule of Mitigation as stated.	The limitations of the calculations for cumulative PTS are further detailed in Volume 4, Annex 7.3: Marine Mammal Quantitative Noise Impact Assessment – Assumptions, Limitations and Uncertainties. The impact assessment presents the SELcum impact ranges but the illustration provided in Volume 4, Annex 7.3 highlights the precaution in these estimates. A revised Outline MMMP was consulted on through the ETG process and has been included in application ref: 6.4.7.2, and is now referenced in the Schedule of Mitigation.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 60, page 86 NRW acknowledge and agree that NRW’s comments regarding the use of MU’s to screen sites for grey seal have been taken into account, and that Pembrokeshire Marine/ Sir Benfro Forol SAC has now been included in Report 5.1 Annex 1 HRA screening update (non-ornithology).	This is noted by the Applicant.	yes	no

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PrB_018_11102021	S42	Report 5.1: RIAA	Table 4: Summary of potential for LSE for non-ornithology features, page 89 As per the comments on Report 5.1 Annex 1 HRA screening update (non-ornithology), NRW agree with the conclusion that there is a potential for LSE at all marine mammal SACs in Wales from underwater noise from construction and decommissioning, namely; •Cardigan Bay/ Bae Ceredigion •Ben Llŷn a'r Sarnau/ Lleyn Peninsula and the Sarnau •Pembrokeshire Marine/ Sir Benfro Forol •North Anglesey Marine / Gogledd Môn Forol •West Wales Marine / Gorllewin Cymru Forol •Bristol Channel Approaches / Dynesfeydd Môr Hafren As per the comments on Report 5.1 Annex 1 HRA screening update (non-ornithology), NRW consider that there is sufficient cause for pathways of impact to marine mammals from disturbance and collision from vessel activity to be considered to have a likely significant effect.	The Applicant acknowledges this and welcomes NRW's agreement on the conclusions of LSE. The Project is making a commitment to minimise the risk of collisions. The adoption of best practice vessel handling protocols (e.g. following the Codes of Conduct provided by the WiSe Scheme, Scottish Marine Wildlife Watching Code or Guide to Best Practice for Watching Marine Wildlife) will minimise the potential for any impact. The final codes of conduct will be discussed and agreed with NRW and JNCC through the marine licence conditions.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 81 NRW agree that the MMMU is the appropriate scale in which to screen in project for in- combination impacts.	This is noted by the Applicant.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 98 NRW do not consider a sufficient argument is currently presented to justify the conclusion of low cetacean sensitivity to PTS. Please see the comments on PEIR Volume 2, Chapter 7: Marine Mammals section 1.5.1 'Cetacean sensitivity to PTS' for full detail.	A clarification note was drafted and sent to NRW via the ETG process that outlines the results of the expert elicitation on the impacts of PTS and provides an updated set of definitions for sensitivity for marine mammals.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 214, page 155 As per the comments on PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol section 1.10.1 'PTS from Piling' on page 79, it is unclear if or how the accumulation of impacts from piling events over time has been taken into account when estimating the number of animals potentially exposed to PTS. As per the general comments on PEIR Volume 4, Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol, NRW appreciate that finalising an MMMP without the final details of the project infrastructure can present challenges. However, with the level of information currently provided, the outline MMMP does not fully consider how potential injury for marine mammals will be monitored and mitigated. This document will need significant development before NRW can be confident that this risk will be fully mitigated.	Additional information will be added to the MMMP (for review and agreement by the ETG). This will include the evidence base for the use of ADDs and the potential noise reduction levels that can be achieved with at-source noise abatement methods.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 216, page 158 As currently there is insufficient detail to consider the MMMP as effective mitigation of impacts from piling or UXO, it may not be possible to rule out an Adverse Effect on Site Integrity.	Additional information will be added to the MMMP (for review and agreement by the ETG). This will include the evidence base for the use of ADDs and the potential noise reduction levels that can be achieved with at-source noise abatement methods. Please note: The draft outline MMMP is for pile driving only. It is not intended to cover UXO which will be the subject of a separate marine licence application.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 217 As per the comments on PEIR Volume 2, Chapter 7: Marine Mammals section 1.10.6 'Disturbance from UXO', NRW do not sign up to the use of EDRs to quantify disturbance. Please see our comments on that section for full details.	The Applicant acknowledges this feedback regarding the use of EDRs. The Applicant is aware that NRW have undertaken a review of the methodologies available to assessing impacts to marine mammal SACs from underwater noise, and relevant assessments will be updated to align with the recommendations from NRW's report. EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 221, page 159 A more recent joint agency Conservation Objectives and Advice on Operations document dated March 2019 is available from the NRW website; https://naturalresources.wales/media/691805/north-anglesey-marine-conservation-objectives-and-advice-on-operations.pdf	The link provided within this comment did not work, with no document found. However, a version of the Conservation Objectives and Advice on Operations document dated March 2019 and was referenced in the RIAA.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 225, page 161 As previously stated, NRW do not sign up to the JNCC (2020) noise guidance. The method presented to assume that "Since during the 'off season' the area is no different in terms of average densities than the rest of the MU, SNCBs' advice is that the EPS's strict protection measures apply and no additional noise management measures are required. The noise management approach in this guidance should therefore not apply outside the relevant season" refers specifically to applying the guidance to assessments, and as NRW do not sign up to the guidance, NRW do not apply this method by default. Instead, NRW recommend that the impacts of projects be assessed on a case by case basis.	This text has been removed from the RIAA.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 226 NRW do not agree with the statement that "works outside that period would effectively be subject to EPS licensing requirements and not HRA." The works would still meet the criteria such to be subject to HRA, but the content of the assessment will vary depending on the timing of the works.	This text has been removed from the RIAA.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 227, page 162 NRW considers that there is still considerable uncertainty in the evidence underpinning the calculation of Effective Deterrent Range (EDR), especially in Welsh waters, and as such has not signed up to the cited JNCC guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs. (England & Northern Ireland). NRW therefore advise that applicants should calculate disturbance distances on a case by case basis using the latest published information and modelling procedures rather than EDRs (Sinclair et. al., in press). Given that a dose response approach has been used to assess impacts underwater noise in other sections of the PEIR, NRW recommend that approach is also applied to the RIAA. For disturbance from piling noise, the dose response assessment in PEIR Volume 2, Chapter 7: Marine Mammals section 1.10.3 has already identified disturbance effects within the boundary of North Anglesey Marine SAC. To now apply an EDR approach despite this supplied evidence is contradictory and not defensible. The provided dose response evidence should be taken into account in this assessment.	The Applicant acknowledges this feedback regarding the use of EDRs. The Applicant is aware that NRW have undertaken a review of the methodologies available to assessing impacts to marine mammal SACs from underwater noise, and relevant assessments will be updated to align with the recommendations from NRW's report. EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 230, page 164 Given NRW's concerns regarding the use of an EDR approach to assess disturbance, we cannot agree with the outcome of the assessment as presented. Until further detail is provided in line with our recommendations, NRW cannot reach a conclusion regarding the potential for an Adverse Effect on Site Integrity on North Anglesey Marine SAC.	The Applicant acknowledges this feedback regarding the use of EDRs. The Applicant is aware that NRW have undertaken a review of the methodologies available to assessing impacts to marine mammal SACs from underwater noise, and relevant assessments will be updated to align with the recommendations from NRW's report. EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 235, page 165 As per our comments on PEIR Volume 2, Chapter 7: Marine Mammals section 1.10.6 'Disturbance from UXO', NRW do not sign up to the use of EDRs to quantify disturbance. Please see the comments on that section for full details.	The Applicant acknowledges this feedback regarding the use of EDRs. The Applicant is aware that NRW have undertaken a review of the methodologies available to assessing impacts to marine mammal SACs from underwater noise, and relevant assessments will be updated to align with the recommendations from NRW's report. EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 245, page 170 Please see NRW's comments on Report 5.1 Annex 4 Bottlenose dolphin and grey seal additional information section 1 '1 Information for the bottlenose dolphin RIAA' for full comments.	Comments addressed within relevant sections and within the appropriate Annex (application ref: 5.2.1) .	yes	no

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PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 247, page 171 Please see the previous comments on the relevant supporting documentation (PEIR Volume 4, Annex 7.1: Marine Mammal Baseline Characterisation & PEIR Volume 4, Annex 7.3: Marine Mammal Quantitative Assessment Assumptions) for details on NRW's concerns regarding the approach taken to estimate the worst case disturbance scenario using the NW and SE modelling locations and the approach taken to estimate of number of bottlenose dolphin impacted. In addition, as per the comments on PEIR Volume 2, Chapter 7: Marine Mammals Paragraph 118, NRW recommend that in line with NRW's position on the use of MMMU's, as per our comments on Report 5.1 Annex 4 Bottlenose dolphin and grey seal additional information, we consider the area of the MMMU to be functionally linked with the SACs within it. Thus as was done for grey seal, rather than assuming 50% of the animals present are 'SAC animals', all animals present within the MMMU should be considered as a component of the sites. Should the approach be revised in the manners described, NRW advisory recommend reframing the assessment to focus on the area of disturbance as a percentage of the MMMU outside of the protected site, the percentage of the MMMU population impacted, the proximity to the protected site, the temporal extent of the impact, and the objectives of the protected site. NRW do not anticipate this to substantially alter the conclusions of the assessment but consider it a more robust method by which to assess the impact. At this stage NRW consider it unlikely that the conclusions of the RIAA on the potential for impacts from disturbance from piling on bottlenose dolphin to result in an Adverse Effect on Site Integrity would change should the approach be updated to follow NRW's recommendations to make it more robust.	The Applicant acknowledges this feedback and has updated the RIAA to consider the area of the MMMU to be functionally linked with the SACs within it. As such two approaches are detailed: 1) assuming impacts to the MU population and assuming impacts to the SAC population.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 248 As per previous comments, NRW do not sign up to the use of EDRs in assessments. NRW recommend a more evidenced approach is taken to assess disturbance.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2. (application ref: 6.4.7.2). EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 251, page 172 Please see the previous comments on the relevant supporting documentation for details on NRW's reservations on the approach taken regarding the estimate of number of individuals impacted and the use of EDRs. However, at this stage NRW consider it unlikely that the conclusions of the RIAA on the potential for impacts of disturbance from noise sources other than piling on bottlenose dolphin to result in an Adverse Effect on Site Integrity would change should the approach be updated to follow NRW's recommendations to make it more robust.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2). EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC. The Applicant welcomes NRW's agreement on the conclusions of Adverse Effect on Site Integrity.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Disturbance and grey seal The separate conclusions from disturbance from piling noise and other noise sources are not as clearly stated here as for previous receptors in the relevant paragraphs (276 & 280). For clarity and consistency, NRW recommend these be approached in the same manner as other marine mammal receptors.	The Applicant acknowledges this feedback and has updated the MMMP to present the conclusions more clearly.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 261, page 177 Please see the comments on Report 5.1 Annex 4 Bottlenose dolphin and grey seal additional information section 2 'Information for the grey seal RIAA' for our comments on the worst case number of seals disturbed by piling activity.	At PEIR, the worst case was concurrent piling. However, the Applicant has removed simultaneous piling from the ES Project Design Envelope and as such the comments on simultaneous piling are no longer relevant.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 276, page 181 Please see the previous comments on the relevant supporting documentation for details on NRW's reservations on the approach taken regarding the estimate of the worst case disturbance scenario. However, given the level of precaution in the assessment methodology, at this stage NRW consider it unlikely that the conclusions of the RIAA on the potential for impacts from disturbance from piling on grey seal to result in Adverse Effect on Site Integrity would change should the approach be updated to follow NRW's recommendations to make it more robust.	At PEIR, the worst case was concurrent piling. However, the Applicant has removed simultaneous piling from the ES Project Design Envelope and as such the comments on simultaneous piling are no longer relevant.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 277 As per the previous comments, NRW do not sign up to the use of EDRs in assessments. NRW recommend a more evidenced approach is taken to assess disturbance. Insufficient evidence has been provided at this time for NRW to reach a conclusion regarding the impact of disturbance from UXO.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2). EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 280 Please see the previous comments on the relevant supporting documentation for details on NRW's reservations on the approach taken regarding use of EDRs. However, given the level of precaution in the assessment methodology, at this stage NRW consider it unlikely that the conclusions of the RIAA on the potential impacts of disturbance from noise sources other than piling on bottlenose dolphin seal to result in Adverse Effect on Site Integrity would change should the approach be updated to follow NRW's recommendations to make it more robust.	Noted – that NRW do not consider it likely that the conclusions of the RIAA on the impacts (on grey seal) of disturbance from underwater noise sources in-combination would change should the approach be updated to follow NRW's recommendations' for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Onset of PTS, page 382 As per the comments on paragraph 216, NRW do not consider there to be sufficient detail in the outline MMMP to consider it effective mitigation of PTS as a pathway. Please see our previous comments on the MMMP on for the assessment from the project alone for full details.	Additional information will be added to the MMMP (for review and agreement by the ETG). This will include the evidence base for the use of ADDs and the potential noise reduction levels that can be achieved with at-source noise abatement methods.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 800 NRW are not content with the approach to assume that Annex IV European Protected Species are offered sufficient protections by this legislation such to conclude no impact on Annex II sites is possible from PTS onset. These assessments are conducted separately, and the assumptions of the protections of one piece of legislation should not be used to justify conclusions regarding the other.	Additional information will be added to the RIAA to better justify why PTS should be scoped out of the in-combination impact assessment.	yes	yes
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 805, page 383 As per our previous comments, NRW do not sign up to the use of EDRs in assessments. NRW recommend a more evidenced approach is taken to assess disturbance.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2). EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Paragraph 807, page 385 Please see the previous comments on the relevant supporting documentation for details on NRW's reservations on the approach taken regarding use of EDRs. However, at this stage NRW do not consider it likely that the conclusions of the RIAA on the impacts of disturbance from underwater noise sources in-combination would change should the approach be updated to follow NRW's recommendations to make it more robust.	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2). EDR for UXO: A clarification note has been drafted and sent to NRW that outlines the thresholds that are available and suitable to assess the impact of disturbance from UXOs. The piling dose-response curve is not appropriate. EDR for piling: The dose-response curve will be used in the RIAA to estimate the overlap of the disturbance contours with the SAC. The Applicant welcomes NRW's agreement on the conclusions of Adverse Effect on Site Integrity.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	16 Conclusions of the Assessment Please see the comments for each receptor for our detailed comments on the outcome of each assessment.	Noted. The conclusions have been updated based on the revised assessments throughout the RIAA.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Report 5.1: RIAA	Document; Report 5.1 Annex 1 HRA screening update (non-ornithology) Table 5 – Effect groups considered for marine mammals NRW note that as per NRW’s comments on the HRA screening in 2020, decommissioning has now been considered as a pathway to marine mammals and that Pembrokeshire Marine SAC has now been “screened in for effect in a manner consistent with other marine mammal sites at distance”. NRW agree with the conclusion that there is a potential for LSE at all marine mammal SACs in Wales, namely; •Cardigan Bay/ Bae Ceredigion •Pen Llŷn a'r Sarnau/ Llyn Peninsula and the Sarnau •Pembrokeshire Marine/ Sir Benfro Forol •North Anglesey Marine / Gogledd Môn Forol •West Wales Marine / Gorllewin Cymru Forol •Bristol Channel Approaches / Dynesfeydd Môr Hafren NRW do not agree that there is no possibility for LSE at these sites from vessel collisions or disturbance from vessel activity from either construction, operation & maintenance, or decommissioning.	The Applicant welcomes NRW’s agreement on the conclusions for a potential for LSE at those sites listed. The Applicant notes that for vessel collisions and disturbance, the Project is making a commitment to minimise the risk of collisions. The adoption of best practice vessel handling protocols (e.g. following the Codes of Conduct provided by the WiSe Scheme, Scottish Marine Wildlife Watching Code or Guide to Best Practice for Watching Marine Wildlife) will minimise the potential for any impact. The final codes of conduct will be discussed and agreed with NRW and JNCC and are proposed to be the subject of a marine licence condition.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Document; Report 5.1 Annex 3 European site information NRW are content that this document accurately reflects the information for the protected European sites with marine mammal features, with the following exceptions; 1.1.1Qualifying features, page 13 Harbour porpoise are a grade ‘D’ feature of the site, and are thus not a ‘qualifying feature ‘of Cardigan Bay/ Bae Ceredigion Special Area of Conservation on the register entry (https://naturalresources.wales/media/627509/SAC_UK0012712_Register_Entry001.pdf).	Classification of harbour porpoise has been amended.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	Document; Report 5.1 Annex 4 Bottlenose dolphin and grey seal additional information Information for the bottlenose dolphin RIAA This section focuses only on Cardigan Bay / Bae Ceredigion SAC. Pen Llŷn a'r Sarnau/ Llyn Peninsula and the Sarnau is also scoped into the RIAA, and so is also relevant. NRW are not currently satisfied with the approach to assume no bottlenose dolphin presence beyond 6km from the coastline. Please see our comments on PEIR Volume 2, Chapter 7: Marine Mammals section 1.10.3 ‘Disturbance from piling’ for full details. The statement “While the maximum number of bottlenose dolphins predicted to be disturbed was 16 individuals (from the maximum design scenario piling of a monopile at the NW modelling location” does not align with PEIR Volume 2, Chapter 7: Marine Mammals section 1.10.3 ‘Disturbance from piling’ paragraph 118, which states “the number of bottlenose dolphins predicted to be disturbed by pile driving at both the NW and SE locations for both monopiles and multileg jacket foundations” “results in low numbers of dolphins predicted to be disturbed on each piling day (up to 17 individuals which represents 5.8% of the MU.” The worst case scenario should be used for assessment, which in this case is simultaneous piling at two locations. NRW are not currently satisfied that the two piling locations chosen represent the worst case scenario for simultaneous piling activities. Please see the comments on PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report section 5.3 ‘Multiple location modelling’ for full details.	As recommended by NRW, the bottlenose dolphin density surface has been amended to assume a higher density within the 20 m depth contour, and the SCANS III density beyond this. The Applicant has removed simultaneous piling from the Project Design Envelope and as such the comments on simultaneous piling are no longer relevant.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	1.2SAC population assessment Due to the mobile nature of all Annex II marine mammal features, it is accepted that they do not stay within site boundaries. Therefore, should an activity occur outside a site, marine mammal features of the sites could travel to and thus be impacted by that activity, wherever it may be in the MMMU. NRW generally consider that there is the potential for the MMMU to be ‘functionally linked’ to SACs given, in most cases, the evidence demonstrating the degree of connectiveness and the fact that SACs are dependent on the wider population within the MMMU and represent special areas of sea within it (NRW 2020). As such, NRW do not consider there to be discrete SAC populations, but rather a wider MMMU population. As for the approach taken in section 2 for grey seal, NRW do not consider that an ‘SAC dolphin’ exists.	The HRA will be revised to assume that all animals in the MMMU are functionally linked to the SAC.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	1.5 Population modelling, page 6 As mentioned in the comments on section 1, NRW have concerns regarding the 6km buffer used to assume bottlenose dolphin presence and that the greater degree of impact from concurrent piling should be taken into account. While it is reasonable that an indicative piling schedule is not available at this stage, justification for piling days being “randomly spread throughout the 12 month construction period”, based on typical construction activities should be provided. Given that the worst case scenario for the total area of disturbance impacts for piling on any one day has been established to be concurrent piling at two locations, this scenario should be assessed. The description of scenario 1 as “two monopiles were piled in 1 day”, and the choice of the ‘number of piling operations’ for this scenario in Table 1 being 1 suggests this has not been considered. This should also be modelled for comparison, and the worst case used for assessment. NRW’s position on determining Adverse Effect on Site Integrity for marine mammal site features in Wales in relation to potential anthropogenic removals (mortality) from marine developments (NRW 2020b) is relevant to any assessment of population decline due to anthropogenic activity.	As recommended by NRW, the bottlenose dolphin density surface has been amended to assume a higher density within the 20 m depth contour, and the SCANS III density beyond this. The Applicant is not able to provide any further detail on the potential piling schedule, and as such, the only information available is that piling will occur within a 1 year window. Therefore, the only way to create a piling schedule that does not have any seasonal variation was to randomly assign piling days throughout the year.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	2Information for the grey seal RIAA As for bottlenose dolphin in section 1, the worst case scenario for disturbance of grey seal described in PEIR Volume 2, Chapter 7: Marine Mammals section 1.10.3 ‘Disturbance from piling’ is from concurrent piling at the NW and SE locations. This value was stated as 109 grey seals (paragraph 131, page 102), rather than 83 as stated here. NRW are not currently satisfied that the two piling locations chosen represent the worst case scenario for simultaneous piling activities. Please see our comments on PEIR Volume 4, Annex 6.2: Underwater Noise Technical Report section 5.3 ‘Multiple location modelling’ for full details.	The Applicant has removed simultaneous piling from the Project Design Envelope and as such the comments on concurrent piling are no longer relevant.	yes	no
PrB_018_11102021	S42	Report 5.1: RIAA	2.3.2 Consequences of disturbance As for bottlenose dolphin and related to the point above, any modelling of impacts from two piles being installed in one day should take into account the impacts of concurrent piling.	The Applicant has removed simultaneous piling from the Project Design Envelope and as such the comments on concurrent piling are no longer relevant.	yes	no
PrB_018_11102021	S42	Document 8.1: Schedule of Mitigation	NRW note that there are no mitigation measures listed for marine mammals; namely, the MMMP as described in Table 3: embedded mitigation of Report 5.1 Report to Inform Appropriate Assessment.	The Outline MMMP has been added to the Schedule of Mitigation.	yes	no
PrB_018_11102021	S42	Document 8.2: Schedule of Monitoring	NRW note that “The noise generated from the first four piled foundations will be measured” but additional clarity is needed regarding the “Offshore Noise Monitoring” chapter where the commitment is listed as having been made.	Clarity has been provided to Volume 2, Chapter 7: Marine Mammals and to the Schedule of Mitigation.	yes	no

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PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Key Issues NRW advice regarding the Seascape, Landscape and Visual Impact Assessment (SLVIA) relates to the potential impacts on the Snowdonia National Park, the Isle of Anglesey AONB and the Clwydian Range and Dee Valley AONB. The proposals would have numerous and extensive significant adverse effects on seascape, landscape, and visual receptors, including within the Isle of Anglesey AONB and Snowdonia National Park and within their settings. There would also be non-significant, but adverse effects on the Clwydian Range and Dee Valley AONB. NRW are concerned that there has been an under-estimation of some seascape, landscape and visual effects on these receptors within the SLVIA. The embedded mitigation of the reduced western extent of the array is likely to reduce visual effects to a marginal degree, but not sufficiently to avoid likely significant effects at the numerous views within the Isle of Anglesey AONB and Snowdonia National Park, as identified in the PEIR. The visual effects in turn lead to significant adverse effects on landscape character within these Nationally Designated Landscapes and within their seascape settings. Without a substantial reduction in array area and/or scale of turbines, many significant and adverse effects on these Designated Landscapes are likely to occur as well as effects that are not significant, but nevertheless adverse. This conflicts with the purpose of these landscapes to conserve and enhance natural beauty, as set out in PPW11. Therefore, NRW advise a substantial reduction in array area and/or scale of turbines to minimise adverse effects on the Isle of Anglesey AONB and Snowdonia National Park. NRW advise that further consideration should be given to NRW’s evidence base: “Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance”. The evidence base is divided into 3 reports, which should be read together:	Section 10.9 of the SLVIA chapter sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation, including the design changes made. See responses to issues also raised in NRW Email of 09.02.2021 not repeated here.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Stage 1 Report, Ready Reckoner The proposal for Maximum Design Scenario (MDS) A is for 48 turbines of 332m height to blade tip. This places them within the 301-350m range, where the report advises that a buffer of 32.8km is required to avoid medium magnitude effects on high sensitivity receptors, which are frequently of major-moderate significance. A buffer of 44km is required to avoid low magnitude effects on high sensitivity receptors, which are frequently of moderate significance. Within the 32.8km buffer, the array is located between 17.99km and 32.67km of 14 high sensitivity receptor viewpoints where all 48 turbines would be visible, and a further two such viewpoints where lower numbers of turbines would be visible.	As noted previously, as a result of the constraints placed on the extensions projects by The Crown Estate Extensions Round, and as acknowledged in the draft NPS EN-3, the AFL is located within closer proximity to the coast than the thresholds suggested by the NRW (2019) Guidance to result in major-moderate significance or moderate significance. The draft NPS acknowledges that applications will be constrained by these requirements, and as such it is not possible for AyM to comply with the Ready Reckoner guidance whilst also meeting the climate emergency and Welsh Government targets. Whilst the thresholds may be a helpful reference for potential effects each proposal should be considered on its own merits and the assessments contained in the SLVIA.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Stage 2 Report, Guidance on siting offshore windfarms Table 4.1 identifies measures to avoid or minimise seascape & visual effects, including: 3. Locate developments beyond the limit of negligible visual effects, particularly for the highest sensitivity area National Parks/AONBs overlaid with Heritage Coasts and, 4. If the above is not possible, locate development beyond the Stage 1 Report low magnitude buffer distances of the highest potential turbine proposed from National Parks & AONBs (44km in this case). 6. Locate developments in areas identified as lower sensitivity in the Stage 3 Report. 13. Avoid developments being visible in juxtaposition with sensitive views to headlands. 14. Avoid developments within buffer distances of several separate designations. 16. Example 1 avoid locations offshore from Islands. 18. Example 3 avoid locations filling or almost filling framed views. 19. Avoid potential cumulative impacts by extending the width of arrays visible through extensions or additional wind farms.	It is not possible to locate the AyM beyond the limit of negligible visual effects, low magnitude buffer distances or buffer distances to several separate designations, for the reasons already stated. The mitigation proposed ensures that the AyM array area is located within an area identified as Medium and Medium/Low sensitivity (Annex 10.5: Figure 2c). Notably the Guidance has not identified any part of the Welsh Marine Plan Area as having Low sensitivity with the majority being identified as High or Medium/High sensitivity. Large parts of the areas identified as being of Medium/low or Medium sensitivity have other constraints associated with them including Marine Special Areas of Conservation, Special Protection Areas and restrictions due to shipping. The AyM is visible in juxtaposition with sensitive headlands in some views. The location of the AFL makes it impossible for this to be avoided. Existing OWFs within the Study Area are also seen in views to headlands. The mitigation set out in Section 10.9 reduces the degree to which framed views are filled. The AFL area has been defined as an extension to GyM. Extension of the width of arrays visible is unavoidable. In any situation where a new wind farm is proposed alongside an operational wind farm the overall width of the array is likely to be extended in some views. Essentially, to avoid this would mean spreading out wind farms more widely within the seascape. Whilst this may reduce cumulative effects locally it would result in an increase in cumulative effects strategically with more widespread cumulative wind farm influence around the Welsh coast, much of which is also designated.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	In relation to these points: 3 & 4. The array is within the Stage 1 Report’s low magnitude buffer distances and within the medium magnitude buffer distance of 32.8km. 6. The array is located primarily in an area of medium sensitivity (Zone 1) as defined in the Stage 3 Report, with a small part to the west appearing to be in an area of high sensitivity (Zone 3) and a part to the north-east in an area of medium/low sensitivity (Zone 2). 13. The array is visible in juxtaposition with sensitive views to headlands. 14. The array is within buffer distances of three Designated Landscapes. 16. The array is located offshore from Islands. 18. The array includes locations where it fills or almost fills framed views. 19. The array extends the width of arrays visible through an extension to Gwynt y Môr.	It is not possible to locate the AyM beyond the limit of negligible visual effects, low magnitude buffer distances or buffer distances to several separate designations, for the reasons already stated. The mitigation proposed ensures that the AyM array area is located within an area identified as Medium and Medium/Low sensitivity (Annex 10.5: Figure 2c). Notably the Guidance has not identified any part of the Welsh Marine Plan Area as having Low sensitivity with the majority being identified as High or Medium/High sensitivity. Large parts of the areas identified as being of Medium/low or Medium sensitivity have other constraints associated with them including Marine Special Areas of Conservation, Special Protection Areas and restrictions due to shipping. The AyM is visible in juxtaposition with sensitive headlands in some views. The location of the AFL makes it impossible for this to be avoided. Existing OWFs within the Study Area are also seen in views to headlands. The mitigation set out in Section 10.9 reduces the degree to which framed views are filled. The AFL area has been defined as an extension to GyM. Extension of the width of arrays visible is unavoidable. In any situation where a new wind farm is proposed alongside an operational wind farm the overall width of the array is likely to be extended in some views. Essentially, to avoid this would mean spreading out wind farms more widely within the seascape. Whilst this may reduce cumulative effects locally it would result in an increase in cumulative effects strategically with more widespread cumulative wind farm influence around the Welsh coast, much of which is also designated.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Stage 3 Report, Seascape & visual sensitivity assessment for offshore wind farms In summary, Part 1 identifies zones within the offshore area with differing levels of sensitivity (see above point 6). Zone 3 is an area of high sensitivity that is unable to accommodate the relevant type of development without significant character change or adverse effects. Zone 1, adjacent to Gwynt y Môr is of medium sensitivity, with potential for a small extension, but scope is limited. The scale of turbines in relation to distance buffers needs to be considered with regard to the sensitivity of zones. Zone 2 is of medium/low sensitivity and the evidence base indicates that development beyond Gwynt y Môr would tend to limit harm. Part 2 provides a detailed sensitivity and capacity assessment for each zone. Within Zone 3 and Zone 1, turbines over 175m are likely to exceed the medium magnitude of effect on high sensitivity receptors.	Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions. The Applicant has introduced a further reduction from 88km2 at PEIR to 78km2 for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application. Ongoing consultation has concluded that the project is not able to further avoid and minimise effects, and as such alternative mitigation is being considered which may include off-set mitigation.	yes	no
PrB_018_11102021	S42	Volume 1, Chapter 2: Policy and Legislation	Section 2.2.11 does not mention the European Landscape Convention. However, NRW acknowledge that this is noted in Chapter 10.	Noted. The Policy and Legislation chapter makes reference to overarching planning legislation, policy and guidance governing the consenting, EIA and HRA processes. Legislation, policy and guidance that is topic-specific is referenced and discussed within the topic-specific chapters of the ES.	yes	no
PrB_018_11102021	S42	Volume 1, Chapter 2: Policy and Legislation	Section 2.4.4 refers to key Local Development Plans (LDPs) but makes no reference to National Park and AONB policies; consideration of these should be included in the Environmental Statement (ES).	The LDPs are discussed in brief within the policy and legislation chapter, however specific details on a topic-specific basis are discussed further within the topic-specific chapters of the ES.	yes	no
PrB_018_11102021	S42	Volume 1, Chapter 3: EIA Methodology	The methodology appears sound with regards to SLVIA.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	NRW note that, whilst some refinement has taken place, the PEIR states that further refinements will happen after the PEIR. As noted above, NRW advise that further refinements are necessary to minimise adverse effects on the Isle of Anglesey AONB and Snowdonia National Park.	Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions. The Applicant has introduced a further reduction from 88km2 at PEIR to 78km2 for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application. Ongoing consultation has concluded that the project is not able to further avoid and minimise effects, and as such alternative mitigation is being considered which may include off-set mitigation.	yes	yes

