



# **Awel y Môr Offshore Wind Farm**

## **Applicant's Response to the Examining Authority's Third Written Questions**

### **Deadline 7**

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# 1 Introduction

- 1 Following the issue by the Examining Authority (ExA) of their Third Written Questions (ExQ3) on 01 March 2023, Awel y Môr Offshore Wind Farm Limited (the Applicant) has responded to each question addressed to the Applicant in the sections below. In addition, the Applicant has provided commentary on selected questions addressed to other Interested Parties (IPs) where it is thought to be helpful to the ExA to do so.
- 2 Supporting information to the Applicant's responses to the ExQ3 has been included by reference to other submissions included in the Applicant's Deadline 7 submission, as well as appendices to this document, which are listed below:
  - ▲ Appendix A – Table Showing Holdings;
  - ▲ Appendix B – Response to ExQ3.9.8, Revised Plan showing Predictive Agricultural Land Classification and results of 2023 ALC Survey at Faenol Bropor;
  - ▲ Appendix C – Response to ExQ3.9.8, Revised Plan showing Agricultural Land Classification (Wales) Surveys and results of 2023 ALC Survey at Faenol Bropor ;
  - ▲ Appendix D – Swept Path Analysis; and
  - ▲ Appendix E – AIL Route Comparison Photographs.

## 2 Applicant's response to the Examining Authority's Third Written Questions

### 2.1 General and Cross Topic Questions

Table 1: General and Cross Topic.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
0.1	NRW	<p><b>Marine Licence</b></p> <p>The Applicant's update on the Marine Licence Submission and Progress submitted at Deadline 4 [REP4-025] states that a public consultation took place during December 2022 and January 2023 concerning information submitted to the Marine Licensing Team of NRW on 25 November 2022. Please provide a summary of any relevant results of this public consultation.</p>	<p>It is acknowledged that this question is not directed at the Applicant, but the Applicant can confirm that no responses to the public consultation were received. The Applicant will, however, provide the ExA with its responses to the 14 technical consultation responses at Deadline 8.</p>
0.2	Applicant	<p><b>Document Control</b></p> <p>The ExA notes submission [REP4-003] in respect of document naming and numbering. However, the matter of inconsistency with dDCO Schedule 13 still pertains to some documents submitted before Deadline 4 (including Offshore Land Plan, Onshore ECC / Substation Flood Consequence Assessments, outline Drainage Strategy and oCoCP Appendices 2, 3, 5, 6, 9, 10 and 11). Please confirm how you intend to rectify this?</p>	<p>The Applicant will update the document references within Schedule 13 of the draft Development Consent Order (dDCO) at Deadline 8 to ensure that any certified documents submitted into examination between Deadline 1 and Deadline 3a (those that do not have the document's original application reference number on the cover page), have their corresponding PINS examination library reference listed instead.</p>
0.3	Applicant, NRW	<p><b>Pre-commencement works – Offshore</b></p> <p>The definition of commencement works in Article 2 of the dDCO [REP6-005], [REP6-006] does not include certain onshore works relating to surveying or investigatory works. Please confirm how pre-commencement works (if they exist) are dealt with in the Marine Licence.</p>	<p>The Offshore Project Description in the Environmental Statement provided for the DCO and marine licences (ML) applications (APP-047) includes a definition of pre-construction works at section 1.6. This includes pre-construction surveys (such as geophysical and geotechnical site investigation surveys, and pre-construction monitoring surveys) and seabed preparation works (such as sandwave clearance, boulder clearance and pre-lay grapnel runs, if required). All of these are typical offshore pre-construction works that can be excluded from the definition of commencement in a ML.</p> <p>NRW is responsible for the drafting of the AyM ML and the Applicant anticipates further discussion regarding the undertaking of these pre-construction activities and how they relate to the commencement of the licensed activities as defined in the ML.</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
0.4	Applicant	<p><b>Pre-commencement works</b></p> <p>The definition of 'onshore' in Article 2 of the dDCO [REP6-005], [REP6-006] includes Works Nos 3 and 3a, categorised in Schedule 1 Part 1 of the dDCO as 'Intertidal and in the County of Denbighshire'. Please confirm that the definition of pre-commencement works contained within the definition of 'commence' in the dDCO applies to these Work areas.</p>	<p>The Applicant amended the definition of 'onshore works' in the dDCO (Document 7.6 of the Applicant's Deadline 7 submission) to include Work No. 3 and Work No. 3A as onshore works. This is to ensure that the local planning authority (which has jurisdiction to mean low water) has appropriate control over the works in the intertidal area given the land-based receptors for such work and so the schemes approved under the relevant requirements appropriately control the relevant aspects of these works. In so far as they are relevant, the pre-commencement works included within the definition of 'commence' in the dDCO apply to all 'onshore works' including Work No. 3 and Work No. 3A.</p>
0.5	North Hoyle Wind Farm Ltd (NHWF), Applicant	<p><b>North Hoyle Wind Farm</b></p> <p>Could NHWF confirm its anticipated date and duration for decommission work of its offshore wind farm.</p> <p>Could the Applicant please describe its assumption regarding North Hoyle wind farm decommissioning work and if it was included in your cumulative effects assessment.</p>	<p>North Hoyle was the second offshore wind farm to be commissioned in the UK, and the first in Wales. As an existing, operational offshore wind farm, North Hoyle has been considered within the cumulative effects assessment in terms of its potential operational phase effects (see the Offshore Renewable Energy table within ES Volume 1, Annex 3.1: Cumulative Effects Assessment Methodology (APP-042)), where relevant.</p> <p>In terms of decommissioning, whilst overall it is considered that there is insufficient certainty over the nature and timing of works associated with North Hoyle to enable a detailed cumulative assessment there is the potential for these works to take place between 2029 and 2030 and they could therefore overlap with construction at AyM. This is based on an estimated operational life of 25 years (North Hoyle was commissioned in 2004), however it should be noted that no information is available about the programme for decommissioning North Hoyle. To date, the only offshore wind farm to have been decommissioned in the UK is Blyth, which is a small-scale pilot project consisting of just two turbines, and the first offshore wind project in the UK.</p> <p>Although there is uncertainty regarding the programme for the North Hoyle decommissioning and the precise nature of those works, a high-level cumulative assessment has been possible as the location and scale of the project is known. This has allowed certain assumptions to be made to identify a reasonable worst case for assessment. This can be distinguished from the Morgan and Mona offshore wind proposals</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>where the location and scale of the majority of the proposals are unknown.</p> <p>The assessment has identified that the greatest potential for cumulative effects arise from the interaction between decommissioning at North Hoyle and construction at AyM, which have the potential to cause additive disturbance effects through the generation of underwater noise. Other potential effects would be more localised with limited potential for an additive effect compared to the effects of the projects alone, and therefore the cumulative effects assessment of North Hoyle decommissioning has focused on noise disturbance effects on marine mammals (see Section 7.13 of ES Volume 2, Chapter 7: Marine Mammals (AS-026)) and fish (see Section 6.13 of ES Volume 2, Chapter 6: Fish and Shellfish Ecology (APP-052)). Whilst there is uncertainty around the timings and nature of decommissioning, a high-level cumulative assessment of North Hoyle decommissioning has been feasible as it is an existing project, and therefore details about the scheme design and its precise location are known.</p> <p>Whilst a worst-case of decommissioning activities has assumed they will involve similar types of impacts to those generated during construction, this is highly precautionary. In practice, most decommissioning work would involve cutting, which is not a significantly noise-generating activity compared to piling during construction. Furthermore, the assumption that decommissioning at North Hoyle will overlap with construction at AyM is precautionary because of the order in which the infrastructure is logically built. In practice, underwater noise-generating activities during construction (foundation piling) typically take place at the beginning of offshore construction, and towards the end of decommissioning (foundation removal), further limiting the potential overlap of these activities.</p>
0.6	Applicant	<p><b>Household Supply</b></p> <p>Please confirm the estimated figure in terms of household supply. At paragraphs 14, 884 and 891 of the Planning Statement [APP-298] it is stated that the Proposed development is anticipated to provide</p>	<p>This is an error in the documentation submitted by the Applicant and the 400,000 figure should be 500,000. This figure is a conservative estimate of the number of homes supplied by the project.</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		clean electricity for up to 500,000 homes, whereas at paragraph 878 this figure is 400,000.	
0.7	Applicant	<p><b>Mona and Morgan Offshore wind Farms</b></p> <p>Your answer to ExQ2.0.6 notes the text contained within paragraph 5(e) of Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 concerning the requirement to assess cumulative effects with "other existing and/or approved" projects, stating that this means that the legal requirement is limited to projects that are either consented or are built out already. The answer further refers to the Advice Note 17 in the context of other existing development and/or approved development. However, scoping reports have been issued for both Mona and Morgan, meaning that they would fall in Tier 2 of the Advice Note.</p> <p>The ExA also note in your response that "there is significant uncertainty regarding...onshore substation site" but note that the potential substation locations are all in the vicinity of Bodelwyddan and would presumably 'feed into' the same National Grid substation as the proposed development would:</p> <p>a) Provide further evidence, with reference to case law if necessary, that "existing" in the context of paragraph 5(e) of Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, equates to projects that are consented or are built out; and</p> <p>b) Provide any further justification over your decision not to carry out a cumulative assessment, should you wish to do so.</p>	<p>The Applicant maintains its position that a cumulative assessment is not required with the Morgan and Mona projects as insufficient information regarding those projects is available upon which to undertake a meaningful assessment. Given both of those projects are themselves EIA development and as sufficient information is available regarding the AyM project for those projects to undertake a meaningful assessment, this is a case where it is legally compliant and appropriate for consideration of cumulative impacts to be considered in detail through those projects' applications, examination and decisions.</p> <p>Further relevant information and legal submissions on this question will be provided at Deadline 8.</p>
0.8	NGET	<p><b>Bodelwyddan Substation</b></p> <p>Your written representation submitted at Deadline 1 [REP1-071] states that "NGET are pursuing a planning application for the enabling works to facilitate the connection of the Proposed Development and other connected projects to the NGET Bodelwyddan substation. NGET is progressing the necessary consent applications, which it currently anticipates submitting in 2023."</p>	N/A

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		Please provide an update to the above in terms of programming and timing, and any further information/details on the proposed enabling works which may be relevant to this proposed project.	
0.9	Gwynedd Council (GC), Applicant	<p><b>Wales Coastal Path</b></p> <p>ExQ2.0.8 concerned the Wales Coastal Path and the proposed re-routing through the Penrhyn Estate.</p> <p><i>To GC:</i> Please provide any further information you may have on the location of this re-routing, and respond to the Applicant's answer to ExQ2.0.8, should you wish to do so. Will the change to the route of the footpath have any implications for recreational and leisure users of the path with regard to any effects of the proposed development?</p> <p><i>To the Applicant:</i> Thank you for your response to ExQ2.0.8. Do you consider that the change to the route of the footpath would have any implications for recreational and leisure users of the path with regard to any effects of the proposed development?</p>	<p>The Applicant notes that the proposed re-routing of the Wales Coastal Path is outside the Zone of Influence used to define the spatial scope of the onshore recreation and leisure aspects of the Tourism assessment. Paragraph 63 of ES Volume 3, Chapter 4: Tourism and Recreation (APP-065) sets out the extent of the ZOI as follows:</p> <p><i>"The ZOI used to inform the onshore recreation impact assessment (defined as the local area of influence (LAI)) has primarily focused on the onshore OL, including the area around landfall point at Frith Beach, through to the substation near Bodelwyddan. For the purposes of this assessment, the local area of influence has been generally taken to be a 500 m buffer each side of the onshore OL."</i></p> <p>As the re-routing is outside the Zone of Influence (ZOI), the Applicant confirms it does not consider there to be any further implications for recreational and leisure users of the path that would be in addition to the considerations highlighted in the Applicant's response to ExQ2.0.8).</p>



## 2.2 Aviation

Table 2: Aviation.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
1.1	Applicant, NATS	<b>Radar Mitigation Contract</b> Please provide any further update to your response to ExQ2.1.1. on the progress of the Radar Mitigation Contract and provide an alternative solution/remedy should the Contract not be signed by March 20th when the examination of the proposed development closes.	The radar mitigation contract has been agreed and is being signed by the parties. The Applicant expects this to be resolved before the close of examination.

