Awel y Môr Offshore Wind Farm

Written Summary of Oral Submissions to ISH3 (Proposed Substation Site and Related Matters)

Deadline 3a

Date: 16 December 2022

Revision: A

Document Reference: 3a.5

PINS Reference: N/A

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

REVISION	DATE	STATUS/ REASON FOR ISSUE	AUTHOR	CHECKED BY	APPROVED BY
A	December 2022	Deadline 3a	Burges Salmon	RWE	RWE

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Awel y Môr ISH 3: The Applicant's Summary of Oral Submissions

This note summarises the submissions made by Awel y Môr Offshore Wind Farm Limited (the Applicant) at ISH3 on 8 December 2022. This document does not purport to summarise the oral submissions of parties other than the Applicant; summaries of submissions made by other parties are only included where necessary in order to give context to the Applicant's submissions.

Updates or responses to action points will be addressed in the response to ISH3 actions document to be submitted at Deadline 4.

1 GOOD DESIGN

Site selection

1.1 The Applicant considers that a critical part of good design is the selection of the right site. The selection of the onshore substation site needs to balance a variety of factors such as keeping the development away from residential properties and a wide range of other technical and environmental factors, whilst remaining an appropriate distance from the connection into the National Grid. The Applicant has undertaken a comprehensive site selection exercise for the substation that has considered a wide range of environmental and engineering factors. This is set out in the application documents.

1.2 The site selection process has included consultation at various stages which has included engagement with Denbighshire County Council (DCC), Natural Resources Wales (NRW) and the Welsh Government (WG) and other stakeholders. It has also included public consultation. The siting of the substation has been confirmed as appropriate by DCC as is recorded within the draft Statement of Common Ground (SoCG) (AS-047) submitted at Deadline 3.

1.3 The Applicant confirmed that the guiding principle for locating the substation has been to achieve an economic and efficient connection. This includes being as close as possible to the National Grid connection point whilst taking into account environmental constraints including siting principles as set out in the Horlock Rules.

1.4 Site selection started with the identification of a connection point with the National Grid. The connection point was identified by National Grid as the existing substation to the south of St Asaph Business Park (Bodelwyddan). Initially, an Area of Search was defined using a 3km buffer from the National Grid substation. Parts of the buffer area were then removed to avoid existing settlements and environmental designations where possible in line with the Horlock Rules.

1.5 The Applicant confirmed that although the Horlock Rules do not specifically refer to a 3km area, there are two critical reasons for the substation to be as close as possible to the National Grid substation. One is the increased costs of 400kv cables and the second is the amount of reactive compensation which is required. Those two points and minimising the overall cable length are why the preference is to be as close as possible to the National Grid substation.

1.6 The Applicant undertook consultation on the substation area of search in February 2020. This consultation also set out the site selection process and sought feedback from consultees including DCC, NRW and the WG. The Area of Search was included in the EIA Scoping Report that was issued in May 2020. The Scoping process provided further opportunity for stakeholders to comment on the site selection process. Following Scoping, a long list of 14 potential sites were identified and these are shown on Figure 21 of the Site Selection and Alternatives Environmental Statement (ES) Chapter (APP-044).

1.7 The Applicant confirmed that outside of St Asaph Business Park (SABP) there were no suitable brownfield or previously developed land available within the 3km buffer and Area of Search. As such, all of the 14 sites identified were all greenfield sites. In addition, although there is

previously developed land within SABP, this had adjacent residential properties and was not large enough to accommodate both the substation and the temporary construction compound (TCC) and so was excluded from further consideration and was not included in the long list.

1.8 The Applicant also noted that SABP is allocated as an Employment Area in the Denbighshire Local Development Plan. Use of this area for a substation would therefore not be considered to be in accordance with local policy. Local Development Plans do not typically include suitable allocation types for electrical infrastructure which is why substations are typically located on greenfield sites.

1.9 The 14 substation sites identified by the Applicant were appraised using a Black-Red-Amber-Green (BRAG) methodology which considered a wide range of topics to reduce the long list to an initial shortlist of 6. Following consultation, this initial shortlist of 6 sites was further reduced to 3 sites which were sites 5, 10 and 11.

1.10 Site 10 was located to the south of the National Grid substation and was considered to have the least capacity to accept development as it occupied elevated ground above the National Grid substation with residential properties in close proximity which gave rise to concerns from a landscape and visual perspective. There was not much available space in the site so opportunities for mitigation for those properties were very limited. Stakeholders also expressed concern about the impact on historic landscapes and concerns were raised around impacts on traffic, archaeology and ecology. As such, it was considered that Site 10 did not perform as well as Site 5 or 11 so was not taken forward.

