

Busnes a Rhanbarthau - Gogledd Cymru
Grŵp yr Economi, Trysorlys a'r Cyfansoddiad

Business and Regions - North Wales
Economy, Treasury and Constitution Group



Llywodraeth Cymru
Welsh Government

Sent to: awelymor@planninginspectorate.gov.uk

24 October 2022

Dear Planning Inspectorate

**Re: EN010112/EN010112-000711-ExQ1
Awel y Môr, DCO examination questions - Welsh Government Response**

The Welsh Government provided a response to the pre-application consultation on 11 October 2022. This is a cohesive and coordinated response from across policy areas of Welsh Government including: the Economy team; CADW; Welsh Language; Land Use Policy; Energy Policy; and Highways Department. All comments are based on existing Welsh Government stated policy. A detailed table of responses to specific questions is included in ANNEX A.

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 north Wales. We also recognise the project could be a catalyst to secure long-lasting legacy benefits for North Wales and indeed Wales, and key to securing such a legacy will be coordinated action and strategic approaches by both the public and private sectors, ensuring the Welsh public purse is protected from additional costs. It is also clear a coordinated and strategic approach is necessary in respect of mitigating risks. Welsh Government believes RWE, as well as all other proposed significant developments across the north Wales region, need to ensure the benefits are maximised as a package and we stand ready to support them deliver this objective.

Following on from the questions the examination authority have raised, Welsh Government will be interested to see how RWE have responded to aspects which have been raised in relation to the Well-being of Future Generations (Wales) Act 2015, which might provide further clarity to the issues raised previously by Welsh Government in its pre-application consultation letter.

In the same pre-application response, the Welsh Government also referred to an engagement framework. RWE have now created an engagement framework which hopefully will allow for future discussions to take place and support issues which have and will be raised in relation to the project.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
ChiefRegionalOfficerNorth@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

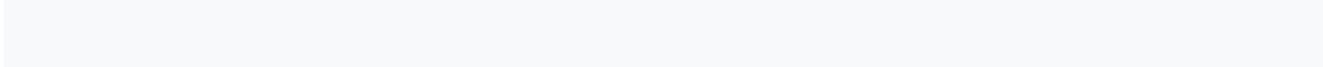
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

In anticipation of the hearing sessions, the Welsh Government will field officials (thematic leads) with the most detailed knowledge in respect of the thematic area being examined if requested by the Examination Authority.

Please find attached a response to specific questions raised by the examination authority at Annex A.

Yours sincerely

Duncan Hamer
Director of Operations - Business & Regions
[Cyfarwyddwr Gweithrediadau - Busnes a Rhanbarthau](#)
Economy, Treasury and Constitution Group
[Economi, y Trysorlys a'r Cyfansoddiad](#)





Llywodraeth Cymru
Response
Welsh Government

Reference (page number)	Question	Response
ExQ1		
0.5 (9)	National Park progression Please provide an update on progress and likely timescales for the potential new National Park for the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).	<p>The designation process will follow an updated process for assessing the case for new landscape designations in Wales within the context of Welsh legislation that has been developed by NRW. This will involve: commissioning an evidence base to assess designation factors (e.g. natural beauty, open air recreational opportunities); identification of candidate areas; and a statutory consultation. This work will take place during the current Senedd term.</p> <p>The current CRDV AONB encompasses three LAs: Denbighshire, Flintshire and Wrexham. To meet the criteria for designation as a NP the boundaries of the current AONB may need to be on a larger footprint. NRW is scoping the area of search which may extend into Gwynedd, Conwy and Powys. The current western boundary of the AONB, therefore, may not be the final recommended western boundary of a new National Park.</p>
0.9 (10)	Carbon Assessment Draft NPS EN-1 section 5.3.4 sets out that all proposals for energy infrastructure projects should include a carbon assessment as part of their ES, along with the type of information which should be included within the assessment. Section 4.2 of draft NPS EN-1	<p>We would recommend that the energy infrastructure project should use the following guidance produced by BEIS to assess the carbon impacts of the project, which also follows the main principles from the HMT GreenBook. This link also contains data tables which should be used to quantify carbon, provides emission factors to convert energy</p>