## 2.3 Biodiversity, Ecology and Natural Environment

Table 3: Biodiversity, Ecology and Natural Environment.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
2.1	NRW, JNCC, RSPB, NWWT	<p><b>General</b></p> <p>Please advise if you have any issues with the Applicant's Response to R17Q1.1 [REP4-008] and the provided template plans, and if issues exist, please reference with explanation and evidence to justify.</p>	N/A
2.2	Applicant	<p><b>General</b></p> <p>Further to your Appendix J – Response ExQ1 2.88 – Technical note on Non-Road Mobile Machinery [REP1-007] please could you summarise any potential air quality impacts upon other habitats from NRMM emissions.</p>	<p>Consistent with the approach undertaken in fulfilment of ExQ1.2.88, a review of other ecological (international, national and local) designations located within 50 m of onshore construction activities has been undertaken to identify further potential interactions. The outcomes of the exercise indicate that 10 Ancient Woodlands (AW) are located within 50m of onshore construction activities (defined by the Order Limits). Use of the Draft Order Limits in this context (assuming that all Non-Road Mobile Machinery (NRMM) is operated at the boundary) is worst case, given that site activities will be planned in advance – to maximise the separation distances between machinery and sensitive receptors, in order to limit impacts, as per the outline Code of Construction Practice (oCoCP) - Appendix 3 – outline Air Quality Management Plan (oAQMP) (REP2-031).</p> <p>AWs and Local Wildlife Sites (LWS) are afforded a similar same level of protection by Natural Resources Wales (NRW), and so the assessment procedure is the same as that set out for LWS in Appendix J – Response ExQ1 2.88 – Technical note on Non-Road Mobile Machinery [REP1-007].</p> <p>Based upon the principles considered within Appendix J – Response ExQ1.2.88 (REP1-007), the likelihood of NRMM emissions resulting in a Process Contribution from proposed activities are greater than 100% of the Critical Level or Load alone is low. This is because of:</p> <ul style="list-style-type: none"> <li>▲ The extent of NRMM proposed to be used (type, quantum and emission standards);</li> <li>▲ Associated control measures; and</li> <li>▲ Transient/ phased nature of the construction works.</li> </ul>



QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>Emissions are therefore considered to be negligible and, on this basis, effects are considered to be not significant. In addition, impacts arising from construction activities are considered temporary.</p> <p>In relation to the operational and decommissioning phases, proposed activities are not anticipated to exceed the construction phase worst-case criteria assessed, and impacts are likely to be lesser in comparison.</p> <p>Based on the above, impacts on ecological designations from NRMM emissions are considered not significant.</p>
2.3	RSPB, NWWT	<p><b>General - Mitigation</b></p> <p>Please advise if you have any issues with Schedule of Mitigation and Monitoring [REP4-021], and if issues exist, please reference with explanation and evidence to justify.</p>	N/A
2.4	NRW, DCC	<p><b>Onshore – Mitigation</b></p> <p>With reference to Applicant's Response to ISH3 Action Points [REP4-003] please could you confirm if you have any issues with pre-commencement works being able to take place in accordance with outline management plans such as the oLEMP [REP4-011], oCoCP [REP5-016], and outline drainage strategy as certified.</p>	N/A
2.5	Applicant	<p><b>Onshore - Mitigation</b></p> <p>Further to your ISH3 Action Points [REP4-003] response please clarify if the outline management plans such as the oLEMP [REP4-011], oCoCP [REP5-016], and outline drainage strategy [REP1-045] as certified would require further review and agreement by DCC and NRW prior to undertaking any pre-commencement works. (e.g. archaeological investigations, creation of temporary means of access, site clearance including vegetation clearance and diversion and laying of utilities and services).</p>	<p>As noted in the Applicant's response to ISH 3 Action Points (REP4-003): <i>"amendments were made to the outline plans (specifically the outline Landscape and Ecology Management Plan (oLEMP) and the outline CoCP plans) at Deadline 2 to specifically address which sections and restrictions apply to pre-commencement works"</i></p> <p>Within the Applicant's Deadline 2 submission, specific sections were added to the outline Landscape and Ecology Management Plan (oLEMP), CoCP (and accompanying management plan documents appended to the CoCP) under the heading of 'Pre-Commencement' to confirm where general principles set out within specific sections of that document will be adhered to in carrying out 'pre-commencement' activities (where relevant to those activities).</p> <p>By confirming the general principles that will be followed during any pre-commencement activity, the Applicant considers that suitable</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			control will be in place via the outline plans (that have been reviewed and agreed by Denbighshire County Council (DCC) and NRW). Therefore, further review and approval is not considered necessary.
2.6	Applicant	<p><b>Onshore - Mitigation</b></p> <p>Further to your ISH3 Action Points [REP4-003] Glascoed Nature Reserve response please could you describe the potential impacts of construction works along the north-eastern corner of the substation platform footprint, and the potential effects upon the habitats and species of Glascoed Nature Reserve.</p>	<p>Glascoed Nature Reserve will not be directly affected by construction work. This includes the boundary hedgerows and trees at the Nature Reserve where they are adjacent to the Onshore Substation (OnSS). These trees and hedges would be protected from damage by the installation of Root Protection Zone fencing, the location and type to be agreed as part of the final LEMP and also set out within the CoCP and CMS (that have been updated as Documents 7.15, 7.11 and 7.12 of the Applicant's Deadline 7 submission to confirm hedgerow fencing will be provided) which would need to be signed off before construction started.</p> <p>Impacts to the great crested newt (GCN) population present at the nature reserve, which forms part of the wider St Asaph Business Park (SABP) metapopulation of GCN, are comprehensively covered within the onshore biodiversity chapter and within the oLEMP. Measures to mitigate and compensate for the impacts are an integral part of scheme design and will form part of a European Protected Species (EPS) licence that will be obtained in advance of work. These measures will also serve to reduce impacts to other amphibian and reptile species present at the nature reserve.</p> <p>The potential for indirect impacts to other important ecological features that may be present at the nature reserve (such as but not limited to barn owl or bats) are assessed within the onshore biodiversity chapter, and mitigation or compensation measures proposed as necessary. These are detailed within the oLEMP.</p> <p>The final design of the substation platform will need to take account of the Root Protection Zones of the boundary trees referred to above and impacts upon them will need to be avoid wherever possible. This will be part of the detailed design of the substation, which will need to be signed off by DCC, in consultation with NRW, before construction starts. This provides a mechanism for protection of these boundary features.</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			In all cases no significant residual impacts are anticipated based upon the mitigation and compensation measures being implemented as described.
2.7	Applicant, NWWT	<p><b>Onshore</b></p> <p>With reference to NWWT SoCG [REP4-032] please could the Applicant and NWWT confirm their position status for each discussion point in Table 3 to Onshore Biodiversity and Nature Conservation or provide an updated SoCG.</p>	<p>The latest contact with the North Wales Wildlife Trust (NWWT) (06 March 2023) indicates that the onshore biodiversity and nature conservation section of the Statement of Common Ground (SoCG) will not be completed by the terrestrial team at NWWT before the close of examination and therefore this topic has been removed from the SoCG. The parties have agreed that the final SoCG (submitted as Document 7.30 of the Applicant's Deadline 7 submission) therefore represents the most up-to-date and accurate representation of the status of discussions.</p> <p>NWWT made Relevant Representations (RR-022 and RR-023) indicating that they wished to register as an Interested Party in order to make further representations, however no further representations were received in the examination.</p> <p>NWWT have been actively engaged by the Applicant during the examination and have confirmed they are in broad agreement in terms of marine ecology (see REP4-032), however have yet to respond on the onshore biodiversity and nature conservation section.</p> <p>NWWT were also part of the onshore ecology Expert Topic Group (ETG) via the Evidence Plan process during the pre-application phase. Whilst it is acknowledged this was during the pre-application phase, a record of consultation comments received from NWWT and the Wildlife Trusts, along with how the Applicant has addressed them is contained within the Summary of Consultation Relating to Onshore Biodiversity and Nature Conservation (APP-136). Further information about consultation activities with NWWT during this stage can be found in the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303).</p> <p>The Applicant does not consider there to be any major areas of concern or disagreement with NWWT over onshore biodiversity and nature conservation, based on their comments to date in the pre-application phase, and the absence of inputs during the examination</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			on this matter. It is noted that agreement logs on this topic are fully agreed with both NRW (REP5-030) and DCC (REP6-044).
2.8	Applicant	<p><b>Offshore – Ornithology</b></p> <p>With reference to IoM SoCG [REP4-014] please could you provide a response if directional data in the assessment suggests there is a likely connection of the study area with the range of the birds nesting on the Calf of Man.</p>	<p>The Applicant compiled and presented directional data on seabird flights within rose diagrams (monthly plots of recorded flight direction and frequency) as part of the baseline in Volume 4, Annex 4.1: Offshore Ornithology Baseline Characterisation Report (APP-095). These data provided evidence that no seabird species recorded in AyM were regularly observed flying in directions that would infer connectivity between the Isle of Man and AyM, even if those species were within foraging range according to Woodward <i>et al.</i> (2019).</p> <p>With respect to Manx shearwater, a species of interest to the IoM Government, a total of eight rose diagrams were produced as presented in Figure A14 (APP-095). The Calf of Man, an island with breeding Manx shearwaters in waters off the south coast on the Isle of Man, is located in a north-northwest direction from AyM and is within the mean max foraging range of 1,346 km (Woodward <i>et al.</i>, 2019). Therefore, connectivity between the Calf of Man and AyM could be suggested if rose diagrams showed strong unidirectional travel in a north-northwest or south-southeast direction, as this could be inferred as Manx Shearwaters recorded in AyM travelling to or from the Calf of Man. Within these data the most dominant direction was of Manx shearwaters flying in a westerly direction, reducing the potential for connectivity when considering directional data. With no evidence of regular travelling of Manx shearwater recorded in AyM in the direction of the Calf of Man, this confirms that birds recorded within AyM are not strongly associated with a colony on the Isle of Man. Therefore, with respect to defining potential breeding colony connectivity to AyM, the Applicant relied upon Manx shearwater's generic mean-max foraging range of 1,346 km (Woodward <i>et al.</i>, 2019) to define colonies with connectivity (which included the Calf of Man). Further details on colonies considered to have connectivity to AyM during the breeding season and subsequent apportioning of impacts to colonies are provided in Annex 5: Ornithology Apportioning Note (APP-032), with specific consideration to seabirds from the Calf of Man also provided in the Clarification Note on Predicted Impacts Apportioned to Isle of Man Designated Sites (REP3-009).</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
2.9	RSPB	<b>Offshore – Ornithology</b> Please could you comment on Applicant response to ExQ2.2.21 [REP6-003] and advise on any disagreement with evidence to justify.	N/A
2.10	RSPB	<b>Offshore – Ornithology</b> Please could you comment on Applicant response to ExQ2.2.23 [REP6-003] and advise on any disagreement with evidence to justify.	N/A
2.11	NRW	<b>Offshore – Ornithology</b> Please could you confirm that you are satisfied with the use of generic parameters given in Horswill and Robinson (2015) as site-specific parameters are not readily available.	N/A
2.12	RSPB	<b>Offshore – Ornithology</b> Please could you comment on Applicant response to ExQ2.2.17 [REP6-003] and advise on any disagreement with evidence to justify.	N/A
2.13	RSPB	<b>Offshore – Ornithology</b> Please could you comment on Applicant response to ExQ2.2.12 [REP6-003] and advise on any disagreement with evidence to justify	N/A
2.14	Applicant, RSPB, NRW	<b>HRA</b> RSPB Please could you comment on NRW Advisory Deadline 5 addendum ANNEX A: NRW Advisory's position regarding the implications of the newly published Conservation Objectives for Liverpool Bay SPA on our statutory advice relating to the Awel y Môr offshore windfarm [REP5-039]. <i>To the Applicant and NRW</i> ANNEX A: NRW Advisory's position regarding the implications of the newly published Conservation Objectives for Liverpool Bay SPA. Please could you advise on any implications for the Report to Inform Appropriate Assessment [APP-027] and associated annexes?	The Applicant has undertaken a review of the newly published Conservation Objectives for the Liverpool Bay Special Protected Area (SPA) and confirms that there are no implications for the RIAA or its associated annexes.  As set out in the Applicant's comments on NRW's response ExQ2.2.12 in REP6-003, NRW concur with this in REP5-047, in which NRW confirm that "[...] <i>As such, even in light of the new COs, it remains NRW (A)'s view that the assessment that the Applicant has undertaken for this feature still stands, and that there will be no adverse effect upon it or the site, either alone or in-combination.</i> "



