Awel y Môr Offshore Wind Farm

Statement of Common Ground 3 – Conwy County Borough Council

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Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

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Position	CCBC to complete upon final SoCG version
For	CCBC to complete upon final SoCG version

Signed	The Applicant to sign upon final SoCG version
Name	The Applicant to sign upon final SoCG version
Position	The Applicant to sign upon final SoCG version
For	Awel y Môr Offshore Wind Farm Limited (the Applicant)

Contents

Tables

1 Introduction

1.1 Background

1 This Statement of Common Ground (SoCG) has been prepared between Awel y Môr Offshore Wind Farm Limited (hereafter referred to as 'the Applicant') and Conwy County Borough Council (CCBC) to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application (the Application) for the Awel y Môr Offshore Wind Farm (hereafter referred to as 'AyM').

2 The need for a SoCG between the Applicant and CCBC was set out within Rule 6 letter issued by the Examining Authority (ExA) on 23 August 2022. Prior to Deadline 1, the Applicant proposed that the SoCG with CCBC would be developed after receipt of detailed feedback in CCBC's Written Representation (REP1-055).

3 The SoCG with CCBC is a means of clearly stating any areas of agreement and outstanding disagreement between the two parties in relation to AyM's DCO application. This SoCG has been structured to reflect the topics of interest and relevance to CCBC.

4 It is intended that this document will help facilitate post-application discussions between both parties and also give the Examining Authority (ExA) an understanding of the level of common ground between both parties.

1.2 Approach to SoCG

5 This SoCG has been developed during the examination phase of AyM. In accordance with discussions between the Applicant and CCBC, the SoCG is focused on the onshore topics listed in Section 2.

6 The SoCG is structured as follows:

- **Introduction:** Outlining the background to the development of the SoCG;
- **CCBC's remit:** Describing the remit of CCBC, the relevance of CCBC's interest in the Application, the main areas of discussion within the SoCG and a summary of consultation to date; and

- **Agreements Log:** A record of the positions of the Applicant alongside those of CCBC as related to the topics of discussion and the status of agreement on those positions.

1.3 The Development

7 The Application is for development consent for the Applicant to construct and operate the proposed Awel y Môr project under the Planning Act 2008.

8 AyM will comprise up to 50 Wind Turbine Generators (WTGs) and will include infrastructure that is required to transmit the power generated by the turbines to the offshore substation via inter-array cables, before being transmitted via export cables to the proposed OnSS located to the west of St Asaph Business Park (SABP) and then to the existing National Grid Bodelwyddan substation.

9 The onshore export cable configuration will include up to two cable circuits connecting to the proposed OnSS and existing National Grid Bodelwyddan substation via a Landfall to the east of Rhyl and underground cables within an onshore Export Cable Corridor (ECC).

10 The key permanent onshore components of AyM will include:

- Infrastructure at Landfall where the offshore cables are brought ashore;
- Up to two Transition Joint Bays connecting the offshore cables to the onshore cables;
- Underground cable ducts, joint pits and cables;
- The OnSS to the west of SABP; and
- Underground cable ducts, joint pits and cables for the grid connection from the OnSS to the existing National Grid Bodelwyddan substation located to the south of SABP.

11 More details on the proposed development are described in the Environmental Statement (ES) Volume 3, Chapter 1: Project Description (Onshore) (APP-062).

2 CCBC's remit as an Interested Party

2.1 Introduction

12 CCBC is a prescribed consultee for the proposed development under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and is also the closest LPA area to the offshore elements of the scheme. CCBC's remit covers the following broad areas that are relevant to the onshore aspects of AyM:

- Tourism;
- Indirect effect on heritage assets within Llandudno; and
- Noise from offshore construction.

13 Agreements and disagreements with the North Wales Local Planning Authorities (NW LPAs) (including CCBC) relating to the offshore Seascape, Landscape and Visual Impact Assessment (SLVIA) and associated impacts on the built environment and heritage are captured in SoCG 1 (see the Statement of Commonality (REP1-011)).