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

	<p>makes reference to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which refer to, amongst other things, climate. In addition, during consultation for the redetermination of the Norfolk Vanguard project, the Secretary of State (SoS) highlighted the desirability of a carbon footprint and impact assessment that considered embedded carbon and greenhouse gases from the extraction, refinement and manufacture of elements of the project, along with the emissions from the construction (including trenching and excavation of arable land and loss of greenhouse gas absorption capacity from farming, plants and trees), operation, maintenance and decommissioning. Could the Applicant signpost any assessment work of this nature that has been undertaken and does the Applicant intend to provide anything further in this respect? If so, by what deadline will be this be submitted by?</p>	<p>use into emissions etc. Note however that the toolkit is currently offline as it is being updated.</p> <p>Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal - GOV.UK (www.gov.uk)</p> <p>If the project requires a business case, then the standard Welsh Government guidance for business cases should be used. However, more recent business case guidance has been published for/by the North Wales Growth Deal team, which explicitly includes carbon & biodiversity assessments within the different stages which may be of interest.</p> <p>Bwrdd Uchelgais Economaidd - ANW Arup 2022 Carbon and Biodiversity Methodology.pdf - All Documents (sharepoint.com)</p> <p>Whilst we agree that embodied carbon as well as direct lifetime emissions changes from the project should be measured and reported, they should be reported separately. This is because embodied emissions are harder to quantify and are inconsistently measured.</p>
<p>0.10 (10)</p>	<p>Offshore transmission network review</p> <p>a) Has the Applicant considered the Department for Business, Energy and Industrial Strategy (BEIS) / Ofgem Offshore Transmission Network Review? If not, why not?</p> <p>b) If it did, has it influenced the design of the Proposed Development in any way?</p> <p>c) Has the Applicant identified any opportunities for a more co-ordinated approach to the design and delivery of the transmission infrastructure of this Proposed Development and other projects in the same region?</p> <p>d) Are any of the Secretary of State's observations on the offshore transmission network review in DCO</p>	<p>Welsh Government officials are involved in the Offshore Transmission Network Review and have raised the issue that Awel y Mor would fall outside the remits of the review.</p> <p>Although this is considered an early project, the Welsh Government is aware of at least two other projects that will require connection to the GB transmission system in this area. These include the offshore wind farm Mona, which is involved in the OTNR, and the proposed Mares interconnector, which is not included in the current OTNR process.</p> <p>The Welsh Government would wish to see the disruption to communities and the land minimised. Our commitment under the Wellbeing of Future Generations Act requires a long-term approach to decision making. We are</p>

	<p>decision letters relating to other offshore wind farms relevant in this respect?</p>	<p>aware that Awel y Môr is ahead of the other potential projects, and also that we are facing a climate crisis and need to proceed at pace. However, we need to consider the disruption created in delivering this project has the potential to increase resistance to future works in the area and potentially slow other projects also needed to deliver clean electricity. Therefore, we consider this to be an opportunity to plan ahead to ensure future development has the least possible cost and impact.</p> <p>We would therefore encourage RWE to engage proactively in discussions with National Grid Electricity Transmission, EnBW/ BP and the proposers of Mares Connect to ensure a more holistic approach, to minimise the impact of any offshore and onshore grid work.</p>
<p>2.6 (14)</p>	<p>General Please can you identify if there is a recognised biodiversity metric tool (such as Natural England current biodiversity metric or similar) to calculate biodiversity net gain (or loss) for the project and whether you would be able to use it for the project. If no, please explain and describe how biodiversity net gain or loss of the project would be determined.</p>	<p>No such tool exists for assessments in Wales. We do not have an established policy for the delivery or assessment of marine net gain. However, applications would be expected to have taken into consideration policies laid out in the Welsh National Marine Plan such as the protection, restoration and / or enhancement of marine ecosystems (as in ENV01) as part of the development. We would have expected the advice from Natural Resources Wales (NRW), as our Statutory Nature Conservation Body, to have been taken into regard as part the application process.</p> <p>The Welsh Government's WNMP Implementation Guidance provides some examples of restoration and enhancement that could be considered and instructs marine plan users to engage with NRW for advice. NRW have developed and published a guidance note, 'GN 059 Principles supporting restoration and enhancement in marine or coastal development proposal' which sets out the approach to advising on inclusion of restoration or enhancement elements in a marine or coastal development proposal' to set out their approach to advising on inclusion of restoration or enhancement elements in a marine or coastal development proposal, as part of their remit to provide advice (statutory and non-statutory) on how developments might affect the Welsh marine environment.</p>