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	Section 4.7 states that the identification of the array location makes the greatest contribution to renewable energy targets whilst minimising environmental impacts and following the principles of good design. NRW do not consider that the proposal has adequately minimised seascape, landscape, and visual impacts. There are aspects of design that do not follow good practice guidance, including the aforementioned NRW evidence base.	The Applicant notes this response and can confirm that the design has been refined to further reduce the potential impacts. The process of refinement has been described in the Site Selection and Alternatives chapter (application ref: 6.1.4).	yes	no
PrB_018_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	Paragraphs 114-117 state that consultation feedback from the Environmental Technical Group (ETG) indicated that Areas H and M of the options had the greatest reduction in effects compared to the base case/scoping. This does not reflect NRW's position, and it is unclear how this statement has been concluded from Table 5, which is incomplete. Full details of the ETG consultation should be included in the ES. NRW note that option area J is considered the optimum design by the applicants and that MDS A is subject to detailed assessment, with consideration given to MDS B, including for some representative viewpoints.	The Applicant can confirm that the table has been updated to capture the feedback received with regards the areas discussed prior to PEIR. The design has since been further refined as described in application ref: 6.1.4	yes	no
PrB_018_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	We note that MDS A is considered in the PEIR to be the 'worst case scenario' and comprises 48 turbines of 332m to blade tip, while MDS B comprises 91 turbines of 252m to blade tip. However, the assessment of significant effects does not appear to vary depending on which MDS is being considered. This indicates that a larger number of turbines of 252m in height would have similar degrees of significance across the study area. Therefore, a substantial reduction in array area and/or scale of turbines would be required to reduce the significant effects.	The Applicant has since revised the array area and project design to reduce significant effects as far as practicable. The refinement process is captured in application ref: 6.1.4	yes	yes
PrB_018_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	Volume 1, Annex 4.1 & 4.2: SSA Identification of Area of Search (AoS) & Shortlisting Outcomes Report: NRW consider the 50km Area of Search for SLVIA to be appropriate.	This is noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Section 10.1: we note that NPS EN-3 states that "the IPC [now the Planning Inspectorate and the Secretary of State] should not refuse to grant consent for a development solely on the ground of an adverse effect on the seascape or visual amenity unless it considers that an alternative layout within the identified site could be reasonably proposed which would minimise any harm". The Welsh National Marine Plan SOC-06, notes that with regard to Seascapes and Designated Landscapes significant adverse impacts should be a) avoided, b) where they cannot be avoided, minimised and c) where they cannot be minimised, mitigated. NRW do not consider that sufficient evidence has been provided to demonstrate that seascape, landscape, and visual impacts have been minimised in this case. Further work on this aspect is advised in the ES.	This table now includes the feedback on this matter received from the ETG.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Para. 25 notes that the viewpoints and visualisations have been agreed and reducing the array area from the maximum extent of the lease area to the boundary (defined as options Areas A, J or H) would be beneficial, but would not mitigate all the effects. The feedback from the ETG should be reflected here (see previous comment on Chapter 4, above).	This table now includes the feedback on this matter received from the ETG.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Table 2 and Section 10.9 refer in detail to the ETG comments and states (25/1/21) that the SLVIA effects have been minimised through embedded mitigation, reducing the westerly extent and removing from a high sensitivity area in the Seascape & Visual Sensitivity to Offshore Wind Farms in Wales guidance. As outlined at the beginning of this report, NRW do not consider that effects have been minimised. Reducing the number of turbines in the high sensitivity area is insufficient to achieve this, due to the scale of the turbines and proximity to the shore. NRW therefore advise that the guidance needs to be applied in full.	The refinement set out in Section 10.9 ensures that no part of the AyM lies within Zone 3 (High Sensitivity), see Annex 10.5: Figure 2c. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions. It is not possible to 'apply the guidance in full' due to the location of the AFL and the scale of OWF WTGs that are likely to be available or economically viable in the required timescale. Where possible, with consideration of the Guidance, the effects have been minimised.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Section 10.4.1, Desk Study: NRW consider the sources of data and guidance used in the assessment to be appropriate.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Section 10.10 SCA F is described as having an industrialised character, due to existing offshore wind farms, oil and gas platforms, dredging and shipping routes and lack of landscape designation. Sensitivity is described as medium-low, with the proposal reinforcing the industrialised character and effects as non-significant. The area is considered seascape and has no landscape designation but lies within the setting of the Great Orme Heritage Coast and Anglesey AONB and is described in the Seascape & Visual Sensitivity to Offshore Wind Farms in Wales guidance as medium sensitivity. NRW agree, however, that the effects are likely to be non-significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	SCA 28 is described as having medium sensitivity, although the guidance notes high sensitivity. Given it forms part of the setting of Anglesey AONB and Snowdonia National Park we consider it to be of high sensitivity and agree that effects are likely to be Significant.	Agreement with finding of significant effects noted. The difference in the attribution of the level of sensitivity to this area in the SLVIA compared with the Guidance is explained in Section 10.10.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Section 10.11 SCA 2: NRW agree that effects on this area are likely to be Significant. The SLVIA considers the significant effects to be limited to the Great Orme. However, NRW consider the significant effects are likely to extend over a greater area, given that it forms part of the setting of Anglesey AONB and Snowdonia National Park.	Agreement with finding of significant effects noted. Assessment of extent of significant effects on SCA 2 reviewed and revised in Section 10.11.5.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	SCA 3-7: NRW agree that effects are likely to be Significant. The SLVIA considers the significant effects on SCA 5 and 6 would be limited in extent, however NRW consider significant effects are likely to occur across the whole of the SCAs.	Agreement with finding of significant effects on SCA 3 and SCA 7 noted. The Applicant has reviewed the assessments for SCA 5 and SCA 6 and revised as it considers appropriate taking into account the mitigation set out in Section 10.9. It does not consider that significant effects would occur over the whole of these SCAs.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	SCA C & D: NRW agree that effects on these areas are likely to be non-significant, although the effect would be adverse and intensify the effect of wind farms by filling in a gap between existing arrays.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The proposal would have significant adverse effects on 7 SCAs and would occur over a greater extent of the SCAs than indicated in the SLVIA.	The Applicant has reviewed the assessments and revised them in Section 10.10 and 10.11 as it considers appropriate taking into account the mitigation set out in Section 10.9.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	There appears to be some under-estimation of sensitivity and significance in the seascape assessment, in our opinion. There are no visualisations of the seascape character from the sea with views to land e.g. from recreational vessels, which are mentioned in the report and would also be receptors of visual effects. NRW advise that visualisations of the seascape character from the sea should be included in the ES, along with an assessment of the visual effects on recreational users who are most likely to be focussed on the appreciation of landscape/seascape views in the setting of Designated Landscapes.	Noted and addressed as noted previously in relation to SCA 2. Visualisations have been prepared from two locations in the seascape to represent views from the Liverpool to Dublin ferry towards Snowdonia National Park and the Isle of Anglesey AONB as agreed with NRW. These are VPs 66 and 67 included in Annex 10.6.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoints 1-3: the SLVIA describes the effects as Non-significant. We are concerned that the effects have been under-estimated and that effects may be Significant. Susceptibility is described as medium-high due to the distance from the receptor. However, we consider that distance is an aspect of magnitude of change, as described in GLVIA3, not of susceptibility or sensitivity of the receptor. Although large-scale sea views, the scale and nature of the development makes it very noticeable and will focus attention on it, sea views are the key focus in the predominantly coastal AONB and are currently empty and untrammelled by development, apart from the occasional transient ship.	The methodology in Annex 10.1 sets out the considerations when assessing susceptibility. The Applicant has reviewed Viewpoints 1-3 and is satisfied that their assessment as Non-significant is valid, particularly in view of the mitigation set out in Section 10.9, which has increased the distance of the Array Area in these views where it is also seen across a narrow extent of the horizontal field of view as part of the very large scale views from these locations. We note that LUC does not concur with NRW with respect to these viewpoints.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoints 4-8 & 14, 16, & 28: NRW agree that the effects at these viewpoints are likely to be Significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoints 41-43: NRW agree that the effects at these viewpoints are likely to be non-significant. However, they do not appear to have been assessed in detail.	Table 3 in Section 10.7 sets out which viewpoints are assessed in detail as agreed with the ETG.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 44; Beaumaris Castle: NRW are concerned that the effects have been under-estimated and may be Significant. This is a highly sensitive location from an important historic monument within the AONB. Whilst a small part of the view, the scale and location of the turbines interferes with the view of the landform.	The Applicant has reviewed the assessment of Viewpoint 44 and considers the effects to be Non-significant as assessed in Section 10.11.3 Table 7.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 53; Puffin Island: this does not appear to have been assessed in detail.	Table 3 in Section 10.7 sets out which viewpoints are assessed in detail as agreed with the ETG.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The village of Moelfre lies within the AONB and effects are described as Non-significant. Given the strong coastal associations, likely views of the coast and sea and proximity to viewpoint 4, NRW consider the effects on this community are likely to be Significant.	The Methodology in Annex 10.1 has been updated to reflect that the assessment of the effects on settlements relates to people in properties. The effects on people using sea front areas and amenities are assessed in relation to the viewpoints and the Wales Coast Path in order to avoid duplication. Assessment in Section 10.11.3 reviewed and revised to include Significant effects on some properties within the settlement.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The village of Beaumaris lies within the AONB and effects are described as Non-significant. Whilst much of the village appears to be orientated away from the view of the turbines, NRW are concerned that the effects may be significant, given the high sensitivity and proximity to viewpoints 8 and 44.	Assessment in Section 10.11.3 reviewed and revised to include further reasoned justification for why the effects are considered Non-significant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	WCP Sections A, B & G & NCR 5: NRW agree that effects along these sections are likely to be non-significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	WCP Sections C, D, E & F: NRW agree that effects along these sections are likely to be Significant. Reduced susceptibility is described due to the transient nature of the viewers. However, these are slow-moving receptors and likely to stop and rest to appreciate scenic views. NRW consider these receptors within an AONB to be of high susceptibility and sensitivity.	Agreement noted. Reference to pace of movement added to assessments in Section 10.11.3	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	LCA 6: NRW agree that effects on this area are likely to be non-significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	LCA 8, 9, 10, 11: NRW agree that effects on these areas are likely to be Significant. Within LCAs 8, 9 & 10 significant effects are described as limited in extent to the coastline and non-significant elsewhere. NRW consider that the extent of significant effects is likely to extend further across these LCAs, as indicated by the ZTV.	The Applicant has reviewed and revised the geographical extent of the areas where Significant effects may arise within LCAs 8, 9 & 10 and provided further justification for this within Section 10.11.3.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The Special Qualities requiring detailed assessment do not appear to have been identified in the Simple Assessment. However, NRW agree that the Special Qualities requiring detailed assessment are: Expansive views, Peace & Tranquillity, Islands around Anglesey. NRW agree that there would be significant adverse effects on these Special Qualities.	The Simple Assessment in Annex 10.3 identifies the Special Qualities of the IoA AONB that require detailed assessment. Agreement noted.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	In conclusion, there would be likely significant adverse effects at 8 viewpoints within the AONB and potentially 4 others. There would be likely significant adverse effects on the community of Moelfre and potentially Beaumaris, within the AONB. There would be likely significant adverse effects along 4 sections of the Wales Coast Path within the AONB. There would be likely significant adverse effects on 4 LCAs within the AONB. There would be likely significant adverse effects on the three relevant Special Qualities of the AONB.	The Applicant agrees that there would be significant adverse effects at eight viewpoints, in views from limited properties within Moelfre, along four sections of the WCP, across parts of four LCAs and on three relevant Special Qualities within the IoA AONB.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoints 10, 12, 38, 40: NRW agree that effects at these viewpoints are likely to be Significant.	The SLVIA Section 10.11.3 does not concur that there would be significant effects on VPs 1, 2, 3, 44 or in views from properties in Beaumaris.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 34; Snowdon Summit: NRW agree that effects at this viewpoint are likely to be non-significant. NRW are concerned that susceptibility (described as medium) and sensitivity (medium-high) have been underestimated at this viewpoint, which is one of the most important in a National Park in Wales. NRW consider sensitivity to be very high at this location (high in the assessment categories). It is noted that whilst the extent of visibility at Snowdon summit is limited, there is a larger area with visibility along Crib y Ddysgul, a popular summit approach.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 36; Tal y Fan: NRW consider that the effects at this viewpoint have been under- estimated and are Significant. Sensitivity at this summit is likely to be high, viewers are not transient, and the sea view draws the eye. The wind farm would be prominent, and the scale would interfere with appreciation of the views of the Great Orme landform and the relationship between the sea, Conwy Bay and the headland.	Agreement noted. Assessment amended to give further weight to importance within SNP and number of visitors.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 36; Tal y Fan: NRW consider that the effects at this viewpoint have been under- estimated and are Significant. Sensitivity at this summit is likely to be high, viewers are not transient, and the sea view draws the eye. The wind farm would be prominent, and the scale would interfere with appreciation of the views of the Great Orme landform and the relationship between the sea, Conwy Bay and the headland.	Assessment in Table 10, Section 10.11.5 of the SLVIA ES chapter reviewed and revised to include further reasoned justification for why the effects are considered Non-significant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	WCP Section I: NRW agree that effects along this section are likely to be Significant.	Effects are assessed as significant along a total of 3 km of this 16 km section of the WCP as acknowledged and agreed in the LUC Review.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	LCA 01 Northern Uplands: NRW consider that the effects on this LCA have been under- estimated and are likely to be significant. Viewpoints 12, 36, 38 and 40 are within this LCA and effects at all these views are significant, in our opinion. The scale of the turbines in views and the likely extent of effects, as indicated by the ZTV, indicate likely significant adverse effects over a large part of this LCA.	Assessment in Section 10.11.5 reviewed and revised to include further reasoned justification for why the effects are considered Non-significant.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	LCA 02: NRW agree that effects on this area are likely to be non-significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The Special Qualities requiring detailed assessment are: Diverse Landscapes and Tranquillity & Solitude – Peaceful Areas. NRW agree that the likely effects on these Special Qualities is non-significant. However, NRW consider that the effects are adverse on scenic views, which are a characteristic of Snowdonia’s landscapes (as noted in the SNP Partnership Plan 2020), and on relative tranquillity.	Agreement noted in relation to effects on identified Special Qualities. Scenery is mentioned numerous times within the SNP Partnership Plan 2020. However, ‘Scenic views’ are not an identified Special Quality or specifically mentioned as a characteristic of Snowdonia’s landscapes.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	In conclusion, there would be likely significant adverse effects at 5 viewpoints within the National Park, in our opinion. There would be likely significant adverse effects along a section of the Wales Coast Path within the National Park. There would be a likely significant adverse effect on LCA01 within the National Park, in NRW’s opinion. There would be non- significant, but adverse effects on two relevant Special Qualities of the National Park.	Noted agreement in relation to Non-significant adverse effects on the two relevant Special Qualities of SNP. The Applicant agrees that there would be significant adverse visual effects at four viewpoints, and along a part of Section I of the WCP. The SLVIA Section 10.11.5 does not concur that there would be significant effects on VP 36 or on LCA 01.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 24; Graig Fawr & 26: NRW agree that effects at these viewpoints are likely to be non-significant. However, NRW consider that there would be adverse impacts on views through an intensification of wind farm development in the views.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 26 and Viewpoint 54; Y Foel: these do not appear to have been assessed in detail.	Table 3 in Section 10.7 sets out which viewpoints are assessed in detail as agreed with the ETG.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Offa’s Dyke National Trail Long Distance Path: NRW agree that effects along this path within the AONB are likely to be non-significant.	This has been noted in the SLVIA chapter	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	LCT 2 and 5: NRW agree that effects on these areas are likely to be non-significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The Special Qualities requiring detailed assessment are: Landscape Character and Quality – Tranquillity and Landscape Character and Quality – Remoteness & Wildness. NRW agree that the likely effects on these Special Qualities would be non-significant. However, NRW consider that there would be adverse effects through an intensification of windfarm development within views from the AONB and erosion of the Special Qualities.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	In conclusion, there would be no significant adverse effects on viewpoints, the Offa’s Dyke path, landscape character areas or the Special Qualities of the AONB. There would be non- significant but adverse effects on some views and two Special Qualities of the AONB. Panoramic views are a noted feature of the AONB, as referenced in the Supplementary Planning Guidance (SPG).	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 4 Anglesey AONB: NRW agree that effects at this viewpoint are likely to be Significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Viewpoint 60 Snowdonia National Park: NRW agree that effects at this viewpoint are likely to be Non-significant.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The proposal would have likely adverse night-time visual effects on the Anglesey AONB, including from viewpoints at Moelfre (4), Point Lynas (2), Red Wharf Bay (5), Benllech Bay (16), Penmon Point (7), Trwyn y Penrhyn (28) and Beaumaris (8), and from beaches at Traeth Lligwy, Traeth Bycant, Penrhyn. Significant night-time effects are likely at viewpoints 2, 4, 5, 7 and 28. Dark skies are a noted feature of the Peace & Tranquillity Special Quality within the Anglesey AONB. Please note the information at the following link regarding a recent Dark Skies study in Wales, commissioned by NRW: Natural Resources Wales / New map casts light on Wales’ dark skies	The Applicant has reached agreement on the adequacy of the viewpoints, which is recorded in the Chapters of the ES (application ref: 6.2.10 (SLVIA) and 6.3.2 (LVIA)) and within the EIA Evidence Plan Report (application ref: 8.2)	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	The proposal would have likely adverse night-time visual effects on some views within the Snowdonia National Park, through intensification of light pollution e.g. from viewpoint 60, where red lights would be visible in an otherwise dark sea beyond the Great Orme. However, there would be no adverse effect on the Core Areas of the Dark Sky Reserve.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. This includes a reduction in the extent of the array area in views from Llanfairfechan and a reduction in lighting intensity to 10% of that shown in the PEIR (200 candela) when visibility from the WTGs is greater than 5km, which is the majority of the time.	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Volume 2, Section 10.13 and Volume 3, Annex 3.1: Cumulative Effects Assessment: The long list includes operational wind farms that are part of the baseline but have an ongoing impact and are considered relevant to the cumulative impact assessment, namely: Gwynt y Môr, Rhyl Flats, North Hoyle, Burbo Bank and Burbo Bank Extension.	The operational OWFs are considered within the assessment as part of the baseline context to which the AyM would be added. They are also considered as part of the existing cumulative situation to which other cumulative development would be added as assessed in the cumulative assessment.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	Onshore wind farms on Anglesey and in Denbighshire are included in the baseline and onshore cumulative impacts with Clocaenog Forest windfarm are included in the CEA.	This has been noted in the SLVIA ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	NRW note that the Morlais tidal energy scheme is screened out and outside the Area of Search. However, NRW advise that in terms of incremental, combined cumulative SLVIA effects on the Isle of Anglesey AONB, its cumulative effects should be considered.	Morlais tidal energy scheme is considered in the CEA in Section 10.13 of the SLVIA chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	NRW note that weight is attached to proposals according to the three tiers identified under EIA, with Tier 2 relating to projects with a Scoping Report submitted and Tier 3 relating to programmes and frameworks. However, it should be recognised that given the policy context, proposals within pre-assessed areas for wind energy developments (onshore) identified in Future Wales: 2040 are highly likely to be progressed. There are two pre- assessed areas to the east of Snowdonia, with Area 1 close to the coast near Colwyn Bay. Similarly, proposals with the Crown Estate Round 4 leasing areas to the north of this proposal are also highly likely to progress and should be afforded some weight.	The Pre-assessed Areas for Wind Energy (PAWE) and the Round 4 leasing areas are considered in the CEA in Section 10.13 of the ES chapter.	yes	no
PrB_018_11102021	S42	Volume 2, Chapter 10: SLVIA	It is stated (Vol. 2, para. 1361) that any additional onshore windfarms will have minimal influence. However, we consider that this is dependent on their scale. Onshore windfarms are being progressed to Scoping stage that are 250m height to blade tip and likely to have significant adverse visual effects at some distance.	The tallest scoping stage WTGs within the Study Area are at Alwen Forest and are 200m to blade tip. The CEA considers the effects of the additional consented onshore wind farms and the potential for further wind farm development within the two PAWE areas in Section 10.13.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 2: LVIA	Regarding the onshore substation, no viewpoint has been included from elevated ground to the east within the Clwydian Range and Dee Valley AONB. Whilst we consider significant visual effects unlikely, NRW previously suggested via the ETG that a viewpoint e.g. from Y Foel, would confirm this. The LVIA states that a viewpoint at Rhuddlan or St. Asaph confirms that visual effects from the AONB are unlikely. However, neither viewpoint is within the AONB; the Rhuddlan viewpoint is at low elevation, adjacent to the River Clwyd and the St. Asaph viewpoint is within the urban area.	The AONB is outside the study area to the east of the Onshore ECC and Substation. A meeting was held with NRW to discuss their s42 response and in particular their request for the AONB to be represented in the LVIA. A viewpoint at Y Foel on elevated land to the east of Dyserth, was agreed during this consultation and a visualisation has been prepared for Y Foel as viewpoint 9. This viewpoint is considered in section 2.12 of the Landscape and Visual Impact Assessment Chapter (application ref: 6.3.2), with the agreement recorded in the Evidence Plan Report (application ref: 8.2).	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 2: LVIA	The substation buildings/plant would be up to 15m high with roofs and upper parts potentially visible from high ground. Therefore, NRW confirm that a viewpoint from elevated ground in the AONB would be helpful, if only to potentially scope out these effects.	See response to comment 679	Yes	no
PrB_018_11102021	S42	Volume 4, Annex 10.1: SLVIA Methodology	NRW agree that the methodology is sound and appropriate. However, NRW have some concerns regarding how the methodology and some judgements have been applied. These concerns particularly relate to the assessment of susceptibility and extent of effects.	Agreement of methodology noted. Concerns relating to assessment of susceptibility and extent of effects have been addressed in relation to the specific receptors mentioned.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 10.2: SLVIA Simple Assessment	NRW are generally in agreement with the contents of Table 2 regarding the scoping out of SCAs and LCAs.	This has been noted by the Applicant.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 10.3: SLVIA Visibility Data	NRW note the above documents regarding SLVIA and have no further comments at this stage.	This has been noted by the Applicant	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	NRW’s main concerns regarding pollution appear to have been addressed in the documents; these being pollution arising from oil, fuels, lubricants and suspended solids, through the mobilisation of soil.	This is noted.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	NRW advise that there have been past issues in this area due to a blow-out of HDD drilling fluid under the main river Clwyd. Therefore, if a Flood Risk Activity Permit (FRAP) is required for HDD under the Clwyd or any other main rivers, this potential impact should be considered within the permit application.	The draft DCO disapples the Environmental Permitting (England and Wales) Regulations 2016 and Land Drainage Act 1991 for FRAP and Ordinary Watercourse Consent (OWC). The Applicant will provide a final Construction Method Statement (CMS), an outline version of which is provided as Appendix 2 (application ref 8.13.2) of the outline CoCP (application ref 8.13)), in which it is proposed to include the final detailed design and approach to watercourse crossings. The Final CMS, will be submitted (as part of the final CoCP), to DCC in consultation with NRW, for agreement prior to construction, as secured in the DCO. Proposed measures to prevent frac-out of drilling fluid are provided in the Pollution Prevention and Emergency Incident Response Plan (PPEIRP), that forms part of the CoCP	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	NRW's main concerns regarding fisheries have been addressed in the PEIR, based on the information currently available. However, please note that during any future FRAP consultations we would wish to provide more detailed comments on the specifics of any watercourse crossings – particularly open trenched crossings and culverting that may require fish rescues prior to works.	Trenched crossing of smaller watercourses (see crossings register provided in Volume 5, Annex 1.2: Crossing Schedule (application ref: 6.5.5.1.1) are assumed for this assessment. Trenching options for smaller watercourse crossings are considered to represent the greatest potential impact to ecological receptors, either directly or indirectly through hydrological changes. Please refer also to the CoCP (application ref: 8.13).	yes	yes
PrB_018_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	NRW note that noise-related impacts from HDD on fisheries and fish movements have been scoped out based on previous projects/modelling results. However, NRW advise that it would be beneficial to aim to avoid the main migration periods of smolts and returning adult fish. As noted in the PEIR, the number of salmonids within the Clwyd catchment are in decline, so it is especially important to ensure successful passage to as many of these fish as possible within the Clwyd. If vibrations do slow migration in this location of the River Clwyd, the fish would be particularly vulnerable to predation.	Noise related impacts to migratory and/or spawning fish from HDD at the River Clwyd are not anticipated to be significant and have been scoped out in agreement with the NRW offshore fish advisory team (application ref: 8.2).	yes	yes
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 3.3, Habitats: NRW note reference to Level 3 of the UKHab Primary Habitat Hierarchy.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 3.3.3: NRW concur with the statements regarding Great Crested Newt (GCN) and natterjack toad.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 3.3.5: NRW agree with the statement that many of the ponds have been specifically created as part of previous mitigation measures. However, this part of Denbighshire exhibits a historic high pond density landscape.	This is noted. The Applicant has included an outline Landscape and Ecological Management Plan (application ref: 8.4) which includes proposals for pond creation	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 3.4.4: NRW note that GCN has been highlighted as a nationally important population. Historic (early 20th Century) references suggested a locally important population of GCN at St Asaph. It is surmised that the historic high pond density landscape of marl pits is likely to have been a material factor in the size of the GCN population at this time.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 3.4.7: NRW concur with the statements regarding bats, otter, water vole and dormouse. Note that the water vole population in the environs of the Afon Gele was previously considered to be of at least county importance.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 4.2 Importance of Ecological Features and Further Survey Requirements: the proposed approach for GCN is satisfactory. Note that owing to more than three years' data with cumulative counts of over 100, NRW consider the area to support a nationally important population of GCN. In NRW's view, modelling could be used to inform the relative importance of ponds from a habitat connectivity perspective.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	NRW concur with the proposed approaches to bat, otter, water vole and dormouse survey and assessment.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 5, Conclusions & Recommendations: NRW concur with the further survey recommendations regarding GCN, bat, otter, water vole and dormouse.	This is noted and the results of these surveys are provided within the techncial Annexes to ES Chapter 5: Onshore biodiversity and nature conservation	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 1.3.3, para. 15: NRW suggest that horse chestnut, beech and pine are omitted and black poplar is included.	This is accommodated in the outline LEMP (application ref: 8.13)	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 1.4, para. 23: the comments in respect of GCN and potentially other species e.g. bats are welcomed.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 1.4, para. 24: NRW do not entirely concur with the definition of mitigation, compensation and enhancement. In addition, we advise that restoration may be required, for the purposes of evidencing the Favourable Conservation Status (FCS) test when the current conservation of a species (or habitat) is unfavourable.	Refer to Sections 5.9 – 5.13 of the Onshore biodiversity and nature conservation ES chapter (application ref 6.3.5)for details of mitigation, compensation and enhancement measures included for GCN. Reference to FCS has been included in Sections 5.10 – 5.13 of the Onshore biodiversity and nature conservation ES chapter (application ref 6.3.5)	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 1.4, para. 25: NRW note the comment regarding significance. It is suggested that reference to the FCS test is also cited (i.e. demonstrating no likely detriment to the maintenance of the favourable conservation status of the local population of GCN).	Reference to FCS has been included in Sections 5.10 – 5.13 of the Onshore biodiversity and nature conservation ES chapter (application ref 6.3.5)	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 1.4.1, para's. 30, 31, 33 and 35: NRW welcome the proposals within these paragraphs. NRW advise the consideration of incidental capture/killing during the operational and decommissioning phase (e.g. roadside gullypots in access roads) and restoration actions in order to demonstrate no likely detriment to the maintenance of FCS where the current conservation status is unfavourable.	Detailed engineering design will be concluded post consent: fine details to be conditioned/supplied later on in the planning decision-making process (i.e. post-consent). All such detail would also be included in the EPSL application.	yes	yes
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 1.4.2, para. 37: NRW welcome the proposals within this paragraph.	This is noted.	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Section 1.4.3, para. 40: NRW note the requirements of a long-term plan that includes defined aims and objectives; habitat management prescriptions; contingency measures if fish or invasive non-native species (INNS) are detected; proposals that are capable of being implemented in the event of failure to undertake or to appropriately implement identified or contingency actions; site liaison and wardening; licensing requirements for undertaking habitat management and surveillance; current and any proposed changes to tenure of the compensation area; [freehold] tenure of the compensation to be approved by the LPA in consultation with NRW; persons or bodies responsible for undertaking management and surveillance together with required skills and competencies; reporting requirements; and proposed dates for updating or revising the management plan.	The Applicant has included an outline Landscape and Ecological Management Plan (application ref: 8.4) which includes proposals for long term management as well as defined aims and objectives. Existing records and survey data relating to INNS are summarised in Section 5.7 with further detail provided in Volume 5, Annex 5.3. An Outline INNS Management Plan is provided in Appendix 11 (application ref: 8.13.11) to the Outline CoCP (application ref: 8.13).	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 6: Ground Conditions and Land Use	NRW note that the majority of the cable corridor from landfall to substation will be across agricultural land with minor potential to encounter land historically affected by contamination. The main areas of concern would be road and railway crossings. NRW understand that targeted site investigations for land contamination would be completed in these areas. NRW agree with this proposal and advise that the format should follow our guidance: A Guide for Developers (Wales) (May 2017) There is potential for unsuspected contamination to be found during the work and a strategy to deal with this will be required.	The comment from NRW is noted and reflects the preliminary findings of this assessment at PEIR which are confirmed in Section 6.10 ES	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Please note that the Groundwater Regulations 2009 have been superseded and absorbed into the Environmental Permitting Regulations 2010 and 2016; any reference to the Groundwater Regulations should therefore be removed. The existing environment has been characterised for both relevant chapters, the only item not mentioned (this may be as there are none, but it needs confirming) is whether there are any licenced groundwater abstraction or private water supplies (held on the public register with the local authority) within the study area. If there are any, the risk of the construction and operation of the onshore development on these features should be assessed. Please note not all private water supplies are registered with the local authority so door-to-door enquiries may be required if there is no mains water supply in the study area to identify private water supplies.	The comment on GroundWater Regulations is noted and has been reflected in the Hydrology, Hydrogeology and Flood Risk ES chapter (application ref 6.3.7.). Information on discharge consents and licenced private water supplies is provided in Section 7.7.6 and Section 7.7.7 of the chapter.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	The majority of the cable laying will be completed by open trenches with trenchless sections (using Horizontal Directional Drilling (HDD)) for river crossings (mainly the River Clwyd), road (A55) and railway. It is understood that additional site investigation will be completed at these locations and NRW agree with this proposal. NRW recommend that a groundwater risk assessment is completed for each section of HDD to ensure that all risks are assessed, and any mitigation measures are outlined and implemented during construction and operation. Clarification should be provided as to whether piling is only (potentially) planned at the substation. If piling is to be used the risk to groundwater should be determined with a groundwater risk assessment, see: Piling into Contaminated Sites	Groundwater Risk Assessments are provided in Volume 5, Annex 7.3 to Annex 7.6 (application ref 6.5.7.3 to 6.5.7.6: Groundwater Risk Assessments)	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Overall, NRW note that the risk of the landfall construction to groundwater resources and quality is considered low and we agree with this conclusion. Section 7.7.6, para. 100: This states that “The following discharge consents are recorded within 250 m of the proposed onshore infrastructure:” However, NRW note that there are no discharge consents listed in this section so, if present, these should be included in the ES.	This is noted. Information on discharge consents and licenced private water supplies is provided in Section 7.7.6 and Section 7.7.7 of the Hydrology, Hydrogeology and Flood Risk ES chapter (application ref 6.3.7.).	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Please be aware that as of 1st December 2021, the updated TAN15: Development and Flood Risk (2021) should be referred to rather than the 2004 publication. Welsh Government have advised that all decisions made post 1st December 2021 should apply the content of the new TAN 15 and associated Flood Maps for Planning (which replace the Development Advice Maps). See: Technical advice note (TAN) 15: development, flooding and coastal erosion GOV.WALES.	At the time of reporting, the new TAN 15 guidance is expected to be implemented in June 2023, which will follow the submission of the AyM application for development consent. Any changes to the planning guidance with respect to these proposals will remain under TAN15 in its current form, however the emerging changes have been reviewed as part of the assessment process	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Please be aware that as of 1st December 2021, the updated TAN15: Development and Flood Risk (2021) should be referred to rather than the 2004 publication. Welsh Government have advised that all decisions made post 1st December 2021 should apply the content of the new TAN 15 and associated Flood Maps for Planning (which replace the Development Advice Maps). See: Technical advice note (TAN) 15: development, flooding and coastal erosion GOV.WALES.	At the time of reporting, the new TAN 15 guidance is expected to be implemented in June 2023, which will follow the submission of the AyM application for development consent. Any changes to the planning guidance with respect to these proposals will remain under TAN15 in its current form, however the emerging changes have been reviewed as part of the assessment process	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	NRW's following comments on flood risk therefore refer to the updated TAN15. Obviously, this will supersede paragraphs 23 and 24 in Section 7.2.3 (Planning Policy) of Chapter 7.	At the time of reporting, the new TAN 15 guidance is expected to be implemented in June 2023, which will follow the submission of the AyM application for development consent. Any changes to the planning guidance with respect to these proposals will remain under TAN15 in its current form, however the emerging changes have been reviewed as part of the assessment process	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	NRW note that Section 7.6 (Uncertainty and technical difficulties encountered) refers to using publicly available data from NRW and Denbighshire County Council to assist in the assessment of flood risk. NRW advise that Section B of the route passes beneath Rhyl golf course and as such recommend further assessment of the impact any coastal defence schemes promoted by DCC may have on the route/proposal and vice versa. Outline details are available on the DCC website (https://www.denbighshire.gov.uk/en/community-and-living/coastal-defence/central-prestatyn/central-prestatyn.aspx).	The Applicant confirms that the cables will be installed beneath the existing (and proposed) sea defences using trenchless crossing techniques such as HDD. The Applicant will continue to engage with DCC regarding the proposed AyM works and proposed flood defence works	Yes	yes
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	The draft order limits within Section B include an NRW-maintained asset (Rhyl pumping station) which affords a degree of fluvial protection to numerous properties (commercial and residential) in the area. NRW's preference would be for landfall to occur as far east as possible within the draft order limits and away from the pumping station and associated culverted main river (Rhyl Cut Pumphouse leg). Thus, para. 69 should be corrected to advise that the Rhyl Cut also discharges via the golf course, as well as into the Clwyd estuary.	The cables will be installed using HDD or other trenchless crossing technique in this area and so will not affect the pumping station. The pumping station is located outside the onshore ECC as shown in Figure 4 of the Volume 3, Chapter 1: Project Description (application ref: 6.3.1)	Yes	yes
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	With regards to Section 7.7.4 (Flood Risk), para. 86 suggests that the defences (at landfall) “.....are considered to offer protection against tidal flooding for at least the 1 in 1,000 year event over the lifetime of AyM OWF.” As per the above, DCC are investigating and promoting a coastal defence improvement scheme which may therefore contradict this statement. Tidal flooding has occurred to properties in the vicinity of the landfall area (most notably in 2013), hence the lifetime of the existing defences may not provide the standard of protection for the lifetime to be considered for the AyM proposal. The following paragraph acknowledges the current improvement works to the west of the landfall area by DCC.	The Applicant confirms that the cables will be installed beneath the existing (and proposed) sea defences using trenchless crossing techniques such as HDD. The Applicant will continue to engage with DCC regarding the proposed AyM works and proposed flood defence works	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Whilst reference is made to having obtained (assumed from DCC) the JBA Consulting. (2018) Denbighshire Flood Consequence Assessment – Level 1 (see Section 7.17), it is also recommended that you obtain (from NRW) a copy of JBA Consulting's Point of Ayr to Pensarn Tidal Flood Risk Assessment (2017). This report considers a possible breach scenario (10) in the coast defences adjacent to Garford Road in Rhyl. The Golf Club is shown to be affected on a current day 0.5% event. The report can be obtained via: datadistribution@cyfoethnaturiulcymru.gov.uk	JBA Consulting's Point of Ayr to Pensarn Tidal Flood Risk Assessment (2017) has been reviewed and informs the Hydrology, Hydrogeology and Flood Risk Assessment of the ES (application ref: 6.3.7)	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	NRW suggest that para. 90 should be updated. The reference to Low, Medium and High would appear to have been obtained using NRW's Flood Risk Assessment Wales mapping, which shows current day flood risk and does not account for climate change allowances. Development proposals (determined post 01/12/21) will need to refer to the Flood Map for Planning. See: Technical advice note (TAN) 15: development, flooding and coastal erosion GOV.WALES	The Hydrology, Hydrogeology and Flood Risk Assessment of the ES (application ref: 6.3.7) has been undertaken with reference to the Flood Map for Planning	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	NRW are generally satisfied with the content of section 7.9 (Embedded Mitigation) for measures to manage flood risk during construction/operation/decommissioning. However, each main river crossing and crossing of associated flood defence infrastructure e.g. Clwyd estuary flood embankments, will be subject to the requirements of Flood Risk Activity Permits (FRAP) issued by NRW under the Environmental Permitting Regulations, 2016. Each application/crossing will require a bespoke FRAP with supporting information. Para. 137 refers.	The draft DCO disapples the Environmental Permitting (England and Wales) Regulations 2016 and Land Drainage Act 1991 for FRAP and Ordinary Watercourse Consent (OWC). The Applicant will provide a final Construction Method Statement (CMS), an outline version of which is provided as Appendix 2 (application ref 8.13.2) of the outline CoCP (application ref 8.13)), in which it is proposed to include the final detailed design and approach to watercourse crossings. The Final CMS, will be submitted (as part of the final CoCP), to DCC in consultation with NRW, for agreement prior to construction, as secured in the DCO	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	NRW advise for para. 133 under “Likely environmental effects: Flood Risk” to be expanded to clarify that the stockpiles of excavated materials could also affect fluvial flood risk from main rivers and indeed tidal flood risk, and not only block overland flow of surface water. Thus, the Code of Construction Practice (CoCP) should also reflect and manage the impact on flood conveyance/displacement for all sources of flood risk.	The Construction Method Statement, provided as part of the CoCP (application ref:8.13.2), provides a commitment that storage on the floodplain of excavated material and other construction materials will be positioned in a manner that does not constrain potential flood waters unduly or direct flood waters towards population or industrial centres of high sensitivity	Yes	no
PrB_018_11102021	S42	Volume 8, Document 3.1: Outline CoCP	Volume 8 (Document 3.1): Outline Code of Construction Practice Volume 8 (Document 3.2): Outline Construction Method Statement Volume 8 (Document 3.7): Outline Pollution Prevention and Emergency Incident Response Plan	Informative from Consultee - Noted. The Applicant would note that the CoCP and associated annexes has been updated and accompanies the application (application ref: 8.13).	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	As with NRW's comments above, the site-specific FCA's should be updated to ensure reference and compliance is made to the updated TAN15 post 1st December 2021, as the DCO application is to be submitted after that date.	At the time of reporting, the new TAN 15 guidance is expected to be implemented in June 2023, which will follow the submission of the AyM application for development consent. Any changes to the planning guidance with respect to these proposals will remain under TAN15 in its current form, however the emerging changes have been reviewed as part of the assessment process	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	The FCA advises that two below ground transition Joint Bays (TJB) and Horizontal Directional Drilling (HDD) exit pit(s) with associated temporary compounds and access routes may be located within Rhyl Golf Course. Again, as per the above this may conflict with the proposal by DCC for the Central Prestatyn coastal scheme which they are investigating. It is suggested that this be addressed with DCC and the FCA amended accordingly.	The Applicant is no longer taking forward the option for TJBs within the golf course, which will instead be located to the south of the railway. As set out in the Onshore Project Description Chapter (application Ref: 6.3.1), the cables will be installed beneath the golf course and sea defences using HDD or other trenchless installation techniques.	Yes	yes
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	Again, reference in the FCA is made to Low/Medium/High risks, which are current day risks. Section 4.3.1 refers to breach or failure of defences. Whilst the FCA suggests that a failure or breach of defences would be considered unlikely, NRW advise that the FCA should consider such an event and the impact of a breach on the construction phase. Breaches cannot be accurately predicted and whilst flood warnings are issued for this coastal frontage by NRW, the magnitude of an event is unlikely to meet the criteria of assessing risks in line with TAN15 i.e. 0.5% and 0.1% and breaches. Therefore, the FCA should include any mitigation measures that can be considered for a breach event rather than reference the Flood warnings.	The Onshore ECC FCA (application ref: 6.5.7.1) has been undertaken with reference to the Flood Map for Planning and gives consideration to the potential impact from a breach of flood defences during construction phase.	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 7: Hydology and Flood Risk	As with NRW's comments above, the site-specific FCA's should be updated to ensure reference and compliance is made to the updated TAN15 post 1st December 2021, as the DCO application is to be submitted after that date. The site is not shown to be affected by flooding from rivers and the sea in the Fmfp, but it does show a possible impact due to flooding from surface water and small watercourses. NRW therefore advise that, as per TAN15 (2021), the Lead Local Flood Authority is best placed to advise further on this source of flood risk and the content of the FCA.	At the time of reporting, the new TAN 15 guidance is expected to be implemented in June 2023, which will follow the submission of the AyM application for development consent. Any changes to the planning guidance with respect to these proposals will remain under TAN15 in its current form, however the emerging changes have been reviewed as part of the assessment process. Consideration of the potential impact due to flooding from small watercourses is given in the Onshore ECC FCA (Application ref: 6.5.7.1)	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Page 15, “Locations” column in Table 2: clarification is needed where the time threshold of “6 months” for annual mean exposure is derived from and the supporting evidence for this. Similarly, clarification is needed where the time threshold of “eight hours or more in a day” originates from. Neither of these are mentioned in LAQM (TG16), and other cited guidance listed in Paragraph 39 on page 20.	These references have been removed from the Air Quality Assessment presented in Chapter 11 of the ES (Application Ref: 6.3.11)	Yes	no

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PrB_018_11102021	S42	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Paragraphs 62 and 63: the report argues that “the significance of unmitigated effect of construction dust cannot be defined”, but the report also states that “significance is only assigned to the effect after considering the construction activity with mitigation”. However, the report hasn’t clarified how the effectiveness of the mitigation can be defined.	The assessment methodology (and identification of appropriate level of mitigation) has been undertaken as per relevant guidance listed in Section 11.2.4 of the Air Quality Chapter (application ref 6.3.11) As per relevant guidance, a series of dust controls are recommended following identification of potential risks – based upon potential activities and surrounding sensitivities. Following effective application of these dust controls, residual effects are considered to be not significant. Relevant dust controls (and monitoring framework) will be included within the AQMP that is part of the CoCP, developed for the proposed onshore construction activities, to secure their effective implementation and anticipated residual effects. See Section 11.4.1 of the Air Quality Chapter (application ref 6.3.11).	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Paragraph 72: In-combination assessment should also be applied to the national sites, if appropriate.	Following discussions with NRW and DCC via the ETG process, it had been agreed, prior to Statutory Consultation, that in-combination screening of road traffic impacts on ecological designations would be limited to international sites. This approach was formally proposed to the ETG Air Quality members (DCC and NRW) via a PEIR Method Statement (SLR, 2021) with the inclusion of a specific question on these matters. NRW provided a formal response agreeing with the approach proposed (NRW, 2021). However, in response to NRW’s feedback from Statutory Consultation, an in-combination screening has also been conducted in relation to national sites for the ES. See Section 11.5.2 of the Air Quality Chapter (application ref 6.3.11).	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Paragraph 146: NRW cannot agree to rule out any future assessment requirement at this stage, as some may need a site-specific assessment at a later stage.	The Air Quality assessments undertaken in support of the PEIR have been repeated for the ES with the consideration of further project information and design clarifications.	Yes	no
PrB_018_11102021	S42	Volume 3, Chapter 9: Traffic and Transport	Please refer to NRW’s comments above for Chapter 11.	This is Noted	Yes	no
PrB_018_11102021	S42	Volume 8, Document 3.1: Outline CoCP	PEIR Volume 8, Document 3.4: Outline CoCP, Appendix 3, Outline Air Quality Management Plan: The first bullet point on page 9 and the sixth bullet point on page 10. It would be helpful to implement the air quality management plan if the conditions triggering these “desirable” measures can be specified. The last three bullet points in the “Specific to Construction” section on page 11. Clarification is needed to explain why these desirable measures cannot be considered essential. The third bullet point on page 12. “Access gates to be located at least 10m from receptors where possible”. Site-specific assessment may need to be considered if the receptor/s is/are very close to the site.	The classification of 'Essential' and 'desirable' is taken from Institute of Air Quality Management Guidance on the assessment of dust from demolition and construction (2104). The Applicant has updated the Code of Construction Practice (CoCP) and associated annexes which are included in the application (application ref: 8.13 et seq)	yes	no
PrB_018_11102021	S42	Volume 3, Chapter 11: Air Quality, Health and Climate Change	Table 4: clarification is needed whether this table considers the emissions from possible Non-Road Mobile Machinery(s) if a close human receptor(s) is present.	Impacts associated with likely NRM PM10 emission contributions on human health have been considered as part of the construction dust assessment within the ES. See Section 11.10.1 of the Air Quality Chapter (application ref 6.3.11).	Yes	no
PrB_018_11102021	S42	Volume 8, Document 3.1: Outline CoCP	The legislation section of the Site Waste Management Plan refers to the Environmental Permitting Regulations 2010. However, these have been superseded by the EPR 2016 so this reference should be updated.	The Applicant has updated the Code of Construction Practice (CoCP) and associated annexes which are included in the application (application ref: 8.13 et seq)	yes	no
PrB_018_11102021	S42	Volume 8, Document 3.1: Outline CoCP	Any construction or demolition work must be carried out in accordance with Environment Agency PPG 6: Working at Construction and Demolition Sites. The activity of importing waste into the site for use as, for example hardcore, must be registered with Natural Resources Wales as an exempt activity under the Environmental Permitting Regulations, 2016. Natural Resources Wales should be contacted to discuss the necessity for an exemption or permit for any waste material imported to, treated on and exported from the site. No material is to be deposited within 10m of any watercourse without discussion with Natural Resources Wales. Should any contaminated water or materials enter or pollute a watercourse or groundwater, Natural Resources Wales must be notified on 03000 65 3000.	The Applicant has updated the Code of Construction Practice (CoCP) and associated annexes which are included in the application (application ref: 8.13 et seq)	yes	no
PrB_018_11102021	S42	Volume 8, Document 3.1: Outline CoCP	Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be 110% of the capacity of the tank, all filling points, gauges, vents and sight glasses must be located within the bund. Associated pipe-work should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund, refuelling should be supervised at all times - and preferably done on an impermeable surface.	The Applicant has updated the Code of Construction Practice (CoCP) and associated annexes which are included in the application (application ref: 8.13 et seq)	yes	no
PrB_018_11102021	S42	Volume 8, Document 3.1: Outline CoCP	If during construction/excavation works any contaminated material is revealed, then the movement of such material either on or off site must be done in consultation with Natural Resources Wales. Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily and in accordance with Section 34 of the Environmental Protection Act 1990. Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the site must be accompanied by Hazardous Waste consignment notes.	The Applicant has updated the Code of Construction Practice (CoCP) and associated annexes which are included in the application (application ref: 8.13 et seq)	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Marine Lake bathing water has been scoped out, with the justification that it is not connected to the marine environment. However, NRW disagree that Marine Lake should be scoped out from the assessment, as there is a connection to the marine environment during flow reversal.	Marine Lake Bathing Water has now been included in the assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Please refer to NRW’s marine WFD Compliance Assessment advice regarding marine matters and WFD e.g. bathing waters.	This is noted. Specific advice is picked up in the comments below.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Page 51: in the April 2021 response to the WFD scoping position paper submitted under the Evidence Plan, NRW informed the applicant that “NRW will publish an updated 2021 WFD classification in the final river basin plan, due December 2021.” However, NRW have had to extend the timeline for the publication of the final River Basin Management (RBMP) Plans for the Dee and Western Wales. Several outstanding issues have had to be addressed before finalising the plans including the publication of the Standards and Classification Directions, which is a joint instruction with England. Welsh Government have agreed with this assessment and new timeframe. NRW intend to submit the final River Basin Management Plans (RBMPs) for the Dee and Western Wales to the Minister in April 2022 and publish the final plans in July 2022. However, NRW intend to release the updated 2021 water body classification ahead of the final plan publication - probably in December 2021. These dates are approximate and not yet confirmed.	This is noted. The latest classifications have been included for relevant WFD waterbodies.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Page 59, Freshwater para. 50: water quality should not be limited to physico-chemical and specific pollutants. NRW advise that chemicals should also be included as for the marine environment (para. 49).	This is noted and has been added to the WFD assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Page 69, Table 2 and p. 70, Figure 4: it is difficult to distinguish locations of the crossings. Figure 4 suggests 5A-WX-11 and 12 are the trenchless crossings, whereas Table 2 describes 5A-WX-8 and 9 as the trenchless crossings.	The table and figure have been updated in the final WFD Assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Section 5.7, para. 109: Marine Lake bathing water has been scoped out, with the statement that it is not connected to the marine environment. However, NRW disagree that Marine Lake should be scoped out from the assessment, as there is a connection to the marine environment during flow reversal. NRW agree that for the majority of the time the lake is only topped up on high tides. However, there are occasions when the lake is drained down by Denbighshire County Council. This has taken place when increased bacte levels are detected or when blue-green algae is present, both of which have occurred fairly recently. The lake is then refilled during the high tide rather than being topped up. Therefore, NRW advise that the Marine Lake should be scoped in to the assessment. There is an ongoing investigation into the recent increased bacte results. One possibility is that the initial topping up of the lake on the high tide is river water that is backed up, before sea water is then pushed through. There is a meter deployed at the moment reading salinity readings of the inflow to the lake. Understanding whether the input of water to the lake is more freshwater from the river or saltwater from the sea could give a good indication of the potential impact on the bathing water from the proposed works.	Marne Lake BW has now been included in the assessment.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Page 96 states that “Both the North Wales and Clywd waterbodies are classed as heavily modified. However, they are not modified for the purpose of renewable energy and therefore no further consideration of the potential impacts associated with AyM is required.” NRW refer the applicant to previous NRW comments referenced on p.40, Heavily Modified Waterbody (HMWB): “The Applicant is correct in stating that the waterbodies are not Modified for renewable energy, however this means that the potential impacts of the project on the Mitigation Measures or potential Mitigation Measures of the HMWB do not need to be considered, and the project “should be treated as a new modification”.	Text has been amended in the WFD assessment and consideration of potential impacts to mitigation measures has been included.	yes	no

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PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Page 99, Water quality: clarification is needed if this discussion includes input of sediment from freshwater sources upstream via Clwyd transitional WB or non-reportable water bodies (land between Afon Gele and Glanfyddion Cut) or if it refers only to marine project activities.		yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Page 109: the text on the “macrophytes, diatoms and invertebrates” receptor appears to contradict the text on p.108 above for the fish and eels receptor where it is stated "which could in turn harm the habitats of fish, macrophytes and phytobenthos, and invertebrates."	Table text amended.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	Page 142, section 7.5: NRW recognise the WFD compliance assessment seeks to draw from, and signpost to where relevant information is provided within the PEIR and to demonstrate compliance with the WFD, rather than duplicate assessment. There is generally a reasonable balance. However, the Cumulative Effects section would benefit from more information – at the moment the reader has to refer to the signposted sections for any detail about marine or freshwater elements.	Text added to support the CEA.	yes	no
PrB_018_11102021	S42	Volume 4, Annex 3.1: WFD Assessment	NRW note that the WFD CA refers to the earlier 2018 version of Operational Guidance Note 72 - Complying with the Water Framework Directive Regulations 2017: how to assess and appraise projects and activities.” Please note that NRW has updated OGN 72 this year so we would be willing send an updated version to the applicant if required.	This is noted. The updated OGN72 has been provided by NRW and has been used to support the compliance assessment.	yes	no
PrB_017_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	It would be helpful for the project to consider statements made by BEIS in the recently published Energy White Paper (December 2020)1 regarding coordination, site selection and the assessment of alternatives.	Thas has been considered within the site selection and alternatives chapter (application ref: 6.1.4) and the SLVIA chapter (application ref: 6.2.10) of the ES.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	There are significantly more references to the ecology of intertidal rock habitats than to seabed sediments. However, to our knowledge this area has minimal rocky habitat beyond artificial coastal protection works. Please refer to Appendix B for further technical comments on these figures and the wider Benthic, Subtidal and Intertidal Ecology chapter.	Noted. Comments from Appenfdix B are provided in rows below.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	We are concerned to note that the worst-case total long-term habitat loss change is 1,611,000m2 and that this is underplayed as a small area within the PEIR, and this of small magnitude for impact assessment. More accurate figures for the amount of habitat lost must be provided for regulators and other organisations to properly assess the impact significance. A breakdown of the exact amount of habitat lost for each of the different array / cable route options should be provided in tabular form with an impact significance assigned.	This has been reviewed throughout this chapter and updated accordingly in Sections 5.11, 5.12 and 5.13 of the ES chapter.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	The table states that the cable and scour protection may be left to remain in situ post-decommissioning. This should not be left as a matter of course; at the end of the wind farm’s life, surveys should be conducted to assess the quality of the communities established and a decision on their removal made in conjunction with the statutory authorities. Developers in the marine environment have a legal requirement to remove cable protection through: •Requirements to decommission under UNCLOS 1982. •Requirements to decommission under the Energy Act 2004. •ØSPAR Decision 98/3 on the Disposal of Disused Offshore Installations states that the leaving wholly or partly in place of disused offshore installations within the maritime area is prohibited. •Subsea cabling sector policy of the Welsh National Marine Plan •Enhanced biodiversity duty and resilience of ecosystems duty under the Environment (Wales) Act 2016	This is noted. A decommissioning plan is anticipated to be required as a condition of the marine licence.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	We do not agree with the assessment of ‘medium’ that has been given to sensitivity of herring to noise impacts. Herring spawning grounds are an important area utilised by adult herring who spawn directly onto the seabed. Displacement due to noise during wind farm construction / decommissioning could have potentially serious population implications. Herring return to the same spawning site every year and expend a significant amount of energy reaching their destination. If noise restricts their access to these areas they may have no energy remaining to locate an alternative site and may ‘abort’ their eggs. This would have a substantial impact on the herring population and potentially an indirect effect on a wide range of other species as herring are an essential component of many food chains. We would recommend considering further mitigation measures to be put in place.	A commitment has been made by the Applicant for soft start piling to be used for all piling, no matter what time of the year. Suitable sediments being present does not indicate that spawning occurs in these areas, as sediment suitability is not the only factor that influences herring spawning. Therefore, additional weight has not been given to the presence of suitable habitats in the assessment of noise impacts on spawning herring, due to the desk-based review not finding any evidence of historic spawning grounds.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	Due to the reasons stated above we do not agree with the assessment of minor adverse significance for mortality and potential mortal injury, recoverable injury or behavioural impacts. While we recognise that the Awel y Môr array area and cable route do not overlap with the Isle of Man herring spawning grounds, Figure 5 shows that the site overlaps with key areas of habitat suitability for herring and identified herring nursery grounds. Taking into account that herring is both an important commercial species and a UK BAP species2, we advise that the precautionary principle should be exercised, with soft, slow start piling recommended year round, and especially during the breeding season (late September to November).	AyM overlaps with herring nursery grounds but has no overlap with herring spawning grounds (See Figure 5). The closest herring spawning ground is located off the Isle of Man, out of range of any potential noise disturbance from piling operations.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	We are disappointed that fishing has been considered as part of the baseline and has not been included in the CEA for fish and shellfish ecology. Fishing is a licensable activity that has the potential to have an adverse impact on the marine environment, including fish and shellfish. This is supported in the leading case C-127/02 Waddenzee [2004] ECR I-7405, the CJEU held at para. 6. “The act that the activity has been carried on periodically for several years on the site concerned and that a licence has to be obtained for it every year, each new issuance of which requires an assessment both of the possibility of carrying on that activity and the site where it may be carried on, does not itself constitute an obstacle to considering it, at the time of each application, as a distinct plan or project within the meaning of the Habitats Directive”. This case law demonstrates that fishing is considered a plan or a project and therefore, not part of the baseline.	The Applicant recognises this request, however as an existing activity commercial fishing is considered to form part of the baseline environment. This approach is in accordance with the guidelines for undertaking cumulative effect assessment in offshore wind farms (Renewable UK, 2013).	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Although bottlenose dolphins tend to be seen and recorded in greater numbers in coastal waters, this does not mean that they are not present in offshore waters. In fact, evidence shows that bottlenose dolphins do use the array area. Given that Volume 4 Annex 7.1 states that bottlenose dolphin data will be made available for inclusion in the ES, then this section should be reviewed and reassessed at this time.	The Sea Watch Foundation data on bottlenose dolphin has now been included in the final ES.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 7: Marine Mammals	We note that while the applicant has included proposed offshore wind farms in the cumulative effects assessment (CEA), there are other proposed projects in the region that are likely to cause disturbance to marine mammals have not been included, such as the proposed Morlais tidal energy project. We believe these projects should also be included within the CEA.	The consented Morlais tidal scheme has now been included in the final ES.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 7: Marine Mammals	We are disappointed that fishing has been considered as part of the baseline and has not been included in the CEA for marine mammals. Fishing is a licensable activity that has the potential to have an adverse impact on the marine environment, including marine mammals. This is supported in the leading case C-127/02 Waddenzee [2004] ECR I-7405, the CJEU held at para. 6. “The act that the activity has been carried on periodically for several years on the site concerned and that a licence has to be obtained for it every year, each new issuance of which requires an assessment both of the possibility of carrying on that activity and the site where it may be carried on, does not itself constitute an obstacle to considering it, at the time of each application, as a distinct plan or project within the meaning of the Habitats Directive”. This case law demonstrates that fishing is considered a plan or a project and therefore, not part of the baseline.	The Applicant recognises this request, however as an existing activity commercial fishing is considered to form part of the baseline environment. This approach is in accordance with the guidelines for undertaking cumulative effect assessment in offshore wind farms (Renewable UK, 2013).	yes	no
PrB_017_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	Table 2 shows that for 49% of aerial sightings it was unknown whether the sighting was of a porpoise or dolphin and none of the dolphin sightings were identified to species level. This does not provide us with enough evidence as to the marine mammal abundance in the Awel y Môr region.	This is acknowledged in Volume 4: Annex 7.1: Marine mammal baseline. Other data sources have been used to supplement the baseline characterization.	yes	no

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PrB_017_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	We are disappointed to see that The Sea Watch Foundation sightings database has not been made available for inclusion in the Marine Mammal Baseline Characterisation however we are pleased to see that it will be made available for inclusion in the ES. Given the lack of information provided by the aerial surveys (see comment above) and vessel based sightings and the lack of suitable existing database we currently believe the data lacking within the baseline characterisation and therefore given additional data we'd like to see further modelling undertaken in the ES.	This has now been obtained and is included in Volume 4, Annex 7.1.	yes	no
PrB_017_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	We are pleased to see that the wide spread movement of bottlenose dolphins has been considered and that connectivity between Awel y Môr and SACs which where bottlenose dolphin are a designated feature will be considered within the HRA.	This is noted. See comments on the RIAA.	yes	no
PrB_017_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	While the seasonality of Risso's dolphin has been briefly discussed in the Sections 5.1-5.8 where it applies to the associated data source, consideration of seasonality does not appear to have made it into either the baseline summary (Section 5.9) or Chapter 7 of the main PEIR report. As mentioned in our joint response to the scoping report, it is likely that this species is not present in the same numbers all year round and there is evidence that there is a clear increase in the sightings of Risso's dolphins recorded from the North Coast of Anglesey in late summer and early autumn. As marine mammal species can be highly mobile, seasonality and the associated presence/absence of marine mammal species throughout the year will be key in determining both the degree of impact and the timing of any future construction and mitigation measures. Therefore, it is important that this information is placed upfront where it can be considered. This approach should be applied to all seasonal receptors.	Seasonality information has been added to Volume 4: Annex 7.1: Marine mammal baseline.	yes	no
PrB_017_11102021	S42	Volume 4, Annex 7.2: Outline MMMP	We welcome the approach by RWE in engaging with NWWT & TWT on Awel y Môr during the evidence plan process and we hope that this can continue into the post-consent stage to reflect the best practice we have been developing with other wind farm developers post-consent. We request to be named on all marine mammal monitoring and mitigation documents as a consultee. We look forward to discussing this in more detail with you over the coming months.	This is noted by the Applicant.	yes	no
PrB_017_11102021	S42	Volume 4, Annex 7.1: Marine Mammal Baseline	We are pleased to see that the Angel Bay haul out site is mentioned within this chapter. However we are disappointed to find that data held by Cofnod (North Wales Records Centre) has not been considered given that it by far the closest haul- out site to the Awel y Môr development. We previously highlighted this dataset in our joint response to the scoping report. Although the site is not within an SAC where grey seal are a designated feature, as stated in Section 8.7 seal telemetry data shows high connectivity with grey seal SACs: Pen Llŷn a'r Sarnau/ Lleyn Peninsula and the Sarnau (Wales), Cardigan Bay/ Bae Ceredigion (Wales), Pembrokeshire Marine/ Sir Benfro Forol (Wales) the Saltee Islands (Ireland) and the Isles of Scilly Complex SAC (England). We would therefore urge that consideration is given specifically to the haul out at Angel Bay within the HRA process. We welcome the inclusion of connectivity with the Republic of Ireland and with the Isle of Man in the assessment of transboundary effects.	This has now been included in Volume 4, Annex 7.1.	yes	no
PrB_017_11102021	S42	Volume 4, Annex 7.3: Marine Mammal Quantitative Assumptions	Regarding predicting response, the document states that "There is limited empirical data available to confidently predict the extent to which animals may experience auditory damage or display responses to noise." In order to understand the impact the project will have on marine mammal populations in this region, the development of a strategic approach to marine mammal monitoring between Gwynt y Môr and Awel y Môr (or other offshore wind farm projects in Liverpool Bay) would yield the most useful data to improve knowledge on this subject and maximise the use of resources.	This is noted by the Applicant.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	General comments on Chapter 5 In this chapter, there are significantly more references to the ecology of intertidal rock habitats than to seabed sediments. To our knowledge this area has minimal rocky habitat beyond artificial coastal protection works. We are pleased that the possibility of encountering peat along the cable route corridor has been identified. It should also be noted that further sampling was undertaken in this area during the Liverpool Bay Sludge Disposal Studies (not referenced). During this time, there was evidence that sometimes the veneer of sediment was thin enough for the sampling grab to hit the glacial till. Vibro-coring was undertaken as part of the sludge investigations, where it was found that inshore there are areas where the there are anoxic sub-surface conditions especially after residues of plankton blooms advect into limited areas. Therefore, we recommend that the benthos studies for Awel y Môr should also be linked with such coring as has been undertaken, whether it is deeper drilling or fairly shallow vibro-coring. Regarding MNCR classification, it should be noted that the MCNR was primarily dive and hard ground led, the nodes on continua are not always the same in offshore lag sediment areas. Our experience is that some of the inshore muddy sand areas seem to switch between MNCR categories. Allowances should be made for switching between dominance of short lived bioturbating species to more stable conditions with a greater diversity of longer lived species. We have included the descriptions on the benthos of the various zones below based on practical benthic sampling and monitoring experience in the Greater Liverpool Bay area, the wider Irish Sea and St Georges Channel.3	Information has been noted and included in the ES were appropriate. Figures have been updated to better illustrate the full data coverage of the development area.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Array area The area towards the western edge of offshore Liverpool Bay is near the transition between the inshore waters (in quality terms) and the slightly more saline open Irish Sea. In loose terms, several studies found a transition at about 4 degrees West in salinity, turbidity, nutrients and more particularly the phytoplankton regime. This is not a fixed "front" but is weakly defined and moves. Most of the superficial sediment in this area is a gravelly sand with enough mud in the interstices for it to be partly cohesive on the northern edge. There are large amounts of shell contributing to the gravel component. In places the area is quite bivalve rich and under the original Petersen classification it would be in his Deep Venus community. Among the common large bivalves are Venus fasciata, Venus casina, Spisula elliptica, Laevicardium crassum and some Glycimeris glycimeris with quite a lot of Chlamys opercularis on the surface. Sea bed photos and side scan sonar displays show that this area has been subject to high disturbance from scallop dredging, and trawling by heavy beam trawls in the last 50 years. The impact of scallop dredging and beam trawling in the Irish Sea has been explored by Kaiser et al. (1996) 4. It is notable in Figure 2 that there has been less sampling of the western part of the array area than for the rest of the site for which there is pre-existing data from other windfarm projects. We are do not have full certainty that this is sufficient to characterise the benthos of the whole site. The distribution of sand binding hydroids such as Nemertesia antennina is important in this region, alongside any other biogenic features that influence bed load transport such as Flustra, Chaetopterus tubes and Alcyonium.	Information has been noted and included in the ES were appropriate. Figures have been updated to better illustrate the full data coverage of the development area.	yes	no
PrB_017_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Zone of influence The zone of influence to the west of the array area runs towards coarser ground likely to have more boulders. In the past there were patches with Modiolus reefs but these have since been decimated by scallop dredging. The report states that the extent of the area was set to allow for the settlement of fines put into suspension. It should be noted that fine particles may settle on neap tides in the lows between ripples but get resuspended on spring tides if they do not stay long enough to become cohesive. Through cycles of settlement and resuspension fines, including organic detritus will often be advected to and concentrate in certain locations. In Liverpool Bay the advection by near bed residual currents and selective deposition is shorewards.	Information has been noted and included in the ES were appropriate.	yes	no