14 Whilst CCBC has broader remits, the project elements of interest for this SoCG are the offshore elements of the scheme comprising WTGS and offshore substation that have the potential to affect tourism, heritage and airborne noise and vibration receptors within the CCBC administrative area.

15 In relation to AyM, CCBC's responsibilities have included engagement in the pre-application process, both through membership of Expert Topic Groups (ETGs) and through bilateral discussion. In addition, it is proposed that CCBC is consulted on the discharge of onshore DCO Requirements for some onshore elements of the works.

2.2 Consultation Summary

16 Table 1 This section briefly summarises the consultation (regarding onshore aspects of AyM) that the Applicant has undertaken with CCBC including both statutory and non-statutory engagement during the pre-application and post-application phases.

Table 1: Consultation undertaken with CCBC during pre-application and post application phases.

DATE AND TYPE	DESCRIPTION OF CONSULTATION
09/12/2019	Traffic, Transport ETG
14/01/2020	Traffic and Transport telephone meeting
09/03/2020	Onshore ETG
18/09/2020	Offshore Ornithology ETG
21//09/2020	Onshore Ecology ETG
25/01/2021	SLVIA & Cultural heritage
10/02/2021	SLVIA & Cultural heritage
29/03/21	Human Environment ETG (Traffic and Transport subgroup)
31/03/21	Human Environment ETG (Noise subgroup)
29/04/2021	Tourism and Recreation
05/05/2021	Socio economic ETG
May & June 2021	Informal Statement of Community Consultation (SoCC) consultation engagement: email correspondence across May & June 2021 to Ceri Thomas & Shane Wetton to inform the drafting of the SoCC and plans for community engagement; MS Teams meeting with Shane Wetton (20/05/2021)
07/06/2021 (emails)	Tourism: organisation of meeting with Destination Conwy Steering Group to discuss Tourism matters Email correspondence between CCBC (on behalf of Jon Merrick) and RWE (Poppy Tremayne)

DATE AND TYPE	DESCRIPTION OF CONSULTATION
09/06/2021	Tourism: Meeting with Jon Merrick to discuss Destination Conwy meeting Jon Merrick (CCBC), Poppy Tremayne (RWE): meeting to discuss attendees, expectations, proposed agenda, etc.
29/06/2021	Tourism: email to Jon Merrick to confirm details for Destination Conwy meeting (5 July 2021) Email correspondence between CCBC (on behalf of Jon Merrick) and RWE (Poppy Tremayne)
05/07/2021	Tourism: MS Teams meeting with Destination Conwy, CCBC, RWE to discuss tourism concerns
06/07/2021	Tourism:
02/11/2021	Human environment ETG
04/11/2021	SLVIA & Cultural Heritage
14/12/2021	SLVIA ETG
30/03/2022	RE: Adequacy of Consultation Representations Email sent to several CCBC Officers (Planning, Community Engagement) regarding AyM's intention to submit DCO application on 20/04/2022, and advance notice that PINS would soon write to them requesting an Adequacy of Consultation representation, in light of their LPA status
26/04/2022 (email)	RE: Confirmation AyM DCO application submission to PINS 26/04/2022 (email)

DATE AND TYPE	DESCRIPTION OF CONSULTATION
5-9 May 2022 (email)	RE: Confirmation of depositing select DCO application materials at Conwy libraries 5-9 May 2022 (email)
24/06/2022 (email)	RE: AyM key updates and outputs required (DCO submission confirmation, Registering as an Interested Party, compilation of Local Impact Report) 24/06/2022 (email)
28/06/2022 (telephone call and email)	RE: Email requesting extension of existing DCO application materials on display in Conwy libraries (until end of August) and querying whether could deposit ML Application documents in same Conwy libraries for the duration of the ML consultations period (until 18/08/2022). 28/06/2022 (telephone call and email)
11/07/2022 (MS Teams meeting)	Project update/briefing via MS Teams (Community Engagement team): focussed on consent planning applications' process and imminent DCO Examination timeline 11/07/2022 (MS Teams meeting)
11/08/2022	SoCG information and invitation (expand a little on this) 11/08/2022 – check date (email)
26/08/2022	Email sent to CCBC (add recipients/team) regarding Rule 6 letter and attaching first DCO Examination Hearings' Notice and asking to print out/post up as might be deemed helpful for local members of the public 26/08/2022 – check date