<p>2.9 (15)</p>	<p>Offshore – General Please can you describe your approach to the marine environment and marine net gains principles.</p>	<p>We expect all developments in Welsh waters to have regard for the Welsh National Marine Plan including in ENV01 (Resilient marine ecosystems) and ENV02 (Marine Protected Areas). It is further expected that developers will consider opportunities to ensure the protection, restoration and / or enhancement of marine ecosystems (ENV01) in the marine environment as part of their proposal, above and beyond mitigation and/or compensation as deemed necessary.</p> <p>As described for query 2.6 a marine net gain policy in Wales has not been defined to date and principles are as yet to be determined. We are aware of the recent consultation by DEFRA on marine net gain principles. These are, however, not applicable to assessments in Wales.</p>
<p>2.93 (35)</p>	<p>Onshore – Habitat and Species Please can you:</p> <ul style="list-style-type: none"> a) Define the term “heavy standard trees” which appears within different ES chapters as a proposed mitigation measure; b) Explain source of 3:1 planting ratio and how this ratio is secured in the dDCO (Table 5, section 13.3.5 [APP-074]); and c) Explain source/location of locally appropriate native mixture for replanting and timeframe in the MDS to reach sufficient maturity to be utilised as a hedgerow. 	<p>There is a strong presumption against the permanent removal of woodland in Wales, as set out in Woodlands for Wales, Welsh Government’s 50yr strategy for woodlands and trees in Wales. The is also an expectation for compensatory planting for trees lost to development, as set out in Planning Policy Wales 11. Individual trees such as hedgerow trees are distinctive features in the landscape and provide breeding sites, food and shelter for many species.</p> <ul style="list-style-type: none"> a) There is no definition for “heavy standard trees” within the UK Forestry Standard, the government’s standard for sustainable woodland management. However definitions for this as provided by nurseries outlines these to be defined as being of a minimum of 12cm girth and 350 cm height. These are large in comparison to trees usually used for new planting or restocking schemes. Their use would ensure an immediate landscape impact, although their stability and survival may be limited by having a smaller root stock than might be the case if grown to this height in situ. b) It is not clear at Table 5, section 13.3.5 whether the 41 trees to be lost are hedgerow trees or part of an existing woodland. If part of a hedgerow, it could be assumed that the 3:1 ratio refers to planting 3 new “heavy standard” trees for every

		<p>hedgerow tree lost, although this ratio is not recognised as a standard stocking rate in forestry terms. If replacing part of an existing woodland, replanting should be undertaken at 2500 plants/ha. This is a recognised standard forestry restocking density and is used in the Welsh Government new woodland creation grant scheme. However for this density, tree plant size would be expected to be far smaller at 20-60cm.</p> <p>c) Source – hedge plants should be sourced within the UK as far as possible to avoid risk of pests/disease from imported plants. Species mix should be in keeping with local hedgerows and suited to site conditions. Replacement hedges that mirror existing field patterns would contribute more to the landscape. Not sure what the reference for MDS is. Hedge growth will depend on site conditions, protection from rodents/livestock and management e.g. weed control. “Utilised as a hedge” will depend on what is expected – landscape feature or livestock-proof boundary, and will be affected by management e.g. hedge laying and growth rate.</p> <p>All species selected should be suited to site conditions. New plantings should be maintained for 10 yrs, with weed control to reduce competition and replacement of dead trees. This is a standard maintenance condition that is attached to Welsh Government grant schemes.</p>
<p>4.8 (52)</p>	<p>Onshore Substation (OnSS) Please provide an explanatory note and earthworks phasing drawings for the construction of the OnSS. Please include: a) location of topsoil and subsoil mounds; and b) drainage features such as ponds.</p>	<p>A detailed ALC survey (according to the ‘Revised Guidelines and Criteria for Grading the Quality of Agricultural Land’ – MAFF 1988) and Physical Characteristics Report is required for the site to confirm if the development area is BMV agricultural land, the proportion of grades identified and the soil resources available. This is essential baseline information to inform (and be able to condition against) the soil management strategy, soil stripping, storage, reinstatement and aftercare scheme for the development. This is to ensure different soils are identified, stripped, stored, and reinstated in the correct</p>