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PrB_017_11102021	S42	Volume 2, Chapter 5: Benthich Subtidal and Intertidal Ecology	Cable corridor Broadly this will run through several zones. Offshore the route may run through a stony area. This was even marked on old fishing charts as having fasteners and it was a problem area for grab sampling. As Liverpool Bay was subject to river channel development before sea levels rose there are old channels part filled with different sediment. Reflectors can be seen in then on low frequency sonar. Beds of terrestrial or saltmarsh peat may be encountered. Disturbance of this peat could result in chunks of it washing up on beaches whatever method of cable burial is adopted. Inshore the route is like to encounter a small band of muddy sand that can at times have a super abundant benthos with <i>Lagis koreni</i>, <i>Abra alba</i> and <i>Amphiura brachiata</i>. This biotope undergoes considerable temporal variation. At times there may be populations of <i>Lutraria</i> that may wash out and strand in spectacular quantities. At other times and overlapping with the lower shore flats there may be very dense populations of <i>Lanice conchilega</i>. Slightly further out dense patches of <i>Donax vittatus</i> may be encountered. Populations in the inshore part of the corridor are likely to recover from disturbance unless the nature of the sediment changes much through mixing of deeper sub surface material with the original sediment.	Information notes and will be included in the ES were appropriate.	yes	no
PrB_017_11102021	S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	It is noted that, apart from the Clwyd Estuary and Adjacent Fields Local Wildlife Site (LWS), the proposed onshore underground cable routes generally avoid LWS. With good design and planning it should be possible for there to be no significant long-term impacts upon the Clwyd Estuary and Adjacent Fields LWS as a result of the proposed work. Where excavation is required, this would include ensuring subsoils and topsoils are separated during excavation and replaced in the correct order when cables are buried. A proposed cable route (9A) would pass near to Bryn Cwnin Wetland (SJ025795). It is important that the effects of any work do not damage or disrupt the hydrology of this sensitive site and appropriate surveys and possibly longer-term monitoring will need to be undertaken to ensure no adverse impacts occur. The proposed routes might also pass through other sites that may not be LWS but still may be important for wildlife, for example, the patches of uncultivated habitat at SJ 03426 80434; Bryn Cwnin Covert SJ 02754 79746 (Route 9A); and uncultivated habitat at SJ 03158 79587 (Route 9C). Potential damage to these sites must be considered and avoided or minimised as much as possible, as should damage to any hedgerows and trees on the route. Undergrounding of the cable using techniques that do not require tree felling should be adopted wherever required. All ground work needs to be carefully timed to avoid significant disturbance to wildlife.	Further details in respect of impacts, mitigation and compensation, plus any monitoring requirements are provided in the Biodiveristy chapter (application ref: 6.3.5) and OLEMP (application ref: 8.4).	yes	no
PrB_016_11102021	S42	N/A	I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development. I am conscious that our teams have engaged positively in the early stages of developing your onshore grid connection route and as part of this dialogue, we have been able to provide you with a register of our affected assets and complement this with information on the risk to the individual assets should damage occur. I am also mindful that you are seeking to refine your cable corridor route and we would be very willing to discuss further once you are able to share more information. Notwithstanding the above we have provided to your team our standard suite of Protective Provisions which we require to be annexed to any Development Consent Order granted for the development. Please do contact us should you have any queries in regard to the content of our draft provisions. I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected. Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com Please quote our reference number in all communications and correspondence.	No response required	Yes	no
PrB_013_11102021	S42	N/A	Thank you for your letter dated 27th August 2021 in relation to the above and the associated documents in respect of the requirements under S.42 of the Planning Act 2008 specifically for non-statutory consultees. This letter is a response from the Territorial Seas Committee (TSC) made up of representatives from a number of Departments and Statutory Boards of the Isle of Man Government. The TSC found it a useful and interesting series of documents and await the associated outcomes as the application progresses through the next stages. The TSC is pleased that the Isle of Man has been identified as one of the non-statutory consultees given the proximity of the development to Manx territorial waters. Thank you for affording us with the opportunity to consider, and provide comments on the above as a consultee.	No response required	Yes	no
PrB_013_11102021	S42	N/A	The Preliminary Environmental Impact Report (PEIR) provides a good overview of the processes of data collection and assessment as part of the early stages of the environmental impact assessment for this project. The TSC is satisfied from these documents that all international environmental standards and best practice will be adhered to when undertaking the collection and analysis of the data obtained from within the proposed development area, and expects that this process should ensure appropriate mitigation measures are in place to address any concerns identified throughout the Environmental Assessments process.	This is noted and welcomed by the Applicant.	yes	no
PrB_013_11102021	S42	N/A	More specifically, the PEIR documentation is significant, and this response represents the input from various officers throughout the Isle of Man Government. The TSC also recognises the scale and compexity of this work and is confident in the assessment processes being undertaken. As such, the Committee wishes to reiterate its primary objective, which is to ensure that Isle of Man interests have been considered appropriately at each stage of the process. Several of the comments below therefore relate to ensuring that relevant Manx data and interests have been adequately and demonstrably taken into account. It is noted that cumulative effects will be thoroughly investigated, but this should encompass more than wind farm developments.	This is noted by the Applicant.	yes	no
PrB_013_11102021	S42	N/A	In addition, and as previously noted in earlier correspondence, of particular importance and concern would be the potential impacts on marine habitats and species found within Isle of Man waters, especially those protected under Manx law1 or identified as threatened or declining by the OSPAR Convention, and which may be affected by the proposed developments. Comments included previously request the inclusion of island-based conservation organisations which may also have relevant information and data of interest to the project, in particular those related to ornithology, cetaceans and other regionally-migratory species. Any marine developments within or adjacent to the Isle of Man territorial waters could also potentially impact commercial fisheries in Manx waters, or the interests of its fleet, so it would be appreciated if the issues were also considered from that perspective, and that relevant fishing organisations on the island are included as consultees via the appointed Fisheries Liaison Officer.	This is noted by the Applicant. Where the xone of influence of an impact extends into Manx waters, Manx interests have been considered specifically within the topic-specific chapters of the ES.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_013_11102021	S42	N/A	Of particular importance therefore is appropriate consideration of the trans-boundary impacts on Manx marine conservation and commercial interests and this Committee would particularly like to ensure that the impact on wildlife, habitats and fisheries in Manx waters are fully considered within the scope of this assessment. As such, and with reference to the Preliminary Environmental Information Report Volume 1, Annex 3.2: Transboundary Screening report, the Committee agree with the conclusion that Transboundary effects relevant to the Isle of Man are included in several of the receptor areas, including; physical processes, fish and shellfish, commercial fisheries. However, in relation to marine mammals and ornithology the Committee does not agree with the conclusion that consideration of marine mammals should be limited to European Sites/SACs within the EEZ of the Republic of Ireland, or that ornithological considerations should be limited to Republic of Ireland and European sites located within the Irish Sea. These conclusions do not appear to take full account of the mobile nature of the species, or the constitutional status of the Isle of Man.	Transboundary assessments have been undertaken for the suggested topic areas.	yes	no
PrB_013_11102021	S42	N/A	More specific comments on these aspects, related to individual sections of the PEIR are noted below, and the original response of the Committee, dated 15th July 2020, is also included for your further reference. Where indicated below, and with reference to the original response, the Committee would seek confirmation that the relevant Consultants have appropriately considered the relevant trans- boundary, migratory/mobile species and fisheries aspects as they relate to Isle of Man interests.	This is noted. Each topic-specific chapter of the ES includes a breakdown of the consultation feedback received and a description of how that feedback has been addressed in the final ES.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 9: Shipping and Navigation	Marine Navigation As an island nation, any significant risk of interference with marine navigation is of concern to the TSC as a good safety record is essential with regard to transport to and from the island, and the shipping lanes in our Territorial waters which are used to connect the UK and Ireland. The TSC has been advised that the Isle of Man Steam Packet Company is content with the current project coordinates, and as such, provided there are no changes made to the proposed site location, the Isle of Man Steam Packet Company no longer needs to be involved. Please advise the TSC should any of this change.	This is noted and welcomed by the Applicant.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 13: Military and Civil Aviation	Aviation Clarification has been sought from Ronaldsway Airport in respect of consideration of the impact of the proposed wind farm on aviation, particularly the airport radar. It has been confirmed that the Airport is satisfied that the proposed location of the wind farm will not pose any operational issues for the Airport at this stage. The Airport has requested that it be kept informed should any amendments to the proposed location be considered by the proposed developer. Further, it is requesting that the organisation involved in its construction keep Ronaldsway Airport informed of progress so that it can monitor activity to ensure that the impact remains as expected.	This was noted by the Applicant.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Noting the conclusion in the PEIR Volume 1, Annex 3.2: Transboundary Screening report that the focus for consideration will be for the Republic of Ireland and European sites located within the Irish Sea. This would appear to exclude the Isle of Man from appropriate assessment of transboundary ornithological considerations which, given the mobile/migratory nature of the species and the importance of the island for birds, would appear inappropriate.	Regional sites are considered via the EIA and HRA as appropriate (noted IoM status with regards SPAs)	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	As previously noted in its earlier response, the Isle of Man is not / has not been an EU member state, and therefore has limited application of EU Directives, and hence European Sites or SACs. However, the Isle of Man Government is a signatory (extended via the UK) to the following international conservation conventions and treaties •UN Convention on Biological Diversity (CBD); •OSPAR Convention ; •Convention on Migratory Species (Bonn Convention), including ASCOBANS (Agreement on the Conservation of Small Cetaceans of the Baltic, North East Atlantic, Irish and North Seas); •Bern Convention; and, •AMSAR Convention. As such the island is committed to protecting biodiversity within its jurisdiction via its own legislation.	Regional sites are considered via the EIA and HRA as appropriate (noted IoM status with regards SPAs)	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	In relation to the PEIR, the following seabirds have Manx breeding populations representing more than 1% of the UK and Isle of Man populations; cormorant, shag, herring gull, great black-backed gull, little tern and black guillemot (Selman 2006), and for further details please see the relevant chapter in the Manx Marine Environmental Assessment: htt ps: // www.gov.im/media/1363402/ch-36-birds. odf. Manx Birdlife has recently published, for the first time, a conservation status report for Manx bird species.	Manx populations have been considered in the offshore ornithology ES chapter.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	The following species, considered in the PEIR Volume 2, Chapter 4: Offshore Ornithology, are also included on the Red List for the island; razorbill, great black-backed gull, herring gull, kittiwake. The following species considered in the PEIR are Amber Listed: guillemot, red-throated diver, common scoter and Manx shearwater. •htt p:/ / manxbirdlife.im/manx-birdlife-publishes-first-ever-red-list-of-birds-for-the-isle-of-man/ •http://manxbirdlife.im/wp-content/uploads/2021/08/BoCoOm-2021-TABLES-vWEB04-2021-07-30.pdf As such, it is recommended that Manx populations of these species should be explicitly considered within the assessment process for the proposed development. In addition, the baseline study indicates that Manx shearwater were recorded in 6/18 aerial surveys, with up to 289 individuals and flight direction indicators for Manx shearwater recorded on the proposed development site are predominantly WNW (i.e. towards the Isle of Man) (pg. 180).	The data sources were noted and included in the offshore ornithology chapter.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	The eponymous Manx shearwater has an important breeding colony on the Calf of Man, approximately 100 km NW of the proposed development site, and is also subject to an ongoing recovery project. While it is noted that this species has provisionally been screened out of further assessment, this is presumably dependant on the data available for consideration, and it is further noted that there remains debate about potential impacts. For example, 'This has led to questions around the assumptions that Manx shearwater consistently fly too low to be at risk of col/isiort (pg. 48, JNCC response). •As such, the Committee requests additional consideration of this species, including the aspects outlined above in relation to Manx interests, and which may provide for a more comprehensive assessment for this species.	Displacement of Manx shearwater has been considered in the offshore ornithology ES chapter.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	The Calf of Man is the Isle of Man's only registered bird observatory which was established in 1959 and became an official British Bird Observatory from 1962. For further information please refer to Manx National Heritage at: http://www.gov.im/mnh	The data sources were noted and included in the offshore ornithology chapter.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	The Isle of Man has 10 statutorily designated Marine Protected Areas (under the Isle of Man Wildlife Act 1990) within its waters (htt ps:// www.gov.im/mnr), several of which include seabirds within their designation features (htt ps: // www.gov.im/media/1371896/quidance-notes-for-majrne-nature-reserve- designations-160221. pdQ. Given the relative proximity of the Isle of Man, the shared species of important conservation status, the presence of a formal bird observatory, several statutory marine protected areas under Manx law, and relevant conservation projects, it seems appropriate that due consideration is afforded the islands seabird interests.	The data sources were noted and included in the offshore ornithology chapter.	yes	no

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PrB_013_11102021	S42	Volume 2, Chapter 4: Offshore Ornithology	Within the PEIR Volume 2, Chapter 4: Offshore Ornithology there are only two, non-specific references to the Isle of Man, and no mention under Trans-boundary considerations or regionally relevant sites (e.g. Calf of Man). •The Committee therefore requests evidence of specific consideration of the Isle of Man in relation to offshore ornithology in relation to the species and points outlined above. •Further, it is recommended that the developers contact relevant on-island organisations in relation to specific consideration of local ornithological interests; Manx Birdlife, Manx National Heritage, Manx Wildlife Trust.	Consideration of Manx populations and on-island organisations has been given in the offshore ornithology ES chapter.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Noting the conclusion in the PEIR Volume 1, Annex 3.2: Transboundary Screening report that the focus for consideration will be for 'European Sites where marine mammals are qualifying features will be assessed within the HRA and RIM' and that 'the assessment is anticipated to focus on SACs within the EEZ of the Republic of Ireland.' As previously noted in earlier response, the Isle of Man is not/ has not been an EU member state, and has limited application of EU Directives, and hence European Sites or SACs. However, the Isle of Man Government is a signatory (extended via the UK) to various international conservation conventions and treaties and is committed to protecting biodiversity within its jurisdiction, via its own legislation.	This is noted by the Appicant. A transboundary assessment, with reference to the Isle of Man, has been undertaken for marine mammals.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 7: Marine Mammals	As such, and in addition to statutory protection of these species under the Isle of Man Wildlife Act 1990, the Isle of Man has 10 statutorily designated Marine Protected Areas (MPAs) within its waters (https:// www.gov.im/mnr), several of which include marine mammals (cetaceans and seals) within their designation features (htt ps: // www.gov.im/media/1371896/quidance-notes-for-marine-nautre-reserve- designations-160221. pdf). These designation features include the following migratory/mobile species, which are referenced within the report, '...harbour porpoise, grey seals, bottlenose dolphins, Risso's dolphins and minke whales are likely to be present in the vicinity of AyM.' These Manx MPAs do not feature in the baseline document for marine mammals, and therefore it is not clear whether they have been appropriately considered within the assessment process as trans-boundary issues. •Inclusion of these features and clarification of their specific consideration is therefore requested.	These sites are now considered within the marine mammal baseline report.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 7: Marine Mammals	Baseline Study Cetaceans 8.7 Telemetry 'Within the 50 km buffer of the AyM array area, there are telemetry tracks from 34 grey seals, 33 of which were tagged in the West England and Wales MU, and one of which was tagged in the West Scotland MU. The 34 grey seals within the 50 km buffer of the AyM array area showed connectivity with the following grey seal SACs: This connectivity between seals in the vicinity of AyM and with SACs will need to be considered in the HRA. Likewise, the connectivity with the Republic of Ireland and with the Isle of Man will need to be considered in the assessment of transboundary effects.' It is acknowledged that the Marine Mammal Baseline report makes significant use and acknowledgement of Manx marine mammal data, however, as with seal telemetry, it is not apparent that this has subsequently been considered within the main PEIR, potentially due to the focus on European Sites/SACs.	This is noted by the Applicant.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 7: Marine Mammals	As a general example, the terms 'Isle of Man' or 'Manx' do not appear in the text of the document other than in the context of references referred to in the baseline document (of which there are 6). Given the acknowledged similarity of species, and their mobility, specific Manx consideration within the main report appears to be absent. Notwithstanding that it may not affect the impact conclusions, it seems appropriate that it is explicitly considered and acknowledged. •It is not apparent that the Manx marine mammals have been specifically considered within the Preliminary Environmental Information Report Chapter 7: Marine Mammals, and the Committee seeks clarification on this issue.	Isle of Man sites are now considered in the marine mammal baseline and ES chapter.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	It is acknowledged and appreciated that specific reference to consultation with the Isle of Man Government has expanded the 'contextual area' for this topic, and leads to greater confidence of consideration of interests. It is further noted in the Preliminary Environmental Information Report Volume 1, Annex 3.2: Transboundary Screening report that assessment of this topic 'is anticipated to focus on the Isle of Man and the Republic of Ireland, in addition to transboundary commercial interests considered through the Commercial Fisheries assessment in the EIA.' The committee further acknowledges the explicit consideration of Manx interests and input in this Section.	Manx interests are now specifically considered in the marine mammal baseline and ES chapter.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 8: Commercial Fisheries	Noting the general conclusion that the potential transboundary impact of effects on commercial fish stocks in the waters of other states (Ireland and Isle of Man) is of negligible significance, and is therefore considered to be not significant in EIA terms. However, as noted in previous correspondence (15 July 2020, attached for ease), there are a number of limitations acknowledged in the assessment report, and also highlighted in the Isle of Man Government's previous submission.	Noted - responses to individual points raised are below.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 8: Commercial Fisheries	There are only 3 references to the Isle of Man in the Preliminary Environmental Information Report Volume 2, Chapter 8: Commercial Fisheries, and only 2 in the baseline report. This is surprising considering the fisheries study area specifically includes Manx Territorial waters pg. 25, and that Manx-registered fishing vessels operate within the wider Irish Sea area. Regardless of eventual conclusions, there is no reference to previous input on this topic by the Isle of Man Government, and so it is difficult to determine whether limited inclusion relates to actual lack of consideration or exclusion via pre-assessment in another process. Either way, clarification would be helpful. •The Committee therefore seeks reassurance that Manx fishing interests have been fully considered, from both territorial sea impacts and within the wider Irish Sea, and in reference to the points noted below and previously.	Isle of Man fleet activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). VMS and landings data sourced from the MMO include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey. Isle of Man data has been incorporated into MMO UK databases since 2011. Commercial fishing vessels that are registered to the IoM are required to hold both IoM and UK fishing licences. The MMO iFISH database therefore provides commercial landing statistics for all vessels registered to UK administrations and crown dependencies.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 8: Commercial Fisheries	For example; Pg25 (Table 4: Receptor Groups) Preliminary Environmental Information Report Volume 2, Chapter 8: Commercial Fisheries, there is no reference to IoM vessels. In determining these receptors, there is no reference to engagement with the Manx Fish Producers' Organisation (as previously recommended), and it is acknowledged that baseline data relates to VMS data for all vessels 15m. Noting page 30, and subsequent data limitations acknowledgements; 24Vessel Monitoring System (VMS) is a form of atellite tracking using transmitters on board fishing vessels. Annual VMS data ore collated by the MMOror all vessels ;;;15m registered to the UK, including all gear types. VMS data for UK vessels have been analysed for 2017 77imitations of VMS data ore primarily focused on the coverage being limited to vessels ? 15m for MMO dato. Il is important to be aware that	As above.	yes	no

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PrB_013_11102021	S42	Volume 2, Chapter 8: Commercial Fisheries	The Committee requests confirmation that Manx vessels have been appropriately considered within the assessment. Specifically; •How has the assessment considered vessels <15m, when only a proportion of active vessels are above this size (noting that all Manx scallop vessels, regardless of size, carry and operate VMS equipment); •Noting the data source (MMO VMS registered to the UK); have Manx vessels (i.e. registered in the Isle of Man, rather than UK-registered), been considered within the assessment baseline; and, •Why only a single year (2017) has been considered appropriate for a commercial fisheries baseline, and the justification for that particular year.	Data sources (landings data, VMS) are As per the response immediately above, Isle of Man fleet activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). VMS and landings data sourced from the MMO include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey. VMS data from 2017 was presented at PEIR as it represented the most recent data made publicly available by the MMO at the time of PEIR publication. Data for 2018/19 is now available and has been presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). of Isle of Man vessels; noting that Isle of Man data has been incorporated into MMO UK databases since 2011. Action to add text to baseline within chapter and Technical Report to make this clear. Landings data include landings by vessels <15m. VMS data for 2017 was presented in PEIR as it represented the most up-to-date VMS data at the time of PEIR publication; additional and more recent data will be presented in the ES, including VMS data for UK registered vessels for 2018 and 2019, and landing statistics for 2020.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 8: Commercial Fisheries	Page 28 Table 6 '21. "Ille data sources that have been collected and used to inform this commercial fisheries assessment are summarised in Table 6. As well as UK data sources/ data has been sourced from European fisheries bodies. Relevant literature from a number of additional sources has also been reviewed and is appropriately referenced throughout Section 8.7. Table 6: Data sources used to inform the commercial fisheries PEIR assessment' •Have Manx-registered vessels been considered within the data set; do they not appear due to lack of fishing activity, or are they not included for some other reason? Example: It is similarly unclear whether Manx fishing vessels have been considered within these data illustrated below; with reference only to UK, Northern Irish and Irish vessels - noting that the Isle of Man is not included in any of these categories. In particular, it is notable that much of the fishing activity illustrated occurs within the Manx territorial sea, and this lack of clarity reduces confidence of comprehensive inclusion of Manx interests.	The Manx Fish Producers' Organisation is included on the AyM fisheries stakeholder distribution list and was invited to attend group meetings and respond to request for individual interview. As per the response above, Isle of Man fleet activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). VMS and landings data sourced from the MMO include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey. VMS data from 2017 was presented at PEIR as it represented the most recent data made publicly available by the MMO at the time of PEIR publication. Data for 2018/19 is now available and has been presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 8: Commercial Fisheries	Fisheries Displacement Effects Noting Pg. 71/72 of the PEIR Volume 2, Chapter 8: Commercial Fisheries 79 The UK dredge fleet is considered to have moderate-high levels of alternative fishing grounds; is deemed to be of low vulnerability, high recoverability and low-medium value. the sensitivity of this receptor is therefore. considered to be low. And with reference to Figure 3.24 (above), which indicates that the regional scallop dredge fishing activity is heavily concentrated in Manx territorial waters. As such, any displacement of fishing activity to 'alternate fishing grounds' is likely to disproportionately impact in Manx waters. It is not clear that this has been considered in this assessment, and it is particularly relevant in the context of current strategic planning for Manx scallop fisheries management; htt ps: // consult.gov.im/environment-food-and-agriculture /consult-on-the-isle-of-man-king-scallop-fishery/ •The Committee requests further assessment of scallop fishery displacement effects in the context of Manx waters, and to include further consultation with DEFA Fisheries Division and the Isle of Man Scallop Management Board.	The potential for displacement is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10 to 8.12. Potential displacement of scallop dredge activity is assessed in the context of the wider Irish Sea, noting that scallop grounds extend across much of the Irish Sea. AyM has not been assessed as causing significant displacement of the scallop dredge fishery given key grounds are outside of the AyM area.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 8: Commercial Fisheries	Fisheries Liaison Plan PEIR Volume 2, Chapter 8: Commercial Fisheries Page 67 of PDF (though listed as page 68 on document) indicates; Development. prior to construction. of a Fisheries Liaison Plan (FLP). setting out in detail the planned approach to fisheries liaison and means of delivering any other relevant mitigation measures. The FLP has been developed. consulted on with fisheries stakeholders and disseminated in June 2021. •The Committee is not aware that island stakeholders have been included in this FLP consultation process, noting the potential for misdirected correspondence, and requests sight of this FLP for comment. •Further, the Committee recommends inclusion of the Manx Fish Producers' Association (MFPO) as a relevant stakeholder for this specific fisheries process.	A revised Fisheries Liaison and Co-existence Plan has been submitted with the Application.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	As previously noted in the Fish and Shellfish Section (Chapter 6 and Baseline) and PEIR Volume 1, Annex 3.2: Transboundary Screening report, assessment of this topic 'is anticipated to focus on the Isle of Man and the Republic of Ireland, in addition to transboundary commercial interests considered through the Commercial Fisheries assessment in the EJA.' As such, the previous submission by this Committee noted the relevance of ecological connectivities between areas within the region, and particularly the importance of larval distribution of scallops from north Wales into the wider Irish Sea. The Committee reiterates it earlier comment (below) and recommends further consultation with Bangor University Fisheries and Conservation Science Group in this regard (http://fisheries-conservation.bangor.ac.uk/).	This has been noted by the Applicant.	yes	no
PrB_013_11102021	S42	Volume 2, Chapter 6: Fish and Shellfish Ecology	•Trans-boundary effects in relation to this indicator have been scoped out of the assessment, and the committee seeks reassurance that sufficient consideration of the potential impacts on sessile, commercially important fishery species have been adequately considered. Specifically, studies have indicated that, within the Irish Sea, south-north connectivity of scallop and queen scallop grounds, and may be important in relation to recruitment patterns further north. This may be true of other species with plankton-dispersed larvae See particle tracking reports: •Neill, S.P. & Kaiser, M.J. (2008) Sources and sinks of scallops (Pecten maximus) in the waters of the Isle of Man as predicted from particle tracking models. Fisheries & Conservation report No. 3, Bangor University. Pp. 25 http://fisheries-conservation.bangor.ac.uk/documents/3.pdf •Close H. (2014) Connectivity between Populations of the Scallop Pecten maximus in the Irish Sea and the Implications for Fisheries Management. MSc thesis, Bangor University, pp 82.	Additional consideration of the potential transboundary impacts on sessile, commercially important fishery species has been given in Section 6.15 of this chapter.	yes	no
PrB_015_11102021	S42	Volume 2, Chapter 11: Offshore Archaeology and Cultural Heritage	Cadw has serious concerns about the Environmental Impact Assessment (EIA) which we note is incomplete. In particular, we note that 30% of the proposed walkover survey for terrestrial archaeology has not been completed and the survey on the intertidal area is also incomplete. The geophysical survey has also only been undertaken on some 65% of the area required. However, the results of this work are essential if any sub-surface archaeological sites are to be identified and the need for further investigative work, including archaeological evaluation, carried out. The failure to complete these aspects is contrary to section 5.8.10 of National Policy Statement EN-1 which states that any application should contain sufficient information to allow heritage significance to be understood. The surveys must therefore be completed so that the impact of the proposed development on the historic environment can be understood.	Section 11.8.3 Landfall – The assessment and mitigation of the intertidal area is presented in Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage (application ref: 6.3.8) and WSI (application ref: 8.14).	yes	no

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PrB_015_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	The proposed development will have an impact on (i) the settings of Beaumaris and Conwy Castles, which are both nationally important scheduled monuments and part of the Castles and Town Walls of King Edward in Gwynedd World Heritage Site and (ii) Penrhyn Castle which is a grade I listed building set in a Grade II* registered historic park and garden and part of the Slate Industry of Northwest Wales World Heritage Site. The proposed windfarm will be seen in identified significant views from all of these designated historic assets. Whilst these significant views are acknowledged in the respective assessments there is no explanation about the reasons why these views have been identified as significant and no full analysis of the impact of the windfarm in these views has been made. This failure appears to be due to the assessor considering that as the windfarm is some distance from the castles, their setting does not extend that far. This is incorrect as explained in Welsh Government TAN 24 Section 1.25 - the setting of an historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Therefore, we consider that the full impact of the proposed development on the settings of these very highly significant historic assets has not been fully assessed leading to the effect being understated in the EIA. Consequently, the assessment of the impact of the proposed development on these historic assets along with the impact on the World Heritage Sites should be redone before the EIA is submitted with any application.	The assessment has been informed by Section 1.25 of the TAN as specifically referenced in 8.4.3 of the ES chapter (application ref: 6.3.8. Cadw's guidance in "Setting of Historic Assets in Wales, 2017" confirms that significance is the key issue, and the importance of "setting" is what that contributes to the heritage significance of a given asset. The guidance also states that "setting" is not in and of itself an asset. The assessment presented in this chapter is consistent with the approach recommended by the relevant guidance and specifically sets out those elements of the setting which are considered to contribute to the significance of an asset. Whilst the key impact is likely to derive from visibility of the AyM WTGs from or in combination with these assets, this assessment proceeds from the position that it is whether the heritage significance of the assets as derived from their various interests and values, that is the effect being assessed, rather than the degree to which the WTGs may or may not be present in a given view. As part of the assessment, the extent of visibility has been considered in relation to whether a given view direction (and distance) is contributor to heritage significance, in relation to the specific interests and value of an asset. Nevertheless, simple intervisibility (at any distance) does not automatically mean that there is an adverse effect on the heritage significance of an asset. Setting, as it contributes to heritage significance and the ability to appreciate that heritage significance does not always extend as far as can be seen. The assessment considered whether there is specific harm to the heritage significance of the assets in question and what the setting of the asset is in its particular circumstances and which parts of that setting contribute to heritage significance (or the ability to appreciate it). Views selected for Viewpoints were based on Scoping Responses and agreed in subsequent consultation (as part of the EIA Evidence Plan process (Application ref. 8.2). Reference to "significant" view, where made, refers to views highlighted in the relevant designations (in the maps presented with the WHS Management plans (see World Heritage Site Management Plan (anglesey.gov.uk), or to the agreed Viewpoints, or where the assessor considered a view important in judging a contribution made by setting to significance. The degree to which the WTGs are visible and whether this affects setting and the contribution made by setting to the significance of the assets is set out in the assessment in sections 8.10-8.12 of the ES Chapter. The assessments presented are considered to be appropriate, proportionate and in accordance with the guidance and policy.	yes	no
LA_007_11102021	S42	N/A	Thank you for the opportunity to respond to your consultation. This response from Welsh Government is made on a without prejudice basis. This consultation presents RWE's initial review of the potential issues associated with the construction, operation and maintenance, and decommissioning phases of Awel y Môr. Awel y Môr represents an opportunity to take Wales closer to meet its decarbonisation targets and, as a result, Welsh Government recognises that it presents both benefits and risks across the region and Wales.	No response required	Yes	no
LA_007_11102021	S42	N/A	We recognise the project could be a catalyst to secure long-lasting legacy benefits for North Wales and indeed Wales and that the key to securing such a legacy will be coordinated action and strategic approaches by both the public and private sectors, ensuring that the mitigation measures ensure and protect the Welsh public purse from additional costs. Welsh Government believes it can support RWE as well as all other proposed significant development across the north Wales region to ensure that the benefits are maximised as a package. It is also clear that a coordinated and strategic approach must also be adopted in respect of mitigating risks.	No direct response - captured where broken out in below lines	Yes	no
LA_007_11102021	S42	N/A	We recognise the importance of ensuring a strong working relationship with RWE, Offshore Energy Alliance and local planning authorities. We understand that limited contact has been made to date with various departments within Welsh Government (separate to those consulted as part of the EIA process) and we are happy to instigate any meetings required to build on the evidence which has already been collated to date. Building on this, we would welcome the opportunity to formalise an engagement framework. We believe that in the spirit of this cooperation and the collective ambition to deliver a successful project. This response is framed to provide you with a cross government view. We hope that the main outcome will be closer working with the Welsh Government teams as well as a more strategic approach to work going forwards. We also note that the National Policy Statements are currently under consultation and therefore it would be useful to understand whether RWE are using these draft documents as policy. The interrelationship document has done this in part.	We welcome the opportunity to engage with Welsh Government on a wide range of matters. The Applicant is engagement with Welsh Government on establishing a framework for ongoing discussions. The Applicant's position on the draft NPSs is set out in 6.1.2 Volume 1, Chapter 2 Policy and Legislation. In line with the Energy White Paper, the NPSs are currently under review. undergoing revision following consultation in later 2021. The ES refer primarily to the extant NPSs, as these remain the primary policy tests of relevance. The draft NPSs are however referred to when relevant throughout the application.	Yes	no
LA_007_11102021	S42	N/A	Overview This response has been prepared on the basis of feedback from across all Ministerial portfolios within Welsh Government. The Well-being of Future Generations (Wales) Act 2015 came into force in April 2016. The Act sets out 7 core Well-being Goals and Principles to provide a clear framework for government and the wider public service to ensure that future generations benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities. This response seeks to consider these well-being goals. It is suggested that in preparation for future stages in the process, there may be an opportunity to work with you and other key regional stakeholders to define a legacy framework for the north Wales region which could be used to facilitate and coordinate delivery that maximises benefits and minimises risks associated (either directly or indirectly) from Awel y Môr.	The Well-being of Future Generations (Wales) Act 2015 is referred to in 6.1.2 Volume 1, Chapter 2 Policy and Legislation and other relevant chapters of the ES.	Yes	no
LA_007_11102021	S42	N/A	In headline terms it is suggested that some of the core principles to underpin any such legacy framework could be as follows: •To protect and value our environment and natural resources; •Building on existing opportunities in the region - to grow and sustain a vibrant offshore sector that is capable of competing at an UK, European and Global scale; •To coordinate action and investment across public and private sectors to create the right conditions and skills for long term growth and prosperity; •To coordinate action and investment across public and private sectors; •To secure and sustain vibrant, cohesive and sustainable communities that promote and protect culture, heritage and the Welsh language; •To secure a legacy of strategic and fit for purpose infrastructure that serves the economy and communities of north Wales; •To protect and secure legacy improvements to the north Wales tourism sector. It is suggested that a more detailed series of objectives could be built around such a framework and used as a basis to benchmark and ultimately leverage and track collective action.	Comments noted. We welcome the opportunity to engage with Welsh Government on a wide range of matters. The Applicant is engagement with Welsh Government on establishing a framework for ongoing discussions.	Yes	no
LA_007_11102021	S42	N/A	Evidence and detail Greater clarity and definition is required in the evidence to support the outcomes of the project. Currently it is unclear from the documents on how assessments will influence the outcomes. The detail of the scope of consideration needs to ensure that the strategic effects of this project are clearly identified as well as the reasoning behind the preferred strategy taken by RWE. Options on the grid connection for example should be clearly presented (see comments on grid later). Further consideration should be made to interlinkages between documents to make it easier for stakeholders to understand where the various elements of the evidence is presented. For example: (Page 121 para. 197 of Vol 3, Chapter 4 on Tourism and Recreation).	Strategic effects of the project are identified by reference to the NPS and other policy documents in relevant chapters of the ES. The Applicant's position on the grid connection is set out in 6.1.4 Volume 1, Chapter 4 Site Selection and Alternatives.	Yes	no
LA_007_11102021	S42	N/A	Mitigation measures that have been identified and adopted as part of the evolution of the project design (embedded into the project design) and that are relevant to tourism and recreation are listed in Table 22. General mitigation measures, which would apply to all parts of the project, are set out first. Thereafter mitigation measures that would apply specifically to tourism and recreation issues associated with the array, export cable corridor, landfall, onshore ECC and substation, are described separately. It would be useful to include the link here to where the information is described.	Relevant chapters of the ES, including 6.3.4 Volume 3 Chapter 4 Tourism and Recreation, set out all relevant embedded mitigation for that topic and include, where needed, cross-references to where more detail on that embedded mitigation may be found.	Yes	no

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LA_007_11102021	S42	N/A	Impact Mitigation The scoping exercise identified potential areas of mitigation and the mitigation proposals need to be explored and explained further and supported with the sound robust evidence. Welsh Government officials stand ready to work with you to understand impacts and mitigation measures in respect of a range of key issues and key assessments which are required in Wales beyond those in elsewhere in the UK: Welsh Language and Culture; Health; Tourism and related accommodation; Wellbeing and Social Care; Emergency Services; Education and Skills; Law and Order; Housing and Regeneration; Poverty; Environment and Countryside; Local Government and Public Services; People and Communities.	Mitigation measures are set out in relevant chapters of the ES and captured as a whole in 8.11 Volume 8 Document 11 Schedule of Mitigation. We welcome the opportunity to engage with Welsh Government on a wide range of matters. The Applicant is engagement with Welsh Government on establishing a framework for ongoing discussions.	Yes	no
LA_007_11102021	S42	N/A	In preparing the evidence to support the application, it would also be useful to gain a greater understanding in relation to how RWE will be looking to minimise the embedded emissions as part of the whole project. As part of the Well-being of Future Generations (Wales) Act 2015, this element will be of great interest to Welsh Government to minimise the effects of the overall carbon emissions from the project in including the decommissioning elements. Some consideration could be given to the use of technology in informing residents and collating further evidence. For example, during construction as a mitigating measure to forewarn residents of certain stages of the development, especially during the construction when the drilling and hammering of the monopoles are taking place. The sound and vibrations of Gwynt y Môr for example could be heard from coastal towns and some indication locally of when this would be occurring could alleviate concerns.	The Applicant has considered the project in the context of the well-being act throughout the assessment, in particular within teh Planning Statement (application ref 8.1) which considers the project as a whole, and the associated planning balance. The application includes an Outline Construction Communications Plan, as part of the overall Code of Construction Practice, that sets out the communication measures which will be implemented during construction of the onshore works. Through the Communications Plan, the Applicant will notify local communities that works will be taking place, when, where and for how long.	yes	Yes
LA_007_11102021	S42	N/A	In combination effects and considerations Welsh Government fully recognises the impacts that this development will have on the communities within immediate proximity to site where the cable will come to shore and across areas of the coast as well as views from inland. In the next stages, further clarification is required on the strategic effects and influences of this development across north Wales and the rest of Wales.	Relevant chapters of the ES set out the study area within which any likley significant effects, including cumulative effects, would arise, for that topic. The study areas differ between chapters on the basis of differing areas of potential effects.	Yes	no
LA_007_11102021	S42	N/A	It is also suggested that further consideration needs to be made and evidenced on how Awel y Môr impacts will be managed within the context of other possible developments in the region. The following stages should address and explain how RWE has considered these effects and how it has been discussing such issues with other possible developers. Clarification as well on whether any discussions have taken place in relation to the proposed community benefits with the other developers to maximise the long term legacy for Wales. This would also be relevant to RWE's other projects in north Wales e.g. Alwen Forest project. This is an integral part of the Habitat Regulation Assessment, the Strategic Environmental Assessment and should be covered within the Welsh Language Impact Assessment. Welsh Government would wish to be part of such discussions to ensure that these align with the Wellbeing and Future Generations Goals and the earlier suggestion in developing a legacy framework for north Wales could be a mechanism to facilitate such discussions.	Cumulative effects with other relevant projects are set out in relevant chapters of the ES, and the approach to cumulative assessment is set out in 6.1.3 Volume 1, Chapter 3 EIA Methodology and the associated Annex 6.1.3.1 Volume 1 Document 3.1 Cumulative Effects Assessment. The project has undertaken an early stage consultation on the Community Benefits in early 2022, though it should be noted the Community Benefits package sits outside the scope of the Development Consent Application.	Yes	no
LA_007_11102021	S42	N/A	Temporary vs permanent solutions Some of the developments associated with Awel y Môr are of a temporary nature whilst constructing, therefore further consideration needs to be provided on how any brownfield sites will be used in future or how these sites could accommodate future opportunities within offshore wind or any other sector. The scoping assessments identify that some roads/ paths may need to be closed temporarily where the grid comes to land and it is clear RWE has already engaged with Denbighshire CC and Natural Resource Wales in relation to the Wales Coast Path and this should clearly continue. The Welsh Government is keen that the principle of least restrictive access be implemented where practicable. A prompt reinstatement of all the routes is necessary to minimise disruption to the local community and the tourism industry.	The approach to site selection is set out in 6.1.4 Volume 1, Chapter 4 Site Selection and Alternatives. The reinstatement of land post-construction is set out in 6.3.1 Volume 3, Chapter 1 Onshore Project Description, and the management and effects on Public Rights of Way in Volume 8, Document 3.8 Public Access Management Plan, and 6.3.4 Volume 3 Chapter 4 Tourism and Recreation.	Yes	no
LA_007_11102021	S42	N/A	Alignment with national priorities The Environment Act, working in tandem with the Well-Being and Future Generations Act provides a robust legislative framework to ensure we accelerate action in relation to Climate Change. Welsh Government has an expectation that all new renewable energy projects should include an element of local ownership. Welsh Government urges RWE to make every effort to ensure the Awel y Môr project can meet this expectation by engaging with local communities and grassroots organisations. We would also expect the community benefits element of the project to be aligned as closely as possible with existing Welsh Government programmes with a view to ensuring maximum benefit in terms of key outcomes such as tackling poverty, decarbonisation, Cymraeg 2050 and future skills. A number of similar community benefits schemes are currently being developed around Wales in relation to major infrastructure projects and would recommend that RWE identifies, and adopts, best practice. In addition we would like to explore how this project could enable a last legacy for Welsh communities through the creation of a regional endowment fund. However, we understand that some elements of community benefits might fall outside the planning process, as only direct mitigation will be considered as part of the DCO process. A regional discussion on this would be strongly encouraged to share learning and experience as these go forward.	The project has undertaken an early stage consultation on the Community Benefits in early 2022, though it should be noted the Community Benefit package sits outside the scope of the Development Consent Application	Yes	no
LA_007_11102021	S42	N/A	Welsh Government would encourage discussions to ensure a strategic approach is taken and would support future Community Benefits strategy. It would be valuable for the Awel y Môr project to adopt the Welsh Government's Community Benefits Measurement Tool, allowing for clear demonstration of the benefits realised. Officials would be available to provide more information and/or training on its use.	The project has undertaken an early stage consultation on the Community Benefits in early 2022, though it should be noted the Community Benefit package sits outside the scope of the Development Consent Application	yes	no
LA_007_11102021	S42	N/A	The development of a National Forest for Wales, a manifesto priority, supports the development of woodlands which integrates communities, promotes health and wellbeing, increases biodiversity and contributes to the climate change agenda. The evidence should identify how this has been taken into account. The EIA raises issues in relation to timing of tree/hedge felling however, some consideration should be given to ensure the species of vegetation is the most suitable to the location, especially as the grid will be crossing the flood plains. This is key in the strategic ambitions to increase the number of trees in Wales.	The Applicant has considered the implications of the proposed project on trees in both the landscape and visual impact assessment Chapter of the ES and the onshore biodiversity Chapter of the ES (application refs 6.2.2 and 6.2.5 respectively). Further to this the Applicant has included an outline Landscape and Ecological Management Plan (application ref: 8.4) which includes reference to tree species to be included in mitigation proposals. The species have been agreed through the EIA Evidence Plan	yes	no
LA_007_11102021	S42	N/A	The onshore development runs close to the boundaries of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). There is an aspiration by the Welsh Government to designate a new National Park in north-east Wales. This is subject to Natural Resources Wales carrying out the statutory designation process, part of which will be to examine where the boundaries of any new Park should lie. While National Parks and AONBs enjoy similar protections in terms of major developments, there is a possibility that the boundary of a new National park may not coincide with the current AONB (which would be de-designated). There may be future implications of the designation on the onshore development linked to Awel y Môr.	The Applicant has included further viewpoints within the onshore landscape and visual impact assessment chapter of the ES (application ref 6.3.2), including a viewpoint location which considers the potential implications for the Clwydian Range and Dee Valley AONB.	yes	no
LA_007_11102021	S42	N/A	Housing The scoping exercise identifies potential areas of disruption but no detail is given in relation to anticipated numbers of workers and therefore this needs to be clarified in detail. The evidence needs to clearly identify whether there will be any additional pressure on housing required in the region to support this development. A clear and strongly evidenced accommodation strategy should be presented. This should include but not exclusive to: detail on the sequencing of accommodation delivery per type; the strategies and plans to improve the current housing stock if necessary; and the considerations being made on innovative long term options for temporary worker accommodation. If required, greater visibility of what considerations have been made to the legacy aspects of worker accommodation e.g. how will these additional houses provide affordable housing in the future; ensure that the tourism industry will not be affected by a considerable loss in accommodation for visitors across the region. The same principle applies to the housing stock, has consideration been given to the possibility of rental/ house values rising and therefore excluding local residents out of the market. These effects have been experienced elsewhere in Wales and what options have been considered.	The Scoping Opinion published by PINS for AyM clearly scoped out the impact of construction on demand for housing [and schools] at line 4.21.4. The Scoping Report proposed to scope out this effect on the grounds that the construction phase is likely to be of fairly short duration and therefore it is unlikely that workers will relocate to the area. The Inspectorate agrees that significant effects are unlikely to occur and this matter could be scoped out.	Yes	Yes

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LA_007_11102021	S42	N/A	The effect of the workers housing policy on the local communities will vary from community to community and depending on the workers profile, the effect on the Welsh language and culture will also vary. There will need to be cross referencing between the housing strategy and the Welsh language impact assessment in order to identify mitigation measures where necessary, that will reduce any negative effects on the Welsh language and culture in the communities affected.	The Scoping Opinion published by PINS for AyM clearly scoped out the impact of construction on demand for housing [and schools] at line 4.21.4. The Scoping Report proposed to scope out this effect on the grounds that the construction phase is likely to be of fairly short duration and therefore it is unlikely that workers will relocate to the area. The Inspectorate agrees that significant effects are unlikely to occur and this matter could be scoped out. An assessment of potential impact and effects of AyM on the Welsh language and culture and, how the proposed development will protect, promote and enhance the Welsh language is included in 8.16 Volume 8 Document 16 Awel y Môr Community Linguistic Statement	Yes	no
LA_007_11102021	S42	N/A	Skills and workforce It is the responsibility of the Welsh Government, along with key stakeholders such as Regional Skills Partnership and Further and Higher Education organisations, to ensure that local people are the best people for employment, ensuring local career opportunities, fairly-paid employment and vibrant sustainable economies. In order to do this, Welsh Government has been fully committed in supporting the developments for the offshore wind industry and area working with the industry to understand what support is required in north Wales. We clearly recognise the potential Awel y Môr has to create high value jobs and improve local skills so that young people can continue to live or return to their local communities. Therefore, further evidence on your assertion to what proportion of the workforce is likely to be local would be useful.	The Socioeconomics chapter of the ES (application ref: 6.3.3) provides evidenced consideration of the likely implications for local, regional, and national employment opportunities associated with AyM. Further to this the Applicant will submit a Supply Chain Plan as part of the Contract for Difference process, which will further define local opportunities.	yes	no
LA_007_11102021	S42	N/A	Given the scale of the workforce required and the potential impact that this will have on the wider North Wales economy, further clarification is required on the skills requirements and the associated training plans. Welsh Government and the Regional kills Partnership is looking forward to working with RWE and other stakeholders to developing future opportunities. Greater clarity on what RWE's plans in relation to future skill opportunities would be welcomed. Consideration would need to be given to such issues as the displacement of existing skills and the ancillary workforce required – how many will these be and how will these effects be mitigated/ minimised. Once the evidence on the detail of workers coming into the area is available consideration will need to be given to whether the project will be effecting the numbers of children going to school in the area and consideration also needs to be given to the Welsh language. A high influx of non-Welsh speakers to a bilingual/ Welsh speaking school could effectively change the linguistic character of a classroom overnight if there are no mitigation measures in place. Changing the children's language of interaction sets a very dangerous precedence for the future of the Welsh language.	The Socioeconomics chapter of the ES (application ref: 6.3.3) provides evidenced consideration of the likely implications for local, regional, and national employment opportunities associated with AyM. Further to this the Applicant will submit a Supply Chain Plan as part of the Contract for Difference process, which will further define local opportunities. Further to this the Applicant has submitted a Welsh Comunity Linguistic Statement (application ref: 8.16) which considers the implications on the Welsh language, and provides the Applicants proposed approach to promotion of it.	yes	no
LA_007_11102021	S42	N/A	Welsh Language Detailed evidence by means of Welsh Language Impact Assessment will need to be carried out, explaining how the project could impact the Welsh language either positively or negatively. The assessment should provide an in-depth clarification of how RWE will put mitigating measures in place to minimize or eliminate any negative impacts on the Welsh language. It is noted that the Welsh Language Commissioner has been identified as a stakeholder. As a first point of contact; it is strongly suggested that RWE engages firstly with the Welsh Government's Welsh Language Division to discuss support available within the Welsh Government and the strong evidence base that local Welsh language groups such as the mentrau iaith can provide for the Welsh Language Impact Assessment. This engagement should facilitate a more focussed and strategic approach to any mitigations put forward relating to the Welsh language.	An assessment of potential impact and effects of AyM on the Welsh language and culture and, how the proposed development will protect, promote and enhance the Welsh language is included in 8.16 Volume 8 Document 16 Awel y Môr Community Linguistic Statement	yes	no
LA_007_11102021	S42	N/A	Transport The Welsh Government would wish to urge RWE to share information as soon as possible with transport colleagues. We would value sight of your detailed Transport Assessment which includes traffic figures and capacity values. Welsh Government would be willing to comment on such an Assessment in advance of formal submission. Promoting sustainable forms of travel should be encouraged including detail on how the workforce will travel in a sustainable manner and on the design and location of provision as well as logistical movements during construction. When providing the evidence in relation to transporting parts relating to the project it would be useful to understand what sustainable options have been considered and how these could push us towards zero carbon. Detail on whether rail freight for example has been considered would also be useful to minimise impact on the highways in the region. We would welcome the opportunity to discuss any opportunity of installing additional telecom ducting within highways during the project as well as understanding RWE's ICT needs to monitor impacts in the future, linking with existing infrastructure in the area.	The Traffic and Transport chapter of the ES (application ref: 6.3.9), provides an assessment of the potential traffic and transport impacts, including traffic generation provided in the supporting ES chapter Annexes. The assessment was provided within the PEIR and has been agreed via the EIA Evidence Plan process, of which the Welsh Government has participated. The application includes an outline Travel Plan (application ref: 8.13.9), which is aimed at promoting sustainable travel during construction of AyM. It is noted that the final port location for the construction of AyM has not yet been selected. The onshore elements of AyM have been sited and routed such that interaction with the public highway involves crossings that are perpendicular, rather than paralell to or within the road network and so installation of telecom ducting within the highway would not be relevant.	yes	no
LA_007_11102021	S42	N/A	Port and Supply chain Welsh Government is fully supportive of RWE's desire to maximise the benefits for business in the UK through the aspiration to spend 60% of their investment in the local (UK) supply chain and this will have to be included in the Supply Chain plan if competing for Contract for Difference. Welsh Government would welcome the opportunity to work on this with RWE. Welsh Government would expect that a significant proportion of this investment will be in Wales and that companies identified within the Advanced Manufacturing, ICT, Construction and Engineering sectors, will be given opportunities to compete for contracts within the project's various tiers. We aim to create a lasting legacy of competent businesses capable of becoming part of the global supply chain, exporting goods and services. Welsh Government is looking forward to working with RWE to develop this opportunity.	Comments noted. We welcome the opportunity to engage with Welsh Government on a wide range of matters. The Applicant is engagement with Welsh Government on establishing a framework for ongoing discussions.	Yes	no
LA_007_11102021	S42	N/A	With this objective in mind, early engagement and enabling the flow of demand-led intelligence will be important in helping to deliver this outcome. Welsh Government has the necessary support mechanisms available for companies identified to offer bespoke and conventional solutions to develop their capability and capacity. Working on this together will be an important priority in developing Wales' industry for the renewable energy market. Welsh Government along the North Wales Economic Ambition Board, Offshore Energy Alliance will work closely with RWE to maximise the opportunities available for local and regional supply content. Working in partnership with RWE sharing demand led intelligence; cluster development will play a critical part when looking at local services such as food, fencing and maintenance on a local level. Supply chain development is a key priority in terms of legacy for Welsh Government and focused engagement on a programme of activity including timelines and specific company requirements will be crucial, we look forward to working with RWE to formulate a full delivery and engagement programme for the duration of Awel y Môr and it's decommissioning.	Comments noted. We welcome the opportunity to engage with Welsh Government on a wide range of matters. The Applicant is engagement with Welsh Government on establishing a framework for ongoing discussions.	Yes	no