## 2.4 Compulsory Acquisition (CA) and Temporary Possession (TP)

Table 4: Compulsory Acquisition (CA) and Temporary Possession (TP).

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
3.1	Applicant	<p><b>Negotiations</b></p> <p>Paragraph 1 of the negotiations document [REP6-016] states that leaseholders and tenants are listed below respective landlords. Please clarify this statement, noting for example, that the owner of Plot 17, the owner of Plot 285 and the owner of Plot 331 as shown in the Book of Reference (BoR) [REP6-010] are listed in the negotiations document but the respective lessees / tenants are not?</p>	<p><b>Plot 17 – Cornerstone and AP Wireless</b></p> <p>Plot 17 forms part of Work No.6 which is a temporary working area for:</p> <ul style="list-style-type: none"> <li>▲ Creation of construction access to Works No. 3, 3A, 4, 5, 6A and 7 from Rhyl Coast Road, including works to junctions and visibility splays and removal and remediation of groynes; and</li> <li>▲ Trenchless installation technique works.</li> </ul> <p>As the plot is subject to temporary possession only there is no intention to acquire any rights from the leaseholder or obtain the consent of the leaseholder to the terms of an agreement for permanent rights. Negotiations with the freehold owner of the land in respect of any temporary rights required will be addressed when the extent of works is known after detailed design stage. Such detailed design and the eventual impact on this affected party's leasehold area will be strongly linked to the design of and construction progress of the coastal flood defence works in this area. If it is envisaged at this stage that works for the creation of an access will affect the leaseholder's demise, the Applicant will engage with them in collaboration with the freehold owner most likely to agree a tripartite licence agreement.</p>
3.2	Applicant	<p><b>Negotiations</b></p> <p>Please explain why the negotiations document [REP6-016] does not include some occupiers, for example those listed under Plot 17, Plot 285 and Plot 331 in the BoR [REP6-010]?</p>	<p><b>Plot 285 – The Executor of the Estate of Richard Dodd</b></p> <p>The Applicant's appointed agents have recently been informed by the landowner's appointed agent that the land is now farmed by Raymond Ivor Beech. The Book of Reference (BoR) has been updated accordingly (Document 7.8 of the Applicant's Deadline 7 submission). Given that this is now owned and occupied by the same party there is no requirement for any form of occupier's consent.</p> <p><b>Plot 331 – Huw Jones (tenant of Wynford Davies)</b></p> <p>The landowner's appointed agent has confirmed that the tenancy terminated on 31 March 2022. It is understood that the land is now farmed in hand by the family and as such there is no tenant to further any discussions in respect of the temporary use of the land. The Book</p>

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			of Reference (BoR) has be updated accordingly (Document 7.8 of the Applicant's Deadline 7 submission).
3.3	Applicant	<p><b>Negotiations</b></p> <p>Please clarify why some Affected Parties are listed numerous times in the negotiations document [REP6-016]?</p>	<p>The Update on Negotiation with Landowners, Occupiers and Statutory Undertakers and Other Utilities document is laid out in such a way as to show tenants and leaseholders underneath the entries for the respective landlords. This effectively allows individual transactions to be tracked through the negotiation process. The template is broadly similar to that used on Hornsea 4. The Applicant has updated the document at Deadline 7 (Document 7.9 of the Applicant's Deadline 7 submission) to include the plot numbers to which the respective transaction lines refer. The document now aligns with the approach taken on Hornsea 4.</p> <p>In response to the question, some Affected Parties are both owners and occupiers of land and others have multiple tenancies along the cable route. The status of negotiation of the Applicant's rights terms and occupiers consent terms may differ and therefore it was thought that this was the clearest way to show landlord and tenant situations.</p>
3.4	Applicant	<p><b>Negotiations</b></p> <p>Submissions [REP5-036] and [REP5-037] indicate a different date for the most recent negotiations to that indicated in the negotiations document [REP6-016]. Please clarify the situation.</p>	<p>Both documents indicate that the latest correspondence in respect of the rights Heads of Terms (HoTs) (prior to 02 February 2023) was 06 October 2022.</p> <p>Confusion may have arisen because of the twin tracking reporting of the freehold HoTs negotiations for Mr and Mrs Evans. The Applicant has updated the document at Deadline 7 (Document 7.9 of the Applicant's Deadline 7 submission) to make it clearer in respect of the progress of the two sets of negotiations relating to Mr and Mrs Evans of Faenol Bropor.</p>
3.5	Applicant	<p><b>Negotiations</b></p> <p>Entries 28 and 29 in the CA Schedule [REP6-018] do not appear in the negotiations document [REP6-016]. Please add them as necessary (noting that the Trustees of the Bodrhyddan Estate Maintenance Fund do not appear in the BoR [REP6-010]).</p>	<p><b>Entry 28 – The Bodrhyddan Farming Company Limited</b></p> <p>This is an oversight and has been included in the D7 update (Document 7.9 of the Applicant's Deadline 7 submission). Importantly, negotiations in respect of an occupier's consent are ongoing.</p> <p><b>Entry 29 – Trustees of the Bodrhyddan Estate Maintenance Fund</b></p> <p>The respective Trustees of the Bodrhyddan Estate Maintenance Fund are listed in the negotiations document. For the avoidance of doubt, the Trustees are Ralph Collins, James Vernon, Owain Rowley Conwy</p>

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			and Tom Rowley Conwy. Wording has been added to the negotiations document to aid clarity on this point (Document 7.9 of the Applicant's Deadline 7 submission).
3.6	Applicant	<p><b>Negotiations</b></p> <p>For ease of reference, and notwithstanding they are not included within the BoR, it would be helpful for the Applicant to include a separate section within the negotiations document [REP6- 016] detailing negotiations with North Hoyle Wind Farm Ltd and Rhyl Flats Wind Farm Ltd.</p>	The Applicant does not consider it is appropriate to include North Hoyle Wind Farm Ltd (NHWFL) and Rhyl Flats Wind Farm Ltd (RWFLL) in the negotiations document on the basis that no land interests are being affected. The Applicant has instead summarised the latest position on negotiations with NHWFL and RWFLL in a separate document submitted at Deadline 7 (Document 7.29 of the Applicant's Deadline 7 submission). An updated version of this document will be submitted at Deadline 8.
3.7	Applicant	<p><b>BoR</b></p> <p>The agent who submitted [AS-048] appears in the BoR [REP6-010] numerous times. Please confirm if these entries are correct.</p>	Yes, the agent (Ralph Collins of Carter Jonas) is a Trustee and registered proprietor of the land as well as being the Estate's appointed agent.
3.8	Applicant	<p><b>BoR</b></p> <p>Has the Applicant undertaken any further investigations into the 'unknown' interests in the BoR [REP6-010], such as for Plots 96, 97 and 98?</p>	<p>With regards to plots 96, 97 and 98, these plots include land within Lyons Caravan Holiday Park. Given the nature of the landholding being an active caravan holiday park, the Applicant is entirely reliant on the landowner to provide information on the occupants or pitch holders of the park. The Park's appointed agent and representatives have been understandably reluctant to divulge information relating to the details of individual pitch leaseholders due to GDPR concerns.</p> <p>In addition to the request made for information from the landowner, the Applicant's appointed land agent placed land interest notices at the entrance of the Lyons Caravan Holiday Park and received only a limited number of responses. It is the Applicant's view that all reasonable endeavours have been made to ascertain the details of the individual pitch leaseholders on a voluntary basis and any further endeavours would potentially be detrimental to the working relationship the project currently has with the Park and the Park's appointed agent.</p>
3.9	Applicant	<p><b>CA Schedule</b></p> <p>As the Welsh Government has made submissions, including in respect of the A55 [REP1-097], should the Welsh Ministers, as the Crown</p>	The Welsh Government entry (as noted by the 3 party ID's) on the Table of Compulsory Acquisition and Temporary Possession Objections (Document 7.10 of the Applicant's Deadline 7 submission) is an amalgamation of The National Assembly for Wales, Secretary of State



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		<p>authority for land associated with the A55 and as the highway authority, be included in the CA Schedule [REP6-018]?</p>	<p>for Wales and The Welsh Ministers. It was requested in email correspondence received from a representative of Welsh Government on 08 November 2022 that for the purposes of the property transactions the three Welsh Government entities can be treated as one and this is the manner in which the discussions in respect of the rights sought over the A55 and surrounding land and Section 135 consent are continuing.</p> <p>The approach outlined above mirrors the approach taken to date with representations made to the examination by Welsh Government in that the comments have not been received from the individual factions of the government.</p> <p>The Applicant has split line 30 of the Table of Compulsory Acquisition and Temporary Possession Objection (Document 7.10 of the Applicant's Deadline 7 submission) into 3 separate lines to reflect the National Assembly for Wales, Secretary of State for Wales and The Welsh Ministers respective land interests.</p> <p>As drafted the dDCO includes the relevant powers for the Applicant to install the AyM cables beneath the A55 without the need for a s61 licence. It is important to note that the works to which this provision would apply consist of works under (and therefore potentially 'in' depending on the depth) the street, and do not interfere with the surface of the street or its use by traffic.</p> <p>In this case the A55 is a protected street by virtue of forming part of the strategic road network. Section 61 of the 1991 Act provides that consent is required for the placing of apparatus in a protected street. That consent may be in the form of a street works licence (section 61(2)(b)). In substance, section 61 is therefore essentially the same as section 50 in that it requires consent to do works in a street, it is the nature of the street that is different. Section 61 also provides that street authorities may not unreasonably withhold their consent to such works.</p> <p>As with the other street works needed under the DCO, the Applicant is seeking to minimise the number of subsequent consents required and thereby reduce the risk of delay to delivery. It is the Applicant's view that this is an appropriate and reasonable approach which follows the Model Provisions. It avoids the need for a separate consent to be</p>