DATE AND TYPE	DESCRIPTION OF CONSULTATION
10/01/2023	Virtual meeting to discuss CCBC feedback on the outline Construction Noise Monitoring Plan in relation to offshore piling noise.
16/01/2023	Virtual meeting to discuss the principles of a Tourism Fund for LLandudno and the Great Orme. The fund would sit outside the planning system and not be secured through the DCO, but would provide funds for tourism related activities at the end of construction and start of operation of the wind farm. A draft agreement is to be provided to CCBC for review.

3 Agreements Log

17 The following sections of this SoCG set out the level of agreement between the Applicant and CCBC for each relevant component of the Application identified in paragraph 12. The tables below detail the positions of the Applicant alongside those of CCBC and whether the matter is agreed or not agreed.

18 In order to easily identify whether a matter is 'agreed', 'not agreed' or an 'ongoing point of discussion, the agreements logs in the tables below are colour coded to represent the status of the position according to the criteria in Table 2 below.

Table 2: Position status key.

POSITION STATUS	COLOUR CODE
The matter is considered to be agreed between the parties	Agreed
The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	Ongoing point of discussion
The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicant or CCBC is not considered to result in a material outcome on the assessment conclusions.	Not agreed – No material impact
The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or CCBC is considered to result in a materially different outcome on the assessment conclusions.	Not agreed – material impact

3.1 Tourism

Table 3: Status of discussions relating to tourism and recreation.

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
Environmental Impact Assessment			
Planning and policy	The EIA has identified all relevant legislation and policy and appropriate consideration has been given to them in the assessment of tourism and recreation impacts of onshore aspects of AyM	CCBC agreed that the EIA has identified all relevant legislation and policy.	Agreed
Consultation	The EIA has had regard to matters raised by CBCC via statutory and non-statutory consultation activities in relation to tourism and recreation.	The EIA refers to matters raised by CCBC.	Agreed
Baseline characterisation	The EIA adequately characterises the baseline environment relevant to tourism and recreation impacts. Available evidence considering the impact of offshore wind farms on local tourism economies does not identify any actual negative impacts arising.	It is difficult to identify a baseline due to the Covid-19 pandemic. Whilst this has been acknowledged in the report, a lot of assumptions have had to be made in order to identify a baseline.	Not agreed – material impact
		Notwithstanding the comment above, CCBC agrees that the EIA has used the evidence available to determine a baseline environment relevant to tourism and recreation as accurately as possible.	Agreed
Assessment scope and methodology	The impact assessment methodology identified in Section 4.4 of Volume 3, Chapter 4 Tourism and recreation (PINS Ref APP-065/ Application Ref 6.3.4) is considered appropriate.	Whilst CCBC notes the conclusions of various studies relating to the impact of windfarms on the tourism sector, the ES notes (Volume 3, Chapter 4, Table 4) that there is an element of uncertainty. Accordingly, CCBC is unable to agree with the conclusions in paragraph 299 of Chapter 4 that the impacts on the visitor economy for Llandudno and the Great	Not agreed – material impact