		sequence, to the same quality as far as practicable, and minimise potential for loss of function and/or BMV agricultural land resource.
8.3 (78)	<p>Offshore Archaeology</p> <p>Please confirm whether you are satisfied with the approach to offshore archaeology as outlined within [APP-057] and whether you have been consulted (or would expect to be) on the draft offshore Written Scheme of Investigation (WSI).</p>	<p>Cadw have consulted the Royal Commission on the Ancient and Historic Monuments of Wales (RCAHMW) on this issue and their Senior Investigator (Maritime) who has specialist knowledge on offshore archaeology has confirmed that the approach outlined within [APP-057] is appropriate. Cadw are therefore satisfied with this approach.</p> <p>Cadw has not, so far, been directly consulted on the draft offshore Written Scheme of Investigation (WSI). The section 4.4 of the draft WSI [APP-304] states that the relevant archaeological curator who will need to approve the WSI and the associated method statements will be the RCAHMW. As noted above the RCAHMW have the geographical remit and specialist knowledge to perform this function and therefore they should be confirmed by the Examining Authority as the archaeological curator for the offshore archaeological investigations.</p>
9.1 (84)	<p>Best and Most Versatile Land</p> <p>NPS EN1 (paragraph 5.1.080) states “Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1,2 and 3a of the Agricultural Land Classification and preferably use land in areas of poorer quality (grades 3b, 4 and 5).” Please explain how the test in paragraph 5.10.8 of NPS EN-1 is satisfied in respect of the Proposed Development?</p>	<p>Planning Policy Wales (PPW11) paragraph 3.58 and 3.59 outlines national policy towards conserving Wales’ Best and Most Versatile (BMV) agricultural land. Further guidance is provided in Technical Advice Note (TAN) 6, including the consultation arrangements with the Welsh Government included at Annex B.</p> <p>The Department has produced the Predictive ALC Map for Wales (2019) and associated Guidance Note on the use of the predictive map including a flow chart of when to commission ALC surveys. The Department has also made publicly available any previous validated ALC field survey data we hold – these are available via Data Map Wales and reports can be requested via LQAS@gov.wales mailbox.</p> <p>There are extensive previous ALC field surveys in the area of the proposed cable route, confirming areas of BMV agricultural land</p>

		<p>(Grade 2 and Subgrade 3a). It does not appear to be the case that the applicant has considered these in their assessment of route options.</p> <p>The applicants have used the Predictive ALC map to provide land quality information – however, no field survey work has been undertaken (as is required in our published Guidance Note – see flow chart on p.2) or previous survey data checked.</p> <p>The grades and spatial distribution of ALC grades determined by a survey is key to inform policy application relating to BMV agricultural land (PPW 3.58 and 3.58) – how considerable weight has been applied to protect BMV land form development, application of the sequential test and demonstrating overriding need.</p> <p>It is therefore unclear how BMV policy has been applied robustly in this application and spatial choices, when the ALC grades and distribution of grades have not been confirmed.</p> <p>The Department would be available to validate any ALC field survey commissioned by the applicant.</p>
<p>9.8 (85)</p>	<p>Grade 3a and 3b Soil Resources In respect of the proposed OnSS, the permanent loss of Grade 3a soil resource is stated as 0.38ha (paragraph 137 of [APP-067]). In terms of landfall infrastructure, the loss of soil resource is stated to be 20 square metres (paragraph 140 of [APP-067]). In both instances, it is stated that the losses are small in comparison to the remaining available Grade 3a and Grade 3b soil resources. Please confirm the overall amount of Grade 3a and 3b soil resources within the region.</p>	<p>The department has published statistics on the <i>Predictive</i> distribution of ALC grades in Wales. As noted in our published Guidance Note, where BMV agricultural land is a matter for consideration, a ALC survey will need to be undertaken to confirm the BMV status of the land as well as area and distribution of grades. In our response to 9.1 (84), it is noted that ALC field surveys have not been undertaken (nor previous survey data checked) to confirm the area and distribution of BMV agricultural land impacted by the development and the application of PPW paragraph 3.58 and 3.59.</p> <p>Therefore, the Department is unclear how figures on area of Subgrade 3a and 3b have been obtained and to their accuracy.</p>