1.11 Site 11 was located to the east of the National Grid substation and approximately 500m to the south of St Asaph. The site benefitted from existing mature trees that offered some visual containment in an overall relatively flat setting. This site was considered to have more capacity to accept development than Site 10 but less than Site 5. There were 18 residential properties within 400-500m of the site with potential for high visual impacts. Although the site had existing screening, there was only limited space for additional mitigation planting to be accommodated and the site was constrained by woodland and overhead lines with a tree-lined watercourse through middle. There were also potential impacts on setting in relation to St Asaph Cathedral and a new transport access route to the site would need to be created.

1.12 Site 5 is the site that was selected and is included in the AyM application. This received broadly positive feedback from stakeholders and existing woodland and landform would restrict visibility from large parts of the area around the site. In comparison to Site 11, Site 5 had a lower number of 9 properties within 350m with views likely and these were partially screened by intervening vegetation. The site also had sufficient space for landscape and visual mitigation. From a cultural heritage perspective CADW initially had concerns regarding the setting of Bodelwyddan Castle and Park, however, on further analysis this was not considered to be a high risk of significant impacts as the site had potential for views to be screened by existing woodland or through mitigation planting. The site was noted to be adjacent to Glascoed Nature Reserve and this was identified as medium risk of impacts.

1.13 Following on from the selection of Site 5 as the preferred choice, the Applicant considered the placement of the substation within the wider Site 5 zone. The substation footprint was located to the north of the Site 5 zone so as to place it further away from residential properties and the crematorium on Glascoed Road. Locating it in the north also makes use of lower ground so that mitigation planting in the south would be more effective for receptors on Glascoed Road. Locating the substation in the north also reduced the impacts on great crested newts (GCN) and left more space in the south for mitigation whilst making use of existing woodland to provide screening from Bodelwyddan Castle and Park.

1.14 The Applicant set out that in selecting a suitable site other landscape and visual aspects had also been considered. This included the relative value as set out in the LANDMAP visual and sensory dataset so that aspect areas evaluated as high were avoided and the proposed site is located within an area evaluated as medium. Landform and gradient were also considered with steeply sloping areas, high points and locations overlooked by properties on higher ground at close proximity avoided.

Design Review and Design Champions

1.15 The Applicant confirmed it is aware of the importance of good design and has included commitments to good design within the Design Principles Document (DPD) (REP3-013). The Applicant has appointed a Design Champion, Phillipa Slater. She is a fellow of the Institute of Civil Engineers and has been involved in the consultation process for the role of design champion and design reviews for national infrastructure process.

1.16 The Applicant confirmed that it has a well-established design review process within RWE using experts from outside of the project team, with significant knowledge of appropriate legislation and past substation developments.

1.17 The Applicant stated that detailed substation design is a multi-disciplinary approach which is complex and takes place over a long timescale. The substation design requires a balance to be struck between various considerations. This includes:

- the need for an economic and efficient design as required under section 9 of the Electricity Act 1989 ;
- the requirement to ensure design safety in construction and operation (which cannot be compromised) ;
- good design as defined under the National Infrastructure Strategy; and
- adherence to National Grid's prescriptive standards for substation design.

1.18 The Applicant considers that balancing these factors is best achieved by leading the review internally, and bringing in external discipline experts as required. Under the DCO requirements, DCC will need to provide signoff at the detailed design stage.

1.19 The Applicant stated that the Design Champion will play key role for how design review will occur and when it should happen. The Applicant confirmed that the Design Champion has been involved through the site selection process and the Applicant is enacting a process that has previously been setup by the Design Champion. The Applicant considered it important to have someone senior within RWE to have this role.

1.20 The Applicant welcomes using external specialists as part of the process and has committed to external involvement in the design review in the DPD. The Applicant stated they consider the review should be led by someone who has skills and expertise in all of the considerations listed above, as well as experience of lessons learnt from previous substation designs. This skillset is critical to a successful design process and should be external to the project team but does not need to be independent of the company. The role of the design review panel is balancing the various considerations and the Applicant considers that the process in place is the best way to do this, whereby external expertise is brought in for specific disciplines as required. The Applicant mentioned that this is a process that has worked on other projects. The Applicant also noted points raised by the Welsh Government that the Design Commission for Wales may be useful for the design review process and the Applicant notes that meetings have taken place between the organisations.