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			<p>secured following the grant of any DCO which would be contrary to the aims of the Planning Act 2008. The Applicant is happy to provide such details of the works as may be necessary to the Welsh Government and is why it is proposing some Protective Provisions with the Welsh Government to secure this (which are currently being considered by the Welsh Government) but considers that it is appropriate that the principle of the consent is secured by the DCO itself. This approach to street works is well precedented in DCOs for works which would otherwise require street works licences under s50.</p> <p>The disapplication of section 61 is precedented in the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014. Paragraph 4(4) of Part 1 of Schedule 19 (under article 56) of that order reads: Section 61(1) of that Act (under which the consent of the street authority is required for the placing of apparatus in a protected street) shall not apply to the placing of apparatus in the course of the authorised project.</p>
3.10	Applicant	<p><b>CA Schedule</b></p> <p>For ease of reference, the ExA again requests that the information as it appears in the negotiations document [REP6-016] be copied over into the relevant parts of the CA Schedule [REP6-018] at each deadline.</p>	This request is noted, and the CA Schedule has been updated accordingly (Document 7.10 of the Applicant's Deadline 7 submission).
3.11	Applicant	<p><b>Document updates</b></p> <p>Please ensure the negotiations document [REP6-016] and CA Schedule [REP6-018] are updated at each successive deadline.</p>	This request is noted, and the CA Schedule and the negotiations document have both been updated accordingly at Document 7.10 of the Applicant's Deadline 7 submission.
3.12	Applicant	<p><b>OnSS and Biodiversity Enhancement</b></p> <p>It is mentioned throughout your submissions, including [REP3a-005], that biodiversity enhancement quantum at the OnSS site would meet relevant policy requirements. Please specify which policy requirements.</p>	The Applicant is preparing a note for the Examining Authority, that will be provided at Deadline 8, setting out the policy requirements relating to biodiversity enhancement and how these are met through the proposed landscape mitigation and ecology mitigation, compensation and enhancement area around the onshore substation, as explained in the Applicant's representations at the Compulsory Acquisition hearing (CAH). The note will include drawings showing potential connectivity within and around the site.
3.13	Applicant	<p><b>Rights of Way</b></p>	The Applicant is not intending for the public right of way within Plot 416 to be permanently stopped up. The dDCO does not contain any powers to permanently stop any public rights of way and therefore any

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		Plot 416, which contains a public right of way, would be subject to CA of land. How would the Applicant (or any subsequent landowner) be prevented from permanently stopping up the public right of way in the future?	<p>permanent stopping would require a separate application to DCC that would be determined in accordance with any relevant procedures.</p> <p>The outline PAMP has been amended to make this position clear (Document 7.14 of the Applicant's Deadline 7 submission).</p>
3.14	Applicant	<p><b>Statutory Undertakers</b></p> <p>The negotiations document [REP6-016] identifies s127(6) of PA2008 as relevant to seven Statutory Undertakers. However, is this correct given that only two of them are identified in the BoR as being landowners (Network Rail Infrastructure Limited and Dŵr Cymru / Welsh Water)?</p>	<p>The Applicant has revised the negotiations document submitted at Deadline 7 (Document 7.9 of the Applicant's Deadline 7 submission) to confirm that there is only the potential for rights to be acquired from land owned by two statutory undertakers namely Network Rail Infrastructure Limited and Dŵr Cymru / Welsh Water. Therefore s127(6) of the PA 2008 is only relevant to these two statutory undertakers.</p>
3.15	Applicant	<p><b>Plots</b></p> <p>Having regard to submission [REP5-034], please address concerns around:</p> <p>a) Time periods for rights sought;</p> <p>b) The necessity for certain plots (or parts of them) to be included within the Order land (i.e. Plots 142 and 145); and</p> <p>c) Implications for future development / diversification of land.</p>	<p>a) There is no ability for the Applicant to acquire rights that are not temporary or permanent through the DCO. Where the period for which rights are needed is uncertain, such as rights in relation to ecological mitigation or enhancement, the Applicant can only include the compulsory acquisition of permanent rights in the DCO. There will be greater flexibility with regards to the duration of those rights in the event that a voluntary agreement is reached.</p> <p>b) The operational access route shown in plots 142 and 145 was designed from a desktop review of existing accesses used by agricultural machinery to navigate the fields. The access routes were designed to avoid environmental constraints and the requirement to remove any trees, hedgerows or permanent features that would restrict the Applicant exercising the rights to maintain the cables. These suggested access routes were incorporated into the PEIR boundary and presented at Section 42 consultation. An overview of the consultation material and proposed plans specific to the Kerfoot's land were reviewed and discussed at a meeting between Dalcour Maclaren and Mr Fearnall on 20 September 2021. Following this meeting, a formal response was submitted by Mr Fearnall to the Applicant as part of the Section 42 consultation period which only briefly alluded to the operational access route and did not suggest that it should be relocated or not included in the Order Limits submitted as part of the DCO application.</p>

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			<p>As part of the ongoing negotiations in respect of the required land rights, Mr Fearnall submitted a proposed amendment to the operational access route on 30 June 2022. It is the Applicant's view that the proposed alternative access route is not suitable because it would involve the traversing of an important hedgerow at point 21a as shown on the Hedgerow and Protected Tree Plan (REP6-036), as well as more extensive interaction with the Applicant's proposed Great Crested Newt mitigation area in plot 144 than would be experienced by utilising plot 145 for access purposes. The hedgerow is identified as a priority habitat in Figure 13 of ES Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation (APP-066).</p> <p>Notwithstanding this, the HoTs which are currently being negotiated with Mr Fearnall have been drafted in such a way as to provide the necessary flexibility to be able agree an alternative route of access over the Affected Party's wider land holding for operational maintenance along a route which shall be agreed between the parties acting reasonably.</p> <p>Plot 145 is required to secure access to the southern section of plot 140 which lies to the eastern extent of the Order Limits and has been deliberately divided from plots 146 and 144 to ensure only the permanent operational access rights endure once the ecological mitigation areas (if required) are restored to agricultural use and returned to the landowner.</p> <p>c) See the Applicant's comments on Wilson Fearnall Ltd.'s response to ExQ2.3.4 for further information. The introduction of underground cables and associated land rights is not considered to materially reduce the quantum of development achievable across a site. For example, if a small part of a development site were required for the AyM cable connection, this area could be used to provide public open space provision, as required under DCC Policy BSC11 – Recreation and Open Space.</p>
3.16	Applicant, Network Rail Infrastructure Limited (NRIL)	<p><b>Protective Provisions</b></p> <p>Please clarify:</p> <p>a) Whether you expect agreement to be reached on protective provisions before the close of the Examination;</p>	<p>a) The Applicant and NRIL are continuing active discussions in relation to the protective provisions and hope that an agreed position can be reached before the end of the Examination.</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		<p>b) The main areas of outstanding disagreement;</p> <p>c) Implications for the Proposed Development should protective provisions not be agreed;</p> <p>d) Approaches open to the ExA should protective provisions not be agreed; and</p> <p>e) Whether consideration has been given to the use of those protective provisions as per other made dDCOs (i.e. Norfolk Boreas and Hornsea Three).</p>	<p>b) The Applicant is awaiting final confirmation from NRIL that there are no outstanding points of disagreement on the protective provisions.</p> <p>c and d) Should protective provisions not be agreed by the close of the Examination, the Applicant intends to submit its preferred set of protective provisions in the final version of the dDCO at Deadline 8. It is anticipated that NRIL will also submit its preferred set of protective provisions to the ExA. It will then be open for the ExA to recommend that either set of protective provisions (or another form of protective provisions) is included in the DCO should it be granted by the Secretary of State. The Applicant and NRIL will continue to negotiate the protective provisions after the close of the Examination and provide an update to the Secretary of State to take into consideration when making the final decision.</p> <p>e) The Applicant has had regard to protective provisions included in other made DCOs including Norfolk Boreas and Hornsea Three and has used these as reference points during the negotiation.</p>
3.17	Applicant, Dwr Cymru / Welsh Water	<p><b>Protective Provisions</b></p> <p>Please clarify:</p> <p>a) Whether you expect agreement to be reached on protective provisions before the close of the Examination;</p> <p>b) The main areas of outstanding disagreement;</p> <p>c) Implications for the Proposed Development should protective provisions not be agreed; and</p> <p>d) Approaches open to the ExA should protective provisions not be agreed.</p>	<p>The protective provisions have been agreed with Dwr Cymru / Welsh Water and will be included in the dDCO submitted at Deadline 8. The Applicant and Dwr Cymru are progressing with a joint statement to confirm the agreed position and plans to submit this at Deadline 8.</p>
3.18	Applicant	<p><b>Other Agreements / Protective Provisions</b></p> <p>Please provide a response to the submission from NHWF [REP5-040], including your views on the protective provisions as suggested. Please also indicate the approaches open to the ExA should agreement between the parties not be reached by the close of the Examination.</p>	<p>The Applicant does not consider that it is necessary or appropriate to include protective provisions in favour of NHWFL on the basis that the relationship between the parties can and should be dealt with by a crossing agreement. This will include reciprocal obligations on both the Applicant and NHWFL in relation to approval of works which is in both parties' interests. The protective provisions drafted by NHWFL do not contain such reciprocal obligations. The negotiation on the crossing agreement is progressing and the outstanding points of dispute are</p>



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			limited to commercial matters. Although the Applicant is hoping that the crossing agreement will be finalised and signed before the close of the Examination, it is common practice for a crossing agreement to be finalised and signed after the close of the Examination.
3.19	Applicant, Rhyl Flats Wind Farm Limited (RWF)	<p><b>Wake effects</b></p> <p>The ExA notes all representations put forward by the Applicant and RWF in respect of wake effects.</p> <p><i>To the Applicant:</i></p> <p>a) Please set out in detail your views on the relevance of NPS EN-3 paragraphs 2.6.176 – 2.6.188 to the Proposed Development (noting that you suggest in [REP1-007] and [REP5- 003] that they are not relevant, though make reference to consultation with 'other offshore wind farm operators' as potentially affected stakeholders within the relevant section of the NPS Tracker [REP3-003] relating to these NPS paragraphs);</p> <p>b) Please confirm and summarise the potential wake effect and socio-economics assessment undertaken to meet Regulation 5 (2)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. If this assessment has not been undertaken, please provide justification and relevant evidence;</p> <p>c) Please confirm and summarise your approach to NPS EN-1, paragraph 5.12.2, where if the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.2);</p> <p>d) Do you consider there could be potential for wake effects on the operation of RWF? If not, why not?; and</p> <p>e) If so, would you be willing to undertake an assessment of this?</p> <p><i>To RWF:</i></p> <p>f) What is the remaining operation period of RWF / when is RWF due to be decommissioned?</p> <p>g) [REP4-048] states that the construction of Awel y Môr would result in a tangible wake loss at Rhyl Flats wind farm of (in the region of) 2%. Is</p>	<p>a) There is no express mention of wake loss effects in any of the National Policy Statements (NPS) including NPS EN-3. It has also not been included in any of the draft NPSs.</p> <p>As noted in the Applicant's comments on the response to ExQ2.3.8 (REP6-003), other offshore wind farm (OWF) operators are referred to in the NPS tracker in relation to paragraphs 2.6.180 and 2.6.181 of EN-3 because the Applicant undertook consultation with other OWF operators in the pre-application stage. However, this reference in the NPS Tracker does not imply that the Applicant considers paragraphs 2.6.176 – 2.6.188 of EN-3 to apply to other OWFs. It merely confirms that consultation took place which is considered to be best practice.</p> <p>The Applicant does not consider that paragraphs 2.6.176 – 2.6.188 of EN-3 apply to other OWFs for the following reasons:</p> <ul style="list-style-type: none"> <li>▲ The title of the section (Oil, gas and other offshore infrastructure and activities) denotes that the intention is for the policy to cover other offshore sectors such as oil and gas. If it was intended to apply to other OWFs, then the title of this section could be left as being 'Other offshore infrastructure and activities' or would expressly include reference to other OWFs.</li> <li>▲ The wording of paragraph 2.6.176 which suggests that 'other offshore infrastructure' includes telecommunications cables, oil and gas pipelines or exploration/ drilling or marine aggregate dredging, further indicates that another OWF would not fall within this category. The drafting of the NPS could have easily kept this to be more open or expressly included other OWFs or electricity generators had this been intended.</li> <li>▲ Paragraph 2.6.184 of EN-3 is a key policy test cited by RWF which relates to avoiding or minimising disruption or economic loss to 'other offshore industries'. The Applicant considers that reference to 'other offshore industries' rather than other offshore infrastructure or activities is further evidence that this section is aimed at other sectors, not offshore electricity generation, which is all part of the same 'industry'.</li> </ul>