<p>9.9 (86)</p>	<p>Outline Code of Construction Practice (oCoCP) and Soil Resources</p> <p>Are you satisfied with the approach and content of the oCoCP [APP-312] and associated appendices (e.g. the outline Soil Management Plan (oSMP) [APP-316]) in respect of the management of potential effects on soil resources? If not, please detail additional methods and/or mitigation measures considered necessary within the oSMP. In addition, please confirm whether you are satisfied that soils would be suitable for the required end use and the appropriateness of the proposed soil restoration methods.</p>	<p>The department has concerns regarding the oSMP.</p> <p>A detailed ALC survey (according to the 'Revised Guidelines and Criteria for Grading the Quality of Agricultural Land' – MAFF 1988) and Physical Characteristics Report is required for the site to confirm if the development area is BMV agricultural land, the proportion of grades identified and the soil resources available. This is essential baseline information to inform (and be able to condition against) the soil management plan, soil stripping, storage, reinstatement and aftercare scheme for the development.</p> <p>This is to ensure different soils are identified, stripped, stored, and reinstated in the correct sequence, to the same quality as far as practicable, and minimise potential for loss of function and/or BMV agricultural land resource.</p> <p>The oSMP is broad and presents gaps in details in how the proposals will actually minimise damage to the soils.</p> <p>The main risks to be considered and addressed would be:</p> <ol style="list-style-type: none"> a. Soil compaction from trafficking and handling (relevant at all project stages) – this has the potential to introduce or exacerbate a wetness limitation and thus affect ALC grade; b. Mixing of topsoil and subsoil resources during soil handling operations – this has the potential to reduce the thickness of topsoil (and associated nutrients) available for crop growth; c. Mixing of soil materials with different characteristics (for example mixing heavy and lighter textured soil materials) – this has the potential to result in wetter soils which are more prone to waterlogging and structural degradation which could affect the ALC grade; d. Contamination of soil materials with aggregate used to construct the access routes, etc.
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<p>9.10 (86)</p>	<p>Outline Code of Construction Practice (oCoCP) and Ground Conditions Are you satisfied with the approach and content of the oCoCP [APP-312] and associated appendices (e.g. the Outline Pollution Prevention and Emergency Incident Response Plan (oPPEIRP) [APP-318]) in respect of the management of potential effects on ground conditions? If not, please detail additional methods and/or mitigation measures considered necessary within the oPPEIRP.</p>	<p>The Department has concerns regarding appropriate ground conditions during the constructing and reinstatement of soils.</p> <p>The oSMP has no information on the timing of operations (time of year), ground conditions (when suitable / unsuitable and how this is assessed), soil types on site and their vulnerability to damage (e.g. wet heavy textured soils and compaction risks).</p> <p>As noted previously, and ALC and Soil Physical Characteristics report is required as a baseline to inform the oSMP and understand the soils (types, volumes and distribution) and potential risks to soils on site.</p> <p>This is also to ensure different soil types and volumes are stripped, stored and placed appropriately.</p> <p>The qualifications, responsibilities and authority of the agricultural liaison agent proposed is not confirmed. Will the agent have the overall authority to stop works on site if ground conditions are not suitable and there are risks to soils?</p>
<p>9.11 (86)</p>	<p>Soil Storage The oSMP confirms that soils shall be categorised based on their origin, and stockpiles/ stored accordingly (paragraph 23 of [APP-316]). What documentation and physical control measures will be put in place to prevent accidental mixing? How will these be secured?</p>	<p>As noted previously, and ALC and soils physical characteristics report is required to inform the types, volumes, and distribution of soils on site. This is essential for informing stripping (soil types and horizon depths) and appropriate storage bunds.</p> <p>The location, soil type and volume of each bund will need to be provided as well as management and audits of soil stored.</p> <p>Soil storage bunds need to be of sufficient size for the separate storage of different soil types without being excessively high bunds – maximum of 3m for topsoil and 5m for subsoil. The working plans need to take account of the area required for soil storage based on soil resources report estimates and bund height / slope constraints. This is particularly important on a site where it is limited by size and working area.</p>