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
		Orme would necessarily be Low in the short-term (up to 2 years), or that it would necessarily be Negligible thereafter.	
		Notwithstanding the comment above, CCBC agrees that the scope of the assessment and the assessment methodology are otherwise appropriate for the purposes of undertaking the EIA.	Agreed
Tourism Fund	The assessment in Sections 4.10.4 and 4.11.4 of Volume 3, Chapter 4 Tourism and recreation (PINS Ref APP-065/ Application Ref 6.3.4) consider the impact of construction and operation activity on the volume and value of the tourism economy and identify potential for short term (up to 2 yrs), significant impacts for the Llandudno and Great Orme area. Although currently the subject of ongoing discussion, including a meeting on 16 January, it is agreed that provision of a Tourism fund to cover Llandudno and the Great Orme, would offset these identified effects.	The effect of this proposal on tourism is uncertain and there is limited data available to show trends for how windfarms affect tourism in North Wales. A tourism fund will help in some ways to mitigate any negative impact on tourism in the area, but there remains a risk that there would still be a negative residual impact on the visitor economy. CCBC has met with the Applicant to agree the principles of a tourism fund and discussions are ongoing.	Ongoing point of discussion
Outcomes of the EIA	The conclusions of the assessment identified in Section 4.10 of Volume 3, Chapter 4 Tourism and recreation (PINS Ref APP-065/ Application Ref 6.3.4) in relation to the construction effects on tourism and recreation receptors are appropriate.	Conwy County shouldn't experience any effects on tourism as a result of onshore construction since the onshore construction is located in Denbighshire.	Agreed
		However, the impact on tourism in relation to the offshore construction works would be similar to that during the operational stages of the offshore windfarm, and the Council continues to have concerns relating to the	Not agreed – material impact

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
		inherent uncertainty and unpredictability of these impacts.	
	The conclusions of the assessment identified in Section 3.11 of Volume 3, Chapter 4 Tourism and recreation (PINS Ref APP-065/ Application Ref 6.3.4) in relation to the operational effects on tourism and recreation receptors are appropriate. Volume 3, Chapter 4: Tourism and Recreation (APP-065) presents a detailed and comprehensive review of the evidence of the relationship between wind farms and tourism. It finds limited evidence that wind farm developments have a negative impact on the local tourism economy. The assessment was made on a precautionary basis and identified a small risk identified at the final stage of construction and initial period of operation. However, there is no evidence from studies of other offshore wind farms in the UK (including existing wind farms off the coast of North Wales) pointing to negative impacts on local tourism economies, which suggests AyM will not have an impact on tourism. The risk identified in the ES is small given the nature of the scheme and strength of tourist economy in Llandudno.	The fact Llandudno attracts older visitors has been considered. Some mitigation measures have been suggested in the form of introducing signage to explain the benefits of the project. It is suggested that Llandudno could attract a different visitor type as a result of the development of AyM, but this is an assumption and not based on any evidence. We would welcome further discussion on this point to mitigate any negative impacts on tourism, such as through provision of a tourism fund described above.	Ongoing point of discussion
	The conclusions of the assessment identified in Section 3.13 of Volume 3, Chapter 4 Tourism and recreation (PINS Ref APP-065/ Application Ref 6.3.4) in relation	Impact on Llandudno and the Great Orme has been classed as moderate adverse and CCBC are in ongoing discussions over	Ongoing point of discussion

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
	to the cumulative effects on tourism and recreation receptors are appropriate.	the provision of a tourism fund to mitigate the impacts of this.	

3.2 Indirect effects on heritage assets within Llandudno

Table 4: Status of discussions relating to heritage assets within Llandudno.

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
Environmental Impact Assessment			
Planning and policy	The EIA has identified all relevant legislation and policy and appropriate consideration has been given to them in the assessment of indirect effects on cultural heritage assets	CCBC agrees that all relevant legislation and policy has been identified and considered in the ES.	Agreed
Consultation	The EIA has had regard to matters raised by CCBC via statutory and non-statutory consultation activities in relation to indirect effects on cultural heritage assets. The Applicant does not consider there to be potential for effects on the maintenance of the built fabric within Llandudno Conservation Area and on listed buildings as this would relate only to a long term effect, whereas the identified effect on tourism economy is considered to be short duration.	CCBC agrees that most of these matters have been addressed in the ES, but notes that the ES does not address the impacts arising from any decline in tourism revenue of the maintenance of the built fabric within Llandudno Conservation Area and on listed buildings.	Not agreed – material impact
		Notwithstanding the comment above, CCBC agrees that the EIA has had regard to matters raised in statutory and non-statutory consultation.	Agreed
Baseline characterisation	The EIA adequately characterises the baseline environment relevant to indirect effects on cultural heritage assets.	CCBC agrees that the baseline environment has been adequately characterised in the ES.	Agreed
Assessment scope and methodology	The impact assessment methodology identified in Section 8.4 of Volume 3, Chapter 8 Archaeology and Cultural Heritage (PINS Ref APP-069/ Application Ref 6.3.8) is considered appropriate	CCBC agrees that the assessment methodology is appropriate.	Agreed
Outcomes of the EIA	The conclusions of the assessment identified in Section 8.10 of Volume 3, Chapter 8 Archaeology and Cultural Heritage (PINS Ref	CCBC maintains its position in the Written Representations that the ES provides a conservative position of the impacts on a	Not agreed – material impact