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		<p>this figure a percentage loss of energy generation from RFWF and in the absence of a wake loss assessment how was this figure calculated?; and</p> <p>h) With reference to NPS EN-3 paragraph 2.6.185, do you consider that this wake loss would be likely to affect the future viability of RFWF?</p> <p><i>To the Applicant and RFWF:</i></p> <p>i) Please comment on whether NPS EN-3 paragraph 2.6.188 (and draft NPS EN-3 paragraph 2.34.8) would offer a possible solution to the wake effect dispute and if so, please provide some suggested wording for such a requirement; and</p> <p>j) RFWF suggests potential for up to 2% wake loss as a result of the Proposed Development. Having regard to the remaining operational period of RFWF and any potential effects on its electrical output as a result of such a wake loss, to what degree might this affect the benefits that the Proposed Development could provide in terms of electrical output / renewable energy over its lifetime?</p>	<p>▲ Had it been the government's intention for these paragraphs to apply to other OWFs this would have been expressly stated given the resulting implications for new development. Had the intention been for consideration of wake loss or the requirement for compensation to be covered by these paragraphs quite simply there would have been direct reference to this – which as the Applicant has previously stated there is not.</p> <p>b) Regulation 5(2)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 relates to impacts on population and human health. These matters have been assessed in the Public Health chapter of the ES (APP-073). Regulation 5(2)(a) is not considered to be relevant to socio-economic matters which are considered in Volume 3 Chapter 3 of the Environmental Statement. The Applicant does not consider that any factors listed in Regulation 5(2) require a wake loss assessment to be undertaken and no representations were made regarding this in the Scoping Opinion in response to the Applicant's EIA scoping request (APP-295).</p> <p>Impacts to other offshore infrastructure (including other offshore wind farms) are considered in the Other Marine Users and Activities chapter of the ES (APP-058), considering the potential impacts of physical overlap of infrastructure (such as cables), and increased vessel traffic which could interact with operations at other wind farms. These impacts are assessed on the basis that they could impact operations at other offshore wind farms, rather than their commercial output. The Scoping Opinion (APP-295) advised (and APP-058 has assessed) that the EIA should consider construction phase effects because of the potential interaction between construction activities and other offshore wind farms (Scoping ID: 4.12.2); and operation phase effects in the context of the potential for maintenance activities to impact operations at other offshore wind farms (Scoping ID: 4.12.9). The Applicant has undertaken a review of other applications for offshore wind farms and has not found precedent of the consideration of the commercial implications of wake loss effects in EIA terms, and this was not requested to be assessed in the Scoping Opinion (APP-295).</p> <p>c) The Applicant has set out its approach to paragraph 5.12.2 of NPS EN-1 in the National Policy Tracker (REP3-003). The Applicant does not consider that potential wake loss effects on other OWFs are matters</p>

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			<p>that are protected by policy or socio-economic impacts that should be considered as part of an EIA.</p> <p>d) The Applicant has never asserted that the presence of AyM would have no impact whatsoever on RFWF. It is a feature of offshore wind development that all new OWFs will have a potential wake effect on existing OWF's, including those that may be tens or even hundreds of kilometers apart.</p> <p>It is the Applicant's case that this matter is appropriately regulated through the TCE leasing process by adherence to TCE's siting criteria for new OWF development (which AyM complies with).</p> <p>Without prejudice to the Applicant's position that wake loss is not a matter that is required by NPS paragraph 2.6.184 to be addressed by applicants for new OWF development, in any event AyM has been designed to minimise its impact on all offshore infrastructure, including other OWFs, as set out in response to ExQ1.3.27 (REP1-007) and comments on RFWFL's submissions (REP3- 002 and REP5-003).</p> <p>e) The Applicant does not consider that it is necessary for a wake loss assessment to be undertaken on the basis that it is not required by policy and that TCE's siting criteria for OWFs dictates the location of the AyM wind turbine generators (WTGs). In any event, to undertake an assessment based on the maximum design scenario would be overly precautionary as the number, layout and height of the WTGs have not been determined, and would therefore not be a sound basis on which to reach any conclusions regarding wake loss effects.</p> <p>f) N/A - Addressed to RFWF.</p> <p>g) N/A - Addressed to RFWF.</p> <p>h) N/A - Addressed to RFWF.</p> <p>i) The Applicant does not consider that it would be appropriate for arbitration to be used in relation to the wake loss dispute between the Applicant and RFWFL. The key issue in dispute relates to the interpretation of the NPS and whether wake loss effects are a relevant consideration in determining the AyM application. The Applicant considers that the correct interpretation of the NPS is a matter for the Examining Authority and Secretary of State and one that is not appropriate to be determined by an arbitrator. Therefore, paragraph</p>



QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>2.6.188 of NPS EN-3 does not offer an appropriate solution to resolving the wake loss dispute given the Applicant's clear position in response to sub-question (a) that the relevant NPS policies do not apply in these circumstances and that, without prejudice to that position, even if the Examining Authority and Secretary of State conclude that the policies are engaged, the Applicant has complied with the policies by minimising the impact on RFWF and there would therefore be no need, and thus no justification for a requirement providing for the matter to be addressed by arbitration.</p> <p>j) For the reasons set out below, any wake impacts on RFWF will be minimal – on RFWF's own assessment a maximum of 2% - and will have no appreciable impact on the very substantial benefits that AyM will provide in terms of renewable generation capacity.</p> <p>As set out in the Applicant's Planning Statement (APP-298), AyM will produce sufficient electricity to power approximately 500,000 UK homes. The wake impact that RFWF has upon AyM has already been considered in the calculation of the Proposed Development's predicted electrical output and hence RFWF does not affect the renewable energy benefits of AyM that have been assessed in the Environmental Statement.</p> <p>The Applicant understands RFWF produces sufficient electricity to power approximately 61,000 households.</p> <p>In (REP4-048) DNV states that it expects the wake loss at RFWF to be "in the region of up to 2%" and acknowledges that further assessment is required to establish a more accurate figure. As the Applicant has previously explained, an assessment based on the maximum design scenario would not be accurate and would be overly precautionary as the final array design and choice of wind turbine generators has not been determined.</p> <p>As confirmed in its responses to RFWFL, the Applicant does not contest RFWF's 2% maximum figure but considers that the actual wake impact may well be appreciably less than this figure and that it remains within the current level of operating variability (i.e. the natural variability of wind speed that the wind farm already experiences each year).</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>The potential wake impact of AyM on RFWF must also be considered in the light of the very limited operational overlap between the two projects, which further underlines that AyM will have no appreciable impact on RFWF and in turn that any wake impacts will not detract from the very substantial benefits of the Proposed Development. According to a company report from RFWFL, RFWF has a "project life" of 23 years and this is also the "estimated useful economic life". RFWF was officially opened in 2009 and hence may be decommissioned by 2032. As set out in paragraph 38 of the Onshore Project Description Chapter of the ES (APP-062) the Applicant's objective is for AyM to be fully operational and commissioned by 2030, which would mean a maximum two-year overlap with RFWF's anticipated operational and useful economic life. Whilst it is acknowledged that some wind farms have extended their lifetimes, it is evident that the potential impact of the Proposed Development on RFWF is both minor and relatively brief, whilst the very substantial benefits of the Proposed Development will continue to be delivered for many years after RFWF has decommissioned.</p> <p>As the Applicant set out in comments on the response to ExQ2.3.8 (REP6-003) there is nothing in the Energy NPSs (either extant or revised draft) or other policy to prevent an OWF from being developed in the vicinity of another OWF. The only control that currently exists is through The Crown Estate's leasing process where buffers are built in to ensure appropriate separation between OWFs, which as explained above AyM complies with. There is also nothing in policy that says that the performance of an existing wind farm (either onshore or offshore) is a protected factor. In fact, there is no policy that says anything about minimum or acceptable performance levels for existing generation assets, including wind farms, as it is recognized that the performance of an offshore wind farm is inherently variable. It is also the case that all wind farms that are in proximity to each other will have a degree of wake effect.</p>
3.20	Applicant, RFWF	<p><b>Protective Provisions</b></p> <p>Notwithstanding wake loss matters, please clarify:</p> <p>a) Whether you expect agreement to be reached on protective provisions before the close of the Examination on all other matters;</p>	<p>a) The Applicant and RFWFL are continuing active discussions in relation to the protective provisions and hope that an agreed position on the majority of points in the protective provisions can be reached before the end of the Examination.</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		<p>b) The main areas of outstanding disagreement;</p> <p>c) Implications for the Proposed Development should protective provisions not be agreed; and</p> <p>d) Approaches open to the ExA should protective provisions not be agreed.</p>	<p>b) Other than the wake loss provision, the Applicant and RFWFL have agreed the majority of points relating to the protective provisions. The main outstanding point of disagreement relates to the indemnity provision and whether the indemnity provided to RFWFL under the protective provisions should be capped.</p> <p>c and d) Should protective provisions not be agreed by the close of the Examination, the Applicant intends to submit its preferred set of protective provisions in the final version of the dDCO at Deadline 8. It is anticipated that RFWFL will also submit its preferred set of protective provisions to the ExA. It will then be open for the ExA to recommend that either set of protective provisions (or another form of protective provisions) is included in the DCO should it be granted by the Secretary of State. The Applicant and RFWFL will continue to negotiate the protective provisions after the close of the Examination and will submit any agreed set of protective provisions to the Secretary of State to take into consideration when making the final decision.</p>
3.21	The Crown Estate	The Applicant's response to ExQ1.3.27c [REP1-007] suggests that The Crown Estate's siting criteria for offshore wind farm extensions (2017) sets a 5km stand-off from other operational offshore wind farms to take into account potential for wake effects / reductions in energy output for other offshore wind farms. Can the Crown Estate please comment on this matter and clarify whether this is the case?	N/A