<p>9.13 (87)</p>	<p>Soil Management Will stored soils be tested for plasticity? If so, please detail the proposed methodology. If no testing is proposed, please explain your reasons.</p>	<p>The testing of soil plasticity needs to consider handling of soils within stockpiles and in situ. The risks of working with or trafficking over plastic soils will be present at all stages of the works, from initial site fencing and soil stripping soil reconditioning/reinstatement. It is also not clear who will have responsibility for assessing soil plasticity or the supervision, monitoring and auditing of activities affecting the soils – would this be the agricultural liaison agent proposed? It is absolutely imperative that all such activities are supervised, monitored and audited by individuals with the appropriate qualifications and experience.</p>
<p>9.14 (87)</p>	<p>Soil Management How will the transmission of information contained within the final SMP be disseminated on site? Is the use of ‘toolbox’ talks envisaged? If so, how will this be secured?</p>	<p>As above, it is absolutely imperative that transmission of information from the SMP is effectively handed over to contractors. Also is it highly important that on-site activities are supervised, monitored and audited by individuals with the appropriate qualifications, experience and authority. The role, responsibilities and authority of the agricultural liaison agent need clarifying.</p>
<p>9.15 (87)</p>	<p>Soil Restoration Methods How will the suitability of soil stockpiles for restoration be assessed? Please confirm whether the final SMP will include a restoration methodology?</p>	<p>An ALC and soil resources survey and report are essential to establish the baseline for restoration target. These should be undertaken and used to inform the restoration methodology. The methodology should be included as part of the final SMP.</p>
<p>9.17 (87)</p>	<p>Decommissioning The oSMP [APP-316] does not refer to the decommissioning phase. Please confirm why this isn't necessary and whether consideration of this phase this will be included in the final SMP? If not, please explain your reasons.</p>	<p>It is expected that details of the decommissioning phase are provided in the final SMP. An ALC and soil resources survey and report are essential to establish the baseline for restoration target and to condition against. These should be undertaken and used to inform decommissioning methodology, target restoration and site aftercare.</p>
<p>18.4 (119)</p>	<p>Technical Advice Note (TAN) 23: Economic Development Are you satisfied that the design of the Proposed Development contributes to the objectives of TAN 23 in</p>	<p>The percentages identified in tables included in Environmental Statement Report Volume 3, (May 2022), table 12 specifically, seem disappointingly low and it is hoped that RWE will continue to work with WG to improve on these percentages for North Wales and Wales.</p>

	<p>respect of the generation of wealth, jobs, and income? If not, please explain your reasons.</p>	<p>The work RWE are carrying out in North Wales is encouraging. Ensuring a local port is used for the construction as well as the Operation and Maintenance will be key to the success of the project in the view of Welsh Government, including the work to be completed on supply chains and skills.</p> <p>The Welsh Government is happy to support RWE to maximise these opportunities for the local economy and it would be useful to clarify the actions required to ensure the good intentions included in the evidence are carried out.</p>
<p>18.11 (121)</p>	<p>Skills and Employment Strategy [RR-004] suggests that the dDCO is lacking a suitably worded requirement in respect of the approval of a 'Skills and Employment Strategy' and that it is best practice to prepare and submit an outline of such a plan. Please explain your position in this respect.</p>	<p>RWE have engaged with Welsh Government in relation to skills and employment and we are keen to continue discussions and co-ordinate work across the fixed offshore wind sector with the other opportunities off the North Wales coast, as well as the Irish Sea projects, and with other renewable and low carbon sectors in North Wales.</p> <p>The links to the Welsh language opportunities in relation to skills are also key to such projects, ensuring the skills recognise the opportunities for Welsh through the training and education opportunities.</p> <p>It would therefore be useful to work collaboratively across sectors to ensure we have the people with the skills in the region for all the projects coming forward. Welsh Government is happy to provide officials to support for such activities.</p>
<p>18.12</p>	<p>Community Linguistic Statement Are you satisfied with the content of the Community Linguistic Statement [APP-325] and the conclusion that the Proposed Development would not result in negative impacts on the linguistic, social character and locality? Additionally, are you content that the Proposed Development would not impede the ability to</p>	<p><u>Community Linguistic Statement</u> The Community Linguistic Statement provides assurances that the Awel y Môr development will not impede the ability to achieve the relevant 'local and national Welsh language objectives'. These objectives are more than the use of the language visually within signs, documentation and websites.</p>

achieve the relevant national and local Welsh language policy objectives? If not, please explain your position in this respect.