1.21 The Applicant mentioned that the transmission works (including the onshore substation) are built by the Applicant but once constructed and operational, must be transferred to an Offshore Transmission Owner (OFTO) who will continue to operate and maintain the transmission assets. The Applicant set out the design principles as included within the Landscape Institute's Technical Guidance Note (2020) which relates to the design of infrastructure. The note sets out design principles in relation to the following:

- Responding to context and sense of place;
- Designing to enhance green infrastructure and ecosystem services and deliver net gain for biodiversity;

- Views and Visual Amenity;
- Optimising resources;
- Design elements: Siting, Alignment and pattern; Earthworks; Buildings and structures; Water;
- Plant selection and handling; and
- The importance of good implementation, maintenance and management.

1.22 The Applicant noted that whilst some of the principles will be developed further through the detailed design process many of these design considerations have informed advice received by the Applicant to date.

The choice of Gas Insulated or Air Insulated Substation

1.23 The Applicant confirmed that intention is to retain the option of using either Gas Insulated Switchgear (GIS) or Air Insulated Switchgear (AIS) at the substation. The Applicant stated that it considers it to be standard practice to have the option for both and that key parameters for both have been included in the draft DCO (REP3-006). The Applicant noted that no preference for either AIS or GIS has been expressed by any other party.

1.24 The Applicant stated that AIS has a larger footprint and lower height while GIS is higher but would require a smaller footprint. The Applicant stated that there is pressure to stop using SF6 gas which is a potent greenhouse gas if accidently released. The only certain way to move away from this is to use AIS. However, the Applicant mentioned that SF6 free GIS is being developed which is not currently ready. The Applicant would therefore like to retain the option for using either AIS or GIS.

1.25 The Applicant noted that other substations including for Gwynt y Môr Offshore Wind Farm (GyM) (which uses GIS) have a different set of constraints and should be considered in light of the procurement process at the time. Triton Knoll Offshore Wind Farm uses AIS and the consent included the option for either GIS or AIS. There may be a combination of reasons for choosing either AIS or GIS and the Applicant considers that it is normal for a project to retain the option for using either AIS or GIS. The Applicant also noted that there is uncertainty about the costs of GIS and AIS in the future.

1.26 The Applicant mentioned that there is information in the ES about the maximum design parameters of the substation. The DPD also includes an indication of what both AIS and GIS would look like and indicative drawings are contained in Appendix F of the Applicant's response to the ExA's First Written Questions (REP1-007). The Applicant reiterated that it was standard practice for there not to be a detailed design at this stage.

1.27 The Applicant noted that from a landscape and visual perspective there are advantages and disadvantages associated with each of the options.

1.28 For AIS, the buildings would have lower maximum heights but similar heights of electrical and other infrastructure compared to GIS.

1.29 For GIS much, but not all of the electrical infrastructure would be housed in a building with a maximum height of 15m. In addition to this there would be some external electrical infrastructure of up to 12.5m and further smaller buildings. The GIS building, at 15m, would be taller than nearby buildings that tend to be two to three storeys (i.e. approximately 7-10m) or equivalent heights for farm/commercial buildings.

1.30 The built forms of the AIS would all be lower than the maximum building height for GIS so that proposed planting mitigation could fulfil its screening potential faster than for taller buildings. However, an AIS substation would have a larger overall footprint and so would require larger amounts of cut and fill to create the substation platform compared to GIS. The smaller area of

GIS and its associated cut and fill could also avoid a greater number of the landscape features on the site such as the hedgerows and hedgerow trees.

1.31 The smaller footprint of the GIS option could allow greater flexibility in arranging the built elements within the substation footprint, which may offer benefits in terms of reducing landscape and visual effects.

Design Principles Statement and Requirement 6 of the draft DCO

1.32 The Applicant noted that no feedback has been received by any other parties on the DPD and that consultation with DCC and NRW will take place on the final design of the substation. The Applicant noted that DCC is likely to discharge the requirement as a planning application with details available online and the opportunity for other parties to be involved and make representations. The Applicant is willing to consider involving other parties on the DPD and the outline Landscape and Ecology Management Plan (oLEMP) (REP2-010) if a request is made.

1.33 The Applicant noted that the substation is not within a designated area which means that details such as colours have not been the focus of discussions. The Applicant also noted that it has not received a request that key elements of the design needs to be secured at this point. The Applicant confirmed it is happy to look at the DPD and see if there is an option to include colour options. The Applicant also noted that they would consider NRW's guidance note on environmental colour assessment and how this may also relate to fencing.