## 2.5 Construction

Table 5: Construction.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
4.1	Applicant	<p><b>Onshore</b></p> <p>Further to your ISH3 Action Points [REP4-003] response to pre-commencement, construction and programme, response to ExQ2.4.3 [REP5-004] and Outline Onshore Construction Method Statement [REP6-045] please indicate the maximum hardstanding footprint area and indicate these locations at the OnSS area for the following pre-commencement works:</p> <p>a) Archaeology investigation;  b) Ground investigation; and  c) Site clearance including vegetation clearance.</p>	<p>The Applicant does not anticipate that the total area of temporary hardstandings would be greater than 1500 square metres. The Applicant will endeavour to use the same footprint for pre-commencement works, however, if these are to occur simultaneously, then the Applicant may require a greater area than this and will look to minimise the overall footprint of any additional temporary hardstanding' s and where possible share footprints for features such as storage, car parking and welfare.</p> <p>The temporary hardstanding location would be identified in consultation with the landowner but is anticipated to be in the southern part of plot 417 to facilitate temporary access via Glascoed Road.</p>
4.2	Applicant, NRW, DCC	<p><b>Onshore</b></p> <p><i>To the Applicant</i></p> <p>Please could you confirm the impact assessment for noise and air quality (with reference to your response in ExQ2.4.7 [REP5-004] that crushing/sorting may be required in the event that either rock or granular and cohesive material are encountered). Please also clarify if crushing/sorting is deemed a demolition activity, with reference to your previous response ExQ1.4.18 [REP1-007] that you do not intend to undertake demolition activities on site.</p> <p><i>To NRW, DCC</i></p> <p>Please could you list any permits required for crushing/processing material on site.</p>	<p>The Applicant confirms that crushers have been included within the noise assessment provided in ES Volume 3, Chapter 10: Airborne Noise and Vibration (APP-071). Table 21 within Volume 5, Appendix 10.3 of the ES (APP-153), includes two crushers within the plant list for substation ground works.</p> <p>Potential air quality impacts may arise during the event that rock or granular and cohesive material are encountered and crushing / sorting is undertaken. However, given that crushing / sorting operations are not proposed to be continuous, and only required in the event rock or granular and cohesive material are encountered, potential impacts are likely to negligible and temporary – not leading to any long-term deterioration of conditions. Furthermore, a series of construction phase control measures were included within the Outline Code of Construction Practice (oCoCP) - Appendix 3 - Outline Air Quality Management Plan (oAQMP) (REP2-031) which will help minimise temporary impacts associated with crushing / sorting. These include:</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p><i>“Plan site layout (layout of the works taking place on site) so that machinery and dust causing activities are located away from receptors, as far as is possible.</i></p> <p><i>Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period, where appropriate.”</i></p> <p>Notwithstanding this, it is recognised that screening / crushing is defined a demolition activity as per the Institute of Air Quality Management (IAQM) guidance. However, given the nature of these operations, it is considered that screening / crushing is affiliated with earthwork activity (which has been assessed in the ES).</p> <p>The dust emission magnitude associated with potential earthwork activity was assumed to be Large. This dust emission magnitude (and associated mitigation) is believed to be suitable in understanding impacts associated with screening / crushing activity. Despite this, in acknowledgement of the potential screening / crushing activity that may occur in event that rock or granular and cohesive material are encountered, the construction dust assessment has been reviewed to account for these demolition activities.</p> <p>This review has confirmed that the potential worst-case onshore construction works are found to be:</p> <ul style="list-style-type: none"> <li>▲ High risk in relation to dust soiling impacts on people and property (this remains unchanged from the ES conclusions);</li> <li>▲ Low risk in relation to human health impacts (this remains unchanged from the ES conclusions); and</li> <li>▲ Medium risk in relation to ecological impacts (this remains unchanged from the ES conclusions).</li> </ul> <p>The maximum risk of impacts associated with construction dust remains unchanged relative to the ES assessment outcomes (ES Volume 3, Chapter 11: Air Quality (APP-072)).</p>
4.3	Applicant, NRW	<p><b>Onshore</b></p> <p><i>To the Applicant:</i></p> <p>Please could you clarify your approach to waste and materials. The statement that cut material from the site can be utilised as part of the</p>	<p>The Applicant has updated the Construction Method Statement (CMS) submitted at Deadline 7 (Document 7.12 of the Applicant's Deadline 7 submission) to include confirmation that material excavated as part of the cut and fill works will be reused on site under the 'Definition of Waste Code of Practice' (DoWCoP) produced by</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		<p>fill material requirements of the earthworks platform, subject to testing and specification requirement in response to ExQ2 4.7 [REP5-004] infers that it would not be a waste but be managed in such a way that it would be a material.</p> <p><i>To the Applicant and NRW:</i></p> <p>Please outline the mechanism and approach to the waste legislation framework in regard to the re-use of excavated rock/granular soil and if an outline materials management plan is required.</p>	<p>Contaminated Land: Applications in Real Environments (CL:AIRE). As part of the DoWCoP a Materials Management Plan (MMP) will be produced which will detail how the site construction materials would be managed by the appointed contractor demonstrating that the material meets the requirements of the DoWCoP.</p>

## 2.6 Good Design

Table 6: Good Design.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
5.1	Applicant	<p><b>Design Principles Document</b></p> <p>The ExA note the changes made to the Design Principles Document at Deadlines 4 and 5. One such change relates to the Design Review Process (Chapter 4, [REP5-020]). Please provide within the document an indicative timeline for the process and the various stages identified. This does not need to include dates but should, for example, show the stages outlined in paragraphs 120 to 128 in a clear visual style so that interested parties can clearly see the stages proposed and local residents can see when they can expect to be consulted within the process.</p>	<p>The Design Principles Document has been updated to include an indicative timeline (Document 7.16 of the Applicant's Deadline 7 submission).</p>
5.2	Applicant	<p><b>Design Principles Document</b></p> <p>Your answer to ExQ2.5.4 [REP5-004] notes the potential opportunity for an extension to the Nature Reserve as part of the proposals and the potential for public access through the mitigation areas, provided certain conditions are met. Could such proposals be included within the Design Principles Statement? If so please provide an updated version.</p>	<p>The Applicant has amended the Design Principles Document to include engagement with DCC and NRW on these opportunities. An updated version of the Design Principles Document is provided at Document 7.16 of the Applicant's Deadline 7 submission.</p>



## 2.7 Draft Development Consent Order (dDCO)

Table 7: Draft Development Consent Order (dDCO).

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
Questions / comments relate to dDCO Revision K [REP6-005] (clean) / [REP6-006] (tracked)			
Articles (A)			
6.1	Applicant	A27(8) – this still appears to be excessive in scope as it continues to refer to CA of rights over land identified for TP only. Any land subject to CA of rights / restrictive covenants is included in Schedule 7 and provision is made for this in A20. There is no apparent crossover of Schedules 6 and 7. Please amend A27(8) of the dDCO as necessary.	This provision has been amended in the revised draft DCO (Document 7.6 of the Applicant's Deadline 7 submission).
Schedules (Sch), including Requirements (R)			
6.2	Applicant	Sch 1, Part 1 (just above Table 1) - you correctly changed the first reference to 'works plans' to 'location plan' (as the location plan includes the co-ordinates) but incorrectly changed the second reference to 'works plans' to 'location plan' also. Please rectify as the Work Nos are shown on the works plan.	This provision has been amended in the revised draft DCO (Document 7.6 of the Applicant's Deadline 7 submission).
6.3	Applicant	Sch 2, Requirement 2, Table 3 – should this specify maximum hub and meteorological mast heights (noting that SLVIA documents (i.e. [APP-206 / APP-209]) suggest this would be 179m for MDS A and 157m for MDS B)?	<p>The Applicant does not consider that maximum hub and meteorological mast heights should be included within Requirement 2 on the basis that it is not a key parameter in the DCO. When the maximum design scenario (MDS) was agreed with consultees, it was agreed that maximum blade length was a more important consideration.</p> <p>The MDS scenarios have been carried into the dDCO to limit upper and lower tip height. Visualisations used for the SLVIA assessment (AS-027) have used the highest hub height for the maximum rotor diameter.</p> <p>Meteorological masts are needed to measure wind speed at turbine hub height, therefore the height of meteorological masts is controlled by engineering function. These also need to be the same height to conform with standards for monitoring and measurement of wind turbine performance. The Offshore Project Description (APP-047) confirms that the WTG hub and meteorological mast heights will be</p>



QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			aligned. Furthermore, the dDCO has been amended to include wording which provides that there must be no material difference in the size and appearance of the wind turbine generators.
6.4	Applicant	Sch 4 - further to ExQ1.6.46(a), this schedule still refers to 'Streets and rights of way to be temporarily stopped up or restricted' though no streets are identified. Please explain the reason for this or amend the schedule as necessary	This provision has been amended in the revised draft DCO (Document 7.6 of the Applicant's Deadline 7 submission).

## 2.8 Flood Risk and Water Quality

Table 8: Flood Risk and Water Quality.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
7.1	Dŵr Cymru/Welsh Water	<p><b>Foul Water Drainage</b></p> <p>Your submission at Deadline 1 [REP1-058] states that it appears that the application does not propose to connect to the public sewerage system but that if circumstances change that you would wish to be re-consulted. The proposed substation preliminary outline drainage strategy [APP-138], [REP1-045], contains proposals for foul sewerage connections (part 4).</p> <p>Please provide any comments on these proposed connections, should you wish to do so.</p>	N/A

## 2.9 Historic Environment

Table 9: Historic Environment.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
8.1	Applicant and any interested/ relevant IPs	<p><b>Faenol Broper</b></p> <p>The Landscape and Visual Impact Assessment (Volume 3, Chapter 2 of the ES) [AS-029] and the Visual Effects from Faenol-Broper document [REP4-027] states that Faenol-Broper is a Grade II listed farmhouse (Table 13 and para 6 respectively). However, it is the ExA's understanding that it is the barn to the North West of Faenol-Broper Farmhouse which is the listed building as opposed to the farmhouse (Cadw reference 1378).</p> <p>Please confirm if this is correct. If so please correct/amend any relevant documents, including their findings and conclusions if necessary. If this is not correct, please provide evidence of the listing of the farmhouse.</p>	<p>The Applicant confirms that it is the barn to the North West of Faenol Broper that is the listed building and has provided an updated version of the Visual Effects from Faenol-Broper document (Document 7.21 of the Applicant's Deadline 7 submission) and will also include the revision within the Errata list which will be submitted at Deadline 8, as relevant to the LVIA chapter (AS-027).</p>