There is a need for clear understanding how this significant infrastructure development could impact on demographic changes, eg. educational needs, job opportunities for local people and housing needs as well as the long-term sustainability of the relevant communities, which includes supporting the Welsh language as a living community language.

The strong links with Coleg Llandrillo, in skills development and apprenticeships is welcomed. But again, there is a need for a better projection within the CLS of how many local opportunities will be made available and what socio-economic impacts if employment is sought from outside the area. [AS-034] refers to 210 additional FTE jobs being created to support offshore construction. Is it possible to have a clearer indication of how many jobs will be created locally and how many jobs will sought from outside the area / north Wales region? This could have a significant impact on the Welsh language, community services and local job opportunities and the local economy. In our view this should be addressed within the CLS. It would be beneficial to see what mitigation measures will be in place it also strengthens the case of the need for a full impact assessment.

It is evident that the percentage of Welsh speakers is lower in the Rhyl and Prestatyn wards compared to more rural and Welsh-speaking heartlands of Denbighshire. But the linguistic significance of Rhyl and Prestatyn wards should not be compromised. Within these two wards there are 6,190 Welsh speakers and this figure accounts to 28% of all Welsh speakers within the county of Denbighshire. Therefore, more consideration should be taken to the needs and interest of the Welsh language within the development.

It is not clear from the CLS if the consultations actively engaged with Welsh-speakers and specifically with community-based organisations that support and promote the use of the Welsh language.

		<p>This Development is a Large Scale Infrastructure Project and in line with TAN 20 (Windfall Site) and Denbighshire LDP a Language Impact Assessment is necessary. Although the CLS states that there is no negative impact on the Welsh language it is felt that the CLS does not provide sufficient consideration to the linguistic nature and interest within the relevant area. A full Impact Assessment would provide more detail of the impacts on inward migration, local services and any mitigation measures that could be put in place to support the language. We accept that the decision on the requirements of an IA is a matter for Denbighshire Planning Authority. But there should be consideration to the Welsh language within any community benefits proposal.</p>
<p>18.13 (121)</p>	<p>Community Linguistic Statement Paragraph 57 of [APP-325] confirms that all non-technical visual elements of the Proposed Development will be produced in either Welsh or bilingually in Welsh and English. Please confirm how this will be secured? Additionally, contractors and all supply chain companies will need to comply with RWE’s Welsh Language Policy. Please provide a copy of this policy.</p>	<p>The Awel y Môr will ensure that all visual signage will be bilingual. This is welcomed and is in line with TAN 20 and Denbighshire LDP and SG. In a development of this scale there should also be more consideration of how the development supports the local and national strategies to support the use of the Welsh language. Other than providing bilingual signage, it would be beneficial to learn what actions will be taken to support the language within the relevant coastal communities of Denbighshire.</p>
<p>18.16 (122)</p>	<p>Construction Employment Paragraph 219 of [AS-034] states that the Proposed Development has the potential to support 150 FTE jobs per annum, which relates to the ‘No Local Port Scenario’. It is further confirmed that the figure of 150 FTE jobs is likely to consist of 30 jobs relating to onshore installation and commissioning, with the remaining 120 involved in offshore construction. Please provide a similar breakdown of job types for the ‘Local Port Scenario’ FTE figures.</p>	<p>The Welsh Government looks to work with the potential project developers in north Wales and the ports to ensure the ports are in a strong position to maximise local contents. Missing the opportunity in North Wales will lead to a far smaller economic benefit to the north Wales region.</p> <p>The Regional Economic Framework recognises the importance of the ports in North Wales (para 3.2).</p> <p>North Wales regional economic framework (gov.wales)</p>