Offshore Transmission Network Review (OTNR)

1.34 The Applicant confirmed it has been aware of OTNR and has taken it into account. The Applicant stated that when the project was being scoped and designed there were no other projects where discussions could take place on this. The Applicant mentioned that any co-ordination with other projects would delay the whole process and would essentially mean starting again which is not consistent with the principles of early opportunities OTNR and the increased focus from BEIS on accelerated delivery of projects as set out in the Energy Security Strategy.

1.35 The Applicant confirmed that matters relating to connection with the National Grid substation is a matter for National Grid. The Applicant has had joint meetings with National Grid and other projects in order to work together and co-ordinate so that projects can be delivered in timely way.

2 LANDSCAPE AND VISUAL

oLEMP – planting / landscape proposals and management matters

2.1 The Applicant noted that in some situations it may be appropriate for bunding to be included in substation design/landscaping proposals. The landscape and visual impact assessment (LVIA) has not included for any bunding as part of the assessment as the current proposal is for the cut and fill to be balanced across the site. Advantages and disadvantages of bunding were set out as steeply sloping landform could add a further effect in the landscape whilst slopes of gentler gradient would have less of an impact and could ensure that screening by planting mitigation occurred more quickly. Bunding may also have an effect on drainage.

2.2 However, this site slopes from the south to the north so that the land upon which the mitigation planting is proposed, between the substation and Glascoed Road, is already at a higher elevation. Also, there are numerous features on the site that it is considered beneficial to avoid such as the ponds and associated mature trees and other hedgerow trees. Including gently transitioning bunding slopes would potentially impact on these features and the beneficial and detrimental effects of bunding would need careful consideration at the detailed design stage. . The Applicant confirmed that as many existing mature trees on the site as possible would be retained.

2.3 The Applicant confirmed Figure 2 of the oLEMP contains outline principles which shows the largest area for the substation. The smaller GIS option had not been included as this is not the

worst case for land take. The Application also confirmed that the LVIA considered the worst case landscape impacts.

2.4 After construction, the final use for this area is yet to be determined as there may be a requirement for sustainable drainage system (SuDS) measures for the substation (dependent on detailed design) or for further landscape mitigation/ecology compensation. The Applicant confirmed that the total site, including landscaping and ecological mitigation areas, would be transferred to the OFTO.The Applicant confirmed that within the cable corridor where hedges and trees are removed they would be replaced within the redline boundary but only hedgerows can be located directly over the cables themselves with replacement hedgerow trees located within the redline boundary but not directly above cables. The Applicant confirmed that the only additional planting is around the substation.

2.5 The Applicant confirmed that the total area at the substation provides mitigation, compensation and enhancement. The main ecological impact of the substation footprint is the impact on bat and GCN habitats so compensation planting is needed for this to re-establish habitat links. The Applicant confirmed the oLEMP proposals have been prepared with input from DCC and NRW. The Applicant mentioned that enhancement is provided to promote ecological resilience as required by Welsh legislation, national and local planning and policies.

2.6 The Applicant stated that Requirement 9 of the draft DCO requires the planting of replacements for any dead or diseased trees for 5 years after planting the trees. However, it is unlikely to require any significant maintenance or management beyond a 3-year establishment period. The area covered by the LEMP would then be subject to management primarily to meet ecological objectives (including but not limited to European Protected Species Licence requirements), whilst also ensuring the screening effect is maintained.

2.7 The balance between ecological and landscape aims will be subject to agreement with DCC in consultation with NRW as part of the detailed LEMP approval process.

2.8 Ongoing management to meet ecological objectives at the substation would be undertaken for the lifetime of the project. Management would ultimately be the responsibility of the Applicant, although it is possible that the management could be delivered by an appropriate local body subject to agreement closer to the time.

Related provisions of the draft DCO

2.9 The Applicant confirmed Work No 39a is a zone where the TCC may be located. This will depend on any National Grid works around this area. The Applicant confirmed that it does not have any certainty on these works so will need to retain flexibility.

2.10 In relation to Work No 34, the Applicant mentioned permanent rights are needed over the Glascoed Road visibility splay for maintenance purposes. The Applicant is unable to confirm the extent of vegetation to be cleared and this is subject to detailed design. The Applicant is happy to engage with the landowner in respect of these details.