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LA_007_11102021	S42	N/A	The Welsh Government has made a manifesto commitment to build a sustainable future for our key ports. On 10 March 2021 the Welsh Government launched Llwybr Newydd: the Wales Transport Strategy (WTS) 2021 that will shape our transport system in Wales over the next 20 years. Within the WTS the Welsh Government has set out its Ports and maritime transport Priorities over the next five years which will include: •Investing in projects that deliver more sustainable ports infrastructure and which contribute to decarbonisation in the sector; •Working with ports in Wales to identify opportunities for future economic development such as offshore renewable energy and innovations in decarbonisation	Comments noted. We welcome the opportunity to engage with Welsh Government on a wide range of matters. The Applicant is engagement with Welsh Government on establishing a framework for ongoing discussions.	Yes	no
LA_007_11102021	S42	N/A	The Welsh Government’s Marine Energy Programme is currently focussing on a ports infrastructure upgrade project – to ensure Welsh ports get an appropriate share of the significant economic activity that will result from fixed and floating offshore wind projects in UK and Irish waters. The Welsh Government has partnered with the Offshore Renewable Energy Catapult to evaluate our current grid and port capability for the floating offshore wind sector. The two non-technical reports were published in September with a number of key recommendations for action. The potential benefits from both floating offshore wind (FLOW) and fixed offshore wind (Fixed OW) energy are significant, including low-carbon energy generation, jobs and wider economic activity over the next two decades and beyond. Welsh Government is keen to work with RWE to ensure the north Wales ports benefit from this proposed project and will continue to work with RWE to bring opportunities to fruition.	Comments noted. We welcome the opportunity to engage with Welsh Government on a wide range of matters. The Applicant is engagement with Welsh Government on establishing a framework for ongoing discussions.	Yes	no
LA_007_11102021	S42	N/A	Tourism and Recreational Activities The data collected in relation to tourism relates to a time pre-covid. Welsh Government officials would like to discuss this evidence base further due to the complexity of the effects on this sector. The approach in Wales now is to ensure there is an opportunity for visitors throughout the year in Wales and this is especially the case in north Wales where adventure tourism and Christmas time visitors is growing. Further consideration should be given to a collaborative approach to ensure that data can be collected as soon as possible to try and establish a better evidence base. This could be particularly the case for cycle/ walking routes. There will inevitably be some impact on Public Rights of Way during the construction phase onshore. These should be minimised, and the developers will need to work closely with Denbighshire CC Countryside service to comply with statutory rules and also mindful of user experience. The Wales Coast Path is a major national tourism asset. It is enjoyed by many thousands of people a year and contributes to national wellbeing and the tourism economy. Additional mitigation measures should be put in place with NRW / Denbighshire CC to ensure both minimum disruption to the Path itself during construction, and also reducing the impact on the experience of walkers in general in the landfall area.	The review of available research presented in the PEIR has been updated to take account of more recent data that was conducted whilst Covid-19 restrictions were placed on North Wales. This is presented in section 4.7.4 of the ES Chapter (application ref: 6.3.4). Section 4.2.4 of the ES Chapter highlights importance of the Welsh Government’s year-round tourism strategy approach. The conclusion from the available research, presented in section 4.7.4, is that there is little impact of OWFs on walkers, ridershorse riders and cyclists. Most users of the Wales Coast Path (WCP) will be local and using a short section only, and their use will not be related to the National Trail status. Those users that are attracted to the route because it is 'The Wales Coast Path' will be expecting to see a variety of land and seascapes on their journey; and evidence suggests that they will not be put off by a proportion of the seascape featuring OWFs.	yes	no
LA_007_11102021	S42	N/A	The evidence on the visitor economy seems to suggest that there will be very little impact (page 110 Vol 3 chapter 4 – Tourism and Recreation) on this and the evidence to support it seems dated (General perceptions-based studies(such as RCUK (2009) and Soini et al. (2011)). Further clarification on whether further work has been carried out on public’s perception of offshore wind turbines by RWE. Some general statements are included in the evidence e.g. “wind farms appear to be significantly associated with demographics, but also suggests that attitudes are dependent on type and frequency of usage of the beach and coastal zone”. It is not clear what this means in relation to this project – does it mean a more positive attitude depending on age? Cadw will be responding specifically on the Environmental Impact Assessment, as there are concerns in relation to the evidence supporting the assessment. This response will therefore not repeat those highlighted by Cadw.	The evidence base of the relationship between offshore wind and tourism has been updated (please see section 4.7.4 of the ES Chapter (application ref: 6.3.4)) and a research study into tourism sector employment trends in seaside towns located in proximity to several operational UK offshore wind farms has been undertaken (please see Volume 5, Annex 4.2 (application ref: 6.5.4.2)).	yes	no
LA_007_11102021	S42	N/A	Health and Public Services The scoping exercise has identified some areas which might potentially be effected. There is a need to ensure that details on the effects of local health services are considered when more specific evidence is released, including any issues of safety that need to be considered to those members of the public living close to the site for when grid comes to land.	An assessment of impacts on public health is included in 6.3.12 Volume 3, Chapter 12 Public Health, and on the impacts on public health services in 6.3.3 Volume 3, Chapter 3 Socioeconomics	Yes	no
LA_007_11102021	S42	N/A	Funding opportunities from procurement In addition to the community benefits mentioned above, from a procurement perspective, the Awel y Môr project could create significant opportunities. Although procurement carried out by you may not be subject to EU Regulations, the principles of the Wales Procurement Policy Statement framework could be adopted, supporting the ambitions of the Welsh Government in relation to procurement.	Comments noted.	Yes	no
LA_007_11102021	S42	N/A	Grid in Wales Awel y Môr falls outside the Offshore Transmission Network Review however the Welsh Government would wish to ensure that any major infrastructure projects in Wales minimise the impacts on local areas. We would welcome therefore a discussion on the options, which you have considered to minimise the impact of his project on the grid in the region. We note that the requirements of the draft UK National Policy Statements requires elements of grid options and providing this evidence going forward would be useful. The Minister for Climate Change issued a written statement on 13 September – Evolving the Energy Grid for Net Zero in Wales Written Statement: Evolving the Energy Grids for Net Zero Wales (13 September 2021) GOV.WALES. The Welsh Government’s preferred position (PPW para 5.7.9) on new power lines is that, where possible, they should be laid underground. However, it is recognised that a balanced view must be taken against costs which could render otherwise acceptable projects unviable. Where undergrounding of lines is not possible or applicable, proactive engagement with energy companies and the public to mitigate the visual impact of any potential new transmission lines should take place. Clarification on the considerations given to undergrounding the grid would be of benefit.	As set out in 6.3.1 Volume3, Chapter 1 Onshore Project Description the onshore cable circuits will be installed underground and no new overhead lines are proposed for AyM. Options considered for onshore site selection are set out in 6.1.4 Volum 1, Chapter 4 Site Selection and Alternatives, and the projects position on the Offshore Transmission Network Reveiw (OTNR) in the Cable statement (application ref: 7.1)	yes	no
LA_007_11102021	S42	N/A	Hydrogen Welsh Government would also be interested in understanding how this project might contribute to a multi-vector energy opportunity across north Wales. There is considerable discussion on hydrogen across the north Wales region currently and it would be useful to understand how this project might contribute to those opportunities.	Hydrogen related infrastructure does not form part of the project’s design envelope. However the applicant is keen to continue engaging with WG on the role AyM will play in the wider energy strategy.	Yes	no

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LA_007_11102021	S42	N/A	Circular economy and Decommissioning Beyond Recycling – The Circular Economy Wales strategy’s aim is to keep resource in use for as long as possible and find these resources new uses at the end of their first useful life. And we expect producers/developers to reduce waste at the end of life of an installation, including reusing as much as possible, and then recycling what cannot be prevented or reused. We would wish to see RWE develop a decommissioning plan from the outset with the waste hierarchy followed. This ambition is supported by general policy in Planning Policy Wales. Which empathises the need to make sustainable resource choices and to promote the principals of a circular economy when proposing a development. The potential for designing out waste should be considered at an early stage when formulating proposals and should include using materials and products which are or can be deconstructed and reused, refurbished, remanufactured or disassembled and recycled.	How the project will deal with waste from onshore construction is set out in 8.13.5 Volume 8 Document 3.6 Outline Site Waste Management Plan. A Decommissioning Plan will be required to be submitted prior to decommissioning in accordance with a requirement in the DCO.	Yes	no
LA_007_11102021	S42	N/A	Conclusion I hope you find these comments useful. Further and more detailed information can be provided separately if necessary and nominated officials from key areas stand ready to discuss with you. Thank you for the opportunity to comment on your proposals. Please accept this as a Welsh Government response to the current consultation, the survey has not been completed. We look forward to continue to work with RWE for the benefit of the region.	Comment noted.	Yes	no
MOP_26_11102021	S42	N/A	1.1Background 1.1.1aulmert Ltd has been appointed by Mostyn Estates Limited to prepare a response to the consultation by RWE in respect of their proposals for the Awel y Môr Offshore Wind Farm north of Llandudno. 1.1.2As proposed, the windfarm will not exceed 91 offshore Wind Turbine Generators (WTGs) and depending on the final design could have a capacity of up to maximum of 100 Megawatts (MW). Onshore there is a proposal for a substation which will be located within a compound at Bodelwyddan.	Context. No response needed	yes	no
MOP_26_11102021	S42	N/A	1.2Mostyn Estates Limited 1.2.1Mostyn Estates Limited is a private limited company which manages the interests of the Mostyn family across North Wales and elsewhere. 1.2.2their principal areas of activity are its commercial, residential and agricultural holdings within Llandudno, together with its agricultural estates based round Rhewl and Tremostyn, Flintshire. 1.2.3The Mostyn family connection with Llandudno and Flintshire began over 500 years ago. The majority of the town as of today was laid out in 1849 by the Mostyn family, who leased most of the plots for development and influenced the building design and uses of the land. Mostyn Estates has always sought to promote the economic wellbeing of the town and in recent years promoted Mostyn Champneys Retail Park, Parc Llandudno and the town’s Victoria Centre. 1.2.4The Estate values the unique Victorian heritage whilst wishing to ensure the future prosperity of the town.	Context noted. No response needed	yes	no
MOP_26_11102021	S42	N/A	2.1Location 2.1.1The offshore element of the proposed windfarm comprises an area of 88.3km2. adjoining the existing Gwynt y Mor Wind Farm to the south east. 2.1.2The proposed offshore element would cover an area roughly triangular in shape, with the most westerly turbines being located approximately 10.5km north of the Great Orme. The northern boundary of the triangle would be contiguous with the northern boundary of the Gwynt y Mor array, and similarly the south-eastern boundary of the would also be continuous with the north-western boundary of the Gwynt y Mor Wind Farm. The south-western boundary follows the same alignment as the windfarm at Rhyl Flats. 2.1.3The Cable Corridor would connect the proposals with a landfall location between Rhyl and Prestatyn eventually connecting to the existing National Grid Substation near the St Asaph Business Park.	Context noted. No response needed	yes	no
MOP_26_11102021	S42	N/A	2.2The Proposal 2.2.1WE have prepared and published a The Preliminary Environmental Information Report (PEIR) in support of the proposals. 2.2.2The PEIR identifies two alternative Maximum Design Scenarios (MDS) which are as follows: MDS A - up to 48 ‘large’ Wind Turbine Generators, with a rotor diameter of up to 300m and a blade height of up to 332m above Mean High Water Springs. MDS B - up to 91 ‘small’ Wind Turbine Generators, with a rotor diameter of up to 220m and a blade height of up to 252m above Mean High Water Springs. 2.2.3ffshore construction is anticipated to take up to three years, with the project expected to be operational for up to 25 years.	Context noted. No response needed, however the Applicant would note that the maximum design has been reduced from a maximum of 91 turbines to a maximum of 50.	yes	no
MOP_26_11102021	S42	N/A	3.1National Policy Statements for Energy Infrastructure 3.1.1Government policies for the delivery of major energy infrastructure is set out in 6 National Policy Statements (NPS) for Energy Infrastructure, of relevance to this proposal are EN-1 and EN-3. 3.1.2NPS EN-1 sets out national policy for the energy infrastructure. It has effect, in combination with the relevant technology-specific NPS, on the decisions by the Infrastructure Planning Commission (IPC) on applications for energy developments that fall within the scope of the NPSS. For such applications this NPS, when combined with the relevant technology-specific energy NPS, provides the primary basis for decisions by the IPC. 3.1.3Paragraph 1.1.3 states that applicants should ‘...ensure that their applications, and any accompanying supporting documents, are consistent with the instructions and guidance in this NPS, the relevant technology-specific NPS and any other NPSS that are relevant to the application in question’. 3.1.4With regard to the role of NPS EN-1 in the planning system Paragraph 1.21 states that ‘In England and Wales this NPS is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether, and to what extent, this NPS is a material consideration will be judged on a case by case basis’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_26_11102021	S42	N/A	NPS EN-1 sets out that the Government are committed to meeting our legally binding target to cut greenhouse gas emissions by at least 80% by 2050, compared to 1990 levels (Paragraph 2.2.1) and that the UK needs to wean itself off such a high carbon energy mix: to reduce greenhouse gas emissions, and to improve the security, availability and affordability of energy through diversification (Paragraph 2.2.6). 3.1.6Part 4 of NPS EN-1 sets out certain general policies in accordance with which applications relating to energy infrastructure are to be decided. 3.1.7Paragraph 4.1.3 states that ‘In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account: •its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and •its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.1.8In this context Paragraph 4.1.4 continues stating that ‘... the IPC should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels’. 3.1.9Part 5 of NPS EN-1 considers the Generic Impacts of proposals. 3.1.10Section 5.3 deals with biodiversity and geological conservation. It states that Paragraph 5.3.3 that ‘Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.1.11Section 5.8 has regard to the Historic Environment. Paragraph 5.8.2 states that: ‘The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped and planted or managed flora. Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called “heritage assets”. A heritage asset may be any building, monument, site, place, area or landscape, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance’. 3.1.12With regard to the applicant’s assessment Paragraph 5.8.8 states ‘As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development’s impact’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.1.13Section 5.9 has regard to Landscape and Visual impacts, it states that Paragraph 5.9.1 that ‘The landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. In this context, references to landscape should be taken as covering seascape and townscape where appropriate’. 3.1.14Paragraph 5.9.5 stats that ‘The applicant should carry out a landscape and visual assessment and report it in the ES. A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant’s assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.1.15The following paragraph (5.9.6) states that ‘The applicant’s assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character’. 3.1.16Section 5.12 deals with the Socio-economic impacts and acknowledges at Paragraph 5.12.1 that ‘The construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels’. 3.1.17In this regard Paragraph 5.12.2 states that ‘Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.1.18Paragraph 5.12.3 states that this assessment should consider all relevant socio-economic impacts, and these may include: •the creation of jobs and training opportunities; •the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; •effects on tourism; •the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and •cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	The NPS acknowledges at Paragraph 5.12.5 that ‘Socio-economic impacts may be linked to other impacts, for example the visual impact of a development ... but may also have an impact on tourism and local businesses’. 3.1.20NPS EN-3 deals specifically with Renewable Energy Infrastructure and taken with EN-1 provides the primary basis for decisions by the Infrastructure Planning Commission (IPC) on applications it receives for nationally significant renewable energy infrastructure.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no

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MOP_26_11102021	S42	N/A	3.1.21Chapter 2.6 of NPS EN-3 has specific regard to Offshore Wind; it states at Paragraph 2.6.1 that ‘Offshore wind farms are expected to make up a significant proportion of the UK’s renewable energy generating capacity up to 2020 and towards 2050’. 3.1.22NPS EN-3 goes on to consider Offshore Wind Farm Impacts. 3.1.23With regard to biodiversity it states that applicants and the IPC should have regard to fish, seabed habitats, marine mammals and birds. 3.1.24In respect of Heritage Assets, Paragraph 2.6.139 outline two principal ways in which they can be affected: - From the direct effect of the physical siting of the development itself such as the installation of the wind turbine foundations and electricity cables or the siting of plant required during the construction period; and - From indirect changes to the physical marine environment (such as scour, coastal erosion or sediment deposition) caused by the proposed infrastructure itself or its construction	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.1.25Paragraph 2.6.199 identifies Seascape is an additional issue for consideration. It states that ‘Seascape is a discrete area within which there is shared inter-visibility between land and sea. In some circumstances it may be necessary to carry out a seascape and visual impact assessment (SVIA) in accordance with the relevant offshore wind farm EIA policy’. 3.1.26Paragraph 2.6.200 emphasise that ‘The seascape is an important resource and an economic asset’ and that ‘Coastal landscapes are often recognised through statutory landscape designations’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.2Welsh National Marine Plan 3.2.1The Welsh National Marine Plan (WNMP) was published in November 2019 and guides the sustainable development the Welsh marine area by setting out how proposals will be considered by decision makers. 3.2.2Paragraph 15 states that the WNMP will be a consideration in any determination of a relevant Nationally Significant Infrastructure Projects (NSIP) alongside any relevant NPS or other relevant considerations.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Welsh National Marine Plan and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.2.3Paragraph 16 states that ‘Welsh Ministers expect NSIP developments located wholly or partly in the Plan area contribute to the well-being of Welsh communities and the sustainable management of natural resources’. they should seek to deliver lasting legacy benefits for the local community, the economy and the environment, including through: - Supporting the sustainability, vibrancy and quality of life of coastal communities; - Conserving and enhancing the cultural heritage of Wales’ coastal communities and promoting the Welsh language; - Contributing to long term sustainable economic development and local prosperity by creating high quality, local employment opportunities, taking into account the likely requirements for training, and working with national and government training organisations; - Contributing to the transition towards the achievement of low carbon, sustainable economic development, minimising carbon emissions and increasing the resilience of people, places and the environment to the effects of climate change; and - Contributing to the conservation and enhancement of biodiversity and ecosystem resilience, as defined in the Environment Act (Wales) 2016.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Welsh National Marine Plan and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.2.4WNMP Policy GEN_01 states that ‘There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales’ well-being goals’. However, Policy GEN_02 states ‘Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making’. 3.2.5Paragraph 112 recognises that the sea plays a significant role in contributing to the well-being of coastal communities at a local level and that ‘The right development in the right place may aid adaptation or provide a regenerative boost, but equally it could have a negative impact upon the intrinsic environmental characteristics and qualities on which the prosperity and well-being of the community depend’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Welsh National Marine Plan and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.2.6Paragraph 122 acknowledges that the historic environment can drive sustainable economic development, attracting tourism and providing enjoyable places in which to live and work. It is important that the historic environment is appreciated, protected and accessible for present and future generations. Policy SOC_05 in regard to Historic assets states: ‘Proposals should demonstrate how potential impacts on historic assets and their settings have been taken into consideration and should, in order of preference: - Avoid adverse impacts on historic assets and their settings; and/or - Minimise impacts where they cannot be avoided; and/ or - Mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance historic assets are encouraged’.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Welsh National Marine Plan and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.2.7With regard to designated landscapes Paragraph 128 states that ‘There are also a number of non-statutory designations including Heritage Coasts and Registered Historic Landscapes. Some 42% of Wales’ coastline is defined as Heritage Coast; often this is contiguous with other designations such as National Parks or AONBs. These non-statutory designations were defined to protect stretches of scenic and undeveloped coastline from unsuitable development’. 3.2.8Policy ELC_01 supports proposals for offshore wind energy generation where they contribute to the objectives of the WNMP.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Welsh National Marine Plan and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.3Future Wales – The National Plan 2040 3.3.1Future Wales – the National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. 3.3.2With regard to wind energy, the plan on page 94 of Future Wales identifies pre-assessed areas for wind energy - all of these areas are onshore. This is similarly reflected on the North Wales Regional Strategic Diagram on page 111.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Future Wales - National Plan 2040 and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	Volume 1, Chapter 4: Site Selection and Alternatives	3.3.3Policy 17 states that the Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs. It continues stating that in pre-assessed areas the likely impacts of development on landscape has been modelled and found acceptable and a presumption in favour of large scale wind energy proposals in these location exists. 3.3.4Therefore, the proposals at Awel y Môr do not benefit from this presumption.	The proposed array area sits within an area of seabed considered within The Crown Estate licencing round for offshore wind farm extensions. As an offshore wind farm it does not sit within the terrestrial pre-assessed areas for wind and solar. Notwithstanding this the Applicant has, since receipt of this feedback, reduced the array area, reduced the horizontal spread of the project, and reduced the maximum number of turbines from 91 to 50. The rationale behind this is presented in the Site Selection and Alternatives chapter.	yes	no

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MOP_26_11102021	S42	N/A	3.3.5Policy 18 has regard to Renewable and Low Carbon Energy Developments of National Significance. It states that: 'Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria: 1.Outside of the Pre Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty); 2. There are no unacceptable adverse visual impacts on nearby communities and individual dwellings; 3. There are no adverse effects on the integrity of Internationally designated sites (including National Site Network sites and Ramsar sites) and the features for which they have been designated (unless there are no alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI) and appropriate compensatory measures have been secured); 4. There are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species; 5. The proposal includes biodiversity enhancement measures to provide a net benefit for biodiversity; 6. There are no unacceptable adverse impacts on statutorily protected built heritage assets;	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Future Wales - National Plan 2040 and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	7. There are no unacceptable adverse impacts by way of shadow flicker, noise, reflected light, air quality or electromagnetic disturbance; 8. There are no unacceptable impacts on the operations of defence facilities and operations (including aviation and radar) or the Mid Wales Low Flying Tactical Training Area (TTA 7T); 9. There are no unacceptable adverse impacts on the transport network through the transportation of components or source fuels during its construction and/or ongoing operation; 10. The proposal includes consideration of the materials needed or generated by the development to ensure the sustainable use and management of resources; 11. There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. The cumulative impacts of existing and consented renewable energy schemes should also be considered'.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the Future Wales - National Plan 2040 and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	3.4Planning Policy Wales 3.4.1Planning Policy Wales Edition 11 (PPW) was published in February 2021. It sets out the land use planning policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW, the TANs, MTANs and policy clarification letters together comprise national planning policy. 3.4.2The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. 3.4.3PPW contains no specific policies regarding offshore windfarm developments, simply referring to the guidance in Future Wales and the policies in the Welsh National Marine Plan.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the PPW11 and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	4.1Statutory Consultees 4.1.1Under Section 42 of the Planning Act 2008 (the Act) the promoter of a Development Consent Order has a duty to carry out pre-application consultation as part of the Development Consent Order application process. 4.1.2Section 44 of the Act sets out three categories of specified persons promoters must consult as part of the Development Consent Order application process. These being: - Category 1 persons (owners, lessees, tenants, occupiers); - Category 2 persons (persons interested in the land, or power to sell, e.g. mortgagees); - Category 3 persons (persons who after diligent enquiry might be entitled to make a relevant claim if the DCO is made and fully implemented). 4.1.3Any Development Consent Order application must be accompanied by the Book of Reference which lists all persons having any one of the three interests listed above.	The Applicant has included a comprehensive Planning Statement (application ref: 8.1) which accompanies the Application and considers UK and Welsh national policies, including the PPW11 and Local Policies. Further to this each technical Chapter of the ES considers national and local policies of relevance to the given technical assessment.	yes	no
MOP_26_11102021	S42	N/A	4.1.4Category 1 & 2 Persons are relatively easy to define as being those whose land is physically affected by the construction of a scheme (although often this cannot be fully completed until design options are finally selected). 4.1.5The vast majority of Category 3 persons who must be listed in the Book of Reference and consulted formally in the Section 44 Consultation will be those whose property may be affected in value as a result of impacts from the scheme. 4.1.6Therefore, promoters have three main tasks to accomplish: - Deciding who will be so affected by new physical impacts to the extent that they should be in the Book of Reference as a Category 3 Stakeholder; - Identifying the names and addresses of these people before statutory consultation; - Quantifying what they think the likely liability range is for any eventual Part 1 claims or s10 claims.	The Applicant carried out a careful review to identify potential category 3 parties based on precautionary criteria informed by the PEIR and ES processes and expert advice. That process is summarised in the Book of Reference. Those identified as falling within the scope of category 3 due to the potential to have a relevant claim have been consulted and included in the Book of Reference. The Applicant did not identify any relevant claim for the Estate, and accordingly does not consider that the Estate should be classed as category 3 or that the consultation was inadequate.	Yes	no

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MOP_26_11102021	S42	N/A	4.1.7~~It~~ is considered for Statutory Consultation purposes promoters should take a precautionary approach and be inclusive taking into account that being listed in the Book of Reference does not mean that someone will necessarily have a supportable compensation claim. 4.1.8~~Mostyn~~ Mostyn Estates consider that they fall within Category 3 as those whose property may be materially affected as a result of impacts from the scheme. A plan of their landholding is included at Appendix 1 and should be treated as PRIVATE AND CONFIDENTIAL. 4.1.9~~This~~ This landholding includes the Great and Little Orme, much of Llandudno Promenade, many hotels and commercial properties. 4.1.10~~It~~ is therefore considered that as Mostyn Estates where not consulted formally at the Section 44 stage that inadequate consultation has taken place.	Consenting Impact	Yes	no
MOP_26_11102021	S42	N/A	4.2~~Principle~~ Principle of Development 4.2.1~~It~~ is accepted that a national level that planning policies are supportive of the development of new, and the expansion of renewable energy developments, including wind energy. and that substantial weight should be given to developments which contribute to achieving the climate change goals. 4.2.2~~However~~ However, it is noted that whilst the general thrust of planning policies at a national level are supportive of large scale renewable energy schemes, these polices also acknowledge that they can have significant environmental, social and economic impacts. 4.2.3~~Therefore~~ Therefore, in cases where these environmental, social and economic impacts are of such significance and detriment these should outweigh the strong policy support for offshore renewable energy.	This is duly noted by the Applicant. The planning case, including the need for the proposed project and the planning balance is considered in detail within the Planning Statement (application ref: 8.1).	yes	no
MOP_26_11102021	S42	Volume 3, Chapter 3: Socioeconomics	4.3~~Socio~~ Socio Economic Impacts 4.3.1~~The~~ The Socio Economic Impacts of the proposal are set out I Volume 3, Chapter 3 of the Preliminary Environment Information Report (PEIR). 4.3.2~~The~~ The introduction states that this chapter PEIR presents the preliminary results of the assessment of the likely significant effects of the Awel y Môr Offshore Wind Farm with respect to socio-economics including jobs and economic output, in addition to impact on community and health facilities. 4.3.3~~However~~ However, it is noted that the Socio Economic Chapter of the PEIR appears to deal solely with the impacts of the onshore elements of the development and not the potential significant impacts of the proposal overall, both offshore and onshore, on communities and businesses along the coastline, particularly in Llandudno. 4.3.4~~The~~ The above is clear from Paragraph 163 and 164 of the PEIR chapter which only identifies 12 community facilities, such as schools, health facilities, leisure amenities and churches within 500m of the Draft Order Limits as likely to be impacted.	The PEIR assessed effects on economy, tourism economy and community facilities at spatial levels which are considered appropriate to each receptor. This rationale was tested in the Scoping Report, and its suitability was not questioned in the Scoping Opinion. The assessment follows best practice as laid out in Section 3.4 of the ES Chapter (application ref: 6.3.3).	yes	no
MOP_26_11102021	S42	Volume 3, Chapter 3: Socioeconomics	4.3.5~~Clearly~~ Clearly the socio economic impacts of the proposal, both onshore and offshore, will be much wider than that and have potentially significant impacts on settlements such as Llandudno and its surrounding environs. 4.3.6~~Whilst~~ Whilst it is acknowledged that the development will have economic benefits in terms of employment particularly during the constructions phase, as discussed elsewhere in this report, Llandudno relies heavily on the tourism and leisure industry along with its heritage. 4.3.7~~This~~ This potential loss of visitors will have a knock on effect on the local economy with the potential for reduced investment from Mostyn Estates and others in Llandudno as a consequence of the proposed development. 4.3.8~~The~~ The impacts of the proposal on these industries could potentially lead to loss of employment within the coastal towns; the socio-economic impacts of this have not been assessed within the PEIR and therefore cannot be quantified.	The Applicant recognises the concerns raised by Mostyn Estates whilst also noting that the concerns are not supported by the available empirical evidence. . The EIA has concluded that the project would not have a significant effect on the tourism economy in Llandudno and the Great Orme. The evidence base to support this conclusion (and associated limitations) is presented in Section 4.7.4 of teh ES Chapter (application ref: 6.3.4). In response to the received feedback, an additional research study has been conducted which collected evidence on the tourism sector employment in seaside towns in proximity to several offshore Wind Farms across the UK (please see Volume 5, Annex 4.2 (application ref: 6.3.4.2)). The conclusions of the study are used to support the assessment presented in Sections 4.10.4 and 4.11.4 of the ES Chapter (application ref: 6.3.4).	yes	no
MOP_26_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	4.4~~Tourism~~ Tourism & Recreation 4.4.1~~Volume~~ Volume 3, Chapter 4 of the PEIR presents the results of the assessment of the likely significant effects of the Awel y Môr Offshore Wind Farm with respect to tourism and recreation including the visitor economy, as well as onshore and offshore recreation. 4.4.2~~Firstly~~ Firstly, it is noted that at Section 4.2.4 of the PEIR, in relation to Local Planning Guidance, reference is made only to the Local Development Plan for Denbighshire County Council. Given the wider impacts of the proposals it is considered that other Local Development Plans and their tourism policies should be acknowledged including those in the Conwy County Borough administrative area.	Other local authority development plans, including that for Conwy, were reviewed and referenced within both the PEIR and this ES chapter (see Section 4.2.4 of application ref: 6.3.4).	Yes	no
MOP_26_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	4.4.3~~Table~~ Table 19 of the PEIR sets out an overview of the nature of the tourism offer to visitors to locations in North Wales. It identifies the Great Orme and Llandudno as one of these locations and describes the nature of the tourism offer as follows: ‘The visitor offer of Llandudno and the Great Orme is also characterised by its local beaches. However, the area’s offer is much broader than either of the two areas identified above, and hence appeals to a broader market. This includes conference visitors and attendees to major events at Venue Cymru, as well as visitors to Llandudno’s many beachfront hotels and seaside attractions and facilities. The Great Orme has a tramway and cable car (longest in Britain) and the visitor centre at the summit all of which contribute to the area’s unique and varied tourism offer. The Great Orme is also home to pitch ‘n’ putt golf, and provides an opportunity for stunning views extending as far as the Lake District. Other aspects of the area’s visitor offer include Happy Valley (sheltered grassy hollow on Great Orme’s eastern flank), the Alice Trail (inspired by Lewis Carroll’s Alice’s Adventures in Wonderland), and Llandudno Pier (the longest Victorian pier in Wales). The area is also popular with climbers, as well as skiing and boarding enthusiasts (at Llandudno Snowsports)’.	This is contextual information with no response required	yes	no
MOP_26_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	4.4.4~~Assessment~~ Assessment of the potential visual impact of the proposal on onshore recreation receptors, in particular from the Great Orme Country Park is welcomed as is the presentation of visitor data for the Great Orme. 4.4.5~~With~~ With regard to the data presented in Figure 4 of the PEIR and the impact of the existing Gwynt y Mor windfarm, it is noted that at Paragraph 127 it is acknowledged that the none of the data sets potted are comprehensive, their validity for the purposes of the assessment is therefore questioned. 4.4.6~~Similarly~~ Similarly, the conclusion that ‘On the basis of the findings of the research review and visitor data from Great Orme, it is concluded that the presence of WTGs will have no significant impact on onshore recreation’ is also questioned. 4.4.7~~Given~~ Given the proposal will extend further westward than the Gwynt y Mor windfarm it is considered that this will result in a greater impact on the Great Orme. The conclusions of the supporting review of the Seascape, Landscape and Visual Impact Assessment undertaken by Bright & Associates confirm this, concluding that the impact will be of Major (adverse) significance (Paragraph 7.3.8).	As with the assessment for Llandudno and the Great Orme presented in Section 4.10.4 and 4.11.4 of teh ES Chapter (application ref: 6.3.4), there is the potential for the visual effect to discourage some visitors whilst it may enhance the enjoyment for others through adding an interesting seascape view. The limitations of the available empirical evidence are acknowledged in reaching this conclusion, and steps have been taken to address this through additional research. This involved updating the evidence base of the relationship between offshore wind and tourism (please see section 4.4.7) and undertaking a research study into tourism sector employment trends in seaside towns located in proximity to several operational UK offshore wind farms (please see Volume 5, Annex 4.2 (application ref: 6.3.4.2)).	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_26_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	4.4.8Section 4.7.4 of the PEIR examines tourism perception of wind farms. Paragraph 175 acknowledges that ‘Overall, there is a limited body of evidence relating to the extent to which offshore wind farms impact upon tourism, with the majority of the research to date being focused on onshore farms’. 4.4.9Given the stage the proposal is at, and the acknowledged limited body of evidence, there is the opportunity to undertake specific ex-ante research in relation to the Awel y Môr to better understand the potential impacts. 4.4.10It is noted that at Paragraph 182 reference is made to ex-post research undertaken in regard to the Gwynt y Mor windfarm, however, the conclusions if this research are not presented. 4.4.11Given the acknowledged, limited body of evidence it is unclear how a conclusion that ‘offshore wind farm developments generate very limited, or no negative impact on tourist and recreational users during the construction and operational phases’ can be drawn.	The review of available research presented in the PEIR has been updated to take account of more recent data. This is presented in section 4.7.4. of the ES Chapter (application ref: 6.3.4) An additional research study has also been undertaken which is presented in Volume 5, Annex 4.2 (application ref: 6.3.4.2).	yes	no
MOP_26_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	4.4.12Table 32 provides an assessment of magnitude of impact on tourism economy at the local level. With regard to the Great Orme and Llandudno it identifies the magnitude of impact as Low, concluding that: ‘During the Turbine installation phase of construction, the offshore WTG of AyM will be visible from both the Great Orme and along the Llandudno waterfront. Whilst this has potential to lead to some impact on holiday and day visitors, it is not anticipated to result in a substantial impact as AyM will add WTGs to the area’s current seascape, rather than changing it. The impact is likely to occur at the latter stages of construction, with potentially a small number of visitors being discouraged by the development activity. However, there is the potential for these discouraged visitors to be replaced by other visitors as the local tourism sector and market adapts (as well as the displaced visitors deciding to visit other areas of North Wales). Llandudno has also specific facilities which are not available elsewhere and/ or are unique to the area (including conferences, exhibitions and live music), from which the visitors are unlikely to be deterred by the development. Overall, it is anticipated that the addition of AyM on the local horizon has the potential for a low negative impact on overall visitor numbers and for this to be short term in nature’.	This is contextual information with no response required	yes	no
MOP_26_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	4.4.13As stated in Table 32 Llandudno has specific facilities which are not available elsewhere and/or are unique to the area, however, this is not say that visitors will be discouraged from visiting the area. 4.4.14Mostyn Estates wholly disagree with the conclusion that the proposal is not anticipated to result in a substantial impact as it will add WTGs to the area’s current seascape. Whilst this is true, the proposed turbines will be some 12-13km from the shoreline, closer than the existing WTGs at Gwynt y Mor which are 16.5km from the shoreline of Llandudno. 4.4.15The height of the proposed WTGs is noted, these are anticipated to be 332m in total, this compared to the Gwynt y Mor WTGs which are 138m in overall height to blade tip and the Great Orme which is 207m at its summit. The proposed WTGs are significantly larger than any natural or manmade structure in the locality. 4.4.16Similarly it is cited that there little impact from the existing wind farm as a reason for supporting the new proposal. However, is stated above the Awel y Môr is larger and closer to Llandudno and the scale and massing of the proposals will have a significant impact, for example, metre that two-thirds of the view from the Great Orme will be impacted. 4.4.17It is considered that the assessment of the tourism impacts are underestimated and are likely to be greater than the stated ‘low negative impact on overall visitor numbers and for this to be short term in nature’.	The ES has been updated in response to this feedback. Specifically Volume 2 Chapter 10 (application ref: 6.2.10) considers the potential impacts on the Seascape and Landscape, Volume 3 Chapter 8 (application ref: 6.3.8) considers the potential impacts on the heritage environment, Volum 3 Chapter 3 (application ref: 6.3.3) considers the potential impacts on the tourism economy, and Volume 3 Chapter 4 (application ref: 6.3.4) considers the impacts on Tourism and Recreation more broadly. Whilst it is not possible to reduce the size of the proposed turbines at this stage (this flexibility is supported in teh National Policy Statements as described in the Planning Statement (application ref: 8.1)) the Applicant has sought to reduce the potential impact by reducing the maximum number of turbines from 91 as proposed in the PEIR to 50 in this final application.	yes	no
MOP_26_11102021	S42	Volume 2, Chapter 10: SLVIA	4.5Seascape, Landscape and Visual Impact 4.5.1A review of the approach and contents of a Seascape, Landscape and Visual Impact Assessment (SLVIA) which has been undertaken as part of a Preliminary Environmental Information Report has been undertaken by Bright & Associates. A copy of the full report is included at Appendix 2. 4.5.2This review examines the SLVIA regarding offshore matters, namely, the turbines rather than the cable routing, substations or other infrastructure on land (i.e. onshore). It focuses on the methodology adopted, approach and results relevant to the environs of Llandudno as well as the landscape character and designations applicable to the Conwy area. Seascape Character Areas which might be directly affected by the development and those adjacent to this part of the coast have been considered.	This was noted by the Applicant.	yes	no
MOP_26_11102021	S42	Volume 2, Chapter 10: SLVIA	4.5.3Our review of the SLVIA concludes that we have concerns regarding current Natural Resource Wales and GLVIA3 guidance and how it has been applied to the SLVIA. Therefore, the results appear to be biased to conclusions of lower impacts. 4.5.4The reference to significant or not-significant is not an appropriate approach nor is it adopted in the majority of other environmental topics for the development. 4.5.5Overall, it is considered that the SLVIA does not comply with GLVIA3 as it does not clearly differentiate between the significant effects that are likely to have some bearing on the eventual decision and those of lesser concern.	It is not possible for the AyM to apply many of the criteria suggested by the NRW (2019) Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance due to the site location, which is fixed. The draft NPS EN-3 acknowledges that certain constraints on the location of extension projects mean that applicants have a limited ability to select alternative sites. The Applicant has nonetheless sought to minimise effects, most recently by reducing the project extent from 88km2 at PEIR to 78km2 for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application. The NRW (2019) Guidance provides information about the possible threshold distances for different magnitudes of change based on different WTG heights based on a very small sample of previously-submitted SLVIAs. It also provides guidance on how higher or lower magnitudes of change may arise based on a range of factors. In relation to seascape sensitivity, it provides relative levels of sensitivity to wind farm development occurring within an area of seascape largely based on distance from designated landscapes. Whilst this is useful to guide the understanding of the likely effects of an OWF it does not constitute policy or supersede or replace the understanding provided by a project-specific SLVIA and the capacity of a seascape/ landscape to accommodate the development in question. Any divergence in the SLVIA from the stated sensitivity levels in the NRW Guidance has been explained. The reference only to significant or non-significant effects is acceptable under GLVIA3 paragraph 3.33. Nevertheless, the ES methodology has changed to include assessment of levels of significance following consultation.	yes	no
MOP_26_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	4.6Heritage 4.6.1PEIR Volume 3, Chapter 8 considers Onshore Archaeology and Cultural Heritage. 4.6.2It is noted from Paragraph 15 that a distance based approach has been adopted to define the study area for the assessment of effects on heritage assets. However, this relates only to 1km area either side of the Export Cable Corridor. It therefore does not take account on any impacts on heritage assets in the coastal towns such as Llandudno which include Conservation Areas and Listed Buildings. 4.6.3Similarly, Volume 2 Chapter 11 - Offshore Archaeology and Cultural Heritage fails to acknowledge visual impacts on Conservation Areas and Listed Buildings. 4.6.4It is considered that this is a major omission form the assessment. Llandudno Conservation Area was one of the first designated in Wales and contains one of the finest surviving Victorian seaside resorts in the UK. It is a magnificent example of mid-Victorian town planning characterised by elegant terraces of classically influenced buildings. The attractiveness of these properties results from their ordered and well-proportioned fenestration and high quality decorative detailing.	Effects from the offshore infrastructure on heritage assets/areas at Llandudno were considered in the Onshore archaeology andCultural Heritage Chapter of the PEIR (Chapter 8). The ES chapter (application ref: 6.3.8) considers the potential implications of the AyM project on all relevant receptors, including the Llandudno Conservation Area.	yes	no

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MOP_26_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	4.6.5 Llandudno itself contains approximately 394 listed buildings, the second largest number of listed buildings in a town or city behind Cardiff. 4.6.6 The impacts on wider heritage assets has not been assessed, for example the impacts on Degannwy Castle, which is a Scheduled Ancient Monument, and sits 108m above sea level as not been assessed. The monument is of national importance for its potential to enhance knowledge of medieval defensive organisation and settlement. The site forms an important element within the wider medieval context and within the surrounding landscape. 4.6.7 Given the clear importance of the heritage of Llandudno it is considered that the impacts of the proposals should be considered as part of the Environmental Statement.	Full justification for the asset selection was provided in the scoping exercise (and in line with the PINS scoping response). Llandudno was considered in the PEIR and the assesment presentedwas considered porportionate and appropriate. Deganwy castle has been added in the scoping selection justification note that accompanies the ES chapter (application ref: 6.3.8.2.	yes	no
MOP_26_11102021	S42	N/A	4.0.0 CONCLUSION 4.0.1 Mostyn Estates Limited object to the proposals by RWE for an offshore windfarm at Awel y Môr Offshore Wind Farm north of Llandudno. 4.0.2 As major landowners in the area they object to the proposals on the following grounds: Inadequate consultation: As major landowners in the area it is considered that they fall within Category 3 of Section 44 of the Planning Act 2008 and should therefore have been formally consulted on the Development Consent Order. Whilst the statutory requirement for formal consultation under the Planning Act 2008 is 28 days Mostyn Estates do not consider the detail provided by the promotor at consultation is adequate, nor the consultation period long enough for affected parties to meaningfully engage and feedback, despite the period being extended to 42 days. Covid restrictions have largely been removed and more public exhibition events should have been incorporated into the consultation process. Whilst online material is a useful addition to the formal consultation process this has not been sufficiently accompanied by alternative forms of communication. Further detailed engagement should continue with all affected parties to ensure feedback and mitigation is fully considered ahead of any submission for the DCO and we welcome meaningful engagement with RWE going forward.	As a result of the ongoing Covid position, and RWE policy, public exhibitions were not considered appropriate. In lieu of this the Applicant undertook consultation over an extended period (42 days), using a combination of virtual exhibition, outdoor event roadshow (including Llandudno), and communication through press releases and newsletters. The Applicants extensive consultation has been described and presented within the Consultation Report (application ref: 5.1), which this appendix accompanies. Ongoing consultation has taken place through the EIA Evidence Plan to ensure where mitigation is required it agreed with statutory and non-statutory advisers, including Cadw and Local Planning Authorities.	yes	no
MOP_26_11102021	S42	N/A	Socio economic impacts: The impact of the proposal on the tourism and leisure industry in particular could lead to loss of employment within the coastal towns. The socio-economic impacts of this have not been assessed within the PEIR and therefore cannot be quantified. Impacts on Tourism & Recreation: It is considered that the assessment in the PEIR of the tourism impacts in Llandudno are underestimated and are likely to be greater than the stated 'low negative impact on overall visitor numbers and for this to be short term in nature'. Seascape, Landscape and Visual Impact: Overall, it is considered that the Seascape, Landscape and Visual Impact Assessment does not comply with GLVIA3 as it does not clearly differentiate between the significant effects that are likely to have some bearing on the eventual decision and those of lesser concern. Heritage: The PEIR only seeks to assess the heritage impacts of the proposal in a 1km area either side of the Export Cable Corridor. Given the clear importance of the heritage of Llandudno it is considered that the impacts of the proposals should be considered further.	The socioeconomic chapter of the ES (application ref 6.3.3) provides an assessment of the potential impacts on the tourism economy associated with AyM. The Applicant has also, following receipt of stakeholder feedback, reduced the proposed project from a maximum of 91 turbines to a maximum of 50, and has reduced teh westerly extent of the proposed array area. The SLVIA Chapter (application ref: 6.2.10) provides consideration of teh marked reduction in the number of turbines. The SLVIA Chapter is also accompanied by an annex which provides a detailed presentation of the GLVIA3 compliant methodology employed in the assessment (application ref: 6.4.10.1)	yes	no
LA_00807102021	S42	N/A	I refer to your pre-application consultation regarding the above matter. The proposal was submitted to a special meeting of the Planning Committee on the 7th October 2021, which resolved: A) To make an objection to the proposed Development Consent Order. B) To authorise the Development and Building Control Manager to respond to the applicant's pre- application consultation. C) To authorise the Development and Building Control Manager to make further representations following the submission of the application to the Planning Inspectorate, and to make arrangements for the Council to be represented at the Examination.	Comment noted.	Yes	no
LA_00807102021	S42	N/A	The Council supports in principle the development of renewable energy, and recognises that offshore wind energy will play an important part in ensuring that Wales and the UK can meet their respective national and international commitments on reducing greenhouse gas emissions. However, the Council has significant concerns regarding the proposal that is subject to the consultation exercise. These fall into four main areas: i) Seascape, landscape and visual impacts; ii) Impacts on the tourism economy; iii) Impacts on the built environment and heritage; iv) Impacts arising from construction works on the amenity of resident and visitors. I will amplify each of these concerns below:	Comments noted and addressed in relevant responses below.	Yes	no
LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	Seascape, Landscape and Visual Impacts The Seascape, Landscape and Visual Impact Assessment (SLVIA) that forms part of the Preliminary Environmental Information Report (PEIR) has been reviewed by LUC, which were appointed by a group of seven local planning authorities in North Wales. The LUC Report concludes that the SLVIA is thorough and contains comprehensive assessments of the key seascape, landscape and visual receptors. Although the method is sound and comprehensive, there are issues with its application and judgements, which it considers to result in under reporting of significant effects. These include assessments of sensitivity of the landscape and visual receptors and the magnitude of change. Whilst LUC agrees with the SLVIA's conclusions in respect of the significance of impacts from the representative viewpoints and on the Landscape Character Areas, it does not agree with its conclusions in respect of the significance of impacts from a number of settlements and sections of the Wales Coastal Path and on the Seascape Character Areas.	This is noted by the Applicant. Further consideration is given below.	yes	no
LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	In respect of settlements, LUC does not agree with the SLVIA that the effects on Penrhyn Bay, Rhos on Sea and Colwyn Bay would be 'locally significant, but otherwise non-significant'. It considers that the high proportion of bungalows in Penrhyn Bay and of flats and taller buildings in Rhos on Sea, and the varied topography of Colwyn Bay, would each give rise to significant effects over a greater proportion of the settlements. Whilst it concurs that the significant effects are likely to remain local, it considers that their extent should be clarified. Furthermore, LUC disagrees with the SLVIA that the effect on the settlement of Llanddulas would be 'non-significant'. LUC considers that the SLVIA gives too much weight to the screening impacts of intervening properties, whereas in fact Llanddulas has developed on a north-facing slope and a large proportion of properties have open, coastal views. It considers that significant effects, potentially locally, are likely. In terms of the Wales Coastal Path, LUC disagrees with the finding that the effects on four other sections of the Wales Coastal Path would be 'locally significant, but otherwise non-significant'. These comprise Sections L (Great Orme), M (Llandudno), N (Penrhyn Bay) and O (Colwyn Bay). LUC considers that, given the extent to which they would be affected, significant effects should be recorded for the whole of each of the respective sections.	The Methodology in Annex 10.1 has been updated to reflect that the assessment of the effects on settlements relates to people in properties. The effects on people using sea front areas and amenities are assessed in relation to the viewpoints and the Wales Coast Path in order to avoid duplication. The LUC Review does agree that the effects on Penrhyn Bay, Rhos on Sea and Colwyn Bay would be locally significant but seeks clarification on the extent of the area identified as local. The assessment of the effects on properties in Penrhyn Bay, Rhos on Sea and Colwyn Bay have been reviewed and the geographical extent of the significant effects clarified and revised as set out in Section 10.11.6.	yes	no

