



Marine Licensing Team,  
Cardiff Permitting Service,  
Natural Resources Wales,  
29 Newport Road,  
Cambria House,  
Cardiff,  
CF24 0TP  
*By Email*

**Constituency Office**

29 Madoc Street,  
Llandudno LL30 2TL

**Swyddfa'r Etholaeth**

29 Stryd Madog,  
Llandudno LL30 2TL

8/07/2022

**Re: ORML2233 / Awel y Môr offshore wind farm**

Dear Sir/Madam,

I hope that this letter finds you well. I am writing with regards to the marine licence application for the proposed Awel y Môr (AyM) offshore wind farm.

Having considered the documentation, I wish to formally object to the granting of a licence. Please find below the reasons below:

1. I understand that the geophysical assessment of the interlink area between AyM and Gwynt y Môr is reliant solely on a previous assessment undertaken by Wessex Archaeology. However, the survey data for that previous assessment did not cover the entire interlink area. As such, and as is noted in the document entitled 'Category 6: Environmental Statement Volume 2, Chapter 11: Offshore Archaeology and Cultural Heritage' the potential remains for unidentified features of archaeological potential to be present within the interlink area. As such I think it reasonable to suggest that a geophysical assessment be undertaken of the whole interlink area;
2. It is my understanding that although the proposed development is confined to the Site Investigation Boundary, the exact layout of the proposed turbines, other structures and cable route have not been confirmed. As such, there is no clear Maximum Design Scenario for assessing potential adverse impacts on offshore archaeological and cultural heritage receptors. Therefore, I am concerned that the worst-case scenario approach does not properly ensure that any difference in layout has been fully captured as part of the assessment in the Environmental Statement;
3. There is a risk of total or partial loss of archaeological receptors during the decommissioning phase due to the draw-down of sediments. I understand that the draw-down of sediment into voids left by removed turbine foundations could lead to loss of sediment, destabilising archaeological sites and contexts, and exposing such material to natural, chemical or biological processes, and causing or accelerating loss of the same. Even more concerning, is that RWE have tried to justify this by explaining that currently only general locations of known wrecks and obstructions are available, with the position and extent of the marine

[Cont...]





[Cont...]

archaeological resources not yet established, and therefore that mitigation will include a review of the geophysical survey and monitoring data throughout the life of the project to gain a greater understanding of the archaeological resource and the long-term effect of the development. I think it unacceptable for the project to proceed until such a time that there is complete certainty as to the position and extent of the marine archaeological resources. Indeed, whilst I acknowledge that there is an intention to report unexpected finds, this provides no certainty that the risk of total or partial loss of the archaeological receptor can or will be mitigated;

4. According to *RIAA Annex 5: Ornithology Apportioning Note* there is the potential for offshore wind farms to have a negative effect on the integrity of Special Protection Areas within foraging range of the offshore wind farm site during the breeding season;
5. The document entitled '6.2.7\_AyM\_ES\_Volume2\_Chapter7\_MarineMammals\_vFinal' seems to be unavailable for download and study by interested parties;
6. The applicant has not been able to carry out a quantitative assessment of the magnitude or significance of the impact of temporary threshold shift (TTS) on marine mammals. Whilst such an approach has been agreed with Natural England, the MMO and CEFAS and, as such, recent projects have not presented an assessment of magnitude, sensitivity or resulting significance for TTS-onset, I am unclear as to the NRW stance on the matter;
7. The commercial fisheries stakeholder group meeting held on September 2020 saw concerns raised about underwater noise and effects of fish resources; potential for extension of the Traffic Separation Scheme north of AyM; long term effects from construction and operation; and cumulative effects from other projects. I believe that further dialogue is required with the stakeholder group so to ensure that they are content with proposals before granting a licence;
8. The Welsh Fishermen's Association have highlighted that 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'. I agree with the Association that such missing vessel location information is of serious concern, and as such I would be grateful if you could ascertain whether the applicant has or will complete the data set as part of the assessment. The majority, approximately 90%, of the Welsh fleet are vessels 12m and under in length. As such, I agree with the suggestion that the information gap makes the impact pathway assessment conclusions unreliable with respect to the impacts on commercial fisheries from all aspects of the development. This seems to be the case when considering that RWE have noted that VMS data available to the applicant does not include vessels <15m length;
9. Lack of consideration given to the impact on proposals for large areas of integrated multi trophic aquaculture development close to the proposed AyM site;

[Cont...]

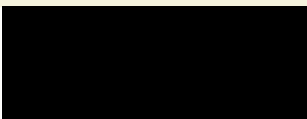


[Cont...]

10. Concern 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. There needs to be complete clarity that the development would not result in a negative impact on the livelihoods of fishers and changes in fish abundance before a licence is granted.

I trust that my submission will receive careful consideration.

Kind regards,



**Janet Finch-Saunders MS/AS**