2.11 The Applicant confirmed Requirement 8 of the draft DCO refers to substation site and Requirement 9 refers to landscape works under Requirement 8. The Applicant mentioned that planting outside of the substation site is covered by Requirement 13 of the draft DCO which will be discharged in accordance with the staging of the onshore works. Requirement 17 also provides reassurance that land will be reinstated after completion of the relevant stage. The Applicant confirmed that the final LEMP will cover replacement of trees along the cable route for 3 years subject to ongoing maintenance commitments. The Applicant will retain rights for maintenance of replacement planting along the cable route.

Visual effects (including from Glascoed Nature Reserve and Faenol Bropor)

2.12 The Applicant stated that the different height of the platform for GIS was calculated relative to its illustrative location in the southern part of the site for the purposes of LVIA. For the AIS the platform level will be at a balance point roughly between northern and southern extents of the

platform. There will be a different platform level for the GIS as it will be located in a smaller area within the AIS footprint area where there is a different cut/fill balance.

2.13 The Applicant confirmed that the gradient of the substation platform batter shown in the visualisations is 1 in 3. The Applicant noted that the final gradient was subject to detailed design once further geotechnical information was available after consent.

2.14 The Applicant noted that AIS buildings are significantly smaller than GIS buildings. The Applicant further noted that although Requirement 7 of the draft DCO does not include a specific maximum height for AIS buildings, it is tied to the ES assessment which has considered a maximum AIS building height.

2.15 The Applicant stated that Viewpoint (VP) 1 is not representative of the view from Faenol Bropor due to increased screening at the property due to landform and vegetation which it considers would result in a lower magnitude of change. The Applicant noted representations made by the agent of the Faenol Bropor residents in relation to viewpoints from Faenol Bropor. The Applicant confirmed that the viewpoints were agreed with DCC and other key consultees in advance. Where additional viewpoints were requested then this was taken into account. The Applicant does not consider it standard practice for viewpoints to include individual properties. The Applicant provided specific visualisations from Faenol Bropor for the benefit of the residents and will continue discussions with the residents and their agent.

2.16 The Applicant noted the request by a landowner's representative to include coniferous trees in the landscaping scheme and confirmed that these were included for the section 42 consultation but there was a request by statutory consultees to remove these. The Applicant would need to agree this with other consultees before these can be added to the woodland mix. Planting mixes would be agreed as part of the detailed design process.

2.17 The Applicant also confirmed that the lighting proposed along the access road would be low level (bollard type) rather than column mounted or floodlighting.

2.18 The Applicant confirmed that it is happy to look at colour options for the substation and other aspects such as fencing although this would be subject to National Grid requirements.

3 BIODIVERSITY, ECOLOGY AND THE NATURAL ENVIRONMENT

Mitigation, aftercare and monitoring

3.1 The Applicant confirmed that the term 'preliminary mitigation' is used in the ES as additional surveys will need to be undertaken to confirm the final mitigation measures to be delivered. The Applicant anticipates that the additional surveys will not affect the conclusions of the ES.

3.2 The Applicant stated that Figure 2 of oLEMP is an illustrative plan. The Applicant confirmed that during the construction stage there will be restricted links for wildlife. If, as a result of final scheme design and depending on pre-construction survey results, links during construction (such as GCN underpasses) are deemed necessary then this will be considered by the Applicant.

3.3 The Applicant confirmed that the two ponds on the substation site are currently not managed for ecological objectives (they are managed for agricultural purpose), and that bringing them into ecological management will mean that they represent enhancement measures. The Applicant also mentioned that bat boxes would be placed on the most appropriate trees (as identified by survey) and would be subject to detailed design. The Applicant stated that the location of barn owl poles are illustrative and can be anywhere in the area categorised.

3.4 The Applicant stated that the diverse neutral grassland has been located in areas not affected by the construction of the substation. In these areas, the Applicant will be looking at managing existing vegetation to be more structurally and species diverse for biodiversity gains. How the areas would be managed would be agreed with NRW and DCC as part of the final substation LEMP.

3.5 The Applicant stated that from an ecological point of view, the substation site is agricultural land (so of a lower ecological quality) and the ecological value within the area arises from the hedgerows. The Applicant stated that GCN and small mammal habitats can be established fairly quickly whereas other habitats, such as for bats and birds, may take approximately 5-10 years. The Applicant stated that south eastern portion of Figure 2 of oLEMP would also have benefits for other species such as hedgehogs.