		As mentioned in the pre-application consultation response by Welsh Government, linking this opportunity with other projects in North Wales would be useful especially other projects which RWE are bringing forward which could also include onshore wind, this seems to be missing from Environmental Statement Report (Volume 3, Chapter 3, Socio Economics, May 2022).
18.20 (122)	<p>Healthcare Services</p> <p>Paragraph 224 of [AS-034] states that the Applicant will provide healthcare services. Please confirm:</p> <p>a) What healthcare services are to be provided by the Applicant?</p> <p>b) Will the services only be available to non-UK-based workers? c) How will such services be secured?</p>	<p>The applicant would need to provide for onsite and response to emergency situations and incident response.</p> <p>Services as above should be available for all workforce.</p>
18.21 (123)	<p>Healthcare Services</p> <p>Paragraph 223 of [AS-034] refers to the possibility of the capacity of the Proposed Development being greater than 576MW. One implication of an increase in capacity may be that if the workforce increases, the level of additional patients for GP services could result in the number of registered patients exceeding the recommended benchmark of 1,800 patients per GP. Please explain what other effects an increase in capacity above 576MW would have on the outcome of the socio-economic assessments.</p>	<p>The proposed workforce numbers would not have a material impact on the provision and delivery of health and care services in the region.</p> <p>Potential concentration of the workforce around a particular GP practice would need to be considered in the light of the current patient to GP ratio in some areas of N. Wales.</p>
18.22 (123)	<p>Healthcare Services</p> <p>Paragraph 98 of [AS-034] states that the in respect of the demand for healthcare services the assessment is based on the wider North Wales area but that the impact has the potential to be concentrated locally, around areas of construction or port activity. As a decision hasn't yet been reached in respect of the port,</p>	<p>The proposed workforce numbers would not have a material impact on the provision and delivery of health and care services in the region.</p> <p>Potential concentration of the workforce around a particular GP practice would need to be considered in the light of the current patient to GP ratio in some areas of N. Wales.</p>

	how does the assessment reflect the possible geographical variation in the labour catchment area?	Consideration may need to be given to Emergency services response in the area with regards to health and safety incidents and the timeliness of response by WAST.
18.26 (124)	<p>Supply Chain Strategy</p> <p>Is there a commitment to a proportion of contracts to be provided through local suppliers? If so, how would this be secured, monitored and delivered?</p>	<p>This element is key to the success of this project in North Wales. Welsh Government recognises the project could be a catalyst to secure long-lasting legacy benefits for North Wales and indeed Wales and 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.</p> <p>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.</p> <p>The percentages identified in tables included in Environmental Statement Report Volume 3, (May 2022), table 12 specifically, seem disappointingly low and it is hope that RWE will continue to work with WG to improve on this percentages for North Wales and Wales.</p>
20.8 (130)	<p>Draft Development Consent Order</p> <p>As Highway Authority are you content with the proposed powers contained in Articles 9 to 13, Part 3, Streets, of the draft Development Consent Order (dDCO) [AS-014]? If not, how would you like them to be amended, why and to what effect?</p>	<p>https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010112/EN010112-000181-3.1_AyM_DCO.pdf</p> <p>Section 61 of the Application of the 1991 Act should apply and taken from part 4 and inserted in part 2 Article 10. The A55 is classed as a special road.</p>
20.11 (130)	<p>Outline Construction Traffic Management Plan</p> <p>Are you content with proposals in the outline Construction Traffic Management Plan [APP-319] to</p>	<p>Appendix 7, Outline Construction Traffic Management Plan (planninginspectorate.gov.uk)</p>

	consult on potential traffic disruption during the construction phase of the project and mitigate its effects?	Scope of CTMP should be extended to include appropriate structural and capacity assessments of route to assess impact of all construction traffic, not just AILs. There are areas that include the dialogue with NMWTRA and this will help discussions.
20.14 (131)	Horizontal Directional Drilling Are you satisfied that proposals to use Horizontal Directional Drilling (HDD) under the A55 Trunk Road are feasible and will not result in any significant effect on its infrastructure or main line and junction traffic flows?	Whilst the SRN team are content with the principal of HDD at this location, at this time we have not provided geotechnical certification to confirm we approve the specifics of the proposal. This should be provided in advance of permission being granted in case any departures etc. are required.
20.15 (131)	Draft Development Consent Order What protective provisions for the A55 Trunk Road, if any, would you like to see included in Part 6, Schedule 9 of the dDCO [AS-014]?	Note 20.8 above. Heads of Terms to be agreed which will include easement, maintenance agreements and Geotechnical Certification required under CD 622 of Design Manual for Roads and Bridges. Works to be delivered under Section 61 of Streetworks Act.