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
	APP-069/ Application Ref 6.3.8) in relation to the construction effects on archaeological and heritage receptors are appropriate. The Applicant does not consider there would be a moderate adverse effect to the conservation area as this is significantly more extensive than that part which lines the beach (the section incorporating/facing onto the promenade). Views from the core of the town to the bay are generally limited. The ability to appreciate the way in which the planned development within the conservation area conforms to the bay, the way in which the streets and buildings are arranged, and the architectural detail in the individual buildings will not be affected.	number of historic assets, and that the impact on Llandudno Conservation Area in particular should be assessed as being Moderate Adverse.	
		Notwithstanding the comment above, CCBC otherwise agrees that the conclusions of the ES in relation to the construction effects on archaeological and heritage receptors are appropriate.	Agreed
	The conclusions of the assessment identified in Section 8.11 of Volume 3, Chapter 8 Archaeology and Cultural Heritage (PINS Ref APP-069/ Application Ref 6.3.8) in relation to the operation effects on archaeological and heritage receptors are appropriate.	As above.	Not agreed – material impact
		Notwithstanding the comment above, CCBC otherwise agrees that the conclusions of the ES in relation to the operational effects on archaeological and heritage receptors are appropriate.	Agreed
	The conclusions of the assessment identified in Section 8.13 of Volume 3, Chapter 8 Archaeology and Cultural Heritage (PINS Ref APP-069/ Application Ref 6.3.8) in relation to the cumulative effects on archaeological and heritage receptors are appropriate.	Agreed	Agreed

3.3 Noise from offshore construction

Table 5: Status of discussions relating to airborne noise and vibration.

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
Policy and Legislation	The EIA has identified all relevant legislation and policy and appropriate consideration has been given to them in the assessment of airborne noise from construction of the offshore elements of AyM	Agreed.	Agreed
Consultation	The EIA has had regard to matters raised by CCBC via statutory and non-statutory consultation activities in relation to airborne noise from construction of the offshore elements of AyM.	Agreed.	Agreed
Baseline Information to inform EIA	The EIA adequately characterises the baseline environment of Llandudno in Section 10.8.5 of Volume 3, Chapter 10 Airborne Noise and Vibration (PINS Ref APP-069/ Application Ref 6.3.10) relevant to airborne noise from construction of the offshore elements of AyM	Notwithstanding the comment below regarding the baseline to inform the noise threshold proposed for DCO Requirement 6, CCBC otherwise agrees that the baseline presented in the ES is appropriate for the purpose of undertaking the EIA.	Agreed
Baseline Information to inform noise threshold proposed in DCO Requirement 4	The background noise monitoring undertaken in Llandudno in January 2022 (which has measurements taken in inclement weather removed), and at the landfall location (Rhyl/Prestatyn), in April 2021 represent an appropriate baseline to use when calculating a construction noise threshold as set out in the ABC Method contained in BS5228:2009+A1:2014.	The monitoring was undertaken during January 2022 (7th to 11th) which would not be indicative of noise levels during quieter periods, e.g. summer months. Inclement weather noted during day and evening of the 7th, all of 8th, day 9th, and day 11th, which would have had an effect on the results. The Applicant has confirmed that these inclement weather results were removed and therefore whilst CCBC has concerns over the threshold itself (see below), CCBC does agree that the threshold has been calculated correctly using the ABC method.	Agreed
Assessment scope and methodology	The impact assessment methodology identified in Section 10.5 of Volume 3, Chapter 10	Agreed.	Agreed