3.6 The Applicant confirmed that the compensation and enhancement quantum is agreed with NRW and DCC and meets the relevant policy requirements. The initial enhancement proposals in the oLEMP includes the erection of ten bird boxes, including two pole mounted barn owl boxes, the creation and ongoing management of five new ponds; creation of 9.8 ha of species-rich, lowland meadow, creation of additional hedgerows and creation of 2.96 ha of locally native broadleaved woodland. This will be subject to further agreement through the final LEMP. The area also includes mitigation for landscape purpose and so provides dual purpose (so represents an efficient use of land).

3.7 The Applicant confirmed that the land around the substation will be within the substation ownership which will be the Applicant initially then transferred to the OFTO. The land will be within the responsibility of a single party and will be maintained in accordance with the landscape and ecological maintenance obligations.

Pre-commencement, construction and programme

3.8 The Applicant confirmed that preliminary works means pre-commencement works and that this has been clarified for the purposes of the DCO. Pre-commencement works include archaeological and ecological surveys, creation of a temporary site access and site clearance. The Applicant confirmed that the requirements in the DCO include controls on pre-commencement works (by reference to the detail in the outline management plans that are appended to the CoCP and that will be secured through the DCO) even though works will be before the final plans are agreed. The Applicant has sought to include sufficient details in the outline plans to appropriately control pre-commencement works.

3.9 The Applicant confirmed that Requirement 15 of the draft DCO will cover all works including pre-commencement works. The Applicant also confirmed that Requirement 17 relates to stages of works under Requirement 5 which provides that pre-commencement works can take place before the staging of the onshore works has been notified to DCC.

3.10 The Applicant confirmed that pre-commencement works are considered within the construction phase of the development for the purposes of the ES.

3.11 The Applicant clarified that the indicative layout within the TCC and cable route contains some flexibility including where the cable will connect to the substation within the Order Limits. The Applicant confirmed that any works would be constrained by the details on the Works Plan.

Soil Management Plan

3.12 The Applicant stated that the Soil Management Plan (SMP) (REP2-033) includes commitments for soil condition surveys to inform the management of the soil. This will include measures such as reinstatement of soil. The Applicant also clarified that the SMP will refer to management of soil including ensuring sufficient areas are available for storage to avoid mixing of soils and allow appropriate handling.

Resilience of ecological networks and ecosystems

3.13 The Applicant confirmed that most fundamentally, the project as a whole assists toward global ecosystem resilience by reducing reliance on carbon for energy generation, and minimising impacts on climate.

3.14 The Applicant also contributes to a resilient economy through measures undertaken around the substation. Hedgerows, woodlands and ponds are proposed at locations which link to the existing infrastructure, helping to link together and to expand important species populations

such as GCN and habitat types. The outline design serves to increase links to Glascoed Nature Reserve and adjacent ancient semi-natural woodlands, and so assist with resilience of areas beyond the Order Limits. The Applicant stated that this increase in links, number of ponds and number and types of habitats present means that the project contributes to resilience of ecological networks and ecosystems.

3.15 The Applicant stated that compensation is needed at the substation site for the permanent loss of 8 trees of potential use to roosting bats in the substation footprint, potentially 5 further trees in batter slope around the substation, 540m of hedgerow within the substation footprint, potentially 130m of additional hedgerow within batter slope area around the substation, foraging habitat for GCN and habitat for passerine species.

3.16 The Applicant confirmed that in respect of GCN, there is a need to compensate for permanent impacts to existing terrestrial habitat used by an exceptional population of GCN, which breed in ponds immediately adjacent to the substation site in Glascoed Nature Reserve. There will be an area of terrestrial habitat permanently lost as result of substation footprint and as a result of the permanent access road. The removal of hedgerows at the substation also severs links to potential foraging or sheltering habitats in close proximity of GCN breeding ponds next to St Asaph Business Park. It is necessary to provide this prior to or at the commencement of construction and to maintain it until such time as habitat links are re-established.

3.17 The location of compensation must be contiguous with habitats used by the GCN, in order that the local GCN population has access to it. It must also be as close as possible to that lost in order to minimise impacts and in all cases within 500m.

3.18 The Applicant also stated there is a requirement to provide ecological compensation. The Applicant noted that it makes sense, and follows the “rules of thumb” to increase extent and connectivity, for the project to deliver any enhancement in the same place as ecological (and landscape) mitigation and compensation. The ecological enhancement is located at the substation as it is the place which will bring the most benefits. Alongside this, landscape mitigation is required in this area so use of it for both purposes represents an efficient use of land. This approach, and the quantum have been agreed with both NRW and DCC.

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