## 2.10 Land Use

Table 10: Land Use.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
9.1	DMPC on behalf of Mr JB and Mrs E Evans	<p><b>Faenol Broper</b></p> <p>The Applicant makes reference to the Faenol Broper agricultural unit also farming 30ha of land near Bodelwyddan Castle which would not be affected by the Proposed Development (Page 176 of [REP1-007]). Is this land in addition to the 61.29ha of the holding as reported and if so, does this have any implications for the percentage of land take referred to by DMPC ([REP1-103] and [REP1-104]) and the viability of the farm business? Please annotate the additional 30ha on a plan.</p>	N/A
9.2	Applicant	<p><b>Faenol Broper</b></p> <p>The Ground Conditions and Land Use [APP-067] and Socio-Economic [AS-034] ES chapters report no significant effects on agricultural operations as land to be restored. Is this conclusion accurate in the case for Faenol Broper given the permanent land take for the OnSS and associated works?</p>	<p>For the purpose of this response, the phrase "agricultural operations" has been taken to mean the physical act of farming of the land either through the growing of crops or herbaceous forage or the grazing of livestock. No assessment of the current or future viability of Faenol Broper as a farm business has been undertaken as this would require the provision of accurate accounting information by the owners of the holding. To date no such information has been either requested or provided.</p> <p>Land north of the bridleway DE/201/9 is subject to temporary disturbance of agricultural operations only. Land will be restored to agricultural use once works are completed.</p> <p>Where land is subject to freehold acquisition for the purpose of the OnSS and associated works, agricultural operations will not be possible during the course of the construction works. Upon completion of the works and following establishment of landscape mitigation and ecological mitigation, compensation and enhancement areas, it may be possible to facilitate low intensity grazing as part of the biodiversity management regime for the area around the OnSS.</p> <p>The Applicant does not consider there to be a significant effect for the reasons set out in the response to ExQ3.9.3.</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
9.3	Applicant	<p><b>Agricultural Holdings Table</b></p> <p>Please update the table within Appendix D in relation to ExQ2.9.6 [REP5-004] to include the following detail:</p> <p>a) Total size of each holding;</p> <p>b) Loss of holding to Proposed Development by hectare;</p> <p>c) Loss of holding to Proposed Development, split by temporary and permanent development by hectare;</p> <p>d) Percentage loss of holding to Proposed Development, split by temporary and permanent development; and</p> <p>e) Significance of loss in EIA terms for each holding.</p>	<p>a) Although the Applicant does have information on the holding size at Faenol Bropor (holding is 61.29 ha), where permanent loss of agricultural land would occur, the Applicant does not hold information on holding size for other onshore elements of the scheme where any effects on land use will be temporary. The Applicant does not consider there will be significant effects for holdings along the cable corridor for the reasons set out under point (e) of this response.</p> <p>b) The only area where there will be a loss of holding from the development of permanent infrastructure will be at Faenol Bropor. The area of land that would be lost as a result of the onshore substation and surrounding access, mitigation, compensation and enhancement area (represented by plots 416 and 417), are shown in Appendix D in relation to ExQ2.9.6 (REP5-004) and repeated in this document as Appendix A.</p> <p>c) The table previously provided in Appendix D in relation to ExQ2.9.6 (REP5-004) has been updated to show the area of temporary or permanent land take (operational access land is included in the temporary land calculations given this is a relatively small area and will not preclude current agricultural use of this land).</p> <p>d) The percentage loss of land ownership at Faenol Bropor is 54% (as noted by the landowner's agent). This calculation does not account for approximately 30 Ha of land understood to be farmed by the landowner under the terms of a tenancy agreement and is located towards Bodelwyddan Castle that is not affected by AyM or any other land that the landowner farms. If the 30 ha of tenanted land was included the percentage loss would reduce to 37%. As noted above, the Applicant does not have information on holding size for other holdings that are temporarily affected by the scheme that is required to calculate percentage loss.</p> <p>e) The Applicant has not undertaken an assessment of the impacts of the proposed development on individual land holdings within the EIA. It's approach, as confirmed through the EIA scoping and s42 PEIR consultation, was to consider the total worst-case footprint of the onshore development area and ascertained the total loss (ha) of</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>agricultural land for each ALC. This assessment concludes that the effects from temporary and permanent works will not be significant.</p> <p>With the exception of the Transition Joint Bays (TJBs) and operational accesses, the effects of the cable corridor and landfall works will be temporary in nature and dispersed along the 12 km linear cable route such that effects are not concentrated in any one farm holding area avoiding causing large scale disruption to farming practices and cultivation to any single landholding. The reinstatement of land above the buried cable will allow agricultural cultivation to re-commence once the cable has been installed. Any disturbed field drainage will be reinstated and the cable will be buried to a depth that will allow cultivation of the land. As such any effects on land use are therefore temporary and reversible.</p> <p>Measures have been proposed to reduce the impact of construction works upon agricultural operations (such as agreeing crossing points will be used in suitable places in order that livestock and vehicles can cross the cable corridor working width) are included in the Outline Code of Construction Practice (Document 7.11 of the Applicant's Deadline 7 submission). There are also measures within the accompanying management plans (such as biosecurity measures in the outline Invasive Non-Native Species Management Plan (REP2-047). Financial compensation will be paid by the Applicant to holdings that are impacted as a result of the temporary works.</p> <p>The TJB is limited in size (20m x 5m) and would not significantly affect the holding it is located within (it is noted that the TJB for the Burbo Bank Extension is located within the same land parcel and agricultural operations have continued). As noted above, the operational access land represents only a relatively small area that will be used infrequently for site inspections of the onshore transmission infrastructure. The operational accesses make use of existing field access arrangements and will not preclude current agricultural use of the land affected.</p> <p>Given the considerations above, the Applicant considers there will not be any significant effects upon holdings along the cable corridor and landfall.</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>The Applicant does, however, acknowledge that there will be a large proportion of the Faenol Bropor land holding removed from agricultural operation by the OnSS and the associated access, mitigation, compensation and enhancement areas.</p> <p>The Applicant considers that only in the absence of appropriate compensation being paid by the Applicant in respect of the acquisition of the freehold interest in the land (noting this is not a situation that would occur as payment will be made either through the agreement of voluntary terms or (as a worse case) through the exercise of compulsory acquisition powers), this could constitute a significant effect in EIA terms.</p> <p>However, Faenol Bropor is a livestock and arable farm where the locational requirements for land to be in close proximity to agricultural infrastructure are not considered to be as great as for other farming practices such as dairy farming. The proceeds from the voluntary sale of land or compensation arising as a result of the acquisition of land through compulsion can be used, at the discretion of the holding, to continue agricultural operations such as through intensification or the acquisition or lease of a corresponding area of land to that which would be lost.</p> <p>These same payments could also contribute towards other activities that could support the holding such as through farm diversification.</p>
9.4	Applicant	<p><b>Agricultural Holdings</b></p> <p>In respect of those holdings noted as not forming part of a recognised agricultural holding, but are farmed by a tenant or occupier (Appendix E in response to ExQ2.9.6 [REP5-004]), please confirm which plot they relate to in the Book of Reference [REP6-010]. Please include this information on the above-mentioned agricultural holdings table in relation to Appendix D of ExQ2.9.6 [REP5-004].</p>	<p>The agricultural holdings table has been amended and is provided in this document at Appendix A.</p>
9.5	Trustees of the Bodrhyddan Estate Maintenance Fund and Bodrhyddan	<p><b>Outline Soil Management Plan (oSMP)</b></p> <p>Noting your concerns in respect of potential effect on soil quality, are you satisfied with the measures proposed in the oSMP [REP5-018]? If not, please list your specific concerns and any additional mitigation considered necessary.</p>	N/A

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE																											
	Farming Company																													
9.6	Applicant	<p><b>Onshore Substation Site (OnSS)</b></p> <p>Noting that a further Agricultural Land Classification (ALC) survey has been undertaken at the proposed OnSS site, is it necessary to update the table provided in response to ExQ1.9.8 [REP1- 007]?</p>	<p>The Applicant has updated the table to incorporate the results of the 2023 Agricultural Land Classification (ALC) survey as follows:</p> <p>The area of the OnSS footprint and wider landscape mitigation and ecological compensation and enhancement area (Plot 417), includes 1.5 Ha of Grade 3a which represents 0.69% of Grade 3a within 1000m of OnSS and 0.011% of Grade 3a land in Denbighshire.</p> <table border="1"> <thead> <tr> <th>ALC GRADE</th> <th>HECTARES WITHIN 1000M</th> <th>HECTARES WITHIN DENBIGHSHIRE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td></td> <td>683</td> </tr> <tr> <td>2</td> <td>8.553</td> <td>6,785</td> </tr> <tr> <td>3a</td> <td>216.53</td> <td>13,128</td> </tr> <tr> <td>3b</td> <td>131.01</td> <td>21,648</td> </tr> <tr> <td>4</td> <td></td> <td>13,877</td> </tr> <tr> <td>5</td> <td></td> <td>12,426</td> </tr> <tr> <td>Urban</td> <td>31.45894</td> <td>2,385</td> </tr> <tr> <td>Other</td> <td>21.520193</td> <td>12,917</td> </tr> </tbody> </table>	ALC GRADE	HECTARES WITHIN 1000M	HECTARES WITHIN DENBIGHSHIRE	1		683	2	8.553	6,785	3a	216.53	13,128	3b	131.01	21,648	4		13,877	5		12,426	Urban	31.45894	2,385	Other	21.520193	12,917
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2	8.553	6,785																												
3a	216.53	13,128																												
3b	131.01	21,648																												
4		13,877																												
5		12,426																												
Urban	31.45894	2,385																												
Other	21.520193	12,917																												
9.7	Applicant	<p><b>Onshore Substation Site (OnSS)</b></p> <p>Please provide a plan illustrating the split of ALC land on the proposed OnSS site.</p>	<p>The Applicant has provided a copy of the Agricultural Land Classification Survey at Deadline 7 (Document 7.20 of the Applicant's Deadline 7 submission) that was undertaken in 2023 and includes a plan showing the split of ALC land.</p>																											
9.8	Applicant	<p><b>Agricultural Land Plans</b></p> <p>Please provide revised plans contained in of Appendix L and Appendix M, produced in response to ExQ1.9.1 [REP1-007], at a scale of 1:10,000.</p>	<p>The Applicant has provided a revised version of the 2 plans at Deadline 7 within this document at Appendix B and Appendix C. The Plans have been produced at a scale of 1:10,000 and include the results of the 2023 ALC survey undertaken at Faenol Bropor.</p>																											



QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
9.9	Applicant	<p><b>Sustainable Farming Scheme</b></p> <p>Noting the continued concern regarding tree loss and the potential effect on the required level of tree coverage to qualify for the proposed Welsh Government Sustainable Farming Scheme [REP5-036] and the comments provided by Welsh Government regarding this matter [REP5- 044], has any communication taken place with the Welsh Government in order to provide the required details for possible exemptions and/or variations to be considered in more detail?</p>	<p>The Applicant has not had any communication with Welsh Government in relation to the proposed Sustainable Farming Scheme prior to this question. The Applicant has contacted Welsh Government for an update regarding the proposed Welsh Government Sustainable Farming Scheme on 8 March 2023. It is noted that this is currently in draft form (further information is available from the Welsh Government here: <a href="https://www.gov.wales/sustainable-farming-scheme-guide">https://www.gov.wales/sustainable-farming-scheme-guide</a>), however on the basis of its current drafting, the Applicant does not foresee AyM presenting a barrier to any future applications to the scheme.</p>
9.10	Applicant	<p><b>Outline Soil Management Plan (oSMP)</b></p> <p>Paragraph 76 of the oLEMP [REP4-011] states that “<i>At the OnSS TCC, grassland will be reinstated to its previous state following construction. Elsewhere, grassland will be reinstated with the aim of creating the S7 Priority Habitat lowland meadow. This shall be initiated via careful soil management, to ensure the replaced soil is of low fertility and prepared to a good standard.</i>” Please confirm where in the oSMP this specific approach to reinstatement is detailed?</p>	<p>The Applicant has amended the outline Soil Management Plan (oSMP) to include ecological (rather than land productivity), aims for the ecological mitigation, compensation and enhancement area around the substation and has provided an updated version as Document 7.13 of the Applicant's Deadline 7 submission.</p>

## 2.11 Landscape and Visual

Table 11: Landscape and Visual.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
10.1	Applicant DCC	<p><b>Outline Landscape and Ecology Management Plan (oLEMP)</b></p> <p>The oLEMP (paras 90, 92 and 93) [REP4-011], oCoCP (para 40) [REP4-019] and oCMS (para 99) [REP4-017] make provision for details of tree protection. However, should this be extended to make provision for details of hedgerow protection also?</p>	The Applicant has updated the oLEMP, CoCP and oCMS (Documents 7.15, 7.11 and 7.12 of the Applicant's Deadline 7 submission) to include provision of details for the protection of retained hedgerows that are adjacent to, and within, the working area within the final LEMP.
10.2	DCC	<p><b>Outline Landscape and Ecology Management Plan (oLEMP)</b></p> <p>The Applicant considers a five-year period to be suitable within Requirement 9 of the dDCO, though has amended the oLEMP [REP4-012] to make provision for the final LEMP to include proposals for the long-term maintenance of landscaping associated with the OnSS site. This would be secured under Requirement 13 of the dDCO. Please confirm whether this resolves your concerns regarding landscaping around the OnSS and its effectiveness as screening over the long term.</p>	N/A
10.3	Applicant	<p><b>Landscape and Visual Impact Assessment (LVIA)</b></p> <p>LVIA Figure 2.6 [APP-162] was revised [AS-033] as requested by the ExA. However, both versions are identified as 'Revision A'. Please amend [AS-033] to reflect this error and include the application reference on this document also (6.6.2.2.7).</p>	The Applicant has provided an updated version at Document 7.22 of the Applicant's Deadline 7 submission.