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LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	Finally, in terms of seascape character areas, LUC disagrees with the SLVIA's findings that the effect on Seascape Character Area B (Colwyn Bay) and C (Vale of Clwyd) would be 'non-significant'. It considers that the scale of the Awel y Môr WTGs when compared to the existing WTGs, as well as the wide panoramic view from the coast, would result in significant effects on both seascape character areas. LUC also disagrees with the SLVIA's finding on the effect on Seascape Character Area 2 (Conwy Bay). The SLVIA considers that this would be 'locally significant, but otherwise non-significant'. LUC notes that the proposed turbines would alter the perceived scale of the Great Orme from a large proportion of the seascape character area. Significant effects would occur across a greater proportion of the seascape character area than reported by the SLVIA. The Council concurs with most of the findings in the LUC report, but considers that the impact on receptors along the A55 should not be recorded as 'insignificant'. The Gwynt y Môr offshore windfarm is particularly prominent on the eastbound section of the A55 east of Penmaenbach tunnel, from where it projects above the townscape of Llandudno and breaches the otherwise flat profile between the Great Orme and the Little Orme. The addition of the Awel y Môr offshore windfarm would be seen by eastbound travellers further west along the A55, and would therefore give rise to the possibility of significant sequential (and potentially, in-combination) impacts.	The assessment of the effects on SCA B and SCA C have been reviewed and the assessments clarified in Section 10.11.6. No change has been made to the finding of Non-significant effects in these instances.	yes	no
LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	Similarly, westbound receptors on the A55 between Llanddulas and Colwyn Bay would be subject in- combination effects of the Awel y Môr offshore windfarm with the existing offshore windfarms. For these reasons, the Council considers that the impact on the A55 should be recorded as 'locally significant, but otherwise non-significant'.	The assessment of the effects on the A55 in Section 10.11.6 have been reviewed. This has included further field work, on-site assessment and preparation of additional visualisations (VPs 63-65). It remains the opinion of the assessors that whilst there will be adverse effects on views from parts of the A55 these would be Non-significant. This is partly as a result of the lower relative sensitivity that people travelling at speed along this route have to the proposed changes in their views.	yes	no
LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	The Council recognises the support given for the expansion of offshore wind energy in national policy documents, and that this would inevitably result in significant changes to coastal seascapes and views. However, the Council has concerns over four aspects of the proposal. First, the scale of both the individual WTGs and of the extent of the Awel y Môr array as a whole would result in a significantly greater visual impact from a number of viewpoints than views of the existing offshore wind farms. This in turn would cause the offshore windfarms to become the dominant feature of the seascape.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	yes
LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	Second, the Awel y Môr array would lie close to, and affect the setting of, a number of coastal landscape features. These include the Great Orme (Heritage Coast and part of a Special Landscape Area and Historic Landscape) and the Little Orme (which also forms part of a Special Landscape Area and Historic Landscape). Both of these form prominent landscape features which effectively act as 'book-ends', enclosing both the town of Llandudno and its North Shore. Other coastal landscape features include Rhos Point, which is not subject to any landscape designation, but which forms a distinctive boundary, demarcating the bays of Colwyn Bay to the east and Penrhyn Bay to the west. The Council is concerned that the Awel y Môr offshore windfarm would significantly affect the seascape character, and detract from the appreciation of the coastal landscape features when viewed both from coastal viewpoints and seaward views from inland viewpoints.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	yes
LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	Third, the proposal would cause both sequential and in-combination cumulative effects with other offshore wind farms, including existing offshore wind farms, and this would increase the dominance and saturation of wind farms as a seascape feature.	Noted. Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	yes
LA_00807102021	S42	Volume 2, Chapter 10: SLVIA	Fourth, in the absence of a cumulative assessment with any future onshore wind farms (including the Pre-Assessed Areas for Wind Energy identified in Future Wales: The National Plan 2040), there are concerns that the SLVIA does not fully evaluate the cumulative effects as required by Planning Inspectorate Advice Note 17: Cumulative Environmental Effects. Due to these concerns, the Council considers that the proposal would have unacceptable impacts on landscape and seascape character and on visual amenity.	Section 10.10-10.12 consider the effects of the addition of AyM to the baseline cumulative context as shown on Figure 1 and some of the effects assessed relate to the accumulation of wind farm development. Section 10.13 assesses the cumulative effects of the addition of AyM to the baseline cumulative context plus the reasonably foreseeable cumulative developments shown on Figure 1. This also takes account of the potential for future onshore wind farms within PAWE 1 and 2 identified on Figure 1. It cannot consider cumulative effects of AyM in the context of a more general 'any future onshore wind farms' due to the lack of information about these. This accords with PINS Advice Note 17. As well as applying other policy considerations the seascape, landscape and visual effects of AyM must be balanced with other factors, such as the contribution of the renewable energy produced, in mitigating the effects of climate change, when considering acceptability Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	no
LA_00807102021	S42	Volume 3, Chapter 4: Tourism and Recreation	Impacts on the tourism economy The Council's Tourism and Regeneration Project Officer notes that: •The majority of tourists who come to Conwy County come for the beaches. This is evidenced in the May 2020 and April 2021 visitor surveys which we undertook. In the May 2020 survey, 69% respondents rated the beaches as their top attraction in Conwy County. In the April 2021 survey, 75% respondents indicated the beaches were their top attraction. The construction of Awel Y Mor may force these visitors to visit other unspoiled beaches in a different area which would be a huge loss of tourism in Conwy County. •There is evidence to suggest that smaller wind farms generate a less negative response from tourists. Awel Y Mor is due to consist of between 48 – 91 turbines at 250-330m. This is in addition to the existing Gwynt Y Mor wind farm and Rhyl Flats development, so we would be concerned about the impact the additional Awel Y Mor wind farm will have on tourism. •We would be concerned about the impact of any light pollution from the wind farm affecting dark skies. •Conwy County Borough Council has submitted its expression of interest to become UK City of Culture 2025 under the title Conwy 2025. Being connected to communities, culture and a place's heritage are all important aspects of the bid. We'd be concerned about whether the Awel Y Mor development would prevent us from acquiring this title.	The evidence related to the popularity of Llandudno and surrounding areas for its beach is helpful as the available research on the relationship between wind farms and visitors suggest these types of visitors are less likely to be discouraged. It is possible that the bigger scale of the project's turbines may be an attraction in their own right, especially if opportunities to build this in destination marketing and promotion is pursued. Likewise with City of Culture, there are opportunities to promote Conwy's 'energy coast' as part of a low carbon transition theme linking to local communities and place. The Tourism and Recreation Chapter of teh ES (application ref: 6.3.4) and the socioeconomics Chapter of the ES (application ref: 6.3.3) provide consideration of AyM on the tourism offering, and tourism economy respectively.	yes	no
LA_00807102021	S42	Volume 3, Chapter 4: Tourism and Recreation	•The majority of tourists to the area are aged 45+. This is evidenced in both the May 2020 and April 2021 visitor surveys. In Chapter 4: Tourism and Recreation, it states "There is a need to be cautious in generalising but the evidence base (see for example Devine-Wright, 2007) points towards a tendency for younger people and those in higher socio-economic groups to be more accepting of wind farm development...". So the construction of Awel Y Mor is more likely to be viewed negatively by the majority of tourists to our area. •The presence of wind farms could have an effect on the frequency and duration of visits. •The evidence base points towards potential for greater impacts to occur where wind farms or other infrastructure are sited in areas of high landscape value. In our May 2020 and April 2021 surveys, the top reason for people visiting Conwy County was because they love visiting and it's a beautiful location. The proposed Awel Y Mor wind farm could have a very negative effect on our tourism industry since visitors may perceive the area as less beautiful. The SLVIA assesses the magnitude of change as being 'Medium High' from the Great Orme, Llandudno paddling pool and Colwyn Bay prom, and as 'Medium' or 'Medium low' for the other viewpoints (Llanfairfechan Promenade, Bryn Eurny, Mynydd Marian, Abergele Promenade and Cefn Coch Stone Circle).	These are a number of reasonable points here which are supported in the research evidence and reflected in the assessment in sections 4.7.1 and 4.7.4 of the Tourism and Recreation Chapter of the ES (application ref: 6.3.4) - as such, these point to a source of uncertainty in the assessment and hence a risk. As the assessment presented in this ES chapter notes in Section 4.10.4, there is the potential for some visitors to be discouraged, although these are not necessarily lost from North Wales or Wales as a whole. However, In terms of the argument that the evidence base points towards potential for greater impacts to occur where wind farms or other infrastructure are sited in areas of high landscape value' this may be less applicable in this instance due to (i) visitors to Llandudno coming for the range of its facilities not just its landscape/seascape value and (ii) the location of AyM at sea which doesn't impact directly on views of and access to many of the high quality landscapes surrounding the town. These points are part of the consideration of the magnitude of impact assessed in Section 4.10.4 and Section 4.11.4 of the ES Chapter.	yes	no
LA_00807102021	S42	Volume 3, Chapter 4: Tourism and Recreation	•Regular visitors to an area may be more likely to oppose developments. Frankal and Kunc (2011) found that regular visitors to a particular tourism area may be more likely to oppose wind farm developments (although no conclusions were drawn about the extent to which this might be reflected in their visiting behaviour). This reflects the findings of wider research into reactions to wind farms amongst residents where a theme of people's attachment to a particular place is an important factor which influences their responses to developments see for example Devine- Wright, 2012). – A huge proportion of responses in the visitor survey were from people who regularly visit the area. To put into perspective, in 2019 we had 2.57 million staying visitors who contributed £644.19m to the economy which is a 6.4% increase on 2018. We also had 7.22million day visitors who contributed a total of £351.99m to the local economy. This is a 7.1% increase on 2018.	As above, this is considered in the Tourism and Recreation Chapter of the ES (application ref: 6.3.4).	yes	no
LA_00807102021	S42	Volume 3, Chapter 4: Tourism and Recreation	•Llandudno is a key tourist resort in the county with 15,000 bed spaces. It is a holiday accommodation zone meaning that there is a policy protecting holiday accommodation. The change of use of holiday accommodation is not permitted. These businesses could suffer by price reductions as a result of the construction of Awel Y Mor if the wind turbines are deemed an eyesore by visitors. Any perceived reduction in the attractiveness of the landscape or wider effect on the tourism experience could reduce visitor demand to such an extent that it results in reduced prices. •Tourism is a priority sector in Conwy which contributes £996.18m annually to the local economy. This has increased every year and our aim is to increase this to £1billion by 2027. If the construction and development of Awel Y Mor discourages visitors then this may prevent us from achieving our target of increasing the economic impact of tourism to £1billion by 2027 as set out in the Conwy Economic Growth Strategy.	As noted above, the weight of evidence (Section 4.7.4 of application ref: 6.3.4) suggests that there will be no or very limited impacts on the visitor economy, although there is the need to reflect and respond in the analysis to the particular characteristics of Llandudno and its surrounding areas. Besides the potential for detrimental impacts, it is important to also note the potential for visitors to be attracted by the project and for this type of visiting activity to be actively promoted by tourism destination agencies. In addition, there is the potential for Llandudno, alongside other coastal resorts in the UK, to benefit from increased UK domestic tourism arising from the short- and longer-term consequences of the pandemic (although it is unclear at this time how long this current trend may continue as international travel resumes). An additional study has been conducted which collected evidence on the tourism sector employment around several offshore Wind Farms across the UK (please see Volume 5, Annex 4.2 (application ref: 6.5.4.2) and a summary of the findings in Section 4.10.).	yes	no

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LA_00807102021	S42	Volume 3, Chapter 4: Tourism and Recreation	The PEIR considers that the magnitude of impact on the tourism economy in Llandudno and the Great Orme would be low in the short term and negligible in the longer term, and in other resorts would be negligible (para. 291 of Volume 3, Chapter 4). However, it is unclear to what extent this conclusion takes account of the demographic profile of visitors to Llandudno and the County generally, or to the distinctive heritage and character which are critical in its attractiveness to that visitor profile. Paragraph 292 notes that there is a potential for any visitors discouraged by the WTGs to be replaced by other visitors, yet does not include evidence to support this. As such, the Council considers that the conclusions in relation to the magnitude of the impact are subject to a wide margin of uncertainty.	The assessment does take account of the characteristics of Conwy (and therefore Llandudno) and its surrounding areas, including its visitor offer, characteristics of visitors and reasons for visiting (please see Section 4.7.1 of application ref: 6.3.4). Whilst the research suggests (see Section 4.7.4) OWF usually has no or limited impacts on visitor economies, there is an element of uncertainty here linked to the scale of the development and the characteristics of the resort. An additional study has been conducted which collected evidence on the tourism sector employment around several offshore Wind Farms across the UK (please see Volume 5, Annex 4.2 and a summary of the findings in Section 4.10.4). The study found that the employment data does not provide evidence that the development of large-scale offshore wind farms near to significant seaside towns is associated with a decline in tourism employment.	yes	no
LA_00807102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Impacts on the Built Heritage The main concerns relate to seaward views from the Llandudno waterfront and the impact on views of the Great Orme from other locations. There are concerns that the Onshore Archaeology and Cultural Heritage Assessment has not taken into account the contribution to the significance of Llandudno Conservation Area (and listed buildings therein) made by artistic/aesthetic and communal/cultural values - these are important in the establishment, and history, of Llandudno as a resort town. The impressive sea view is fundamental here and would be harmed by the new, strikingly large turbines. Thus, the significance and appreciation of the built heritage would be impaired. The necessity of presenting the views in 2D means the actual impact that will be experienced will be greater in reality.	Agree that this view is important in context of the seaside resort, but in terms of the value of the CA as a whole this is not the case. As set out in the PEIR the architectural interest in best appreciated in close proximity. The overall town plan can be appreciated in a wider content, but the presence of turbines out to sea (whatever scale) does not affect how the development and layout of the town is understood. The ES Chapter (application ref: 6.3.8) has been updated to address the concerns raised, alongside a marked reduction in the number of turbines proposed, from a maximum of 91 to a maximum of 50 turbines.	yes	no
LA_00807102021	S42	Volume 3, Chapter 4: Tourism and Recreation	At the Great Orme, new turbines would be conspicuous, but in the context of the vastness of the ocean, wouldn't be unduly detrimental to appreciation of the numerous archaeological sites that occupy it. However, several of the viewpoints towards the Orme detract from its appearance as a prominent headland, which was an important factor in its selection for some of the monuments that occupy it, not to mention its name. Furthermore, the vast majority of the buildings along Llandudno's Promenade comprise hotels, and the vast majority of these are listed as being of special architectural or historic interest. These buildings are expensive to maintain due to their traditional building materials and features. In the light of the uncertainty of the impacts on the tourism economy, the Council has concerns that any reduction in either the number or the value of hotel bookings could affect future investment in the tourism industry, and hence the frequency and quality of maintenance of the built fabric. Over time, such a deterioration would be detrimental to the character and appearance of the Llandudno Conservation Area and to the special features of interest of the listed buildings.	Addressed in the points above and section 4.10.4 and 4.11.4. of application ref: 6.3.4	yes	no
LA_00807102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	The PEIR considers (in para. 247 of Volume 3, Chapter 8) that the impact on the heritage significance of the Llandudno Conservation Area would be low in magnitude, resulting in an effect that is assessed as minor and not significant in terms of the EIA Regulations. In the light of concerns expressed above, the Council considers that this is a conservative assessment of the magnitude and significance of the impacts. The PEIR further notes (in para. 254 of Volume 3, Chapter 8) that the impact on the setting of Llandudno Pier would be medium in magnitude and moderately adverse in significance. The Council notes this conclusion which adds to its concerns relating to impacts on the built heritage.	The assessment presented in Volume 3, Chapter 8 (application ref: 6.3.8) is considered to be robust and compliant with the relevant guidance, as set out in the methodology presented in the chapter. The assessment considers the potential for an effect on the heritage significance of the various assets, this significance deriving from the various interests and values they hold. Whilst the impact may be largely one related to the visual presence of the proposed AyM WTGs, simple intervisibility of the AyM WTGs, is not automatically harmful to that significance and the ability to appreciate it. Rather there must be a specific change in setting causing a specific effect which reduces or harms the heritage significance of an asset.	yes	no
LA_00807102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Impacts arising from construction works on the amenity of resident and visitors The Council has concerns that only one noise sensitive receptor (NSR) has been chosen (in Penrhyn Bay) and no desktop assessment has been made for any NSR in Llandudno, Craig y Don or even further east, in Rhos on Sea. The NSR in Penrhyn Bay is likely to receive some relief from the actual noise of the piling - especially for piling operations relating to turbines towards the western end of the proposed development, from Little Orme's Head. It is recommended that the developer should undertake background noise level surveys at NSRs along The Parade or Colwyn Road in Llandudno/Craig y Don and Marine Drive in Rhos on Sea to be able to undertake a desk top assessment for predicted noise levels based on this data. The predicted noise levels identified in Table 52 of Volume 3, Chapter would have a major (significant) during night time workings.	Section 10.8.5 of the Airborne Noise and Vibration Chapter (application ref 6.3.10), describes the additional baseline noise monitoring that has been carried out in response to the feedback from CBCC and the associated noise limits during different weather conditions for NSR in Conwy area. Section 10.11.9 of the chapter sets out the wind turbine piling assessment against the specified limits	Yes	no
LA_00807102021	S42	Volume 3, Chapter 10: Noise and Vibration	The PEIR notes that that specifying noise control limits, or even restricting the hours of working for the piling operations in the DCO would reduce the potential for NSRs to be affected to negligible. The Council would welcome the developer's thoughts and proposals with regard to this once further noise assessments and desk top surveys have been undertaken. Requirement 5 of the draft DCO proposes a restriction on noise generated during the construction of the offshore works. "Except in an emergency or with the prior written approval of the relevant planning authority, the noise generated during the construction of the offshore works when measured at [TBC (OS Grid Reference TBC)] must not, in neutral weather conditions, exceed the following levels on any day during the following periods:[tbc] [tbc]" The Council is concerned that the draft Requirement lacks clarity in respect of the maximum noise levels, the periods during which they would apply, and the location of the measurements. Furthermore, the draft Requirement does not require the developer to carry out monitoring either proactively or in response to complaints, and does not specify a reporting procedure for monitoring activities. The Council would also strongly recommend that, should consent be granted, the developer/contractor provides and advertises contact details so that members of the public could approach them directly to discuss concerns or issues they might experience during the construction phase.	The wording within the draft DCO has been amended in response to the feedback received. An outline Construction Communication Plan is provided as part of the outline CoCP (application ref 8.13.13) and sets out the communication measures which will be implemented by the Applicant, its contractors and subcontractors during construction.	Yes	no
LA_00807102021	S42	N/A	Conclusion The Council supports in principle the development of renewable energy, and recognises that offshore wind energy will play an important part in ensuring that Wales and the UK can meet their respective national and international commitments on reducing greenhouse gas emissions. However, the Council has significant concerns regarding the proposal that is subject to the consultation exercise. The Council therefore objects to the proposal as submitted.	Comment noted.	Yes	no
LA_005_11102021	S42	N/A	The Isle of Anglesey County Council (the Council) confirms that it has had the opportunity to review the Preliminary Environmental Information Report (PEIR) for the Awel y Mor offshore wind farm project. The Council wish to provide the following comments in order to facilitate the preparation of the final Environmental Statement (ES) that will support the application for Development Consent Order (DCO). The Energy Island Programme was established to put Anglesey at the forefront of low carbon energy research and development, production and servicing, and bringing with it potentially huge economic rewards to the region. A collective effort between several stakeholders within the public, private and third sectors working in partnership, its vision is to create a once-in-a-lifetime opportunity for jobs, economic growth and prosperity through capitalising on a number of transformational projects on Anglesey. The Council believes that it is important to work in partnership with developers and organisations across the region to maximise on the opportunities for Anglesey and North West Wales. The Council is therefore supportive of low carbon developments providing that they are sustainable in form and that local benefits including local employment, skills enhancement and supply chain opportunities are maximised and realised.	Comment noted.	Yes	no

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LA_005_11102021	S42	Volume 3, Chapter 3: Socioeconomics	1. Maximising Socio-economic benefits Local Employment & Supply Chain Opportunities The PEIR estimates that the level of supply chain expenditure retained by local businesses in North Wales would be between £13 million and £28.8 million (dependent on a no local and local construction port scenario). The Council notes that in terms of receptor groups and the study area used for the socio- economics assessment that the receptors have been divided between three categories – Wales, North Wales (which includes Anglesey, Conwy, Gwynedd, Denbighshire, Wrexham and Flintshire) and the Local Area of Influence which is defined as a 500m buffer from the Draft Order Limits. At the North Wales level, the PEIR confirms that 50-80FTE jobs will be supported throughout AyM’s development and construction phase and are estimated to represent up to 0.03% of the current baseline. On this basis, the magnitude of impact of construction activity on employment within North Wales is therefore assessed as negligible.	Context. No response needed	yes	no
LA_005_11102021	S42	Volume 3, Chapter 3: Socioeconomics	The Council would welcome a further breakdown of jobs by sector over the duration of the construction period. This would enable the Councils (across North Wales) to identify the skills requirements for each stage and allow local people and companies to target these opportunities. It would also enable education providers to identify and target apprenticeship and work placement opportunities for local young people. The Council also notes that the assessment splits the construction phase into scenarios which is dependent on the proposed port locations – a ‘no local construction port scenario’ and a ‘local port construction scenario’. The Council welcomes this approach and trusts that this scenario will be updated as more information and choices are made regarding the use of the construction port.	Opportunities to maximise local socio-economic benefits will be presented in more detail post- consent. Following consent, a skills and employment strategy will also be produced for approval and will be produced in accordance with the Supply Chain Plan required under the CfD supply chain process that must be approved by the SoS, and against which the Applicant will be required to demonstrate progress in terms of implementing. Therefore comments relating to more detail on maximising socio-economic benefits are not addressed here, but are acknowledged as an important point that will be explored following consent.	yes	no
LA_005_11102021	S42	Volume 3, Chapter 3: Socioeconomics	The PEIR estimates that the project would generate a GVA to North Wales of £2.6 million per annum and £12.8 million in total without a local port scenario. Under a local port scenario, these figures rise to £12.8 million and £63.9 million respectively. This would represent up to 0.3% over the current baseline. The IACC strongly believes that a significant proportion of construction jobs should come from the local region. The IACC would encourage RWE to consider these opportunities now to enable local people and companies to train or upskill to capitalise on these opportunities. The Council would also like to see minimum local employment targets as well as the provision of apprenticeship and work placement opportunities to ensure that local young people can capitalise on the opportunities during both construction and operation. Given the potential for other major offshore wind projects to take place in North Wales such as the Round 4 zone off the North of Anglesey, the Council very much considers that there is potential for collaboration in order to ensure that impacts are minimised whilst maximising the potential socio-economic benefits for the region. The Council would also encourage early and meaningful engagement with the North Wales Economic Ambition Board (NWEAB), who will deliver the Growth Deal for North Wales, to maximise the potential economic value of the project for the region.	Opportunities to maximise local socio-economic benefits will be presented in more detail post- consent. Following consent, a skills and employment strategy will be produced for approval under the CfD supply chain process. Therefore comments relating to more detail on maximising socio-economic benefits are not addressed here but are acknowledged as an important point that will be explored following consent.	yes	no
LA_005_11102021	S42	N/A	The Council would also encourage early and meaningful engagement with local education providers including primary schools, secondary schools, Coleg Llandrillo Menai and Bangor University to ensure that local young people are given the opportunity to train and work on these large infrastructure projects. Similarly, local companies need to be made aware of the supply chain opportunities that will be made available during all stages of the project to allow them to plan accordingly and ensure that they can capitalise on the opportunities presented.	The Applicant will continue to engage with the supply chain both directly and through industry organisations, such as the Offshore energy Alliance, to make suppliers aware of future opportunities related to AyM. The Applicant also notes that a Skills Plan will be a requirement of a future Contract for Difference Supply Chain Plan. Both of these avenues for engagement sit outside of the Development Consent Order application.	Yes	no
LA_005_11102021	S42	N/A	Potential of Holyhead Port It is noted that the PEIR does not specify either a construction or operational port that will facilitate the project. The Council has gained confirmation directly from you that the port development will not be part of either the DCO or marine licence application and that any port upgrade works would be delivered through separate requests for consents. It is noted and welcomed that Holyhead Port is included on the long list of ports that have been identified as part of the EIA process. We are aware that you have already commenced engagement with Stena Line Ports and would recommend for this engagement to continue in particular to gain an up to date understanding of the proposed future proposals for the Port. Furthermore, the Council believes that suitable land could be available on Anglesey to support the construction and operation of the Awel y Mor project. The IACC is happy to discuss this further with RWE to understand your requirements as the project develops.	Comments noted. The Applicant looks forward to continued enagement with the Isle of Anglesey Council on potential port opportunities.	Yes	no
LA_005_11102021	S42	Volume 3, Chapter 4: Tourism and Recreation	2. Tourism and Recreation The Isle of Anglesey is a unique and popular destination for visitors and local people alike. The Island offers peace, tranquillity, adventure and experiences along with fantastic views and vistas, a distinct Area of Outstanding Natural Beauty covering practically the whole coastline of the Island, UNESCO World Geo Park, Beaumaris Castle – UNESCO sites and a multitude of other attractions. Anglesey’s tourism industry currently attracts over 1.79million visitors annually with a total economic impact in excess of £362million. The sector also supports over 4000 jobs on the island and is now one of Anglesey’s largest industries. Tourism contributes to local prosperity and quality of life in Anglesey. The Island needs to manage and develop tourism because this is where it has a natural comparative advantage. The Tourism & Recreation Chapter of the PEIR concludes that the impacts on the tourism economy would be ‘low’ or ‘negligible’.	Anglesey offers a high-quality environment which is valued by visitors. However, the greater distance from the Isle of Anglesey destinations and the AyM project, and hence reduced visibility, substantially reduces the potential for negative impacts on visitors and the tourism economy. This is considered in Sections 4.10.4 and 4.11.4 of the ES Chapter (application ref: 6.3.4).	yes	no
LA_005_11102021	S42	Volume 2, Chapter 10: SLVIA	The Seascape, Landscape and Visual Assessment (SLVIA) that forms part of the PEIR consultation confirms that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscape and leisure, tourism and heritage receptors (see further details in the next section of our response below). This results in significant concerns regarding the potential indirect negative impacts that the landscape and visual impacts of the proposal may have on Anglesey and the wider region as a key tourist destination as well as associated socio-economic impacts. It is requested that this is given further consideration in terms of further potential mitigation measures that can be designed into the project to minimise potential impacts.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.	yes	yes
LA_005_11102021	S42	Volume 2, Chapter 10: SLVIA	3. Seascape, Landscape and Visual Impact Assessment Land Use Consultants (LUC) have been commissioned to independently review the Seascape, Landscape and Visual Impact Assessment on behalf of the seven North Wales Planning Authorities, and the Authorities collectively have significant concerns regarding the impact of the proposal on the regional interests. A joint response by the North Wales Local Authorities Expert Group has been forwarded to you (a copy of which is also provided in appendix 1). The IACC confirms that it fully endorses the findings and recommendations of this report with regards to potential impacts on receptors and designated landscapes on Anglesey. A summary is also provided below of the IACC position with regards to matters concerning SLVIA;	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.	yes	no

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LA_005_11102021	S42	Volume 2, Chapter 10: SLVIA	The SLVIA identifies significant effects on seascape, landscape and visual receptors. In relation to the designated landscape, the SLVIA has adequately investigated and evaluated its potential impacts on the AONBs, including impacts on the special qualities. The LUC report queries the level of effect on some of these and identifies additional receptors where effects are judged significant, and/or more widespread than predicted in the SLVIA. Both the SLVIA and LUC report confirm that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscape and leisure, tourism and heritage receptors. While the IACC acknowledge that reducing the extent of the array to the west has potentially reduced significant effects to the north east coast of Ynys Môn, this is a short section of the east coast and it is considered that significant effects need to be further reduced.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	yes
LA_005_11102021	S42	Volume 2, Chapter 10: SLVIA	As confirmed in the report prepared by LUC minor amendments will not reduce effects to the extent set out in the Welsh National Marine Plan Policy SOC_06 for Designated Landscapes and it requires further measures to avoid, minimise, or mitigate the identified impacts in a proportionate manner. As noted in the LUC report, effective reduction would require substantial changes to the height and spread of the array. To confirm, the IACC requests that the design of the proposals are re-visited in order to reduce adverse impacts on designated landscape and leisure, tourism and heritage receptors through reducing the scale and making changes to the spread of the proposed array. The Council requests that a meeting takes place between the Awel y Mor Project Team and the North Wales Local Authorities Expert Group to further discuss matters concerning Seascape, Landscape and Visual Impacts.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions. Further ETG meetings were held on 14 December 2021 and 27 January 2022 at which times the above matters were discussed.	yes	no
LA_005_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	4. Archaeology and Cultural Heritage The Council has consulted with Gwynedd Archaeological Planning Service (GAPS) the regional curator with regulatory and advisory functions and the Council's advisor with regards to matters concerning archaeology. The comments provided by GAPS are included as Appendix 2 of this response. The Council expects the advice of GAPS to be taken into further consideration in terms of finalising the ES in particular in relation to establishing the nature, magnitude and significance of the potential impact of the project on Menai Bridge (Grade I listed building ref 18752) in ES terms.	Noted. See response for GAPS, and within Volume 3, Chapter 8 of the ES (application ref: 6.3.8)	yes	no
LA_005_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	Cultural Heritage The Council has had the opportunity to review PEIR Documentation Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage and Volume 6 annex 10.5 would be as follows: Although separated by a distance of approximately 25km the proposed Offshore Array would nevertheless have a visual impact from various designated heritage assets identified in the report located on Anglesey. The report states that the visual impact of the Offshore Array on the following designated heritage assets has been assessed as 'Negligible': Beaumaris Castle (SAM & Grade I), Trwyn Du (Penmon) Lighthouse (Grade II*), Remains of monastic settlement including tower and walls (SAM & Grade I), and former Telegraph Station (Grade II).	The assessment presented in Volume 3, Chapter 8 of the ES (application ref: 6.3.8) is considered to be robust and compliant with the relevant guidance (TAN24 and CADW's guidance on the assessment of Settings (The Setting of Historic Assets in Wales, CADW, May 2017)), as set out in the methodology presented in the chapter. The assessment considers the potential for an effect on the heritage significance of the various assets, this significance deriving from the various interests and values they hold. Whilst the impact may be largely one related to the visual presence of the proposed AyM WTGs, simple intervisibility of the AyM WTGs, is not automatically harmful to that significance and the ability to appreciate it. Rather there must be a specific change in setting causing a specific effect which reduces or harms the heritage significance of an asset. It is therefore considered that the assessment of potential effects on the heritage significance of the named assets are proportionate and that effects are not under-reported.	yes	no
LA_005_11102021	S42	Volume 3, Chapter 8: Onshore Archaeology and Cultural Heritage	The Council is of the view that the assessment of visual effects on these heritage receptors appears to have been under assessed and would refer to the direct comments provided by Cadw with regards to the proposal's impact on the Schedule Ancient Monuments of Beaumaris Castle and remains of monastic settlement including tower and walls. The IACC requests that further engagement takes place with both the Council and CADW and that the design of the proposals are re-visited in order to reduce adverse impacts on the above identified heritage receptors through reducing the scale and re-visiting the layout of the proposed array.	The assessment presented in Volume 3, Chapter 8 of the ES (application ref: 8.3.8) is considered to be robust and compliant with the relevant guidance (TAN24 and CADW's guidance on the assessment of Settings (The Setting of Historic Assets in Wales, CADW, May 2017)), as set out in the methodology presented in the chapter. The assessment considers the potential for an effect on the heritage significance of the various assets, this significance deriving from the various interests and values they hold. Whilst the impact may be largely one related to the visual presence of the proposed AyM WTGs, simple intervisibility of the AyM WTGs, is not automatically harmful to that significance and the ability to appreciate it. Rather there must be a specific change in setting causing a specific effect which reduces or harms the heritage significance of an asset. It is therefore considered that the assessment of potential effects on the heritage significance of the named assets are proportionate and that effects are not under-reported.	yes	yes
LA_005_11102021	S42	N/A	I hope that the above advice is of assistance to you and will be fully taken into consideration in the finalisation of the Awel y Mor Project application. As highlighted above we do request that further consideration is given to means of designing mitigation into the project design in order to remove or minimise on key receptors and we would be grateful of the opportunity to discuss these measures further with you.	The Applicant notes the comments. The Isle of Anglesey Council has been involved in relevant Expert Topic Group meetings, in particular the SLVIA ETGs, discussing the evolution of the project design after PEIR.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Please find below our collective response to the Preliminary Environmental Information Report (PEIR) for the proposed Awel y Môr Offshore Wind Farm (AyM OWF). Following a funding opportunity presented by RWE, the LUC was appointed by a group of seven North Wales Local Planning Authorities in July 2021 to undertake a review of the PEIR. The proposed wind farm comprises of onshore and offshore elements and potential effects resulting from these are reported separately in the PEIR. The LUC review considered the method, scope, process and findings of both the Landscape and Visual Impact Assessment (LVIA) and the Seascape, Landscape and Visual Impact Assessment (SLVIA). A copy of this report is included with this letter. In their report the LUC concluded that the SLVIA is thorough and contains comprehensive assessments of the key seascape, landscape and visual receptors within the planning authorities and the designated landscapes of Snowdonia National Park, the Isle of Anglesey AONB and the Clwydian Range and Dee Valley AONB. However, while the method is sound and comprehensive, there are issues with its application and judgements, which the LUC consider to result in under reporting of significant effects. These include assessments of sensitivity of the landscape and visual receptors and the magnitude of change brought about by the proposed AyM OWF.	This is noted. Responses to specific points are given below.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	The LUC note that the non-technical summary identifies the landscape and visual effects in par 151 - "In the construction, O&M and decommissioning phases, a range of effects on seascape character, landscape character, designated areas and viewpoints have been predicted, ranging from non-significant to significant in EIA terms." The LUC review considers this summary to rather dilute the full range of effects and does not help identify the significant effects that need to be considered as part of the planning balance.	Noted, the NTS has been updated accordingly to provide a better account of the significant effects associated with the proposed project.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	As noted previously, the LUC review considers the SLVIA and LVIA to be competent and robust assessments that correctly identify significant effects, however there are a number of findings that their review indicates disagreement with (these are set out in Appendix A of the attached report). The LUC recommend that the following areas are explored; •The application of magnitude of change criteria to the assessments of effects on views. The LUC particularly note the emphasis in the SLVIA that the AyM OWF will 'intensify' the existing effect of operational wind farms. In their view (and a view shared by the Expert Topic Group) this does not accurately reflect the appearance of the AyM OWF and the contrast in scale between it and the operational schemes. •The extent to which significant effects are found to occur across receptors. There is emphasis throughout the SLVIA on effects being localised. While in many cases this is justified, in some instances the LUC review indicates that significant effects may extend further than stated in the SLVIA •This point is particularly the case in the assessment of effects on settlements, where sea views may be affected across the built up area, not just at the sea front. Similarly, sea views from routes may be affected even where the route is not immediately coastal in location	This is noted by the Applicant.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	In terms of mitigation, it is acknowledged that no mitigation of the significant effects of the offshore wind farm is feasible, other than further changes to the design. It is acknowledged by the expert topic group and the LUC that the applicant has reduced the extent of the turbine array, which has reduced effects on the Isle of Anglesey and the AONB, however the SLVIA still finds significant adverse effects on landscape character and views within the AONB. It would require a further reduction in the extent of the array to achieve effective mitigation of these effects.	Noted. There is now a reduction from 88km2 at PEIR to 78km2 for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application.	yes	yes

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	The LUC note that reduction in turbine height has not been discussed in the SLVIA as a means of mitigating impact, despite this being a key concern for stakeholders and the expert topic group. The SLVIA has assessed two alternative turbine heights as set out in the MDS (see chapter 1 of the LUC report). The review of the SLVIA indicates that findings of significant effect do not vary according to which MDS is considered. This suggests that turbines of 252m in height would have the same spread of significant effects as turbines of 332m, and that turbines would have to be substantively smaller to achieve effective mitigation. AyM OWF is described as an extension (throughout the SLVIA), or as a 'sister project' (PEIR vol 2, chap 1, par 24) to the existing Gwynt y Môr. However the operational development at Gwynt y Môr can be summarised as; •160 WTGs with blade tip 133m above MHWS and 107m rotor diameter Therefore with such a vast difference in scale it is hard to see how the project can be described as an extension to the current developments.	Noted. For the reasons presented previously in this document, it is not possible to reduce the height of the proposed turbines further as smaller models are not anticipated to be available and/ or economically viable.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	As noted in chapter 2 of the LUC review, at PEIR stage it is accepted that mitigation proposals are at a relatively early stage. Further development of this section will be required for the environmental statement, but the principles set out are sound and appear capable of being developed into an effective mitigation scheme. The North Wales Authorities Expert Top Group collectively have significant concerns regarding the impact of the proposal on the regional interests. The turbines proposed in the array are significantly larger than those comprised in the existing Rhyl Flats and Gwynt y Môr offshore windfarms, and owing to siting and scale, the AyM OWT would be will be noticeable and distinct from existing developments, and would be viewed as an entirely new windfarm, rather than an extension to existing.	Noted. Please see previous responses for the constraints placed on the Applicant with regards placement of the array, and the likely turbines available that will allow an economically viable project to be developed.	yes	yes
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	The PEIR SLVIA concludes no significant effects on a number of viewpoints. However, as stated in the appended LUC report at Appendix A this identifies a number of points of disagreement. Thus resulting in significant concerns regarding the impact of the proposal on the regional interests particularly associated with the landscape and visual impact of the proposal which may have an indirect negative impact on tourism for the region, and associated socio-economic impacts. At PEIR stage, it is accepted that mitigation proposals are at a relatively early stage, and therefore reduction in height of turbine should not be discounted at this stage. The North Wales Local Planning Authorities Expert Topic Group each have their own specific impacts from this scheme, and as such the next section is so that each Local Authority can set out their specific comments and views on the proposed development.	Noted. Please see previous responses for the constraints placed on the Applicant with regards placement of the array, and the likely turbines available that will allow an economically viable project to be developed. In the absence of a reduced turbine height, the Applicant has introduced a reduction from 88km2 at PEIR to 78km2 for the final application, and a reduction in the maximum number of turbines from 91 in PEIR to 50 in this final application.	yes	yes
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Isle of Anglesey County Council The SLVIA identifies significant effects on seascape, landscape and visual receptors. In relation to the designated landscape, the SLVIA has adequately investigated and evaluated its potential impacts on the AONB, including impacts on the special qualities. The LUC report queries the level of effect on some of these and identifies additional receptors where effects are judged significant, and/or more widespread than predicted in the SLVIA. Both the SLVIA and LUC report confirm that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscape. While the IACC acknowledge that reducing the extent of the array to the west has potentially reduced significant effects to the north east coast of Ynys Môn, this is a short section of the east coast and it is considered that significant effects need to be further reduced.	See specific responses to comments made by NRW (and LUC) above in relation to effects on receptors within the IoA AONB.	yes	yes
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	It is clear from the LUC report that minor amendments will not reduce effects to the extent set out in the Welsh National Marine Plan Policy SOC_06 for Designated Landscapes and it requires further measures to avoid or minimise the identified impacts in a proportionate manner. As noted in the LUC report, effective reduction would require substantial changes to the height and spread of the array. To confirm, the IACC requests that the design of the proposals are re-visited in order to reduce adverse impacts on the Ynys Mon AONB through reducing the scale of the development.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions. Further ETG meetings were held on 14 December 2021 and 27 January 2022 at which times the above matters were discussed.	yes	yes
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Conwy County Borough Council Officers recognise the support given for the expansion of offshore wind energy in national policy documents, and that this would inevitably result in significant changes to coastal seascapes and views. However, Officers have concerns over four aspects of the proposal. First, the scale of both the individual WTGs and of the extent of the Awel y Môr array as a whole would result in a significantly greater visual impact from a number of viewpoints than views of the existing offshore wind farms. This in turn would cause the windfarms to be a dominant feature of the seascape, the Marine Character Areas and from land.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Second, the proximity of the Awel y Môr array to the Great Orme Heritage Coast and to other coastal landscape features which form part of the distinctive character of the North Wales coast would significantly affect the seascape character, and would detract from the appreciation of those features when viewed from neighbouring viewpoints.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Third, the cumulative effects with other offshore wind farms (including existing offshore wind farms) would increase the dominance and saturation of wind farms as a seascape and landscape feature industrialising the area with potential impacts on tourism.	Noted. Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Fourth, in the absence of a cumulative assessment with any future onshore wind farms (including the Pre-Assessed Areas for Wind Energy identified in Future Wales: The National Plan 2040), there are concerns that the SLVIA does not fully evaluate the cumulative effects as required by Planning Inspectorate Advice Note 17: Cumulative Environmental Effects.	Section 10.10-10.12 consider the effects of the addition of AyM to the baseline cumulative context as shown on Figure 1 and some of the effects assessed relate to the accumulation of wind farm development. Section 10.13 assesses the cumulative effects of the addition of AyM to the baseline cumulative context plus the reasonably foreseeable cumulative developments shown on Figure 1. This also takes account of the potential for future onshore wind farms within PAWE 1 and 2 identified on Figure 1. It cannot consider cumulative effects of AyM in the context of a more general 'any future onshore wind farms' due to the lack of information about these. This accords with PINS Advice Note 17. As well as applying other policy considerations the seascape, landscape and visual effects of AyM must be balanced with other factors, such as the contribution of the renewable energy produced, in mitigating the effects of climate change, when considering acceptability Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Denbighshire County Council The PEIR concludes no significant effects on Denbighshire interests, however the Council is in disagreement with the assessment on the following receptors: •No significant effects are reported for any Denbighshire viewpoints in the SLVIA. This is not agreed for viewpoint 23 at Rhyl Aquarium it is considered that there will be significant effects. The addition of AyM OWF turbines on the horizon will fill in gaps, accentuate the differences between existing and proposed developments and result in greater incidence of stacking and visual clutter. •No significant effects are reported in the SLVIA for any of the Denbighshire settlements along the coast. This is not agreed and it is considered that there will be significant effect at Rhyl along the sea front promenade. •The SLVIA identifies no significant effect for SCA C Vale of Clwyd. This is not agreed and it is considered that significant effect would be likely here due to the prominence of the turbines in views from the coastal parts of this SCA.	Noted. Responses to specific points are provided below.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	The Council also has concerns regarding the impact of the proposal on the Clwydian Range and Dee Valley AONB has been underestimated. The ZTVI diagrams confirm that the both the Scenario A (48 x 332m blade tip height) and Scenario B (91x 252m height) proposals will be visible from a substantial area of the AONB. When viewed from the AONB the proposed windfarm will visually connect the existing Rhyl Flats and Gwynt Y Môr wind farms to create a much larger, continuously developed skyline/seascape across much of the horizon. One of the special qualities of the AONB is the opportunity to experience wide ranging panoramic views, including those out to sea, and the Council and the AONB Joint Committee is becoming increasingly concerned that the protected landscape is being visually 'hemmed in' by both onshore and offshore windfarm development to the detriment of this special quality. Views from the AONB will be increasingly characterised by wind farm dominated landscapes and seascapes.	MDS A and MDS B scenarios are shown in the visualisations for VP 24. This was agreed through ETG consultation in advance of the PEIR and confirmed for ES. The effects on the Special Qualities of the Clwdian Range and Dee Valley AONB are assessed in Section 10.11.7. Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. The review of the SLVIA undertaken by LUC on behalf of the North Wales Planning Authorities and the landscape officer at NRW both concur with the findings of the SLVIA in relation to the effects on the AONB which although adverse are assessed as Non-significant.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	The AONB viewpoints (24 Graig Fawr, 26 Prestatyn Hillside Viewpoint Car Park, and 54 Y Foel, Dyserth) selected for assessment in the SLVIA are representative of the impact on key views from the northern part of the AONB but, given the scale of the proposals, the development will be visible from a much larger area of the protected landscape. A critical decision in relation to the potential visual impact of the development will be whether Scenario A (48 x 332m turbines) or B (91x 252m turbines) is pursued. The SLVIA viewpoint diagrams illustrate Scenario A, but it may be that the greater number of smaller turbines proposed in Scenario B would have less impact overall on views out to sea given that less turbine would be visible above the horizon. It would have therefore been beneficial to be presented with illustrations for Scenario A and B for comparison purposes.	As above.	yes	no