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
	airborne noise and vibration (PINS Ref APP-071/ Application Ref 6.3.10) is considered appropriate to assess offshore construction noise impacts to inform the EIA		
	The threshold of 50 dB(A) Leq,T is the most appropriate threshold to use for construction noise.	The council does not agree to the threshold level of 50 dB(A) which it feels is too high when considering still night time periods in Llandudno, particularly during periods when background noise levels are relatively low	Not agreed – material impact
	The threshold that is proposed by CCBC of 5 dBA above background level, is not considered appropriate. This approach is aligned to the methodology for assessing static, operational equipment as set out in BS4142 - Methods for rating and assessing industrial and commercial sound, and, as confirmed within BS4142, is not an appropriate methodology for construction noise.	The council proposes a condition that no noise associated with the works is greater than 5dBA above background. Whilst the authority appreciates that the noise assessment has been undertaken correctly using BS5228:2009+A1:2014, it still has reservations regarding the proposed limit of 50 dB(A) Leq T. Neither BS5228 nor BS4142 were specifically written for or have regard noise associated with piling for an offshore windfarm. BS4142 specifies differences in noise levels above the background level that a specific sound source will either have an adverse impact or a significant adverse impact on the receptor, they are: • A difference of around +5dB is likely to be an indication of an adverse impact, depending on the context; and • A difference of around +10dB or more is likely to be an indication of a significant adverse impact.	Not agreed – material impact

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
		Stipulating a fixed noise level, without having regard to the prevailing background level will, in the Principal Environmental Health Officer's opinion, lead to noise complaints. Stipulating a variable noise limit, which has regard to the prevailing background noise level is less likely to result complaints of noise. Although the applicant has verbally stated on numerous occasions that the time period for T is 60 minutes, that Council has yet to see this confirmed in writing, any draft Order must have T defined.	
	The Offshore Piling Noise and Vibration Monitoring Plan includes proposals for effective communication with local residents in the Llandudno area. A key aspect to the management of potential piling noise and vibration will be effective communication with local residents in the Llandudno area. Making sure that local residents are aware that piling will be taking place, when it will take place and the duration of piling works will help to reduce the likelihood of complaints being made to CCBC through greater awareness of the AyM construction works.	The Council agrees that the draft outline communications plan will help to keep residents informed of the windfarm construction and help to reduce the likelihood of complaints being made to CCBC but is in ongoing discussions with the applicant regarding the final Plan.	Ongoing point of discussion
Outcomes of the EIA	The conclusions of the assessment identified in Section 10.11.8 of Volume 3, Chapter 10 Airborne Noise and Vibration (PINS Ref APP-069/ Application Ref 6.3.10) in relation to the	Agreed.	Agreed

DISCUSSION POINT	APPLICANT'S POSITION	CCBC POSITION	POSITION STATUS
	construction effects on sensitive noise receptors are appropriate.		
	The proposed threshold of 50 dB(A) Leq,T has been correctly calculated using the ABC Method contained in BS5228:2009+A1:2014	Agreed.	Agreed
	Although CCBC remains concerned regarding the 50 dB(A) Leq,T, the proposed Offshore Piling Noise and Vibration Monitoring Plan, will provide CCBC with information on piling noise that will assist it in reviewing any complaints that may be received during offshore piling works and that this represents an appropriate approach to take with regard to concern relating to offshore piling noise.	Still have concerns regarding setting the limit at 50dB. Monitoring location L1 LAeq, L90 and L10 all went under 40dB (few exceptions) on the 10th between 10/01 00:32 and 04:47. LAeq, L90 and L10 all went under 50dB (few exceptions) between 09/01 23:17 and 10/01 06:32	Not agreed – material impact

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