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LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Flintshire County Council The proposed development site is over 20km from Flintshire and only likely to be visible from the very western coastal strip in Flintshire and also from higher ground; particularly the Clwydian Range and Dee Valley AONB. Therefore, due to the distance the proposed development is from Flintshire, the development is unlikely to have any direct visual or seascape/landscape effects on Flintshire. The LUC report commissioned by the North Wales Planning Authorities to undertake a detailed review of the SLVIA on behalf of the North Wales Authorities (enclosed) concludes that overall, the SLVIA is thorough and contains a comprehensive assessment of the key seascape, landscape and visual receptors. It is considered that the SLVIA methodology is sound and comprehensive.	This is noted by the Applicant.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	The SLVIA identifies 60 assessment viewpoints, two of which are within Flintshire. These viewpoints have been reviewed and impacts on the receptors identified are assessed to be non-significant which are considered to be appropriate by LUC. LUC agree with the judgements in the SLVIA in relation to the viewpoints from Flintshire, concluding that the proposed development would result in no significant effects on the landscape and visual receptors within Flintshire. Due to the distance the proposed development is in relation to Flintshire, it is considered that the visual impact on Flintshire and its receptors would not be significant. The Flintshire County Council agrees with both the conclusions of the SLVIA for the proposal with regards to the viewpoints within Flintshire, and the conclusions of the LUC report. In relation to the Clwydian Range and Dee Valley AONB, the SLVIA identifies no significant effects on the relevant special qualities of the AONB, namely Tranquillity, Remoteness and Wildness. The LUC report agree with this conclusion, seascape and coastal views are not a special quality or reason for designation of this AONB. Flintshire County Council would also agree with this conclusion with respects to the impact on the AONB in Flintshire.	This is noted by the Applicant	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	However, from a regional perspective it is considered that there are issues with its application and judgements which is considered to result in under reporting of significant effects in parts of the region. These includes assessments of sensitivity of the landscape and visual receptors and the magnitude of change bought about by the proposed development.	The Applicant has reviewed the SLVIA in relation to the aspects where disagreement was highlighted and revised it, where appropriate, taking into account the mitigation as set out in Section 10.9.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Whilst Flintshire County Council are in agreement that the visual impact on Flintshire, and its receptors would not be significant, it is noted that the SLVIA does identify significant effects on seascape and landscape and visual receptors throughout the North Wales region. Furthermore, in relation to designated landscapes in the region, the LUC report queries the level of effect on some of these and identifies additional receptors where effects are judged significant, and/or more widespread than predicted in the SLVIA. As stated above, both the SLVIA and LUC report confirm that the Awel y Môr proposal at the scale and height proposed would be a major feature and substantial detractor to several special qualities associated with the designated landscapes of North Wales and the National Park. This in turn, may have an indirect negative effect on tourism for the region as a result of the offshore arrays and the potential significant impact from certain key tourist destinations in North Wales, particularly parts of the Isle of Anglesey, Snowdonia National Park, Gwynedd with its recent status of World Heritage Status, and parts of Conwy. This may have an indirect negative impact on the number of visitors travelling to North Wales. Many travelling to North Wales will need to travel through Flintshire on the A55 so this may have an indirect impact on tourism and other shops and services.	Noted. Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Gwynedd Council The Council agree with the findings within the LUC report regarding the significant effects reported in the SLVIA at the viewpoint at Bangor Pier. The Council also concurs with LUC’s findings that there will be significant effects at Penrhyn Castle Terrace, where there is an open vista across Conwy Bay, the sensitivity of which is now higher due to the recent designation of the surrounding area as a World Heritage Site. This concern reflects the comments of the group as a whole and LUC’s findings in that significant effects have been underreported due to the application and judgements made. Despite this it is considered that the SLVIA methodology is sound and comprehensive.	This is ntoed by the Applicant.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Snowdonia National Park Authority The LUC conclude the impact on the National Park to be the following; •Significant effects reported in the SLVIA at 2 viewpoints at Carnedd Llywelyn and Conwy Mountain. In addition we suggest that there will be a significant effect at Tal y Fan where the views to the turbines will contrast with Great Orme, and the different scale of turbines at AyM and Gwynt y Môr (GyM) would be very noticeable •Locally significant effects along section I of the Wales Coast Path •No significant effect on LCAs identified in the SLVIA, although we suggest that LCA01 (Northern Uplands) would potentially have significant effects •Locally significant effects are reported in the SLVIA on seascape character (SCA Conwy Bay). We would argue that these effects are more widespread across this area as the turbines would alter the perceived scale of the Great Orme from much of the SCA •In terms of special qualities, seascape and sea views are not one of the special qualities relevant to the SNPA designation, and we agree that there would be no significant effects on the relevant special qualities of ‘diverse landscapes’ and ‘tranquillity and solitude’. •We agree there will be no significant effects on views from the Dark Sky Reserve due to the distance and influence of existing lighting outside the SNP.	See specific responses to comments made by NRW (and LUC) above in relation to effects on receptors within the SNP.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Additionally, in chapter 4 of the LUC SLVIA review (under the heading Wales Marine Plan (WMP)) it is noted that Policy SOC_06 – Designated Landscapes (from the WMP) states that; “Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration”.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. A key factor when reviewing the potential for mitigation of SLV effects has been to try to reduce the impacts on the purpose and special qualities for which the SNP and AONBs have been designated. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	“Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration”. It also states that proposals should; •Avoid adverse impacts on designated landscapes; and/or •Minimise impacts where they cannot be avoided; and/or •Mitigate impacts where they cannot be minimised	As above.	yes	no
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	In their review of the SLVIA, the LUC note that “it is clear from this review of the SLVIA that there will be significant adverse impacts on designated landscapes of Anglesey AONB and Snowdonia National Park...Efforts have been made to minimise these effects through reducing the site area, however further mitigation is unlikely to be possible”. In terms of potential mitigation, it is noted that no mitigation of the significant effects is feasible other than further changes to the design. The applicant (RWE) has reduced the extent of the turbine array however the SLVIA still finds significant adverse effects on landscape character and views. It would require a further reduction in the extent of the array to achieve effective mitigation. Reduction in turbine height has not been discussed in the SLVIA as a means of mitigating impacts, despite it being a key concern. The LUC review indicates that findings of significant effects do not vary according to which Maximum Development Scenario is considered. This suggests that turbines of 252m in height would have the same spread of significant effects as turbines of 332m, and that turbines would have to be substantively smaller to achieve effective mitigation.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. Section 10.8 sets out the key parameters for assessment and the consideration of mitigation of SLV effects through a reduction in WTG height.	yes	yes
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	The cumulative effect of the new proposed wind farm alongside the current ones seen at Gwynt y Môr and Rhyl Flats would mean that the cone of sight and sea horizon will be disrupted even further by wind turbines, particularly when considering that the proposed turbines would be double the height of those nearby currently. These impacts will include significant adverse effects from certain viewpoints and parts of the landscape in the National Park. A report will be presented to the Authority’s Planning and Access Committee on October 20 2021 to give a background to the project so far and to express concerns on the proposed development in its current form, and to recommend that further mitigation measures are explored, whether those are in terms of reducing the extent of the array; the reduction of the turbine height; or both.	Section 10.9 sets out the further mitigation of SLV effects that have been included in the AyM MDSs following consultation. A key factor when reviewing the potential for mitigation of SLV effects has been to try to reduce the impacts on the purpose and special qualities for which the SNP and AONBs have been designated. Volume 1, Chapter 4: Site Selection and Alternatives sets out the consideration of alternatives and the rationale for the extent to which the SLV effects can be mitigated (or minimised) through a reduction in the AyM array area and WTG dimensions.	yes	yes
LA_006_11102021	S42	Volume 2, Chapter 10: SLVIA	Wrexham County Borough Council No additional comments	This is noted by the Applicant.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_27_11102021	S44	N/A	I am writing to set out the Trustees formal response to the consultation documents you have produced in association with the proposed Awel Y Mor project. The Trustees own land comprising Land Registry title WA859967 (the Land) which will be directly affected by your proposals. Whilst the Trustees are not opposed to the development of the project in principle, there are strong concerns regarding the current proposed onshore cable route and associated works both within, and within the vicinity of, the Land.	The chosen route has been selected as a compromise between all constraints in the region including combined with engineering, ecological, landscape and visual interaction and PRoW management.	yes	no
MOP_27_11102021	S44	N/A	The Land is situated to the south-east of the existing development boundary of Rhyl. It was acquired by the Kerfoot family as a block of good quality agricultural land with strong development potential the given the future growth proposals for Rhyl. The Land was settled in April 2009 and the trust has three beneficiaries. Wilson Fearnall Ltd Alkington Hall, Whitchurch, Shropshire SY13 3NG Email : rwf@wilsonfearnall.co.uk Tel : 01948667113 Mob : 07764275218 The Land is currently farmed in conjunction with a neighbouring dairy farm and regularly grows good crops of grass, maize and cereals. Representations have been made to the emerging Local Development Plan process for the Land to accommodate residential/ mixed use development and opportunities with development partners are being explored. Neighbouring residential developments on third party land have recently been completed.	The chosen route has been selected as a compromise between all constraints in the region including combined with engineering, ecological, landscape and visual interaction and PRoW management. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation and for any sterilisation from development shall be paid on a proven loss basis.	yes	no
MOP_27_11102021	S44	N/A	Progressing the project in line with the current design envelope will create significant short, medium and long-term disturbance to the interests of the Trustees that could be mitigated by design amendments ahead of the final DCO submission. The Trustees maintain that alternative route corridors should be utilised for the cables in line with the feedback provided during the first round of consultation to avoid any use of or impact on the Land. If this is not achievable an alternative route moving the cables further East would be preferred to mitigate the overall impacts. This alternative route is shown on the plan at Appendix 1.	Northern TCC at B5119 Dyserth Road taken forward. The chosen route has been selected as a compromise between all constraints in the region. The chosen route has been selected as a compromise between all constraints in the region including combined with engineering, ecological, landscape and visual interaction and PRoW management. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation shall be paid on a proven loss basis.	yes	no
MOP_27_11102021	S44	N/A	Construction Period The Trustees do not consider the Indicative Construction Programme from the Onshore Project Description document to be an accurate reflection of the construction period and associated disturbance. The Land forms part of Route Section C and hosts proposals for a TCC, an ECC access point, a road crossing and a considerable stretch of ECC. The predicted vehicle movements suggest this to be one of the longer and busier sections to service from the proposed access point. Considering the onsite requirements (including demarcation and necessary H&S measures) to deliver the proposed enabling works, the cable construction programme, commissioning, re-instatement and demobilisation it is likely that proposed works will prevent any reasonable access to, or use of, the Land for the full period of 4 ½ years of construction and possibly longer with supply chain delay risk. Not only will this result in direct revenue loss to the Trustees, but the loss of forage production may have a catastrophic impact on the viability of dairying business undertaken by the tenant.	The Applicant acknowledges that the landowner may wish to access severed land with a view to continuing to use or to manage land during the course of the construction period. The Applicant shall therefore endeavour to provide access to any land which is agreed between the parties to be severed by any of the proposed construction activities. It should be noted that there may be short periods of time during which land may temporarily be inaccessible due to specific construction activities but these periods shall be kept to a minimum and communicated the landowner in advance. The voluntary agreement shall include suitable provision in respect of compensation for losses associated with where it is agreed between the parties that severed land is uneconomic to farm or restricted in terms of cropping rotation. In the event that voluntary agreement is not reached, the Compensation Code shall apply to the assessment of compensation for severed land.	yes	no
MOP_27_11102021	S44	N/A	Construction Process A cable depth of between 1.64 to 0.6m is referred to, but no final assessment of likely depths has been provided within the Land. At depths above 1.2m deep any cables are likely to limit regular farming cultivations. With the addition of shallow joint pits and link boxes in situ during, and possibly post, operation of the windfarm ongoing farming uses of the Land will be impeded. A minimum installed cable depth should be considered so as not to interfere with future agricultural use.	The landowner has the benefit of entering into a voluntary agreement which provides provision to undertake installation of the cables at no less than 0.65m from the current surface of the land. Furthermore, The landowner may benefit from additional drainage work both inside and outside of the Project orderlimit necessarily through any voluntary agreement. Placement of manholes and chambers are yet unknown, relevant and reasonable compensation would be available for any cable joint bays, manholes and above ground apparatus.	yes	no
MOP_27_11102021	S44	N/A	Services Land is crossed by a number of existing utility and private service media. Current proposals do not include adequate information or design tolerance for avoiding or diverting these existing services.	Protective Provisions will be used for Statutory Undertakers. Enabling works will deal with relocation and reinstatement of private services.	Yes	no
MOP_27_11102021	S44	N/A	Land Rights There has been little information provided as to the requirement for temporary and permanent land rights for which the project may seek Compulsory Acquisition powers. Further detail is required for consideration. Assuming the project will be seeking cable easements with sufficient engineering protections the current ECC will become sterilised for most forms of future development. Not only will development within the ECC be restricted, but any of the Land to the East of the proposed route will also become severed and impossible to develop. Practically, the ECC will form a 'soft' future development boundary for Rhyl from its Western boundary removing any possibility of future uplift in value.	The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation and for any sterilisation from development shall be paid on a proven loss basis.	Yes	no
MOP_27_11102021	S44	N/A	Incorporating suitable provisions to mitigate this impact in all areas of the ECC should be adopted to include: •Lift and shift' provisions •Bimited lifetime of land rights to 25 years in line with operational life of project •Allow use of easement land for services, infrastructure, gardens etc The same issue applies to any permanent rights of access that may be required to service the operational cable, but the consultation information is devoid of this information. Detailed proposals should be provided and consulted on with all affected parties prior to final submissions.	The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation and for any sterilisation from development shall be paid on a proven loss basis. Lift and shift isn't available as an option. Any easement will not be time limited. Any use of the easement corridor and protection of the underlying assets will be controlled by the relevant restrictive covenants.	Yes	no
MOP_27_11102021	S44	N/A	Consultation and Engagement The Trustees do not consider sufficient engagement has been undertaken with landowners to fully inform the project design in or to incorporate relevant mitigation. Further detailed engagement is required before proposals are finalised. Whilst the statutory requirement for formal consultation under the Planning Act 2008 is 28 days the Trustees do not consider the detail provided by the promotor at consultation is adequate, nor the consultation period long enough for affected parties to meaningfully engage and feedback. Covid restrictions have largely been removed and more public exhibition events should have been incorporated into the consultation process. Whilst online material is a useful addition to the formal consultation process this has not been accompanied by sufficient alternative forms of communication to generate meaningful two-way engagement.	The Applicant has provided a detailed account of all consultation undertaken in support of the application in the Consultation Report (application ref: 5.1), and the EIA Evidence Plan Report (application ref: 8.2). The documents provide an account of the comprehensive consultation undertaken through online, in person, and multi media formats, in accordance with the published guidance.	yes	no
MOP_27_11102021	S44	N/A	Further detailed engagement should continue with all affected parties to ensure feedback and mitigation is fully considered ahead of any submission for the DCO and we welcome meaningful engagement with RWE going forward.	Comments noted	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
LA_009_12102021	S42	Volume 2, Chapter 13: Military and Civil Aviation	The submitted PEIR recognises the principal defence issues that could be impacted by the progression of the proposed development. Volume 2, Chapter 13: Military and Civil Aviation (August 2021 Rev. A) of the PEIR reflects the content of a previous MOD response to consultation dated 21 September 2021. The use of airspace in the vicinity of the proposed development for defence purposes has been appropriately identified and considered, the requirement to supply sufficient information to allow accurate charting of the development and for the installation of appropriate aviation safety lighting is addressed in section 13.9 Embedded mitigation. The mandatory requirements set out in Civil Aviation Authority publication CAP 393 for aviation safety lighting are specifically referenced.	This is noted. Requirements for aviation lighting are provided in Section 13.9 of the aviation chapter.	yes	no
LA_009_12102021	S42	Volume 2, Chapter 13: Military and Civil Aviation	The PEIR details the potential for radar systems to be affected by the proposed wind farm, highlighting the potential for the development to be within radar line of sight (RLoS) of radar systems at RAF Valley and Great Dun Fell. I can confirm that we do not anticipate that the development would have an operational impact on either of the identified radars.	This is noted by the Applicant.	yes	no
LA_009_12102021	S42	Volume 2, Chapter 13: Military and Civil Aviation	An assessment of the location of the offshore element of the development has confirmed that the proposed development area does not overlap with any military danger areas or Practice and Exercise Areas (PEXA). We therefore do not anticipate there to be any concerns relating to military maritime activities. I trust this clarifies our position on this consultation. Please do not hesitate to contact me should you wish to consider these points further.	This is noted by the Applicant.	yes	no
PrB_019_12102021	S42	Volume 2, Chapter 9: Shipping and Navigation	Introduction The UK Chamber of Shipping (hereafter “the Chamber”) welcomes the opportunity to comment on the Preliminary Environmental Information Report (PEIR) for the proposed Awel y Môr Offshore Wind Farm. The Chamber is the trade association for the UK shipping industry, representing some 200 members, operating 900 vessels equalling 18 million GT in capacity, trading around the UK and globally. The Chamber represents the full breadth of the industry, including dry and wet trades, passenger transport (cruise & ferry) including lifeline services, offshore supply and construction, towage and specialist, as well as professional service providers with shipping interests. The Chamber fully supports the Government’s obligations to achieve Net Zero Carbon by 2050 and welcomes the development of offshore renewable energy to succeed. The ports and shipping industries play an essential in enabling those targets to be achieved by providing bases and vessels for construction, operation & maintenance, and decommissioning. The Chamber also asserts that the planning and consultation system must support both the UK’s offshore renewable goals and the wider shipping industry to ensure that navigational safety is not compromised nor economic contribution from the shipping industry jeopardised, as stated within Paragraph 2.6.162 of NPS EN-3. The Chamber had specifically revised Volume 2 Chapter 9: Shipping and Navigation, and the Navigational Risk Assessment Annex, and wishes to submit the following points for consideration.	This is noted by the Applicant. Consideration to the specific points raised is given in the following rows.	yes	no
PrB_019_12102021	S42	Volume 2, Chapter 9: Shipping and Navigation	Navigational Risk The Chamber has some concern over the western extent of the proposed site, specifically the interaction and squeeze with the anchorage in Dulas Bay/Point Lynas. The Chamber notes in paragraphs 52-53 of the Shipping and Navigation chapter of the PEIR that vessel use on routes 9 and 12 (those impacted) are relatively low, however the Chamber recommend that considerate layout for shipping and navigation be utilised when determining the overall layout, noting that the NRA shows the worst case scenario for shipping. The Chamber strongly advocates for two lines of orientation across the development, unless sufficient safety justification be made to the MCA. The Chamber recommends that unusable “dead space” not be permitted between the proposed development and Gwynt-y-mor, and that consistent lines of orientation are maintained between the two developments for the safety of navigation. The Chamber notes with concern the potential highlighted in paragraph 79 of Chapter 9, and raised by Trinity House, around an isolated Met Mast structure outside of the Outer Infrastructure Zone. The Chamber is further concerned by this structure being in proximity to deviated traffic associated with Point Lynas. The Chamber does not support the installation of isolated structures and strongly recommend that alternative locations be sought and the structure be contained within the array area for safety of navigation.	The final layout will be agreed with the MCA and Trinity House, noting that framework Layout Commitments have been agreed that include provision for limiting impact on the GyM lines of orientation. The framework Layout Commitments are presented in the NRA (Volume 4, Annex 9.1 (application ref: 6.4.9.1)). As detailed in the NRA (Volume 4, Annex 9.1 (application ref: 6.4.9.1)) the Other Infrastructure Zone has been refined post PEIR to shift the potential Met Mast locations further from the Point Lynas traffic. The final position will be agreed with MCA and Trinity House.	yes	yes
PrB_019_12102021	S42	Volume 2, Chapter 9: Shipping and Navigation	The Chamber also recognises the “high level of construction standards for commercial vessels operating at sea” as the developer repeatedly references, however the Chamber asserts that this does not mean further mitigations are not required and that it is correct to assume that a drifting allision would be low energy with minor damage to the vessel. Indeed, in adverse weather, when an allision may be considered more likely to occur, the potential for a high energy impact or repeated impact are considerably higher. The developers need also be aware of the potential for an unpowered drifting vessel, whilst taking into consideration charted cabling, to drop anchor for safety concerns and the potential for anchor snag or indeed anchor drag and result in allision. The developers need to be aware that near miss incidents have occurred around the UK between turbines and commercial vessels which have experienced loss of power, leading to emergency anchoring, subsequent anchor drag, and rescue tug use to keep the vessel from alliding with the turbine. Such incidents lead to ship operators incurring significant costs. Whilst recognised at being at an early stage of discussion, the provision of and implications for Search and Rescue (SAR) capabilities in the area need careful consideration and the developer should consider what organisational or financial assistance will be provided to MCA/HMCG in provision of SAR.	Consequences from potential allisions (including drifting) in terms of PLL and pollution are assessed in the NRA (Volume 4, Annex 9.1 (application ref: 6.4.9.1)). Impact assessment of drifting risk has been undertaken for the construction phase, the operational phase) and the decommissioning phase. This includes assessment of emergency anchoring in terms of potential cable interaction.	yes	no
PrB_019_12102021	S42	Volume 2, Chapter 9: Shipping and Navigation	Risk Register The Chamber does not agree that the risk likelihoods of some of the items within the risk register across all stages will be “Extremely unlikely” as stated, rather that they will be “unlikely”, these include: Vessel-to-structure powered allision risk Vessel-to-structure drifting allision risk Reduction of SAR capability due to increased incident rates and reduced access for surface / air responders Cable Burial The Chamber supports full burial of interconnector and inter-array cabling wherever possible as minimising disruption to water depth and snagging risk. The Chamber would like to know what monitoring of the seabed and cable burial will be present post cable-laying, noting that for some developments around the UK, inter array cables in particular have become exposed within a short period.	Impacts on SAR have been assessed for the construction phase , the operational phase and the decommissioning phase. As per Section 9.9 of Volume 2, Chapter 9: Shipping and Navigation (application ref: 6.2.9), the Applicant will comply with MGN 654 which includes a requirement to agree a SAR checklist with the MCA which sets out the relevant mitigations that will be in place. It is noted that AyM will also increase resources including self help capability in the event of a SAR incident. Associated cooperation procedures with the MCA will be agreed via the Emergency Response Cooperation Plan (ERCoP). The rankings assigned are based on various input including the baseline assessment, quantitative modelling, and level of stakeholder concern, and give due consideration to frequency of both realistic and worst-case consequences. The CoS view and input has been captured within the NRA process. Necessary cable protection measures will be assessed and agreed as part of the Cable Burial Risk Assessment (CBRA). This will include conditions in relation to monitoring procedures and interim mitigations in the event that cables become exposed.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
			Safety Zones			
PrB_019_12102021	S42	Volume 2, Chapter 9: Shipping and Navigation	The Chamber notes multiple references to “50 m safety zones otherwise.” The Chamber supports the application and use of safety zones during construction, decommissioning and periods of major maintenance for the safety of life, and supports the developer’s application for these. The Chamber does not support the application or use of safety zones for protection of property or assets. The Chamber welcomes follow up and further discussion on the proposed development going forward.	The application for any safety zones applied for will include a safety case for their implementation that demonstrates how they will reduce risks to project vessels, personnel and third party vessels and crews. It is noted that the Applicant does not intend to apply for permanent operational safety zones.	yes	no
PrB_020_27092021	S42	Volume 3, Chapter 12: Public Health	Our comments relate to Electromagnetic Fields (EMF) and have been made following consultation with our technical advisors at Public Health England’s EMF Dosimetry Group. The technical note on Electro-Magnetic Fields, (4th June 2021) provides evidence to show that the magnetic field levels arising from the AyM OWF Onshore Export Cable Corridor are unlikely to exceed guidance levels established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). The guidelines form the basis for PHE advice and Government Policy. We would however request further information in order to understand how the maximum and typical magnetic field values reported on page 5 of the Technical Note have been estimated. For example, do the values come from the generic cable information provided on National Grid’s www.emfs.info page, or have they been calculated specifically for AyM OWF export cable design and operating conditions? The latter is preferable because the conclusion about compliance is dependent on the export cable being constructed and operating in the same way as the National Grid examples. Therefore, it would be helpful if it can made clearer as to how the reported values were derived.	The ES Chapter (application ref: 6.3.12) has been updated to provide further information on the derived ENF values	yes	no
PrB_021_18102021	S42	Volume 2, Chapter 13: Military and Civil Aviation	I refer to the Application quoted above, NATS has assessed the application and has identified an unacceptable impact on its infrastructure, specifically the St. Annes and Great Dun Fell Primary Surveillance Radars. No impact is anticipated on NATS’s Cleve Hill radar.	A commercial discussion was held to agree terms of the mitigation agreement which will remove effects created to the St Anne’s and Great Dun Fell PSRs. Effects to NATS radar systems are considered in section 13.7.3 of the aviation chapter.	yes	no
PrB_021_18102021	S42	Volume 2, Chapter 13: Military and Civil Aviation	NATS has been engaged with the Applicant over recent years and following its assessment, has proceeded to investigate mitigation measures. These technical measures are tangible and within NATS’s control; negotiations are currently ongoing with the Applicant in order to secure their funding and implementation. While a formal agreement is not yet in place, NATS has no reason to believe that this will not be forthcoming in the very near future. While its position is that of objecting to the application, NATS is confident that it will soon be in a position to support planning conditions. As soon as formal agreement is reached with the Applicant, NATS will submit a further representation confirming this	A commercial discussion was held to agree terms of the mitigation agreement which will remove effects created to the St Anne’s and Great Dun Fell PSRs. Effects to NATS radar systems are considered in section 13.7.3 of the aviation chapter.	yes	no
PrB_022_15102021	S42	Volume 2, Chapter 12: Other Marine Users and Activities	Independent Energy Yield Assessment highlighting any impact on yield to NHHWL and compensation for such losses.	The interaction with other cable assets, including NHHWF, is considered in paragraph 27 et seq (baseline description) and Section 12.10 (assessment of potential impacts). Crossing agreements are also anticipated to be agreed between the Applicant and other asset owners.	yes	no
PrB_022_15102021	S42	Volume 2, Chapter 12: Other Marine Users and Activities	A cable crossing agreement between NHHWL and AyM for the crossing of the NHHWL export cables by the AyM export cable(s).	As above	yes	no
PrB_022_15102021	S42	Volume 2, Chapter 12: Other Marine Users and Activities	Compensation for grid disconnection or curtailment of NHHWL to enable any installation or connection in related to AyM.	As above	yes	no
PrB_022_15102021	S42	Volume 2, Chapter 12: Other Marine Users and Activities	Compensation due to any access restrictions to NHHWL from the construction of AyM if applicable cable but should be in the agreement.	As above	yes	no
PrB_022_15102021	S42	Volume 2, Chapter 12: Other Marine Users and Activities	The agreement for AyM to cover any of legal costs to NHHWL for any agreements. North Hoyle Wind Farm Limited looks forward to the continued cooperation between the two parties and will await further information on the Awel y Môr Offshore Wind Farm export cable route in due course	As above	yes	no
MOP_029_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	Yes	no
MOP_029_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footpath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	Yes	no
MOP_029_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we’re afraid of where else they will cross around our property and we’re concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_029_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planned route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_029_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_030_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_030_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footpath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_030_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we’re afraid of where else they will cross around our property and we’re concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_030_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planned route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_030_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_031_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_031_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footpath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_031_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we’re afraid of where else they will cross around our property and we’re concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_031_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planned route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_031_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_032_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_032_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footpath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_032_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we're afraid of where else they will cross around our property and we're concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_032_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planed route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_032_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_033_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_033_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footbath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_033_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we're afraid of where else they will cross around our property and we're concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_033_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planed route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_033_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_034_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_034_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footbath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_034_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we're afraid of where else they will cross around our property and we're concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_034_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planed route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_034_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_035_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_035_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footbath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance.	PRoW divert - Consent/SLR team (PRoW diversion plans)	yes	no
MOP_035_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we're afraid of where else they will cross around our property and we're concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_035_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planed route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_035_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_036_18102021	S44	N/A	By taking our preferred route, it will only cross 4 fields of the farmers fields rather than crossing 6 fields. By taking the route which will not only cross their 6 fields, the plans show that they will not take a path along the headland of these fields which will create a greater disturbance for the farmer.	The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_036_18102021	S44	N/A	Along with crossing in the middle of the field, it will cross a very busy track/footpath which crosses from the houses at Tarquin Drive down towards our houses at Bryn Cwnin farm. This footbath unfortunately is used a lot by youths, majority of the time using motorbikes and scramblers, which means if this is shut due to the proposed route it will cause these bike users to cross at different places, including fields/standing crops/growing crops/sheep which will cause a great disturbance.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region.	yes	no
MOP_036_18102021	S44	N/A	We can see it will not only cause users to go across fields but will also disturb the privacy of our property. We regularly see people nosing around from the end of the track as it is. By crossing this footpath we're afraid of where else they will cross around our property and we're concerned about our privacy if taken this route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_036_18102021	S44	N/A	The second public footpath that crosses by the woodland of Bryn cwnin covert will also cause concern to us at the houses at Bryn Cwnin farm. I can see a great disturbance to people walking wherever they want to get across to Pentre lane, which would involve walking past or through private property as well as your planed route.	The public rights of way management plan will be agreed with Denbighshire council, which will clarify footpath diversions. The chosen route has been selected as a compromise between all constraints in the region	yes	no
MOP_036_18102021	S44	N/A	Our property is a remote countryside residence and taking up our preferred route will allow us to maintain our privacy.	The chosen route has been selected as a compromise between all constraints in the region	yes	no
PrB_023_09112021	S42	Volume 3, Chapter 1: Onshore Project Description	With respect to the route of the Proposed Onshore Export Cable Corridor 100m (pink) there are several locations where the route will fall within HSE Public Safety Land Use Planning Zones Major associated with Accident Hazard Pipelines operated by Wales and West Utilities, which include*: a. Bodelwyddan Branch (HN016) [Transco ref: 1896, HSE ref 7645] b. Bodfari / Rhosgoch (VN082) [Transco ref: 1862, HSE ref 7610] c. Rhualt / Brookes Farm (HN001 Part 2) [Transco ref: 1886, HSE ref 7635] *Please note the above Major Accident Hazard Pipelines above should not be assumed to be an exhaustive listing, for the avoidance of doubt the pipeline operator, Wales and West Utilities, should be contacted directly. The Proposed Onshore Export Cable Corridor 100m (pink) route does not fall within any HSE Public Safety Land Use Planning Zones associated with Major Hazard Installation(s).	The outline Construction Method Statement sets out how the Applicant will liaise with utilities and services providers. All potentially affected utility providers will be contacted and the location of existing services will be accurately identified on the ground prior to construction or intrusive ground investigations. All utility crossings will be undertaken in accordance with standards agreed with the utility owner/operator, as required.	Yes	no
PrB_023_09112021	S42	Volume 8, Document 3.1: Outline CoCP	There is currently insufficient information available for HSE to provide its' public safety Land Use Planning Advice**. However by way of general guidance, HSE would not advise against the proposed development providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones. 2 ** HSE's Land Use Planning Methodology [https://www.hse.gov.uk/landuseplanning/methodology.htm] Should a new Major Accident Hazard Pipeline be introduced or existing Pipeline modified prior to the determination of the present application, then the HSE reserves the right to revise its advice.	This is noted	Yes	no
PrB_023_09112021	S42	Volume 8, Document 3.1: Outline CoCP	If prior to the determination of the present application, a Hazardous Substances Consent be granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, then the HSE reserves the right to revise its advice	This is Noted	Yes	no
PrB_023_09112021	S42	Volume 8, Document 3.1: Outline CoCP	The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015. Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority	This is Noted	Yes	no
PrB_023_09112021	S42	Volume 8, Document 3.1: Outline CoCP	HSE have no comment as there are no HSE licence explosive sites in the vicinity of the proposed development.	This is Noted	Yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_023_09112021	S42	Volume 3, Chapter 12: Public Health	No comment from a planning perspective.	This is Noted	Yes	no
PrB_024_09112021	S42	Volume 2, Chapter 7: Marine Mammals	TTS assessment JNCC are content for this to be a qualitative assessment as we view this inclusion being for context only, as we define injury as PTS onset (JNCC et al, 2010).	This is noted by the Applicant.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 7: Marine Mammals	Disturbance assessment. It is claimed (page 40) this assessment is based on the current best practice however no references are provided. This needs to be clarified. Further justification is also required for applying the Graham et al (2018) harbour porpoise dose response curve to all cetacean species, including caveats regarding species differences in behaviour, and monopiles vs pin piles in Graham et al. 2018. We note the use of EDRs in the RIAA and favour the use of this method.	Additional information on dose response curves and applicability to other species is provided in 7.4.3 Underwater noise modelling (specifically paragraph 29 et seq.) of the marine mammals chapter (application ref: 6.2.7).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 7: Marine Mammals	Sensitivity of cetaceans to PTS The marine mammal assessment (page 46) considers cetaceans to have a low sensitivity to PTS as there is currently no evidence that PTS at this specific range and magnitude will cause a significant impact on either survival or reproductive rates. For this assessment, low sensitivity is defined as an ability to adapt behaviour with some tolerance and ability to recover from any impact on vital rates (Table 10). This describes the presence of effect and potential for adaptability but does not consider the impact of that effect. The expert elicitation referred to considered there might be a small increase in negative effect on harbour porpoise survival via reduction of predators and/or vessel/shipping, and a low (not negligible) impact on bottlenose dolphin fertility and survivability. Subsequently we believe cetacean sensitivity to PTS should be medium, not low. This may affect the outcomes of the significance assessments/conclusions. We defer to NRW advice re the appropriateness of sensitivity score for grey seals	The definitions of sensitivity have been revised (Table 10). All marine mammals have been assessed as having a Low sensitivity to PTS, except dolphin species which have been increased to Medium (Table 15) of the marine mammals ES chapter (application ref: 6.2.7).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 7: Marine Mammals	Existing environment We question the exclusion of common dolphins from the impact assessment, given some of the data presented in Annex 7.1. Further justification is required	Common dolphin have now been scoped into the assessment.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 7: Marine Mammals	PTS & disturbance from piling The impact area/ranges provided for all species consider single piling events in isolation or if two piling operations happen in the same day. No discussion is provided on the likelihood and potential impacts (or lack of) of repeated exposure to individual animals should they return to the area between piling events. For example, paragraph 93 states cumulative PTS during the installation of a monopile equates to either five or eight harbour porpoise, depending on the density estimate applied. It needs to be clarified whether this number relates to multiple events within a single day or across all 91 piling days.	The piling time has been clarified in the ES and further information on consideration of cumulative PTS has been provided in Volume 4, Annex 7.3: Marine Mammal Quantitative Assumptions (application ref: 6.4.7.3).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 7: Marine Mammals	Requirement for EPS licence Given the predicted ranges at which PTS could occur during piling, a commitment to develop and comply with a MMMP is not sufficient to rule out the need for an EPS licence (for both injury and disturbance) at this stage, especially given the lack of detail provided in the current draft MMMP. See further comment on the MMMP below	This is noted. A revised Outline MMMP has been provided in Volume 4, Annex 7.2 (application ref: 6.4.7.2).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 7: Marine Mammals	PTS from UXO clearance Paragraph 149 claims the suitability of the Southall et al (2019) criteria when assessing impacts during UXO clearance is under discussion. We question this statement as our belief was the discussion related to whether both metrics were needed (SPL and SELcum), not whether the thresholds should be applied at all, as implied by this paragraph.	A range of methods for assessing disturbance from UXO detonation is now included in Volule 2, Chapter : Marine Mammals (application ref: 6.2.7).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Swim speeds in fleeing animal models We note the speeds presented (page 6) are considered worst case i.e. slowest speed, and that animals are expected to be able to swim faster; however, it is not clear whether the modelling presented here has assumed a random movement animal or that the animal will swim away in a straight line. Applying a more precautionary slower swim speed will allow for animals not moving in a straight line, or for them pausing while swimming away. It would also be beneficial to understand the range of potential swim speeds better, as information available in the literature varies.	Additional information on swimming speed is presented in paragraph 24 of the marine mammals chapter (applciation ref: 6.2.7).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Piling parameters The number of piling days assessed is based on the number of turbines, with no contingency for the piling of any single foundation extending into a second (or third) day, for example, if problems with ground penetration are experienced. We question the likelihood of this occurring and recommend a justification for not including a contingency is included in the text. Section 4.2.2: states a maximum of four foundations will be installed in a 24-hour period. We assume this should read four piles, which would constitute one four-legged foundation?	For the assessment of disturbance, it has been assumed that at a worst case, it could take up to three days to install one monopile, and two days to install a jacket foundation.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Multiple piling events We appreciate the scenario chosen represents the greatest geographical spread of piling activities within the site, and that piling vessels will not operate immediately adjacent to one another for logistical reasons. However, the depth at which piling occurs has been demonstrated to have a large effect on the predicted injury ranges. We question whether it's possible for two piling vessels to operate in the deeper areas of the site simultaneously, as this would provide a worse case than the scenario presented.	A design change has been adopted to remove the option of simultaneous piling at two foundation locations.	yes	yes
PrB_024_09112021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Other noise sources We question whether the datasets used when assessing vessel noise includes any using dynamic positioning (DP) and what difference using vessels with/out DP could have on the predicted outputs?	The predicted levels do not consider DP specifically, however DP is not predicted to result in substantially greater noise levels than general vessel noise.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 6.2: Underwater Noise Technical Report	Operational noise It is stated that the measured characteristics (Table 49) are from turbines smaller than proposed for this project however it would be beneficial if the differences were made clear to help provide context to the data used and subsequent model outputs.	This is noted. Further context has been added to the underwater noise technical report (application ref: 6.4.6.2).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 7.2: Outline MMMP	JNCC appreciate the final details of this plan will be agreed once the project design has been finalised however the information currently provided is not sufficient to fully support the claims in the impact assessment that this protocol will reduce impacts to negligible levels. This is of particular concern when considering potential injury and disturbance to EPS. We also advise that the use of at-source noise reduction measures (or noise abatement) should be considered.	The Outline MMMP has been updated to include specific reference to noise abatement measures as part of the suite of mitigation options available (application ref: 6.4.7.2).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 7.2: Outline MMMP	Mitigation zone We agree with the definition of the mitigation zone (page 20) however it may be clearer if this is referred to as the injury zone. A clear distinction should be made between this and the area visually observed by marine mammal observers which is traditionally referred to as the mitigation zone. In this instance, the visual mitigation zone will be smaller than the predicted injury zones. The range of both zones can be agreed once the final design choice has been made, however minimums could be discussed in the draft document.	Terminology has been changed in the marine mammals chapter (Application ref: 6.2.7) to refer to the injury zone in this context.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 7.2: Outline MMMP	ADD choice We support the commitment to repeat the noise modelling once the final design envelope is known as this will better inform mitigation requirements including the duration an ADD should be activated for. We agree the final choice of device should wait until later, as this will enable any new evidence published regarding the effectiveness of specific devices to be considered.	This has been noted by the Applicant.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 7.2: Outline MMMP	JNCC mitigation guidance We highlight that updates are planned for the piling and explosive use guidance next year, which will include the publication of activity specific data collection sheets. All updates will be published on the JNCC web page.	This has been noted by the Applicant.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	Assessment criteria We refer to our previous comments on the sensitivity score for PTS in cetaceans and highlight that changing this may change the outcomes of this RIAA.	This is noted. Amendments to sensitivity scores have been carried through to conclusions of significance throughout the assessment.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	Injury (PTS) assessment We agree the purpose of the MMMP is to reduce the risks of injury to negligible levels (Table 3) however there is currently insufficient detail to conclude this is feasible. We highlight that the JNCC mitigation guidelines for piling and UXO clearance will be updated in the coming year and recommend AyM monitor the JNCC webpage	The Applicant acknowledges this feedback on the MMMP and has undertaken further consultation on a revised MMMP which can be found at annex 7.2 (application ref: 6.4.7.2).	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_024_09112021	S42	Report 5.1: RIAA	Disturbance assessment We confirm that the noise management approach for the North Anglesey Marine SAC only needs to be considered during the summer season (paragraph 226) however this advice relates to Conversation Objective 2, disturbance of the species, only. All activities, regardless of when they occur, need to be assessed in respect the remaining conservation objectives. When considering noise management measures, the SNCB advice (as referred to in paragraph 225) is referring to application of the spatial temporal thresholds. Any mitigation measures applied to reduce injury and/or disturbance (e.g. ADD use, noise abatement if deemed appropriate) would have to be used all year round to comply with EPS licensing, which prohibits injury and disturbance It is not clear in the assessment whether there could be overlap between UXO clearance and piling activities; this needs to be clarified. If there is the potential for overlap, we would look for a commitment that the two activities would not happen on the same day. Our previous comments regarding injury/behaviour following multiple piling events also apply to the RIAA.	The Applicant can confirm that there will be no overlap between UXO clearance and piling activities.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	In-combination assessment While the assumption that other projects would not be awarded consent if there were a risk to marine mammals is fair, we do not agree it can be automatically assumed there would be no risk when multiple projects are considered in combination (paragraph 801). The likelihood of in-combination disturbance is of greater concern, however, potential impacts will depend on the timing and locations of the specific activities so in-combination impacts can't be ruled out. We highlight that all cetacean species are listed as EPS throughout the UK and Europe, not just in Welsh waters as implied in paragraph 800.	Additional information will be added to the RIAA to better justify why PTS should be scoped out of the in-combination impact assessment.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	Overarching Comments We note that the PEIR is based on only 18 months of data and the additional 6 months of data will be fully integrated in the final ES submission. Thus the figures presented in the PEIR regarding impacts are subject to change. Thus, we reserve the right to revise the advice provided such that it remains based on the best available evidence and considers the full 24 months of data once it is available	The assessment has now been updated for 24 months of survey data in all relevant documents (Section 10.3 and 11.3 for ornithological alone and in-combination assessment, respectively).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Red-throated diver have been consistently assessed using inappropriate displacement buffers and mortality rates.	The red-throated diver displacement assessment has now been updated to consider a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Inappropriate mortality rates have been used for assessing impacts of displacement for several species; we recommend presenting results using a 10% mortality rate which we do not believe is over-precautionary.	The presentation of a range of mortality rates is discussed in Section 10.3 of the RIAA (application ref: 5.1).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Consideration of all conservation objectives is required, and in particular for objectives relating to distribution within the site for Liverpool Bay; red-throated diver and common scoter.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Consideration of activities causing disturbance and displacement is required as part of in-combination assessments, particularly for Liverpool Bay; red-throated diver and common scoter. This will require inclusion of activities other than offshore wind.	This is noted. The in-combination assessment considers all relevant plans, projects and activities and is not limited to offshore wind.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	We therefore cannot agree with conclusions for Liverpool Bay SPA within the RIAA; common scoter, or red-throated diver, alone or in-combination.	This is noted, as above.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	We cannot at this stage agree with all of the conclusions within Chapter 4 offshore ornithology, and have made specific comments asking for additional information to be presented to allow an assessment.	This is noted. Post-PEIR ETG consultation has been undertaken in order to resolve these comments, as described in the offshore ornithology chapter (application ref: 6.2.4).	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	10.4; 86. Consideration of both alone, and in-combination impacts need to make reference to a sites conservation objectives, which are not always restricted to population sizes. Therefore in some cases (e.g. Liverpool Bay SPA, and see later comments) cumulative loss of habitat or changes in distribution may need to be considered in-combination with other plans and projects.	Assessments to all relevant conservation objectives for each SPA have been updated in the alone and in-combination assessments within Section 10.3 and 11.3, respectively.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	12.3; 101. Decisions around 'very small numbers' and 'very infrequently' should be made on only 18 months of data. In addition, such decisions should be documented and numbers shown so that we can comment on such decisions. In addition; numbers of red-throated diver would need to be considered within the array plus 10km (or, as previously discussed and agreed for AYM, 8km).	The assessment has now been updated for 24 months of survey data in all relevant documents (Section 10.3 and 11.3 for ornithological alone and in-combination assessment, respectively). Small numbers presented within the alone assessment Section 10.3 for all relevant species discussed within the AyM ETG. The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	12.3; 104. Apportioning calculations do not appear to have been presented . These should be shown somewhere. In addition, whilst we agree with use of the SNH (2018) apportioning method as a generic approach, please bear in mind that a UK-wide version of the MS apportioning tool (currently presented within Searle et al. 2019) is under development and may be available in time for the final RIAA incorporating the full 24 months of survey data. In addition, there may in some cases be site-specific data that can support apportioning for some colonies.	The apportioning approach is outlined within Annex 5 (application ref: 5.2.5).	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.1.2; published conservation objectives for Liverpool Bay SPA can be found https://naturalresources.wales/media/678824/liverpool-bay-bae-lerpwl-spa-conservation%advice.pdf . This is being updated and an updated version may be available for the final RIAA including the full 24 months of data. The update includes objectives for red-throated diver.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.2; note our comments on screening and additional SPA features that should be considered. Guillemot and Razorbill displacement and mortality needs to be assessed for Skomer, Skokholm and the Seas off Pembrokeshire SPA.	Guillemot and razorbill are not within the mean-maximum +1SD foraging range (Woodward et al., 2019) from Skomer, Skokholm and the Seas off Pembrokeshire SPA to AyM and have subsequently, due to no connectivity, have not been considered for assessment during the breeding season. Guillemot and razorbill potential mortalities, as part of the assemblage feature, have been considered during the non-breeding season at this SPA in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 302. published conservation objectives for Liverpool Bay SPA can be found https://naturalresources.wales/media/678824/liverpool-bay-bae-lerpwl-spa-conservation%advice.pdf . This is being updated and an updated version may be available for the final RIAA including the full 24 months of data. The update includes objectives for red-throated diver.	All conservation objectives are updated within the alone assessment, Section 10.3 and Annex 3 (application ref: 5.2.3).	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 311 – 313. Mortality rates of 10% should be presented (and this is not thought to be over-precautionary given Searle et al (2020) estimate mortality rates for some displaced birds higher than 10%, albeit different species and season than wintering red-throated diver).	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 316. Species-specific hotspots are delineated which combined make up the SPA boundary. These delineations are based on objective criteria and it can be assumed that all of a species-specific 'hotspot' is important habitat for that species.	The relevant habitat conservation objectives for each feature of Liverpool Bay SPA are discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 317. Note previous comments re displacement assessment: numbers and distribution of red-throated diver would need to be considered within the array plus 10km (or, as previously discussed and agreed for AYM, 8km). Mortality rates of 10% should be presented (and this is not thought to be over-precautionary given Searle et al (2020) estimate mortality rates for some displaced birds higher than 10%, albeit different species and season than wintering red-throated diver).	The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3. The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 318 -320. See above comments. We do not agree with the displacement analysis for red-throated diver presented. In addition, mortality from ECC should be calculated and added to that resulting from the array to estimate a total annual mortality.	The red-throated diver alone assessment with combined mortality impacts within phases is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 325. Mortality rates of 10% should be presented (and this is not thought to be over-precautionary given Searle et al (2020) estimate mortality rates for some displaced birds higher than 10%, albeit different species and season than wintering common scoter).	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 310, 315, 329 (and other paragraphs discussing mortality rates): JNCC are not aware of empirical evidence re mortality rates of displaced birds. Searle et al (2020) estimate mortality rates of displaced birds of higher than 10% for some species, based on a modelling approach using latest available data and understanding of the ecology of seabirds. We therefore (and as advised in the SNCB displacement note) would like to see results using a mortality rate of 10%.	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 341. A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km.	The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 313, 331, 334, 347, 358. given comments above re mortality rates and displacement buffers, we cannot agree with conclusions of 'no potential for a AEOL' from these paragraphs.	The alone assessment for ornithological features are discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	13.3.4; 342. The conservation objectives for Liverpool Bay SPA include a requirement to maintain or restore the distribution of the qualifying species within the site. An assessment of the potential for vessel movements associated with the operation and maintenance of the array to impact on distribution of SPA features (in particular common scoter, and red-throated diver) is required, alone and in-combination with other activities	The relevant habitat conservation objectives for each feature of Liverpool Bay SPA are discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	For assessment of array operation and maintenance: A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km.	The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	For all displacement assessments, from array and from associated vessel movements, and for all species, impacts based on a mortality rate of 10% should be presented.	There is currently no planned vessel routes during operation and maintenance, therefore a quantitative assessment cannot be undertaken alone or in-combination for this impact on any feature. Potential vessel management mitigation is discussed in Section 10.3.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	Impacts from vessel movements should be added to those from array to provide a total impact during operational phases.	There is currently no planned vessel routes during operation and maintenance, therefore a quantitative assessment cannot be undertaken alone or in-combination for this impact on any feature. Potential vessel management mitigation is discussed in Section 10.3.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_024_09112021	S42	Report 5.1: RIAA	Proportion of SPA (and if appropriate, of species-specific hotspots) that is lost to a species due to disturbance or displacement should be assessed in addition to impacts on population; this is relevant for Liverpool Bay SPA; common scoter and red-throated diver.	The assessment has now been updated for 24 months of survey data in all relevant documents (Section 10.3 and 11.3 for ornithological alone and in-combination assessment, respectively). Small numbers presented within the alone assessment Section 10.3 for all relevant species discussed within the AyM ETG.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	We advise that for in-combination assessments, for species sensitive to disturbance and displacement, inclusion of sectors other than offshore wind is important in particular sectors which involve vessel transits through/nearby to Liverpool Bay SPA (in particular for common scoter and red-throated diver).	Combined impacts within phases (e.g. gannet combined displacement and collision impacts within the operational and maintenance phase) for relevant species are assessed alone and in-combination in Section 10.3 and 11.3, respectively. The Applicant acknowledges the request for combining impacts across phases of the development. The predicted mortalities for each species are given per annum for each phase of the development. These phases are not expected to overlap, therefore, it is not deemed suitable to combine impacts across development phases.	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	We advise that during in-combination assessments, post-consent monitoring data is reviewed for empirical evidence of levels of impact that may be relevant (for example from Gwyn-t-y-mor and Burbo Bank extension and for red-throated diver and common scoter).	Additional site-specific evidence (including the GyM post-construction monitoring) has been used to inform the assessment, as described in the RIAA (application ref: 5.2) and the offshore ornithology chapter (application ref: 6.2.4).	yes	no
PrB_024_09112021	S42	Report 5.1: RIAA	Skomer, Skokholm and Seas off Pembrokeshire SPA – The breeding bird assemblage should be screened in which would include razorbill and guillemot as named assemblage components.	The Applicant believes this is in reference to the non-breeding season, not the breeding season as was discussed in the AyM ETG. Guillemot, razorbill and lesser black-backed gull are not within the mean-maximum +1SD foraging range (Woodward et al., 2019) from Skomer, Skokholm and the Seas off Pembrokeshire SPA to AyM and have subsequently, due to no connectivity, have not been considered for assessment during the breeding season. Guillemot and razorbill potential mortalities, as part of the assemblage feature, and lesser black-backed gull have been considered during the non-breeding season at this SPA in Section 10.3.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.4.2, and Table 3. We note that the PEIR is based on only 18 months of data and the additional 6 months of data will be fully integrated in the final ES submission. The final 6 months of data has been collected but not yet fully analysed. Data is presented as an Annex for information. Whilst we are content to comment on the PIER on this basis, we note that our conclusions might change once assessment based on the full 24months of data is available.	The full 24 months of survey data has been used to inform all assessments in this ES.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.3.3; 19. There are species present within baseline surveys but which are not listed here as receptors for ornithology impact assessment. This needs to be justified. For example Atlantic puffin, European shag, black guillemot, red-breasted merganser and great-crested grebe	An evaluation of valued ornithological receptors and associated rationale is presented in Section 4.9.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Table 4. There are additional species listed in 4.3.3. which may be at risk of collision, why are these not being considered? E.g. Common gull, Lesser Black-backed gull, Sandwich tern, Common and Arctic tern and Fulmar.	An evaluation of valued ornithological receptors, potential impacts and associated rationale is presented in Section 4.9.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.5.1; 34. How is ‘trivial numbers’ determined? What criteria is used? Even small numbers of rare species could be important and warrant detailed species account; please present the numbers for all species, and criteria used to assess ‘trivial’.	Terminology throughout the assessments presented in the ES has been updated in line with the outlined terminology presented in the assessment methodology (Section 4.8).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Table 5. No justification for scoping out indirect impacts through effects on prey species and habitats is provided.	Justification for activities or impacts scoped out of assessment is presented in Section 4.9 of the offshore ornithology chapter (application ref: 6.2.4).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Table 13. The demographic rates presented for red-throated diver are not those presented in Horswill and Robinson 2015. Please check and clarify.	Demographic rates used within the ES, along with the source of these estimates, are presented in Section 4.10 of the offshore ornithology chapter (application ref: 6.2.4).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.9.1; 78. Evidence now exists from various post-consent monitoring of red-throated divers being displaced from windfarm arrays plus buffers of considerably larger than 4km.	Red-throated diver displacement assessment has been updated to consider a gradient approach out to 8 km (see Section 4.11 & 4.12). Evidence regarding the use of a 1% mortality rate is provided in Section 4.12).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Upon what evidence is a mortality rate of 1% based? We are aware of very little (if any) evidence of mortality rates of displaced gannet, guillemot razorbill or red-throated diver. Searle et al (2020) estimate mortality rates of displaced razorbill, for example, based on a modelling approach using latest available data and understanding of the ecology of seabirds, ranging from 5.9 to 14.5.	As above.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.9.1; 79 – 86. And Table 21. Common scoter is a feature of nearby Liverpool Bay SPA. It should be clarified whether the AYM array and (4km) buffer would overlap with the SPA, and if so impacts on the SPA population and distribution of scoter should be provided.	Potential impacts on Liverpool Bay SPA are assessed in the RIAA (Report 5.2; application ref: 5.2).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.9.1; Table 24. What do the numbers in brackets in the last two columns mean/represent?	Those number in brackets refer to predicted impacts using a 10% mortality rate. This table has been amended in the ES for clarity.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.9.1; 110 – 131. A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km.	Red-throated diver displacement assessment has been updated to consider a gradient approach out to 8 km (see Section 4.11 & 4.12).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Red-throated diver is a feature of nearby Liverpool Bay SPA. It should be clarified whether the AYM array and (8 or 10km) buffer would overlap with the SPA, and if so impacts on the SPA population and distribution of red-throated diver should be provided.	As above.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.9.1; 112. What evidence is there that a mortality rate of 10% is highly precautionary? Very little is known about the impact of displacement, but as noted above Searle et al (2020) estimate mortality rates for some displaced birds higher than 10%, albeit different species and season than wintering red-throated diver.	Evidence regarding mortality rates is provided in Section 4.12.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.9.2; 147. What evidence is there that a mortality rate of 1% may be appropriate? We were not able to find this evidence in section 4.10.1	Evidence regarding mortality rates is provided in Section 4.12.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.10.1; same comments as made in section 4.9.1 re mortality rates and displacement buffers, and Liverpool Bay SPA, apply to this section.	Evidence regarding mortality rates is provided in Section 4.12.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Table 32; it would be useful to see estimated peak numbers of birds in AYM array area, in addition to peak density (and month or season in which peak numbers were seen).	Monthly abundance estimates are provided in Volume 4, Annex 4.1 (application ref: 6.4.4.1). Evaluation of valued ornithological receptors, potential impacts and associated rationale is provided in Table 15.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Without knowing the numbers of individuals seen within the AYM array area, we would like to see common gull lesser black-backed gull, fulmar and terns included in CRM analyses.	As above.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.10.3; 294 - 305. Estimates of additional mortality (relative to baseline) for great black-backed gulls is over 0.5%, and therefore a consideration of cumulative impacts on regional population will be required.	Following design changes between PEIR and ES, great black-backed gull collision risk has reduced (Table 44).	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.12; 388. A quantitative assessment on how individual effects may combine to create inter-related effects should be undertaken, rather than a qualitative assessment. A quantitative assessment has been undertaken for each phase (construction, operation etc), and for each type of effect (e.g. collision, displacement) so a quantitative assessment across these can be undertaken (and additional effects which may not have been quantified can be discussed qualitatively).	Details of inter-related effects are provided in Volume 2, Chapter 14: Inter-relationships (application ref: 6.2.14)	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.12; 393. This is premature given comments above	Noted. This has been revised within the ES based on the updated assessments.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.13; 396. Data exists to allow an assessment (e.g. MERP monthly seabird distribution for 12 seabird species).	The Applicant assumed that the data referred to are those presented in Waggitt et al. (2019). The spatial scale of these data (10 km2) are too course to extract any meaningful information regarding potential avoidance behavior for those Round 1 and 2 developments in the region of interest.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.1; 405 and 4.14.2; 415. And 4.14.4; 471. The mean max +1 S.D foraging range for gannet is 509.4km (Woodward et al. 2019).	This has been amended in the final ES.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.1; 407 and 4.14.4; 473. how would a plan/project that is ongoing be considered part of the current baseline? We would not consider this to be the case.	For plans/ projects which are operational at the time of baseline data collection, it is considered that any effects of their operation will be encapsulated within the baseline dataset.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.1; 408 and 4.14.2; 418. We disagree; for species such as red-throated diver and common scoter, there are sensitivities to pressures associated with aggregate dredging, cabling projects and given the localised distributions of these species in some seasons, cumulative effects should be considered across sectors/activities.	Aggregate dredging, dredging and disposal, and cable laying have all been considered within the long-list (Volume 1, Annex 3.1; application ref: 6.1.3.1) and were screened out on the basis of the following criteria: ☐the plan/ project has already been accounted for within the offshore ornithology baseline; ☐there is no conceptual effect-receptor pathway between plans/ projects; ☐there is no physical effect-receptor overlap between plans/ projects; ☐there is no temporal overlap between plans/ projects; or ☐the plan/ project is ongoing and is part of the current baseline; or ☐there is low data confidence or data are not available.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.1; 410 and 4.14.2; 420 and 4.14.4; 476. Data exists to allow an assessment for projects which may not have project-specific data available (e.g. MERP monthly seabird distribution for 12 seabird species).	The Applicant assumed that the data referred to are those presented in Waggitt et al. (2019). The spatial scale of these data (10 km2) are too course to extract any meaningful information regarding potential avoidance behavior for those Round 1 and 2 developments in the region of interest.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.1; Table 41. cumulative full development how is this assessed for projects in Table 40 that are still going through the planning process and are not yet fully developed?	Projects that are still going through the planning process and are not yet fully developed have been included in the long-list following the Planning Inspectorate’s Advice Note Seventeen (PINS, 2019). Where data are available within application documentation, these have been included within the cumulative assessment presented in Section 4.16.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.2; 437 and 4.14.3; 465. Consideration should also be given to cumulative mortality based on a mortality rate of 10%; Searle et al (2020) estimate mortality rates for some displaced birds higher than 10%, albeit different species and season than wintering red-throated diver. Given the numbers presented, this may increase the baseline mortality rate by more than 1%, but should be presented so an assessment can be made.	Mortality rates of 1% and 10% are presented in Section 4.16 of the offshore ornithology chapter (application ref: 6.2.4).	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.2; 441 and 4.14.3; 468. Given above comment, we cannot agree that it is not significant until more information, based on 10% mortality rate, is provided.	As above.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.14.4; 489. Given increase in baseline mortality of more than 2%, we can't agree with conclusion until this is considered further; e.g. has a PVA been undertaken to assess implications of this increased mortality to wider population?	Following design changes between PEIR and ES, great black-backed gull collision risk has reduced (Table 44). Further assessment of how predicted great black-backed gull collision is likely to affect the regional population has been presented in Section 4.12 & 4.16.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	Table 54; see above comments re possible significant effects.	As above.	yes	no
PrB_024_09112021	S42	Volume 2, Chapter 4: Offshore Ornithology	4.16.2; 508 and 509. JNCC agrees that the integration of the final 6 months of aerial survey data with the first 18 months of data is required to allow a baseline for assessment that is characterised by a full 24 months of data and an update of all assessments. We note that our conclusions might change once assessment based on the full 24months of data is available.	The full 24 months of survey data has been used to inform all assessments in this ES.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Figure 2: confusing legend re buffer: is it a 4km, or an 8km, buffer that is shown?	The figure has been updated for clarity in the final ES.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	It is not clear how raw counts of zero give rise to 'abundance' numbers above zero given the method described on p19. This is presumably due to apportionment of observations which were not identified to species level and hence are not included in raw counts but are included in abundance estimates. However, this is not clear in tables in section 4, and should be shown somehow (e.g. separate tables showing raw counts for species groupings and information on how these were apportioned to species).	The final baseline report (application ref: 6.4.4.1) has been amended for clarity.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	It would also be useful to include all surveys in the tables in section 4, and indicate (e.g. italics or grey text) which months neither the species nor relevant groupings were observed	This has been noted by the Applicant.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	P 49. Red-throated diver numbers and estimated abundances within array + 8km buffer should also be shown.	This has been noted by the Applicant. The final baseline report (application ref: 6.4.4.1) has been updated to take account of this feedback.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	There are what appear to be rounding errors within some of the displacement matrices. This may be as a result of the calculated peak mean abundances being non-integers (but shown as integers), however this cannot be verified. As per the SNCB (2017) guidance, to allow recalculation of values, best practice requires presentation of monthly values of abundance in summary and full data from all surveys in an appendix to any report.	The requested data has been appendicised to the baseline report (application ref: 6.4.4.1) and the full displacement matrices are included in the displacement annex (application ref: 6.4.4.2).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	2.1 A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km.	The displacement approach to red-throated diver has been agreed at post-PEIR ETGs based on a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	2.2 A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km, therefore displacement matrices for red-throated diver should encompass this buffer.	The displacement approach to red-throated diver has been agreed at post-PEIR ETGs based on a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	2.2 We recommend that the total numbers of birds on site (flying and on the water) are subject to displacement assessment as there is currently not enough evidence to separate displacement and barrier effects and apportion impacts to the two groups.	This was discussed at the post-PEIR ETG where the final approach was agreed and is presented in the displacement annex (application ref: 6.4.4.2)	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	2.4, Table 2. A buffer of 2km should be used for gannet, instead of the array area only, therefore the mean peak abundance for gannet should be presented for the array area plus 2km.	Gannet displacement has been assessed using a 2 km buffer in the ES (see Section 4.11,4.12 & 4.16) of the offshore ornithology chapter (applicationr ef: 6.2.4).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	2.4, Table 2. A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km, therefore the mean peak abundance for redthroated should be presented for the array area plus 10km (or, as previously discussed and agreed for AYM, 8km).	The displacement approach to red-throated diver has been agreed at post-PEIR ETGs based on a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	2.4 As per the SNCB (2017) guidance, to allow recalculation of values, best practice requires presentation of monthly values of abundance in summary and full data from all surveys in an appendix to any report.	This is included in the appendices to the baseline report (application ref: 6.4.4.1).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.1, Table 3. A buffer of 2km should be used for gannet, instead of the array area only, therefore the displacement matrix should be based on the mean peak abundance in the array area plus 2km.	Gannet displacement has been assessed using a 2 km buffer in the ES (see Section 4.11,4.12 & 4.16) of the offshore ornithology chapter (applicationr ef: 6.2.4).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.1, Table 4. A buffer of 2km should be used for gannet, instead of the array area only, therefore the displacement matrix should be based on the mean peak abundance in the array area plus 2km.	Gannet displacement has been assessed using a 2 km buffer in the ES (see Section 4.11,4.12 & 4.16) of the offshore ornithology chapter (applicationr ef: 6.2.4).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.1, Table 5. A buffer of 2km should be used for gannet, instead of the array area only, therefore the displacement matrix should be based on the mean peak abundance in the array area plus 2km.	Gannet displacement has been assessed using a 2 km buffer in the ES (see Section 4.11,4.12 & 4.16) of the offshore ornithology chapter (applicationr ef: 6.2.4).	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.2, Table 6. The colour used to identify the breeding season is used inconsistently in Table 6 compared to Tables 1 & 2.	This has been noted by the Applicant. Checks of all documents have been undertaken prior to submission for consistency.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.2, Table 7. The colour used to identify the non-breeding season is used inconsistently in Table 7 compared to Tables 1 & 2.	This has been noted by the Applicant. Checks of all documents have been undertaken prior to submission for consistency.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.5, Table 14. A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km, therefore the displacement matrix should be based on the mean peak abundance in the array area plus 10km (or, as previously discussed and agreed for AYM, 8km).	The displacement approach to red-throated diver has been agreed at post-PEIR ETGs based on a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.5, Table 15. A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km, therefore the displacement matrix should be based on the mean peak abundance in the array area plus 10km (or, as previously discussed and agreed for AYM, 8km).	The displacement approach to red-throated diver has been agreed at post-PEIR ETGs based on a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.5, Table 16. A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km, therefore the displacement matrix should be based on the mean peak abundance in the array area plus 10km (or, as previously discussed and agreed for AYM, 8km)	The displacement approach to red-throated diver has been agreed at post-PEIR ETGs based on a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.1: Offshore Ornithology Baseline	3.5, Table 17. A buffer of 10km (or, as previously discussed and agreed for AYM, 8km) should be used for red-throated diver, instead of 4km, therefore the displacement matrix should be based on the mean peak abundance in the array area plus 10km (or, as previously discussed and agreed for AYM, 8km).	The displacement approach to red-throated diver has been agreed at post-PEIR ETGs based on a gradient approach out to 8 km.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	1.2. There are additional species present within baseline surveys and for which collision should be considered; Common gull, Lesser Black-backed gull, Sandwich tern, Common and Arctic tern and Fulmar.	An evaluation of valued ornithological receptors, potential impacts and associated rationale is presented in Section 4.9.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	2.1.1.2. The only empirical evidence of species-specific nocturnal activity that I am aware is for northern gannet (Furness et al. 2018). Whilst some evidence of overall 'seabird' nocturnal activity is presented in Skov et al. (2018) this is not broken down into species or groupings and is not quantified in any way applicable to nocturnal activity rates for use in CRM.	This has been noted by the Applicant.	yes	no
PrB_024_09112021	S42	Volume 4, Annex 4.3: Offshore Ornithology CRM	2.1.1.4. For species which were subject to apportionment, the upper and lower confidence intervals of flying birds were estimated assuming the ratio between the mean and the upper/lower confidence limit remained the same between unapportioned and apportioned estimates for flying birds. This sentence is confusing; no apportionment appears to be presented?	Mean peak seasonal abundances have been presented with the ES and Volume 4, Annex 4.2 (application ref: 6.4.4.2) following the SNCB note (2017). APEM do not consider it applicable to use 95% confidence intervals for assessment of AyM given the level of precaution already inherent within the assessment.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Natural England have focused our review of the documents listed above as outlined in the request. It should be noted that we have not undertaken a review of the following documents; • Awel y Môr Offshore Wind Farm Preliminary Environmental Information Report: Volume 4, Annex 4.2: Offshore Ornithology Displacement (Date: August 2021 Revision: A); • Awel y Môr Offshore Wind Farm Preliminary Environmental Information Report: Volume 4, Annex 4.3: Offshore Ornithology Collision Risk Modelling (Date: August 2021 Revision: A) Therefore it should be noted that our review of the Reports to Inform the Appropriate Assessment (RIAA) can not necessarily detect underlying methodological issues. Where these are apparent, we have attempted to highlight them in the detailed comments provided below. However, our review should not be considered exhaustive. A lack of comment on findings presented in the RIAA does not implicitly constitute agreement with the methods used.	Noted. Responses to specific points are provided below.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	The analysis has been undertaken on 18 months of survey data. Natural England advise that 24 months of (preferably consecutive) baseline survey data are required. We acknowledge from the Offshore Ornithology Expert Technical Group (ETG) that 24 months of data will be integrated into a single Baseline Technical Report for the Environmental Statement. Some additional analysis may be required once 24 months of data is available, e.g., birds considered to have been recorded in 'trivial' numbers up to this point may need to be considered.	The assessment has now been updated for 24 months of survey data in all relevant documents (Section 10.3 and 11.3 for ornithological alone and in-combination assessment, respectively). Small numbers presented within the alone assessment Section 10.3 for all relevant species discussed within the AyM ETG.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_025_02122021	S42	Report 5.1: RIAA	Mortality estimates arising from each pathway (collision, displacement) have been presented for discreet project time frames (cable laying, construction, operation, and decommissioning). Total mortality estimates have not been calculated. Natural England advise that the total estimated mortality impacts should be presented for each pathway (e.g. collision, displacement). Further, for species which may be impacted by both collision and displacement (e.g. gannet), the impacts from both should also be considered cumulatively. At present, the Statutory Nature Conservation Bodies (SNCBs) regard the two impacts (collision and displacement) as additive and advise that they should be summed. Further information on this is available in the 2017 SNCB Interim Displacement Advice Note1.	Combined impacts within phases (e.g. gannet combined displacement and collision impacts within the operational and maintenance phase) for relevant species are assessed alone and in-combination in Section 10.3 and 11.3, respectively. The Applicant acknowledges the request for combining impacts across phases of the development. The predicted mortalities for each species are given per annum for each phase of the development. These phases are not expected to overlap, therefore, it is not deemed suitable to combine impacts across development phases.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Conclusions of no Adverse Effect on Integrity (AEoI) do not consider all Special Protection Area (SPA) conservation objectives. Using Liverpool Bay SPA and red-throated diver as an example, the conclusion of no AEoI has been made against the objective to maintain or restore the population, through putting the estimated mortality into context against the SPA population. However, the objective to maintain or restore the distribution of the qualifying feature has not been properly considered. It is likely that the operation of the wind farm will lead to a change in distribution of red-throated diver at Liverpool Bay SPA. Natural England advise that all SPA conservation objectives must be considered throughout the assessment.	All relevant conservation objectives have been discussed in Section 10.3 for all relevant features.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Generic population age ratios (Furness, 2015) have been used throughout. No site-specific data is utilised. It is noted that throughout the assessment generic age ratios have been applied in preference to site specific data, with small sample sizes being used to justify this approach. In some cases (e.g. gannet where most observations are from within the breeding season and birds can be accurately aged) it may be more appropriate to use site specific age data. Further clarity is required on what constitutes a small sample size, how this has been determined, and the implications of using generic data.	Information on the source and rationale of data used in the apportioning analysis has been discussed in Section 10.3.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Assessment has been made against the citation populations, but also an updated population based on the latest count which is often based on a single year of data and may not be contemporary (e.g. para 454 Lambay Island guillemot count from 2015) It is not appropriate to assess impacts using a single population count, which does not account for any source of variation and may not be representative. Natural England advise that impacts should be assessed using the citation population unless an alternative (e.g. a mean count from the most recent 3-5 years of count data) is agreed with the relevant SNCBs. This may be appropriate if a population can be shown to have increased or declined significantly against the baseline.	Impacts have been assessed against the citation population for all species for which a quantitative assessment has been undertaken. Latest population counts have also been assessed against in order to demonstrate changes to populations. This method of assessment has been undertaken for other recent offshore wind farms in the UK. Therefore, it is deemed appropriate to assess AyM impacts using both citation and latest counts.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Anglesey terns SPA - only sandwich tern and roseate tern features have been assessed. It is not clear why common and arctic terns have been excluded from the assessment. If this cannot be adequately justified Natural England advise that they should be considered for assessment.	The alone assessment for Anglesey Terns / Morwenoliaid Ynys Môn SPA is discussed in Section 10.3.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Copy/paste leading to errors in text A number of species names are incorrect in the text, see e.g. paragraph 440 (gannet should read herring gull), paragraph 482 (gannet should read guillemot).	Erroneous references have been updated to reflect correct ornithological features throughout the relevant sections in the RIAA (10.3 and 11.3 for alone and in-combination assessment).	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	1% Mortality rates have been used in displacement assessments. Natural England's general position regarding mortality rates from displacement is that as definitive mortality rates for seabirds are unknown, we advise investigating a range of figures for mortality rates. Natural England do not agree that a 1% mortality rate for red-throated diver is precautionary. Natural England's response to the MacArthur Green review2 of available evidence for red-throated diver displacement at our Deadline 3 submission for the Norfolk Vanguard Offshore Wind Farm is available on the PINS website3 Natural England advise that mortality rates of 1-10% should be considered in displacement assessments for red-throated diver and auks (for impacts arising from the developed site, its construction and cable laying vessels). We advise that the same approach is taken for common scoter (mortality rate range of 1-10%).	The presentation of a range of mortality rates is discussed in Section 10.3.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	A 4km buffer has been used to assess displacement of red-throated diver. Natural England have recently approved the Joint SNCB Interim Advice on The Treatment of Displacement for Red-Throated Diver (2021) which will be published shortly. Following this guidance, it is advised that displacement is assessed using a 10km buffer as the project is within 10km of Liverpool Bay SPA, which is designated for non-breeding red-throated diver. This buffer is not necessarily required in all directions from the array (i.e. a 4km buffer may be appropriate on the seaward boundary). Assessing a displacement gradient (rather than assuming 100%) may be appropriate over the 10km buffer.	The red-throated diver alone assessment, using a gradient approach discussed within the HRA ETG, is discussed in Section 10.3.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Method used to assess displacement in construction and decommissioning phases (displacement rates have been reduced by 50%). Natural England have advised other projects that it is acceptable to broadly reflect the likely reduced spatial and temporal scale of displacement effects during construction by calculating displacement for the construction period as 50% of that at the operational phase. We suggest this method is simpler than reducing displacement rates by 50%.	Displacement during the construction and decommissioning phase for relevant species are provided in Section 10.3 using a 50% reduction in displacement rate compared to operation and maintenance phase.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Common scoter displacement during cable laying has been assessed using a 1 km buffer around cable laying vessels, justified by Schwemmer et al. (2011). Note that reference list is incomplete, e.g. does not include Schwemmer et al. (2011)4. Although Schwemmer et al. (2011) found a median flush distance of 804m for common scoter, the study found the species flush distance response to vessels to be highly variable. A flock was recorded flushing at 3.2km, and the 95% upper confidence level flush distance presented is >2km (see figure 3). Note that flush distances of 1-2km were reported by Kaiser et al. (2006)5. Natural England advise that a 2km buffer should be used to assess displacement of common scoter by cable laying activities, as used for red-throated diver.	The assessment for common scoter during cable installation is presented in Section 10.3. References have been updated in Section 14.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Gannet displacement – assessment only considers the array area There is no justification for the use of the array area only. NE advises that displacement assessments should also consider the 2km buffer.	Gannet alone displacement assessment within the array plus 2km buffer is discussed in Section 10.3.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Total crew transfer vessel movements appear to be very low (1095) over the operating life of the wind farm. The stated number of movements equates to less than one crew transfer vessel visiting the site each week. Vessel routes are unknown at present. If routes do not follow pre-existing shipping routes new areas within Liverpool Bay SPA will be subject to additional disturbance. Please confirm if vessel movements listed are totals over the 25-year operational period and correct (it appears more likely than annual vessel movements have been presented). Natural England cannot currently agree that “vessels transiting to and from the port during the 25-year operational lifetime of the Awel y Mor project and the wind farm will have a negligible effect on the levels of shipping disturbance”. A vessel management plan will need to be produced to avoid and mitigate disturbance as far as possible. If vessels are routed through Liverpool Bay SPA it will be necessary to assess displacement (particularly of red-throated diver and common scoter) along those routes, especially where those routes deviate from existing shipping lanes.	The information presented around 1095 vessel movements is considered to be accurate and are presented for the full 25-year period. There is currently no planned vessel routes during operation and maintenance, therefore a quantitative assessment cannot be undertaken alone or in-combination for this impact on any feature. Potential vessel management mitigation is discussed in Section 10.3.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	A site-specific foraging range for Sandwich tern breeding at the Cemlyn colony has been used to evidence the claim that adverse effects can be discounted (no connectivity). Data informing the colony specific maximum foraging range is not considered robust. It was gathered over a single breeding season (2009) and many of the tracks were incomplete6. Natural England advise the use of the precautionary mean max +1SD foraging range presented in Woodward et al. (2019)7 to account for inter-annual variation and a high level of uncertainty in the colony specific range.	The alone assessment for Anglesey Terns / Morwenoliaid Ynys Môn SPA is discussed in Section 10.3.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Manx shearwater displacement has not been assessed. Natural England advise that displacement of Manx shearwater should be assessed due to a lack of evidence on potential sensitivity and impacts and potential for future in-combination impacts in the region. It is suggested that analysis considers a displacement rate range of 30-70% and mortality rate range of 1-10% at the array + 2km buffer area (i.e., the same parameters as auks). We acknowledge that it has been set out in the ETG meeting that Manx shearwater will be included in the Environmental Statement, although were missing from the PEIR.	Manx shearwater quantitative alone assessment is discussed in Section 10.3 for the relevant SPAs.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_025_02122021	S42	Report 5.1: RIAA	Predicted collision mortality estimates are presented (assumed to be the mean value), but the assessment does not account for the range of predicted impacts. I.e. a worst-case scenario is not considered. Natural England advise that collision risk assessments need to present data and predicted impacts in a way that allows the full range of uncertainty (e.g. around input data, analysis, methodology) to be understood and evaluated. Natural England advise the use of a 95% UCL to represent a precautionary worst-case scenario of collision mortality.	The collision risk assessment has been updated showing the mean, minimum and maximum scenarios to account for variability within Section 10.3 for all relevant features.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	Migrating terns have not been considered. Natural England advise that low numbers of birds recorded in baseline surveys is not sufficient justification to scope out migrant species from Collision Risk Modelling (CRM) assessments. Digital Aerial Survey represent a snapshot and can easily miss migratory movements. The SOSS Migration Tool (SOSS-MAT) or Migropath are not considered suitable to assess migrant seabirds (including terns), which tend to migrate following coastlines at a distance offshore and do not migrate following straight lines between a point of origin and a destination. An alternative approach is to estimate the number of a species of bird migrating through a wind farm footprint area based on an apportionment of migrant bird numbers across a broad migratory front. See the report for the Marine Scotland project on strategic assessment of collision risk of Offshore Wind Farms to migrating birds (WWT Consulting & MacArthur Green Ltd. 2014)8	Migratory terns assessment using 'broad front' modelling is discussed in Section 10.3 for relevant SPAs. Details on the approach can be found in Annex 4.4. Migratory CRM (application ref: 6.4.4.4).	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	In-combination impacts do not consider data from projects that previously scoped in SPA populations using Thaxter et al. (2012) foraging ranges. No displacement analysis of gannet at sites in range. A number of projects have not been considered due to a lack of data. Natural England advise that all Offshore Wind Farm plan and projects within the relevant spatial scale should be considered by in-combination assessments. In some cases, it is likely that sites with "no data" could have been assessed by other more recent sites to assess in-combination impacts. In any case, simply disregarding impacts from such sites is not appropriate.	All sites have been considered in-combination in Section 11.3. The Applicant does not deem it appropriate to reassess impacts from developments that either did not produce a quantitative assessment or due to the use of the Thaxter et al. (2012) foraging ranges. Only projects which have undertaken a displacement analysis within range have been included in-combination as the Applicant does not deem it appropriate to reassess impacts from developments.	yes	no
PrB_025_02122021	S42	Report 5.1: RIAA	In-combination displacement assessments only consider impacts at operation and maintenance phase for Awel y Mor. Natural England advise that the assessment should also fully consider the impacts of the construction phase (including cable installation) and operation and maintenance works, in additional to effects from the array itself. This should consider vessel movements (including cabling vessels and helicopter traffic).	The in-combination assessment for relevant ornithological receptors is discussed in Section 11.3.	yes	no

4.2 Appendix H2: Responses Received from Section 47 Consultees and Applicant Regard

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_001_07092021	S47	Volume 3, Chapter 2: LVIA	I also note that the detriment to the view from the properties is scored as low because 'high' hedges are alongside the road, this may be the case during the brief period that the hedges are in full leaf (maximum 3 1/2 months per annum) but as they are not evergreen and are also regularly trimmed down to approx 4-5 foot high, therefore the substation shall be much more visible for the majority of the year than is reported. This is also the case with regard properties number 7 & 8, there is very few trees in the garden of the lodge opposite and as they are again only in full leaf for short periods of the year (none are evergreen) this will allow the substation to be seen for a substantial period of the year. Although the report / documentation seems comprehensive much of the information contained could be interpreted as trying to 'pull the wool over peoples eyes' with regard the impact that it will have on our quality of life.	The photography presented alongside the Chapter of the ES (application ref: 6.3.2) was captured in winter. Hedges featured within the photographs had been recently clipped on Glascoed Rd reflecting a worst case position and the assessment presented in the LVIA chapter reflects this and includes the following: <i>'Residential receptors have views over the tops of nearby hedgerows on account of the slight elevation of the properties. The view north east from these properties is from the front of the properties and the view towards the OnSS is regarded to form a part of their principal view. Susceptibility to change for residential receptors to the OnSS is considered to be high.'</i>	yes	no
MOP_001_07092021	S47	Volume 3, Chapter 9: Traffic and Transport	I submitted a basic response to the Awel Y Mor consultation yesterday (06/09/21) but upon further reading of the documentation provided I would like to offer some further information from a residents point of view please. 5 Ffordd Glascoed, LL22 9DW. Within the documentation there are several references to the 30mph speed limit along Glascoed Rd B5381. Unfortunately, this assumption is incorrect, upon leaving St Asaph Business Park (heading West) the limit changes to a national speed limit (clearly signed) 60mph and remains so beyond the crematorium as well as the houses adjacent to the proposed substation access points.	The reference to the 30 mph speed limit was for the change in speed limit to the east of St. Asaph Business Park in the vicinity of the access for the existing National Grid substation, in Volume 5, Annex 9.1	yes	no
MOP_002_07092021	S47	Volume 2, Chapter 10: SLVIA	I am a resident in Prestatyn. I've just been reading about the proposed offshore wind farm north of Llandudno. I must admit that I am not a great fan of the proliferation of these turbines, I'm sure that very few people come to Prestatyn to view the turbines. North Wales towns are very dependent on tourism and a large part of that is the views, the relaxing wide open view of the horizon has long gone but I accept the inevitability of these off-shore developments. The additional turbines will mean 'wall to wall' turbines without any gap in the view.	This has been noted by the Applicant. The cumulative effects of multiple offshore windfarm projects on the seascape, landscape and visual amenity of the North Wales coastline has been considered in detail in Volume 2, Chapter 10 of the ES (application ref: 6.2.10).	yes	yes
MOP_002_07092021	S47	Volume 3, Chapter 4: Tourism and Recreation	Whilst this new development is intended to benefit the UK as a whole I do think that some effort should be made to compensate residents and local businesses that rely on tourism, to this end I think that the consent for such developments should include a contractual obligation to extend the network of car charging points along the North Wales coast, that way residents will see the real benefits of these eyesores as some would describe them. Towns along the coast like Llandudno will need a substantial number of public charging points not only to facilitate the cars of local residents but also the thousands of seasonal tourists who will have no alternative but to use public charging points. RWE could lead the way in this.	The ES does not present any evidence of a need to compensate residents and tourism businesses based on the anticipated impacts and the response from the consultee doesn't provide additional evidence.	yes	no
MOP_003_06092021	S47	Volume 3, Chapter 3: Socioeconomics	Fully in support of your proposals. 2 main reasons:- 1. Green energy is the way forward to help alleviate climate warming. 2. Employment opportunities for local and in particular young people in the Llandudno and Conwy locale. As someone who grew up and was educated in Llandudno and then UCNW, Bangor in my time unless you wanted to work in the hospitality and tourism industry one would have to leave the area to find challenging job opportunities.	This is a supportive response which welcomes the economic and employment benefits.	yes	no
MOP_004_06092021	S47	N/A	Well I have looked at the plans, and I think just go ahead. I know it not your line of work but I also think we should invest in Wave Power. Every house built today should have Solar panels on the roof. THIS should and must be made law. Bits and pieces are not enough, every one must get on board, or we are wasting time and money, as it won't be enough. In my own small way I try every day to save energy. I have, Solar panels, a smart meter, water butts. And before I turn on the tap or heating I ask, 'If I had to carry the water from a tap at the end of my road, how much would I use'. Electric i use the oven, w/machine, shower as much as I can when the sun I out. I charge two Solar lights in the day to use in the evening. My TV goes on for in the day and only two hours after dark. (Just a 32inch screen) When I replace my appliances I look straight away at it's star rating. I never take energy for granted, it's a luxury.	This feedback has been noted by the Applicant.	yes	no
MOP_008_30092021	S47	Volume 2, Chapter 10: SLVIA	Having visited the "van" on the Promenade in Llanfairfechan today and viewed the visual information available, we have the following comments. The scale of turbines proposed makes this installation overpowering, detracting from the natural beauty of the visual impact of the Orme when viewed from Llanfairfechan, From the mock ups viewed the turbine height as seen is almost the same as the Orme itself. There are two turbines to the far left of the installation which look out of place when viewed from the jetty steps here. It is possible at present because of a dark Northern horizon to view and photograph the Northern Lights from the jetty here in Llanfairfechan, the necessary lighting of the turbines at night will prevent this for future generations, as well as change the nightscape for ever.	The potential impacts of AyM on night-time views have been considered in detail in Volume 2, Chapter 10 (application ref: 6.2.10). Reduced intensity aviation lighting has been adopted into the project design as embedded mitigation.	yes	yes
MOP_008_30092021	S47	Volume 2, Chapter 12: Other Marine Users and Activities	As local leisure sailors we are concerned about further areas of navigable water being made " off limits ", given that the proposed scale of Awel y Mor, more than doubles the sea area reserved for turbines	This has been noted by the Applicant. The impacts of AyM on navigation, including recreational sailing, have been considered in detail in Volume 2, Chapter 9 (application ref: 6.2.9). It is also noted that both the RYA and the Cruising Association had no significant concerns over the project and its potential impacts on recreational boating.	yes	no
MOP_008_30092021	S47	Document 8.1: Schedule of Mitigation	What is being done to mitigate any effects of the installation on the traeth Lafan? An area adjacent to Llanfairfechan which is of high scientific and natural value.	Impacts on the Traeth Lafan Special Protection Area have been mitigated through avoiding interaction with the site, in particular avoiding any interaction with the designated features and supporting habitats (intertidal sand and mudflats at the eastern edge of the Menai Strait) through careful site selection. Further information on this, and other European protected sites is presented in Document 5.1 Report to Inform Appropriate Assessment.	yes	no
MOP_008_30092021	S47	Volume 2, Chapter 3: Marine Water and Sediment Quality	Are there studies in place which will model changes to water / sediment movements caused by so many turbines etc and any impact this will have on the local environment?	Following consultation with Natural Resources Wales the Applicant has commissioned an extensive site specific hydrodynamic modelling exercise to be undertaken to ensure potential impacts associated with changes in tidal regime and wave regime are fully understood. The outputs of the study are available for review in Document Reference 6.2.2 of the application and concludes that there are no significant effects anticipated as a result of the construction of the proposed project. These conclusions were drawn against the initial design of the project which has been reduced following consultation responses; the conclusions are therefore considered robust and precautionary.	yes	no
MOP_008_30092021	S47	Volume 2, Chapter 4: Offshore Ornithology	What will be the impact of such a huge installation on migration of birds that utilise reserves such as here in Llanfairfechan (Morfa Madryn, Glan y mor Elias) and RSPB Conwy?	A detailed approach to the assessment of migratory species has been provided in Volume 2, Chapter 4 (application ref: 6.2.4) and its associated annexes.	yes	no
MOP_012_30092021	S47	Volume 3, Chapter 3: Socioeconomics	Rather than dishing out cash support via a grant as was done with Rhyl Flats, what's really needed is help with retrofit. The houses in North Wales have some of the worst EPC's in the UK - Particularly those off the mains gas. Surely a company as big as RWE can muck in, and help with this. Rather than just 'fetching more water' - i.e generating more, we need to 'fix the holes in the bucket' which is to insulate and upgrade heating systems. There are people in social housing in North Wales with storage heaters that will be receiving bills getting near £3K by this time next year if things persist as they are. A single person on Universal Credit has about £209 to pay for food and energy a month.	The Applicant welcomes this feedback and can confirm that consultation will be undertaken in Q1 2022 with regards an appropriate community benefit mechanism.	yes	no
MOP_013_06102021	S47	Volume 2, Chapter 10: SLVIA	I wish to express my concern at these wind farms off Llandudno. We have enough all along this coast and its becoming an eye sore. Why can't you look at tidal infrastructure along the menai straits instead. The views are becoming so spoilt and its like looking out to an industrial estate along this stretch of the coast. My views from my garden are completely taken over by these wind farms and I don't want to see any more of them.	The impacts to seascape, landscape and visual amenity have been considered in detail in Volume 2, Chapter 10 of the ES (application ref: 6.2.10), where it is recognised that there are potential significant effects. The Applicant agrees that tidal energy should form part of the future renewable energy mix, however the AyM area has been leased for offshore wind development.	yes	no
MOP_013_06102021	S47	Volume 3, Chapter 3: Socioeconomics	We also see no benefit in reduction of our electricity and all I see is increasing prices.	This feedback is noted.	yes	no
MOP_018_08102021	S47	Volume 2, Chapter 10: SLVIA	Dear Sirs I understand that wind farms are necessary, however, surely there is a way for turbines to be connected to the lower structure of each turbine, utilising tidal power. The power generated for such turbines would be very regular without further structures being erected. Wih respect none of the structures on land or sea are beautiful! I would be grateful if you would consider the above.	This has been noted by the Applicant.	yes	no
LA_001_08102021	S47	Volume 3, Chapter 6: Ground Conditions and Land Use	The only observation that the Community Council has at this stage in proceedings is that the Council feels that the sub-station should not be built on prime agricultural green land should be build on a smaller scale on a brown field site.	This has been noted by the Applicant. The development has been subject to a detailed site selection process which is described in Volume 1, Chapter 4: Site Selection and Alternatives (application ref: 6.1.4).	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_025_11102021	S47	Volume 2, Chapter 7: Marine Mammals	We are a group of volunteers, supported by the North Wales Wildlife Trust. We have been monitoring grey seals for the last 5 years at Porth Dyniewaid (Angel Bay), Llandudno (grid reference SH 818 827). We have also begun to assist monitoring efforts at Pigeon’s Cave, the Great Orme. Last year we counted 247 seals hauled out, in one instant, at Angel Bay. Also, our combined haul-out count, at Angel Bay and the Great Orme, at one instant, exceeded 300. These haul-out sites are: •12 km away from the Array Area. •Used for pupping, mating and moulting from Mid-August to April inclusive and visited by seals all year round. •They are well known to the SMRU, NWWT, Cofnod and NRW. Our data has been shared with these organisations.	This has now been included in Volume 4, Annex 7.1.	yes	no
MOP_025_11102021	S47	Volume 2, Chapter 7: Marine Mammals	Despite bringing Angel Bay to your attention in last year’s public consultation, we note that there remains a disappointing lack of reference to this haul-out site in your documentation (see attached extracts). These omissions are especially problematic as these are the closest haul-out sites to the proposed development by a considerable margin: •5.1.4_AyM_PEIR_RIAA_Annex4_HRA_Bottlenose_Dolphin_and_Grey_Seal_Additional_Information_vFinal Section 2.3.2 (Consequences of Disturbance) makes no mention of either the Great Orme and Little Orme haul-out sites. •1.7.1_AyM_PEIR_Volume4_Annex7.1_MarineMammalBaseline_vFinal Figure 52 EIRPHOT Locations. Can you confirm that no EIRPHOT data has been gathered at the Great Orme? •2.7_AyM_PEIR_Volume2_Chapter7_MarineMammals_vFinal Figure 11 shows a contour decibel map of likely construction noise on a background of seal density in the sea (Grey Seal Disturbance Contours). The outer, 145, contour nearly touches the Great and Little Ormes and yet the recorded seal density in the sea for these areas is listed as extremely low. We would suggest that the seal density at sea cannot possibly be low adjacent to these two, significant haul-out sites.	This has now been included in Volume 4, Annex 7.1.	yes	no
MOP_025_11102021	S47	Volume 2, Chapter 7: Marine Mammals	Therefore, we think you should be made aware of our data which shows a significant number of seals using Porth Dyniewaid (Angel Bay) as a haul out site. We attach a PDF extract of our annual report with graphs of grey seal counts at Angel Bay, from September 2016 - April 2021, which show an increasing population (AB Report Summary 2020 21 Pages 5 and 11). The haul-out site off the Great Orme also appears to be gaining significance. We would ask that you take note of our data in your consultation process and future development plans. We also feel that, if the construction goes ahead, it would be a valuable opportunity to perform an up-to-date scientific impact study at two readily accessible haul out sites; one which should not be missed. We are happy to answer questions and provide any other data that you may require.	This has now been included in Volume 4, Annex 7.1.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	I am writing in response to the consultation on the Preliminary Environmental Information Reports (PEIR) that have been submitted by RWE in support of its proposal to develop the Awel y Môr Offshore Windfarm site. I make these comments as an experienced fisherman and shellfish farmer based on Anglesey with over fourty years’ experience of fishing in this area. I have a good understanding of the fisheries in and around the windfarm site both from my own direct experience and from discussions with my colleagues who work in other commercial fishing sectors as well as the very active angling community in the area. I serve at the North Wales representative of the Welsh Fishermen’s Association, and serve as a representative for the area on regional and national fishing groups.	Noted, see responses below.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	I have looked at the PEIR documents. They are lengthy and detailed. The non-technical summary alone covers 71 pages. Of relevance to fishing and angling in the area are a chapter and an annex for commercial fishing; a chapter and an annex for angling and charter angling; a chapter and an annex on fish and shellfish ecology; and an annex on underwater noise. Taken together, these reports span over 530 pages. It would be an impossible task for myself, our Association, or indeed any fisher impacted by the proposal to respond in a comprehensive and detailed manner to the ocean of words that have been presented in support of the project. Instead, I wish to draw attention to what I feel are some significant issues with the information presented. I consider that these issues undermine the rigour and robustness of the conclusions that have been drawn. To proceed without addressing these shortcomings would be to put at risk the livelihoods of those people whose livelihoods depend on the fish and shellfish of this area, and to threaten the fish and shellfish stocks off the North Wales coast.	Noted, see responses below.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	My brief comments at this point in the process are:- 1. Robust baseline data has not been presented. The National Policy Statement (NPS) EN-3 requires that “Robust baseline data should have been collected and studies conducted as part of the assessment.” (see Table 1 of PEIR Volume 2, Chapter 8). It is clear to anyone with knowledge of the area and the data used to produce these reports that this is not the case, both regarding information about the fish caught in the area, and the activity of fishing vessels. Some examples are given below.	All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Limitations associated with each data source are clearly described. Further to this, comprehensive engagement in the form of fisheries group meetings and individual interviews with fishermen has been undertaken to understand fishing activity within AyM.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	a. The data on commercial fishery removals are all taken from sources of information that have limited relevance to the actual fishing activity in this area (Volume 4, Annex 8.1, Table 2-2 and Volume 2 Chapter 8, Table 6). This is because most of the fleet working in this area are smaller vessels (typically under 10m – a point that the authors make themselves in sections 3.3.1 and 3.3.3 of the baseline report but not in the Volume 2 report) and the data sources cited are all for vessels larger than this.	Fisheries landings statistics sourced from the MMO include landings made by vessels of both under and over 10m length. Comprehensive engagement in the form of fisheries group meetings and individual interviews (see Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1)) with fishermen has been undertaken to understand fishing activity within AyM.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	b. The spatial data sources that are cited in the report all relate to larger vessels than those that typically work in this area and hence any conclusions that have been drawn from this information will not be robust. This is noted in the Volume 2 report (Chapter 8, para 27),	As above. Fisheries landings statistics sourced from the MMO include landings made by vessels of both under and over 10m length. Comprehensive engagement in the form of fisheries group meetings and individual interviews (see Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1)) with fishermen has been undertaken to understand fishing activity within AyM.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	c. I have participated in many meetings with windfarm operators over the past few years, including some of those listed in the PEIR report that are specific to this project. A recurring theme of these discussions is that the fishers in the area have been reporting changes in fish abundance and diversity in this local area for many years, since the construction of the North Hoyle, Rhyl Flats and Gwynt y Môr windfarms that have impacted their livelihoods and that have not been investigated. This issue has not been studied either for those projects or as part of this assessment.	Trends in commercial landings are described in the Commercial Fisheries chapter and Technical Report. In interviews with fishermen, a specific question was asked around observed trends in catches. Observed trends over the time series vary by species (i.e. landings of some have declined, some and increased, some have fluctuated and not demonstrated a consistent trend). Trends are understood to be influenced by a number of factors, as described in the Commercial Fisheries Technical Report.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	d. I am aware that a licence condition of other windfarms in the area was that surveys should be conducted to determine impacts on fish stocks in the locality. I can find no evidence that this information has been used to inform the report.	Trends in commercial landings are described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). In interviews with fishermen, a specific question was asked around observed trends in catches. Observed trends over the time series vary by species (i.e., landings of some have declined, some and increased, some have fluctuated and not demonstrated a consistent trend). Trends are understood to be influenced by a number of factors, as described in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	e. There are quite a lot of unexplained inconsistencies between reports. Compare for instance the weight of landed catch in Figure 2 of Volume 2 Chapter 8 with values in Figures 3-27 & 3-30 of Volume 4 Chapter 8.1, and also the values of catches in Figure 3 of the former with Figure 3-6 of the latter. It is not at all clear to me that like is being compared with like, nor that Welsh vessels have been included in the Volume 2 data.	All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). VMS and landings data sourced from the MMO include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey. Reports of inconsistencies have been checked and the data is not inconsistent. For example, Figure 2 in Volume 2, Chapter 8 (application ref: 6.2.8), presents landings by all UK vessels, whereas Figure 3-27 in Annex 8.1 presents landings for only Welsh vessels and Figure 3-30 presents landings for UK vessels excluding Welsh vessels. The data presented are all drawn from the same MMO source.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	2. I get the impression that part of the approach in the report has been to heap up piles of reference to overwhelm the reader, without considering its relevance. Some particular examples that I noticed are:-	This is noted. See responses below.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	a. Table 2-1, Volume 4, Annex 12.1 – this table lists two reports that are about sea angling in England. I would remind the authors that this project is in Wales.	This is noted.	yes	no

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MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	b. The reports present no local, regional or recent data on the status of fish species to support the claims that either declines reported by fishers have not occurred (e.g. turbot), are due to increased commercial landings (e.g. gurnard), or are part of wider declines (pollack, tope, cod). These responses are all supported by Irish Sea-level data on stock status and landings. At this scale, the data overlook the experiences of fishers from the area, how have all seen that changes in fish distributions and abundance have changed at the local level.	Trends in commercial landings are described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). In interviews with fishermen, a specific question was asked around observed trends in catches. Observed trends over the time series vary by species (i.e., landings of some have declined, some and increased, some have fluctuated and not demonstrated a consistent trend). Trends are understood to be influenced by a number of factors, as described in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	c. I heard from a fellow WFA member who attended the consultation meeting last week that the PEIR report on angling presents a report about the population biology of grey gurnard (Eutrigla gurnardus) to refute concerns raised by anglers about a decline in size and abundance of tub gurnard (Chelidonichthys lucerne). This draws into question many of the assurances offered about the absence of impacts on this species.	The Charter Angling Technical Report differentiates between gurnard species and this has been carried through to the Other Marine Users chapter (application ref: 6.2.12).	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	d. As well as being unable to find any information from surveys conducted for other windfarms, I was surprised to find that no data are presented from the scientific cruises carried out on a regular basis in the area by the RV Prince Madog and previous Research Vessels from the University of Bangor.	All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8, Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). These include Bangor University reports, as referenced in Annex 8.1.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	3. I notice that the report on angling refers to the impacts of piling noise on fish catches, but that the commercial fishing report does not. I don't know why this is the case, because both commercial fishers and anglers have experienced impacts of windfarm piling at a considerable distance. I see that there are a number of tables in the underwater noise report (Volume 4 Annex 6.2, Tables 26 & 27) which show that sublethal impacts on fish might occur many kilometres away from the site (Figures 12 & 15 of that report illustrate this). Some explanation of the implications of this should be given in both the commercial fishing and angling reports.	Effects on fishing activity resulting from impacts to fish and shellfish resources are assessed within the Commercial Fisheries chapter.	yes	no
MOP_024_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	There are many more comments I could make, but as a professional fisherman I cannot spend all day reviewing a report and correcting basic errors that have been made by salaried consultants who have never spent a day on a fishing boat off the North Wales coast. I would urge them to talk to those of us that fish in the area and take account of our experience of fishing in this area from both before any windfarms were built, and our current experience of fishing here with several working windfarms on our doorstep. I very much hope that these comments can help to create a more informed view of the likely impacts of this project on the people that depend on fish and shellfish for their living. I welcome this opportunity to comment, and am very keen to participate in further consultation opportunities.	It is noted that considerable stakeholder engagement has been undertaken in order to understand fishing activity in this area.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	The Welsh Fisherman's Association – Cymdeithas Pysgotwyr Cymru Cyf (WFA-CPC) is the national representative body for Fishermen's Associations in Wales and we welcome this opportunity to provide a formal response to: - The Awel-Y-Môr Preliminary Environmental Information Report (PEIR) published in August 2021. Our response on behalf of our members is not exhaustive focussing primarily on the relevant fisheries chapters, the assessment confidence levels and evidence gaps.	Noted, see responses below.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	There are a number of serious flaws across the construction, operation and decommissioning assessments of the PIER due to the lack of information on the location of fishing activities from 15m and under vessels within the Awel-y-Mor array area. A number of obvious and specific examples of this issue are highlighted in this response, but the issues highlighted below are not comprehensive, the same issues apply repeatedly throughout the assessment. VMS data is available from 12m and over vessels but the commercial fisheries chapter only uses 15m and over VMS data.	Commercial fisheries activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). VMS data available to the Applicant does not include vessels <15m length. VMS data sourced from MMO displays the value of catches by different gear types and covers UK registered vessels ≥15m length. VMS data from 2017 was presented at PEIR as it represented the most recent data made publicly available by the MMO at the time of PEIR publication. Data for 2018/19 is now available and has been presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Fisheries landings statistics sourced from the MMO include landings made by vessels of both under and over 10m length. Limitations associated with data sources are clearly identified in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.4.5 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Comprehensive engagement in the form of fisheries group meetings and individual interviews with fishermen has been undertaken to understand fishing activity within the AyM area; findings have been incorporated into the description of existing fishing activity presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7, and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). The Consultation Report (application ref: 5.1) provides a detailed account of all consultation undertaken during the AyM project evolution, including consultation with the commercial and recreational charter fishing interests.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8 only refers to 15m and over vessels having VMS from 2017. However, VMS was mandatory for all EU (including UK) vessels 12m and over since 2012, and while it was phased in after 2012 throughout the UK fleet, all vessels 12m and over from 2013 had VMS installed. VMS data for all size classes should be used going back through the reference period.	As above.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 4, Annex 8.1 confusingly refers to both 12m and over and 15m and over vessels having VMS from 2017 depending on nationality. Annex 8.1 indicates that ICES data for EU vessels 12m and over exists, (which should include the UK as part of the EU at that point in time?) but MMO data for UK vessels only exists for vessels 15m and over. The MMO should have 12m and over VMS data for UK vessels from 2013 VMS data for all size classes should be appropriately considered.	As above.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	While it is acknowledged that there is no statutory location data on most 12m and under vessels, due to current VMS rules, the National Policy Statement EN-3 says "Robust baseline data should have been collected and studies conducted as part of the assessment". This missing vessel location information is of serious concern and it would have been expected that the developer would have attempted to complete this data set as part of the assessment. Chapter 8 of the PEIR only focusses on vessels 15m and over in terms of VMS. The majority, approximately 90%, of the Welsh fleet are vessels 12m and under in length. This obvious information gap makes all the impact pathway assessment conclusions unreliable throughout Chapter 8 with respect to the impacts on commercial fisheries from all aspects of the development. The developer should formally engage 12m and under vessels with fishers to map their activity based on their evidence of operation.	As above.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Aquaculture is not mentioned once in either Volume 2, Chapter 8 or Volume 4, Annex 8.1. This is surprising as there are some very large Welsh aquaculture developments close to the proposed site that rely on mussel seed from the wider Liverpool Bay area. There are also proposals for large areas of integrated multi trophic aquaculture development close to the proposed Awel-y-Mor site. The species and the sector should be considered fully within the PEIR and full EIA.	The commercial fisheries section of the AyM Scoping Report noted that commercial aquaculture in Wales has traditionally focused on the managed cultivation of shellfish, principally blue mussels. While the Welsh National Marine Plan identifies potential for the future development of additional aquaculture production. Whilst it is noted that shellfish farming is undertaken within the Menai Strait, and that there exist initial proposals for the development of three shellfish cultivation sites off the North Wales coastline, no existing or potential development locations were identified within AyM boundaries. Potential impacts on Shellfish Protected Waters are considered in Volume 4, Annex 3.1: Water Framework Directive Assessment (application ref: 6.4.3.1). Potential impacts on shellfish species are considered in Volume 2, Chapter 6: Fish and Shellfish Ecology (application ref 6.2.6).	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Considering the possibility of Round 4 wind farms in north Wales within the Crown Estate's Irish Sea bidding area, it would be more appropriate to take a zonal approach to the environmental assessment of fish and shellfish as a receptor and fisheries as a sector, rather than piecemeal, one wind farm at a time. While Round 4 developments have been acknowledged in terms of the cumulative impact assessment to fishers, the cumulative effects from displacement and impacts on essential life stage habitats from multiple developments will be significant and should properly be acknowledged by taking a zonal approach to assessment.	The assessment of cumulative effects is presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.13 and undertaken in line with the approach set out in Volume 1, Chapter 3: EIA Methodology (application ref: 6.1.3) and has taken into account all available information on proposed developments in line with relevant PINS guidance (Advice Note 17). The spatial scale at which cumulative effects have been assessed for commercial fisheries are influenced by the operating range of relevant fishing fleets.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	The report uses unsound, partial information on vessel activity from a pilot project called FishMap Mon and from the WNMP. These evidence sources should be removed.	Commercial fisheries activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Reference to data sourced from FishMap Môn and the WNMP has been retained in the ES. Limitations associated with these data sources are fully described in Annex 8.1, and the individual data sources compiled to prepare WNMP mapping are cited. The data are used to indicate areas of likely fishing activity, rather than suggest areas of lesser activity and are used alongside other baseline data sources and consultation outputs to inform characterisation of the existing environment. The baseline characterisation is therefore considered to use all available data, and is in accordance with best practice methods of data collection.	yes	no

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TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 32 and Volume 4, Annex 8.1 page 26 - 31 utilises outdated, incomplete and potentially inaccurate information to inform the impact pathway assessment conclusions. The FishMap Mon Project was a pilot that was never progressed further due to issues with its methodology for calculating fishing intensity. The fishing location information was a snapshot in time, it is not representative of the fishing activity, only some Welsh boats from the Anglesey area were included and there is no seasonal variation. Some fishers overestimated maps of their historic fishing activity areas while others significantly underestimated. This data set should be removed from the PEIR Report and not relied upon.	As above.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 32 and 43 refers to maps of estimated fishing activity by vessels using static gear from the Wales National Marine Plan (WNMP). It is not good enough to rely on synthesised data for vessel activity location without understanding how it has been treated or modelled or what it is relative to. Does it include the majority of the 12m and under Welsh inshore fleet? This data set should be removed from the PEIR Report and not relied upon.	Reference is made to fleet operational range in the impact assessment presented in Volume 2, Chapter 8 (application ref: 6.2.8), Sections 8.10 to 8.12. The WNMP is cited in Volume 2, Chapter 8, paragraph 12, but the assessment seeks to also reflect the data gathered to characterise the existing environment and the outcomes of consultation; the consultation and impact assessment observes that fleet operational ranges are not limited solely to fishing grounds within AyM.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 18 quotes the WNMP as an evidence source that recognises much of Wales' fishing fleet activity is often localised and dependent upon a particular area, habitat and species, however, Page 77 then contradicts this reasonably accurate summary by saying the fleet has a wide operational range that is not limited to the Awel-y-Mor survey area. This may have some degree of truth for large scallop dredge vessels, but this description does not characterise the smaller indigenous under 12m Welsh vessels prosecuting dredge, net, pot and line fisheries, which are local and limited in range.	As above.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Scalloping is seasonal within the Irish Sea. Within the array area whelk potters move pots from offshore ground to allow scallopers to fish in winter. Those grounds will not be available for scallopers or whelkers to fish during construction, potentially pushing both fleets into the same areas and leading to gear conflict, with potential loss of gear, reduced catch and crew safety.	The seasonality of the scallop dredge fishery is acknowledged and described in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Potential for exclusion and displacement impacts during construction are assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10. The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and 94.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	There is also an elevated risk to fishers' health and safety from forcing smaller vessels further out to sea in order to find fish/shellfish due to site exclusion.	This is noted. Risks to navigational safety are assessed in Volume 4, Annex 9.1: Navigation Risk Assessment (application ref: 6.4.9.1).	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 26, Table 4 does not mention demersal trawling (beam or stern) as a category, even though Volume 4, Annex 8.1 mentions trawling as an activity repeatedly, whether for rays, flat fish or demersal species. This gap needs addressing throughout a Chapter 8.	Volume 2, Chapter 8 (application ref: 6.2.8) presents a summary of the extended baseline description presented in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). The Technical Report identifies (e.g., Figure 3-24) very limited trawling activity in the Study Area, and consultation has not identified trawling activity within AyM. Trawling activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7.5, but based on limited activity, is not further considered in impact assessment.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 43, informal engagement with fishermen is not good enough. There has been no formal engagement according to the report. Table 3 outlines some informal stakeholder meetings with limited stakeholders, how many were at each meeting? There is no consideration or consultation of itinerant visiting vessels from Wales or further. There needs to be some form of formal engagement with all fishermen concerned for there to be any confidence in the assessments produced.	Consultation in relation to commercial fisheries has involved both formal (prescribed by the planning process) and informal (not prescribed by the planning process) stakeholder engagement. All known fisheries stakeholders (including all stakeholders identified by the Fisheries Liaison Officer) have been invited to formally engage during Scoping and Section 42 (PEIR) consultation, and to informally engage via working group meetings and individual stakeholder interviews. Extensive consultation has been undertaken to characterize the existing environment and understand the concerns of fishermen and is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.3 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1).	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 56 mentions 25% of the EU quota value of catch being returned to UK fleets over 5 years. The first 15% has been returned with Wales receiving considerable uplift in a variety of quota species, it is expected that Welsh vessels will fully exploit this new opportunity, to catch quota species in North Wales including within the proposed area of the Awel-y-Mor site. The existence of the new wind farm may impact this new opportunity before it is realised, while it is acknowledged that fishing will resume during operation, this is unlikely to include mobile gears due to the proximity to pylons and cabling routes. There must be proper consideration of this new resource within the baseline for assessment, potentially new boats or existing boats, re-gearred, will want to access this resource but the presence of the array will potentially prevent this and will also influence the Fishermen's Cooperation Strategy compensation modelling.	The description of the likely evolution of the commercial fisheries baseline has been updated in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7.6 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1)and reflects the latest and projected outcomes of the Brexit process.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	It is unlikely that whelk potting can resume in the same operational way it did after the wind farm is constructed. Currently strings of whelk pots between 70 and 100 pots are normally laid, this will not be possible within the wind farms unless they are regimented along certain lines and away from pylons. This is not how fishing is carried out, tide, swell, weather, topography, substrate will determine where is best to fish rather than turbines which will seriously disrupt fishing practices and will force fishermen to re-configure fishing gear, costing more money and take longer to fish the same number of pots, or having to adjust to fishing less pots over the usual soak period with potentially less productivity.	The potential for reduced access in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1. It is assumed that potting activity can resume within the AyM array area during the operation and maintenance phase; which is supported by experience in the UK where whelk potting in particular has resumed within offshore windfarm arrays. As identified in consultation reported in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1), it is acknowledged that mixed views are held by fishermen regarding potting within operational wind turbine arrays.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	It is likely scallop dredging and other mobile gear fishing within the proposed Awel-y-Mor area will not be able to continue fishing after construction due to the operation of the gear (turning), proximity of pylons and potential gear snagging conflict (cables). These mobile gear activities will in all likelihood be forced further offshore. This gives rise to health and safety considerations for smaller vessels and will cause displacement of effort. More vessels will be competing for less fish in smaller areas offshore that are environmentally less understood resulting in using more fuel not less and inadvertently creating more pressure on limited areas with unknown consequences for habitats and fish/shellfish species.	The potential for reduced access and displacement in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1 and Section 8.11.3. It is recognised within the assessment that not all fishing gears may be deployed within the array (noting, for example, that deployment of types of mobile gear within the array is unlikely) during the operation and maintenance phase.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8 Page 77, during construction, potting boats could be forced out of their traditional fishing grounds within the proposed Awel-y-Mor site into traditional scallop grounds further offshore. If this happens then scallop dredges will come into conflict with fleets of pots, causing inevitable financial loss and hardship to fishermen exceeding a medium impact as assessed.	Potential for exclusion and displacement impacts during construction are assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10. The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and are committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 82 and 93.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8 Page 88, makes the presumption that all fishing including mobile fishing will resume after construction within the proposed Awel-y-Mor array area. What is the experience from Gwynnt-Y-Mor (as stated earlier), does mobile or static gear fishing occur there now and to what extent? Mobile fishing is unlikely to resume during operational phase of Awel-y-Mor due to pylons, exclusion areas, array layout, export cable corridors and intersections. More evidence needs to be provided to support the presumption that mobile gear fishing will resume, how much, to what extent etc. in our opinion this should be considered as a direct loss of fishing grounds.	The potential for reduced access and displacement in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1 and Section 8.11.3. It is recognised within the assessment that not all fishing gears may be deployed within the array (noting, for example, that trawling within the array is unlikely) during the operation and maintenance phase. It is assumed that potting activity can resume within the AyM array area during the operation and maintenance phase. As identified in consultation reported in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1), it is acknowledged that mixed views are held by fishermen regarding potting within operational wind turbine arrays.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 71, how do you evidence that the majority of netting vessels are 10m and under?	Landings data sourced from the MMO (see Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1)) indicates that all landings from drift and fixed nets in the Study Area were made by vessels ≤10m length.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 72, the only reason the report concludes that fleets targeting the Awel-y-Mor area are typically larger is due to an over reliance on VMS data on 15m and over fishing vessels. This cannot be confirmed or relied upon as the report does not have 15m - 12m VMS data nor has it attempted to gather under 12m vessel activity data. This assumption is unsound and not supported by evidence. This then makes all subsequent conclusions on impact pathways unsound and unsupported by evidence.	Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1) describe fishing activity in the AyM area. It is recognized that vessels of a variety of lengths fish in the area. All available baseline data sources have been collected and analysed, which include landings data sourced from the MMO that records landings made by vessels both under and over 10m length. Comprehensive engagement in the form of fisheries group meetings and individual interviews with fishermen has been undertaken to understand fishing activity within AyM.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 72, has categorised the dredge fleet as low-medium value, this may be true for large non-Welsh boats relative to other areas that are further offshore and accessible but in terms of local boats and in periods of prolonged adverse westerly winter weather, this area has a high value. Data from the Welsh Governments environmental assessment reports should inform.	The dredge fishery is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report. Landings data sourced from the MMO for all vessel lengths indicates very limited dredge activity by Welsh vessels in the Study Area. Stakeholder engagement has indicated that a single vessel dredges routinely within the AyM array area, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7.1. Further data regarding scallop dredge activity in the Study Area, including inshore VMS (iVMS) data, CatchApp data and heat maps, which is not yet publicly available, has been requested from the Welsh Government.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	There has been inshore VMS on all vessels prosecuting the Welsh scallop fishery since 2012. Welsh Government produce reports each year showing heat maps of scallop dredge activity to inform their environmental assessment process before the fishery opens. This data set is missing.	As above.	yes	no

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TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 73 suggests mitigation to reduce the impact magnitude of potting from medium adverse to minor adverse. It is unclear how there can be coexistence in areas potting has been excluded from? The report talks about an FPL exploring yet undetermined mitigation measures with the fleet. This should remain as medium adverse and the mitigation options explored fully at EIA. It is not appropriate to retire the issue now without the agreed and approved (by fishermen) detail to support the mitigation.	Potential for exclusion and displacement impacts during construction are assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10. The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and 94. A draft FLP (application ref: 8.5) has been prepared and discussed with the fishing industry. The FLP will be developed prior to construction and will be the mechanism used to explore and agree mitigation at an individual vessel level. The EIA assesses impacts at a fleet level, rather than for individual vessels.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 73, there is no information to substantiate the netting conclusions, this cannot be accepted without evidence.	The impact assessment conclusions presented through Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10 to Volume 2, Chapter 8, Section 8.12 are supported by the sensitivity and magnitude justifications presented in the same sections.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 73, due to local and seasonal value of scallop fishery and the lack of evidence on 15m and under vessels this conclusion cannot be accepted.	The impact assessment conclusions presented through Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10 to Volume 2, Chapter 8, Section 8.12 are supported by the sensitivity and magnitude justifications presented in the same sections.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 76, as previously highlighted the potting mitigation is undetermined so cannot be deemed appropriate. Relying on a presumption that has not been substantiated. How would you ensure active pots are set in a manner that avoids gear interaction?	The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and 94, and paragraph 101 regarding potential means to minimise gear conflict. A draft FLP (application ref: 8.5) has been prepared and discussed with the fishing industry. The FLP will be developed prior to construction and will be the mechanism used to explore and agree mitigation at an individual vessel level.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Volume 2, Chapter 8, page 77, both the exclusion and the displacement effects to potters, netters, trawlers, liners and dredgers from the Awel-y-Mor site is not reliable as it is based on incomplete evidence, the report does not include impacts from, or to, the majority of the Welsh fleet who are 12m and under vessels.	Welsh fleet activity is described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). These descriptions have been informed by analysis of all publicly available data and engagement with Welsh fishermen. The impact assessment conclusions presented through Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10 to Section 8.12 are supported by the sensitivity and magnitude justifications presented in the same sections.	yes	no
TO_001_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	At the time of submission, the Welsh Fisherman's Association – Cymdeithas Pysgotwyr Cymru Cyf (WFA-CPC) response is limited, for reasons beyond our control, to Chapter 8 and Annex 8 of the PEIR, we therefore respectfully reserve the right to comment and provide further evidence in relation to other relevant Chapters at the EIA stage in the consenting process.	This is noted by the Applicant.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	How is the HIGH magnitude suggested to be greater than 8 years for a substantial loss of target fish or shellfish, MEDIUM, less than 8 years, LOW less than 2-3 years, NEGLIGABLE less than one year. What is the rational behind this? It is ridiculous that a for a substantial loss of shellfish or fish to occur this has to continue for more than 8 years suggesting that if there are significant drops in shellfish and fish populations due to construction or operation they have to go on for more than 8 years to be graded high.	Assessment criteria are consistent with those set out in Volume 2, Chapter 3 (application ref: 6.2.3). Criteria are developed in order to support objective assessments. In providing definitions of magnitude for the commercial fisheries assessment, indicative impact durations have been provided. The durations are indicative rather than absolute and have been set within the context of AyM timelines (e.g., medium duration is considered to be less than the lifetime of the project, short-term duration aligns with the duration of project construction). As Volume 2, Chapter 8 (application ref: 6.2.8), Table 6 explains, impact magnitude is not judged based solely on duration, but also on physical extent.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Page 72 para 76. 'Typically larger vessels that can fish elsewhere' Yes but they most likely displace to areas inshore and offshore fished by local boats.	The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see paragraphs 83 and 94, and paragraph 101 regarding potential means to minimise gear conflict.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 78. Netting fleet effects are negligible. How can this be, if the fish disappear due to pile driving and operational effects wherever the local netting fleet fishes they won't be able to catch fish even outside Awel y Mor footprint or the cable corridor.	The rationale supporting the assessment outcome is presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10.1, noting that netting activity is typically focused inshore of the AyM array area. Potential impacts on commercially important species and consequences for fisheries activity are assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.10.5.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 81 'Encourage co existence and further mitigate the effect' What does this mean? How can impact magnitude be reduced from Medium?	A draft FLP (application ref: 8.5) has been prepared and discussed with the fishing industry. The FLP will be developed prior to construction and will be the mechanism used to explore and agree mitigation at an individual vessel level. The FLP will explore options including cooperation agreements and associated payments, and seek to ensure that exclusion impacts are appropriately mitigated to minimise the displacement effect, e.g., such that displaced pots are not actively deployed during the period of mitigation (e.g., pots to be left open, or stored on land), or if deployed, they are done so in a manner that avoids or minimises gear interaction.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 99 'storage of pots on land' Will there be payment for lost catches in this gear and payment for land/container rental for storage?	As above.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 100 'displacement impact low for potters' This is not the case, there are only discrete spaces where different species can be potted for and if gear is displaced there is no where for extra gear to be placed. Also in North Wales we are severely restricted as to where we can place gear in the scallop season which runs from November - April when the cable corridor is widely used for winter potting for a variety of species including crab, lobster and whelk. Has this severe restriction on our normal potting operations in winter been taken into account in the PEIR? Large and smaller vessels use this area in the winter and further displacement would mean that gear would have to be brought ashore, restricting winter catches.	The Applicant acknowledges the potential for a significant effect in relation to temporary exclusion of potting vessels from fishing grounds during construction and is committed to developing mitigation that will address exclusion impacts whilst minimising displacement effects; see Volume 2, Chapter 8 (application ref: 6.2.8), paragraphs 83 and 94, and paragraph 101 regarding potential means to minimise gear conflict.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 115 'pots left open in EEC' this is a risk to gear as if gear rolls in weather doors maybe damaged, we would have to bring gear ashore with associated loss of catch and time associated with transporting gear to and from grounds.	All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Baseline data and the outcomes of consultation with fishermen indicate that vessels fish various grounds in the region and would not be limited solely to grounds within the ECC.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 116 'displacement impact low for UK potters' How is this statement backed up as it is not the case?	As above.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 120 Some inshore vessels are not able to relocate from the ECC as this is a winter area and static gear ground is limited due to mobile scallop boats. How was this statement qualified?	As above.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 131 Minor adverse effects on fish and shellfish of behaviour impacts and auditory noise and vibration, mortality and injury. How was this statement qualified and can the PEIR show that the statistical power of the data is sufficient to prove this in the study area and beyond? The papers below highlight how anthropogenic sound may affect crustacea, has this been investigated in the PEIR? Damage can occur to balance organs in crustacea due to seismic surveys. Youenn Jézéquel et al, Sound detection by the American lobster (Homarus americanus), Journal of Experimental Biology (2021). DOI: 10.1242/jeb.240747 Ryan D. Day et al. Seismic air guns damage rock lobster mechanosensory organs and impair righting reflex, Proceedings of the Royal Society B: Biological Sciences (2019). DOI: 10.1098/rspb.2019.1424	This has been noted by the Applicant. Further information can be found qualifying these statements in Volume 2, Chapter 6: Fish and Shellfish Ecology (application ref: 6.2.6).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 133 Local inshore vessels cannot relocate so are NOT of low vulnerability. How did the PEIR calculate that Local inshore vessels could relocate?	All available baseline data sources have been collected and analysed, as described in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1). Baseline data and the outcomes of consultation with fishermen indicate that vessels fish various grounds in the region and would not be limited solely to grounds within the ECC.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 174 Fishermen are not informed of where cables are exposed in for instance Gwynt y Mor even after surveys so to presume that fishing especially mobile gear can resume in areas with cables is not the case. Increased number of cables and increased numbers of turbines increases the risk of fishing in these areas to fishermen and their boats and crew. Has this fact been quantified in the PEIR?	The potential for reduced access and displacement in the operational phase is assessed in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.11.1 and Section 8.11.3. It is recognised within the assessment that not all fishing gears may be deployed within the array (noting, for example, that trawling within the array is unlikely) during the operation and maintenance phase. It is assumed that potting activity can resume within the AyM array area during the operation and maintenance phase. As identified in consultation reported in Annex 8.1: Commercial Fisheries Technical Report (application ref: 6.4.8.1), it is acknowledged that mixed views are held by fishermen regarding potting within operational wind turbine arrays.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 263 The PEIR cannot be considered to be complete if it does not include the cumulative effects of construction and operation of Mona, Morgan and Cobra farms which it is obvious will be constructed at the same time as Awel y Mor on a far greater scale (Mona and Morgan half the size of Greater London). The cumulative effects of these three other wind farms being built over the same period must be considered. Also the cumulative effects of the operation of these 3 wind farms and Awel y Mor and all the other existing windfarms in the Northern Irish Sea must be considered in the EIA. The baseline landings data has not considered the landings from the under 10 metre vessels as this is obvious from the 35E6 landings data that it is from over 10 metre logbook data. The VMS data is only available for over 12 metre vessels and not for the under 12 metre fleet so the distribution of effort given in the report for the inshore fleet is not representative of the actual fishing that occurs in the study area.	The assessment of cumulative effects is presented in Volume 2, Chapter 8 (application ref: 6.2.8), Section 8.13 and undertaken in line with the approach set out in Volume 1, Chapter 3 (application ref: 6.2.3): EIA Methodology. The spatial scale at which cumulative effects have been assessed for commercial fisheries are influenced by the operating range of relevant fishing fleets.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 68 Decline in Gurnard attributable to commercial inshore fishing. This is a complete mistruth and can the analysts prove the statistical power of this statement as there is no targeted commercial fishery for gurnard in the northern Irish Sea. There are Datasets available of trawl surveys, conducted in the same areas, Red Wharf, Conwy, and north Puffin Island, over decades, of a multitude of species by the Bangor University research vessels that were not used in the EIA. Why was this data not used to ascertain trends in fish abundance in the study area? Also the Mccarthy report was about grey gurnard not Tub Gurnard which charter skippers have repeatedly indicated are the species that have declined since pile driving and operation of Gwynt y Mor. Why were no data included in the report about Tub Gurnard?	Recreational fishing (including charter angling) has been described in the baseline and assessed throughout the Sections 12.10 to 12.12. A detailed characterisation of the recreational fishing baseline is included in Volume 4, Annex 12.1: Recreational Fishing Baseline, which also considers trends in catch.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Para 107 'Disturbed fish species will return immediately following the construction phase so recoverability will be high' The EIA needs to explain how this statement has been proved and whether the statistical power of the data is strong enough to prove this statement?	This has been noted by the Applicant. Further information can be found qualifying these statements in Volume 2, Chapter 6: Fish and Shellfish Ecology (application ref: 6.2.6).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Shaun Leake (GOBI) in a meeting on 5th October stated that the turbidity and sediment transport caused by the turbine piles would be nothing more than that caused by a storm. In the Irish Sea we normally have storm force winds very rarely, I suspect far less than 30 days a year, certainly not 365 days a year. A constant storm in various areas in the Irish Sea may have considerable effects on the whole marine ecosystem and this must be investigated. Anthropogenic turbidity in shallow enclosed seas may have affects on primary productivity and predator/prey relationships and the EIA must be able to statistically prove that the construction and operation of multiple wind farms does not have adverse effects on the marine ecosystems.	This has been noted by the Applicant. Further information can be found qualifying these statements in Volume 2, Chapter 6: Fish and Shellfish Ecology (application ref: 6.2.6).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	In Vol 2 Chap 6 para 105. Suggests medium effect on scallops through construction yet then goes on to suggest that because there are other stocks of lobster crab and scallops in the UK shallow seas that it does not matter if these species are affected in the study area. Presumably this suggests that these stocks will be affected but that they will be recruited from elsewhere. Please can the EIA show exactly how this will happen?	This has been noted by the Applicant. Further information can be found qualifying these statements in Volume 2, Chapter 6: Fish and Shellfish Ecology (application ref: 6.2.6).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Gurnard and pollack are not mentioned in the underwater noise chapter and they are two of the main species that charter anglers have seen declines in since Gwynt y Mor construction. Why have these two species been left out of this chapter?	Recreational fishing (including charter angling) has been described in the baseline and assessed throughout the Sections 12.10 to 12.12. A detailed characterisation of the recreational fishing baseline is included in Volume 4, Annex 12.1: Recreational Fishing Baseline, which also considers trends in catch.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	In Germany there are strict rules on noise levels during construction. No more than 160 db permitted 750m from the pile when driving yet this value is predicted over 20 kilometres the PEIR analysis. Bubble curtains are used to adhere to the rules in Germany. The Germans obviously think there is a problem with noise caused by piling and the welfare of marine organisms. Why are these mitigation measures not considered when building wind farms in the UK? Why are these options not covered in the PIER?	Volume 4, Annex 7.2: Outline Marine Mammal Mitigation Protocol (MMMP) (application ref: 6.4.7.2) has been updated to include specific reference to noise abatement measures as part of the suite of options available for mitigation.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	The monitoring of piling noise only is scheduled for the first four piles, why four? Surely strict monitoring of noise needs to be undertaken for all piles? Why are suction bucket and concrete platforms not considered in the building of wind farms in the UK especially when noise levels are so strictly adhered to in Germany during construction? This should be covered in the EIA.	The requirements for noise monitoring are described within the Schedule of Mitigation. Suction bucket and gravity based system foundations are included within the design envelope,	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Does the Fisheries Liaison Plan include the Cable corridor?	It has been clarified that the FLP does include this.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	. To survive this long in this industry we all, whether we know it or not have practiced a duty of care to the marine environment and the organisms within it, for example, returning undersized fish and shellfish, catch and releasing sport fish, not fishing beyond quotas, bringing back our litter.	This is noted by the Applicant.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	We also have a wealth of information, maybe all not written down or presented in a scientific style, but all the same, decades of hands on information about the fishing grounds and trends in different species over the years. Many of us have seen the first oil rigs built in the Irish Sea and lived through months of the associated seismic surveys, aggregate dredging, and the construction of wind farms, North Hoyle and Rhyl flats, farms which are now regarded as small. Since the commencement of construction of Rhyl Flats, but to a far greater extent, the construction of Gwynt y Mor, between 2011 to 2015, we have seen a marked decline in numerous fish species. But the construction of Gwynt Y Mor pales into insignificance as to what is likely to be constructed over the next 9 years, Awel y Mor, Mona, Morgan (half the size of Greater London), and Cobra Farm, a quadrupling of offshore wind farm capacity in the UK by 2030 then doubling that figure by 2050.	This is noted by the Applicant. Baseline data analysed for trends, and supported by feedback given throughout consultation. All information gathered on trends presented in commercial fisheries and charter angling deliverables.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	So during this process of dialogue, over the last couple of years, between RWE, charter skippers and fishermen we have provided much of this information, be it through meetings, zoom calls, individual telephone calls. Through much of this process, personally I thought what we were saying was not being taken on board but it wasn't until I spent the best part of two days (before losing the will to live) reading the PIER, that I knew for sure that 99% of what we have conveyed to RWE has been ignored. That duty of care for the marine ecosystem that we all try to strive to do our best to adhere to, I'm afraid, is not included in marine industrial construction, on a grand scale. The precautionary principle that is so often used in science and fishery science has completely left the room in the case of Windfarm construction, no one seems to have a clue as to how grand scale construction of multiple wind farms, inside a partially enclosed shallow water sea, will effect the marine ecosystem. Posiedon's report on angling does seem to take on board what many of us have been saying but Gobi's analysis of the report does ignore what we have said has happened, for instance Volume 2 Chapter 12 para 107 'disturbed fish species will return immediately following the construction phase so recoverability will be high'. We have repeatedly told RWE that this was and is not the case for GyM.	This is noted by the Applicant. Further context has been provided in Volume 2, Chapter 6 (application ref: 6.2.6) and Volume 2, Chapter 12 (application ref: 6.2.12).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Angling Section Para 68 'Decline in gurnard attributable to commercial inshore fishing' There is no commercial inshore fishery for gurnard in this area! Also the Mccarthy report refers to grey gurnard not Tub Gurnard which is the species we were most familiar with catching.	This is noted by the Applicant. Further context has been provided in Volume 2, Chapter 6 (application ref: 6.2.6) and Volume 2, Chapter 12 (application ref: 6.2.12).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Impact Magnitude is suggested as 8 years or higher to be regarded as high, for loss of target fish or shellfish, this is ridiculous.	See paragraph 129 of the ES chapter for an explanation of how the magnitude of impacts on target species is assessed, noting that it draws on the impact assessment outcomes of the Fish and Shellfish Ecology assessment as opposed to using the definitions of magnitude otherwise applied in the Commercial Fisheries assessment.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Effects are categorised as HIGH MEDIUM or LOW and no matter which category is decided for each section or paragraph I read, GOBI uses a wall of meaningless words to make sure that by the end of the paragraph they can make the following statement; 'therefore the effect will be of minor adverse significance, which is not significant in EIA terms' The sole goal of this PIER in every section I have read appears to be to manipulate the report to fit this statement.	This is noted by the Applicant. Detail regarding the EIA methodology can be found in Volume 1, Chapter 3: EIA Methodology (application ref: 6.1.3).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	In November 2020 in a meeting between Natural Resources Wales (an organisation that you may think might like to do the right thing for our marine ecosystems) and RWE concluded that surveys for fish and shellfish were not required in the study area to complete the PIER, as angling skippers we have been asking and have offered our services for meaningful surveys on finfish before during and after construction but this has never been taken up by RWE. RWE continued with their desk study.	This is noted by the Applicant.	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	Interestingly in the Noise effects chapter many fish species are mentioned except Gurnard and pollack two of the species we have seen large declines in on the ground and wrecks inside 20 miles, during and since GyM construction.	This is noted by the Applicant. Further context has been provided in Volume 2, Chapter 6 (application ref: 6.2.6) and Volume 2, Chapter 12 (application ref: 6.2.12).	yes	no
MOP_028_11102021	S47	Volume 2, Chapter 8: Commercial Fisheries	I'll conclude with some interesting information about German windfarm construction. There is a limit in place of 160 db 750 metres from the pile so there has to be mitigation, for example bubble curtain, the Germans obviously think there is a problem with noise and organisms. No legislation akin to this in UK as far as I am aware. Noise contours in a chart in the Fish and Shellfish section predict 186 db at 16 nautical miles. In 20 minutes of soft piling even a mackerel can't travel more than 6 nautical miles at full pelt in a straight line, obviously whelks, scallops and crustacea have little or no chance of avoiding piling noise.	This is noted by the Applicant Volume 4, Annex 7.2: Outline Marine Mammal Mitigation Protocol (MMMP) (application ref: 6.4.7.2) has been updated to include specific reference to noise abatement measures as part of the suite of options available for mitigation.	yes	no

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
TO_002_25102021	S47	Volume 2, Chapter 4: Offshore Ornithology	Thank you for consulting the RSPB over the proposal to construct Awel y Môr Offshore Wind Farm (the Application). The RSPB has a number of concerns relating to the Application, which have not been adequately addressed in the PEIR. We limit the scope of our comments to ornithology and related matters. Our main concerns are summarised below which we expand upon in the attached Annex A, along with additional comments on other matters: •The minimum turbine tip height is too low at 22m •The limitations of the timing of survey flights are not discussed •The collision risk modelling does not use the most recent version of the model, the Stochastic Collision Risk Model (sCRM) •The minimum Nocturnal Activity factor for gannet does not take into account the most recent research. •The displacement buffer zone for red-throated diver does not consider recent research demonstrating displacement distances of greater than 10km. We trust our comments are of use and look forward to continuing to engage in the consenting processes of the Awel y Môr Offshore Wind Farm. The RSPB reserves the right to make further representations in relation to this matter	These summary points have been noted. Responses to specific points are provided below.	yes	no
TO_002_25102021	S47	Volume 2, Chapter 4: Offshore Ornithology	The nature conservation value of species depicted in Table 9 relates to the UK conservation status originating from Birds of Conservation Concern 4 (2015 update) which is not specific to Wales. Whereas Chapter 3.5 Onshore Biodiversity and Nature Conservation refers to both the UK and Wales conservation status. It would be helpful to be mirror the onshore chapter and includes species listed under Section 7 of the Environment (Wales) Act 2016 and Birds of Conservation Concern in Wales 3 (2016 update).	Conservation status takes into account species of Principal Importance listed under Section 7 of the Environment (Wales) Act 2016 and the most recent Birds of Conservation Concern 5 (Stanbury et al. 2021).	yes	no
TO_002_25102021	S47	Volume 2, Chapter 4: Offshore Ornithology	The lowest tip height is given as 22m above Mean High Water Springs. Given the evidence that the greater the air gap the lesser the risk of mortality through collisions (Johnson et al., 2014), the RSPB would prefer if a higher height was used as early as possible in the assessment.	This has been noted.	yes	no
TO_002_25102021	S47	Volume 2, Chapter 4: Offshore Ornithology	Chapter 4 does not appear to have a section that identifies internationally designated sites for nature conservation. Whereas Chapter 3.5 Onshore Biodiversity and Nature Conservation does include internationally designated sites. We acknowledge international sites relevant to offshore ornithology are listed in Report 5.1, Annex 2: HRA Screening Update (Ornithology). The list of local and national designated sites appears incomplete. It omits some local SSSIs linked with SPAs that are listed in the Report 5.1, Annex 2: HRA Screening Update (Ornithology). For example, it omits the following SSSIs: Cemlyn SSSI a component SSSI of the Anglesey Terns / Morwenolai Id Ynys Môn SPA; and Traeth Lafan SSSI which underpins Traeth Lafan SPA.	Please refer to the RIAA (application ref: 5.2).	yes	no
TO_002_25102021	S47	Volume 2, Chapter 4: Offshore Ornithology	The list of projects and plans appears extensive, although it appears to exclude some Round 4 offshore wind leases including two neighbouring Offshore Wind projects, namely Morgan and Mona offshore wind projects	The list of plans/ projects included in the cumulative assessment follows Planning Inspectorate's Advice Note Seventeen (PINS, 2019) and includes all projects currently in the planning system including those Round 4 sites in the region.	yes	no
TO_002_25102021	S47	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	Para 171 states: Limitations to the assessment, which largely relate to the lack of survey data for protected and notable species, surveys for many of which are still ongoing, have been clearly identified. These limitations will be addressed in the ES, following completion of the relevant surveys. Owing to the acknowledged limitation of ongoing ecological surveys including breeding bird surveys, we will reserve comment until the information is submitted in the ES to inform the assessment.	The onshore bioiversity chapter of the ES (application ref: 6.3.5) and associated annexes have been updated to take account of the now complete and comprehensive ecological survey data.	Yes	no
TO_002_25102021	S47	Volume 4, Annex 4.1: Offshore Ornithology Baseline	The RSPB welcome the provision of the data on the timing of survey flights. These should, however, be contextualised in the species accounts with a discussion on how potential peaks in early morning and evening activity can be incorporated into the analysis.	Noted. This has been taken account of in the final ES chapter.	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.1: Offshore Ornithology Baseline	Consideration of biological seasons. While the Furness (2015) report is very useful, it is based on a large biogeographic area. Local knowledge of the phenology of species should be presented as far as possible.	This has been noted by the Applicant.	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.1: Offshore Ornithology Baseline	It is not clear whether the estimates of flight height derived from aerial survey will be presented.	Flight height data for final ES have been derived from the Johnston et al. 2014 generic flight height estimate data. This is due to the low sample size of the site specific flight height data.	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.2: Offshore Ornithology Displacement	The list of species should include Manx shearwater, as recent work demonstrates that adult birds may avoid lit structures (Syposzet et al., 2021) (Conversely juveniles may be attracted to them)	Displacement of Manx shearwater has now been considered in detail in the final ES.	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.2: Offshore Ornithology Displacement	A displacement buffer of 4km is inadequate for red-throated diver. Recent work (Mendel et al., 2019) has shown red-throated divers can be displaced more than 10km away from offshore wind farms.	The recommended gradient approach and associated displacement rates has been incorporated in the red-throated diver assessment of displacement in Section 4.11, 4.12 & 4.16 and in Volume 4, Annex 4.2 (application ref: 6.4.4.2).	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.3: Offshore Ornithology CRM	The RSPB welcome the use of the Stochastic Collision Risk Modelling tool but note that it is only being used in a deterministic manner. This will not properly account for variability, and we recommend that the tool is used with a full stochastic formulation. However, this recommendation is subject to the publication of revised guidance from the SNCBs, as different avoidance rates are needed for the stochastic and deterministic formulations.	This is noted by the Applicant	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.3: Offshore Ornithology CRM	Manx shearwater should be included in the analysis of collision risk. This may be a risk in particular for juvenile birds that may be attracted to lighting on devices and alter flight height in response.	As discussed in the ETG meeting dated March 2021, the current position relating to Manx shearwater is they typically fly too low to the water to be considered at collision risk height, and are therefore not considered for CRM given their low sensitivity (Furness et al. 2013).	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.3: Offshore Ornithology CRM	Following Furness et al (2018), the Nocturnal Activity Factors for gannet that should be used are 8% in the breeding season and 3% in the non-breeding season.	The sCRM currently does not enable the user to alter nocturnal activity factor per season. The values suggested currently differ from that recommended by other SNCBs, APEM intends to capture variability in nocturnal activity factor (and other input parameters) by using a range of values for assessment.	yes	no
TO_002_25102021	S47	Volume 4, Annex 4.3: Offshore Ornithology CRM	Consideration should be given to the avoidance rates presented in Cook (20213), subject to the publication of recommendations in response to this document from the SNCBs. However, the default rates should be those presented in SNCBs 20144, with the exception of gannet. For this species an additional avoidance rate of 98% for the breeding season should be presented, as all the evidence included in recommendation and guidance is from outwith the breeding season for this species.	Noted. A precautionary approach has been taken and the upper flight speed value of 14.9 from Cook et al., (2014) has been used for gannet as detailed in Volume 4, Annex 4.3 (application ref: 6.4.4.3).	yes	no

4.3 Appendix H3: Responses Received from Targeted Section 42 Consultees and Applicant Regard

Comment Ref.	Type of consultee (LA/S42/S47/S48)	PEIR Document Ref.	Comment	Response	Regard had to Comment in ES?	Design change?
PrB_018_24022022	Targeted S42	Volume 3, Chapter 7: Hydology and Flood Risk	NRW (Advisory) have no significant concerns to raise, but please be aware of the following flood risk matters: •The temporary construction compound (Ffridd beach) will have a degree of flood risk (as does the Garford Road one) and as such suitable measures should be adopted to manage the risks. •NRW require unobstructed access to Rhyl Pumping station (which is owned and maintained by NRW) on a continuous basis. •We note that there is no reference to any changes required due to possible future realignment of the river Clwyd flood embankment. We understand that this is because the proposed route corridor already covers this area.	The temporary construction compound (Ffridd beach) is considered within the Onshore ECC FCA (Annex 5.7.1, application ref 6.5.7.1). The cables will be installed using HDD or other trenchless crossing technique in this area and so will not affect the pumping station. The pumping station is located outside the onshore ECC as shown in Figure 4 of the Volume 3, Chapter 1: Project Description (application ref: 6.3.1). NRW's comments regarding the River Clwyd are noted	Yes	no
MOP_037_01032022	Targeted S42	N/A	As discussed at the drop-in session, we continue to have material concerns further to the following in respect of the proposed use of Ferguson Avenue, in that the Avenue is simply not suitable for the traffic that will be generated as a result of the proposals, and the damage to houses along the Avenue that are anticipated to occur over time as a direct result. 1. Tight junction layout - causes difficulties for heavy goods vehicles and coaches etc in turning in and out of Ferguson Avenue from Victoria Road including the issue that drivers sometimes have to mount kerbs/footways, which will only be magnified significantly by the proposals. Ferguson Avenue was originally just a small cul-de-sac and no strengthening works as far as we are aware have ever been undertaken. 2. Unsuitability of Ferguson Avenue itself/traffic problems – the Avenue is unsuitable for use by the increased traffic that will be generated. It has not been shown that Ferguson Avenue is capable of withstanding the additional volume and weight of traffic that will be generated (and the risks to the sewers/pipes etc that run underneath) and that residents' homes will not suffer from the vibrations – quite the opposite in that should this happen, the inference that the residents will just have to try and seek some sort of statutory compensation after that point. 3. Ferguson Avenue house foundations - all the properties have shallow foundations built on sand. Again, the vibration caused by the frequent passage of heavy vehicles is highly likely to cause structural damage to the properties, and also reduce their value. Just to conclude, we are dismayed by the current proposal to use Ferguson Avenue in preference to the other more suitable access route under consideration. Should the Ferguson Avenue option be selected, we'd be grateful for your comments on how it is proposed to deal with any damage to the houses/road and a plan to deal with this in advance.	Matters relating to construction methodology and relevant mitigation for impacts is covered in the Outline Code of Construction Practice (Application ref: 8.13).	yes	no
MOP_038_01032022	Targeted S42	N/A	My client has the following concerns and wishes to raise them with the project team: •Preferred Construction Route Virtually the whole of the owned land is currently impacted by the scheme, as the two separate routes converge where it crosses the A525. My client requires confirmation as to which route will be chosen and to what extent additional land is required for temporary construction compounds. Not only will it result in a loss of rental income, it will also result in a loss of land to the farmer of the land, who is also impacted by the scheme. •Ecological Mitigation Land Two additional areas have been outlined for land to be used as an additional area for ecological mitigation. Further details are required as to what this will be used for the duration of its use? Please advise on how the return of the land to the client will be managed. There is a concern that once the land has been used for habitat mitigation e.g. for greater crested newts, it may be extremely difficult to return the land back to its original pre-scheme condition. I would be grateful if you could acknowledge receipt of this email and provide a response to the questions asked, at the earliest possible opportunity. Please do not hesitate to contact me, should you wish to discuss the matter further.	The Northern Route has been selected. The Applicant shall endeavour to negotiate a voluntary agreement with the landowner in respect of the rights required, through which compensation for losses will be addressed. In the event that the Applicant and the landowner fail to agree such a voluntary agreement, the Compensation Code shall apply and as such compensation for any sterilisation of any land shall be paid on a proven loss basis. Part of the mitigation area for habitat improvement along the southern watercourse is for Water Vole and Otter mitigation and should species be present provide the necessary mitigation before during and after construction whilst the wider area is reinstated and restored. Full details of the Onshore biodiversity chapters and methodology can be found at Application Reference 6.3.5.	yes	no
PrB_017_11032022	Targeted S42	Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation	In order to demonstrate Net Biodiversity Benefit with regard to PPW policy, it would be good if the Wildlife Site dune habitat could be expanded through some dune habitat restoration or enhancement of the patch in the centre of the picture below (south of the Wildlife Site, West of the Bowls centre and East and North of the 'Ffridd' area. Also, just to remind you, there have been long-term plans to have the hard embankments either side of the River Clwyd brought back landward at the location where the cables are likely to cross the River. I suggest you speak to the appropriate people in NRW to make sure that this is fully considered the plans. As this is a long-term objective, the people in NRW that you are dealing with directly might not be aware of them. (This information has come from a retired NC/NCC/CCW/NRW employee who sits on our conservation committee and knows his stuff). There could be opportunities here as well for managed re-alignment of the river corridor at this point for Net Biodiversity Benefit.	Chapter 5 of the ES (onshore biodiversity (application ref: 6.3.5)) gives consideration to biodiversity enhancement. This is further considered in the Outline Landscape and Ecological Mitigation Plan (application ref: 8.4).	yes	no



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