## 2.12 Seascape, Landscape and Visual

Table 12: Seascape, Landscape and Visual.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
17.1	Applicant, NRW	<p><b>Plans</b></p> <p>The third row of [REP4-003] provides links to a number of requested documents. Please provide pdf copies of these.</p>	<p>The Applicant has provided pdf copies of the following documents:</p> <ul style="list-style-type: none"> <li>▲ The Anglesey AONB Management Plan (Document 7.23 of the Applicant's Deadline 7 submission);</li> <li>▲ The Clwydian Range and Dee Valley AONB Management Plan (Document 7.24 of the Applicant's Deadline 7 submission) (noting a new management plan has been adopted in December 2022 – see Applicant's response to ExQ3.17.2 below); and</li> <li>▲ The Eryri (Snowdonia) National Park Partnership Plan (Document 7.26 of the Applicant's Deadline 7 submission).</li> </ul> <p>The Applicant has liaised with NRW in relation to this question and understand that NRW will provide a pdf copy of the White Consultants Report within their Deadline 7 submission.</p>
17.2	Applicant, NRW	<p><b>Clwydian Range and Dee Valley AONB Management Plan</b></p> <p>[REP4-003] notes that a revised version of the Clwydian Range and Dee Valley AONB Management Plan was adopted in late December 2022. Please: a) provide a pdf copy of this; and b) identify any implications for the SLVIA (and LVIA).</p>	<p>a) The Applicant provided a pdf copy of the Clwydian Range and Dee Valley AONB Management Plan (2022), hereafter described as CRDVAONB Management Plan (2022) as Document 7.25 of the Applicant's Deadline 7 submission.</p> <p>b) At section 3.2.13 of the CRDVAONB Management Plan (2022) it is noted that the Welsh Government announced in 2021 its intention to make a new National Park in north-east Wales.</p> <p>The Applicant responded to ExQ1.10.16 in relation to this matter (REP1-007). No further information on a revised boundary is included in the CRDVAONB Management Plan (2022).</p> <p>There would be no change to the findings of the LVIA or SLVIA as a result of this intention.</p> <p>The Applicant has compared Section 5 of the CRDVAONB Management Plan (2022) and notes that the Special Qualities are unchanged from what was assessed in the SLVIA.</p> <p>Of relevance to the consideration of AyM and its contribution to the mitigation of climate change is that within the CRDVAONB Management Plan (2022) there is considerable reference to climate</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>change and the need to consider it when making decisions and adapt to it:</p> <p><b>'3.1.1 Nature, Landscape and Heritage</b></p> <p><i>The first Statutory purpose of AONB management is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</i></p> <p><i>The State of Natural Resources Report 2016 (SoNaRR2016) provides strong evidence for the scale and extent of the Nature Emergency, declared by Welsh Government on 30 June 2021. It highlights sustained decline and continued vulnerability to biodiversity, both at present and in terms of climate change resilience. 17% of species in Wales are at risk of extinction.</i></p> <p><i>This condition assessment is reinforced by the State of the AONB Report, aligned to this management plan and highlights the imperative of this plan to put nature into recovery and enable greater resilience and adaptability to climate change.'</i></p> <p><i>There is an entirely new section within the CRDVAONB Management Plan (2022) - Section 9: The Changing Climate.</i></p> <p><i>This section recognises the impact of climate change, noting that 'These trends are already being observed within the AONB with high impact extreme weather events such as the Llantysilio Mountain wildfire in summer 2018, and flood damage caused by Storm Christoph in January 2021.'</i></p> <p><i>The CRDVAONB Management Plan (2022) sets out a call for action noting that 'The future sustainability of the special qualities and features of the AONB depend on a decisive and multi-level response to climate change, both with regards to responding to imminent change and reducing emissions that will further exacerbate climate change in the future.'</i></p> <p>Policies for the 2020-2025 Management Plan are built on an understanding that education and collaboration will be key to successfully mitigating against, and building in resilience for, climate change impacts on the Clwydian Range and Dee Valley AONB:</p> <p>Of relevance to AyM are:</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p><i>'Pol-ACC4 – Ensure that the impact on, and of, climate change within the AONB is integral to decision making at all levels.</i></p> <p><i>Pol-ACC5 – Recognise that climate change impacts transcend land and administrative boundaries. Harness the power of collaborative action for enhancing mitigation and resilience to climate change.'</i></p> <p>This suggests that the climate change mitigation that would be achieved through the AyM OWF by reducing carbon emissions would have a recognised beneficial role in conserving numerous aspects of the CRDVAONB including its Special Qualities.</p>
17.3	Applicant, IoACC, GC, CBCC, DCC, Eryri National Park Authority (ENPA)	<p><b>Landscape Enhancement</b></p> <p>Please:</p> <p>a) provide an update on discussions / negotiations around the potential landscape enhancements to designated areas; and</p> <p>b) confirm whether the intention is to submit a completed legal agreement in respect of this into the Examination and, if so, when?</p>	<p>The Applicant has issued three different funding options to the NW LPAs with regards to the S106 fund. It is for the Steering Group of the S106 to choose how they wish the fund to be financed.</p> <p>A draft Requirement has been issued to the group for review as set out in REP6-022 and replicated here:</p> <p><i>(1) Work No. 1 must not be commenced until a scheme for the provision of landscape compensation has been submitted to and approved by the relevant planning authority [following consultation with NRW, the Isle of Anglesey County Council, Eryri National Park Authority and Conwy County Borough Council].</i></p> <p><i>(2) The landscape compensation scheme shall set out appropriate measures to compensate for the impact of the development on the protected landscapes of Eryri National Park, the Isle of Anglesey Area of Outstanding Natural Beauty and Great Orme Heritage Coast.</i></p> <p><i>(3) The landscape compensation shall be provided in accordance with the approved scheme and the timescales set out within it.</i></p> <p>The Applicant intends to meet with the group on Friday 10 March to discuss the S106 with the hope of reaching an agreed position to submit into the examination at Deadline 8.</p>
17.4	NRW, ENPA, IoACC	<p><b>Climate Change</b></p> <p>The Applicant makes reference (including in paragraphs 3.36 and 3.61 of [REP5-007]), to predicted widespread adverse changes to landscapes, including those within the AONBs and the SNP (now ENP), as a result of unchecked climate change. It goes on to suggest that</p>	N/A

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		the Proposed Development's mitigation of climate change impacts would thus play a part in conserving these landscapes. Do the parties share this view, and if not, please provide reasons?	
17.5	Applicant	<p><b>NPS EN-1</b></p> <p>Having regard to NPS EN-1 paragraph 5.9.12, please explain how the Proposed Development has sought to avoid compromising the purposes of the AONB and National Park designations and how it has been / would be designed sensitively given the various siting, operational, and other relevant constraints?</p>	<p>The Applicant considers that it is important to consider the matters set out in NPS EN-1 as a whole (and alongside those set out in NPS-EN3) and has done what it can to avoid compromising the purposes of the designated AONB and National Park. It should be noted that the project sits well outside the boundaries of these designated areas.</p> <p>Within the constraints of siting, operational, technical and other environmental constraints the AyM OWF has been designed as sensitively as possible and the design includes the following measures that take account of the sensitivity of the AONB and National Park.</p> <p>The array area is, by requirement, an extension to the Gwynt y Môr OWF and has been located to the west of it for the reasons set out in ES Volume 1, Chapter 4: Site Selection and Alternatives (APP-044). As an extension to an existing wind farm changes to the views from the CRDV AONB, Eryri National Park and the closer parts of the Isle of Anglesey AONB are incremental rather than the OWF being a new type of feature within the seascape. Where OWFs are proposed to be located in areas of seascape where no offshore development exist, and are visible from nationally designated landscapes, impacts are likely to be greater as acknowledged by Seascape &amp; visual sensitivity to offshore wind farms in Wales: Strategic assessment and Guidance" (White Consultants for NRW, March 2019) which notes areas further west around the Isle of Anglesey are of high sensitivity as shown in ES Volume 6, Annex 10.4: Figure 2c of the SLVIA (APP-193). This suggests that as an addition to a number of existing OWFs the impacts of AyM OWF are on the Eryri National Park and AONBs have been reduced from the outset.</p> <p>Taking into account the sensitivity of the AONB and National Park the array area has been reduced to the minimum extents that the Applicant considers would allow for an economically viable project to be established at this site, as an extension to Gwynt y Môr OWF.</p>



QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>This minimum array area has been designed to be located beyond the boundary of the zone identified in Seascape &amp; visual sensitivity to offshore wind farms in Wales: Strategic assessment and Guidance (White Consultants for NRW, March 2019) as high sensitivity and instead it is located within areas of Medium and Medium/low sensitivity.</p> <p>The boundaries of the minimum array area have been designed sensitively so that the horizontal field of view affected by the AyM OWF in views from the Eryri National Park, CRDVAONB and Isle of Anglesey AONB has been kept to the minimum possible.</p> <p>The distance between the minimum array area and the Isle of Anglesey has been maximised as far as possible.</p> <p>The Applicant has proposed within the design a relatively dense layout of wind turbine generators (WTGs) within the minimum array area as set out in (REP1-007). Whilst this results in some compromise to the renewable energy yield it has been a key design consideration in defining the minimum array area whilst also maintaining high levels of low carbon energy. The density of the WTGs does not contribute materially to the effects on the AONBs and National Park.</p> <p>The Applicant has set out the rationale for the size of individual turbines in the WTG Size Technical Note (APP-299). The Applicant has taken the design decision not to propose taller WTGs within the minimum array area than 332m in consideration of the effects on the National Park and AONB. Other OWF proposals are now coming forward with maximum design parameters that exceed this height (for example Five Estuaries scoped at 397m above MHWS (Five Estuaries Wind Farm Ltd (2021)), Outer Dowsing scoped at 403m above LAT (Outer Dowsing Offshore Wind (2022)), and Morecambe scoped at 350m above MSL (Morecambe Offshore Windfarm Ltd. (2022)) and this may put AyM at a disadvantage in competing against such schemes to obtain a Contract for Difference (CfD), which is the UK Government's mechanism that determines whether an OWF proceeds or not and is based entirely on economics. Therefore, the design decision to not propose taller WTGs at AyM has been driven by</p>



QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>considerations of sensitive design given the visibility from the AONB and National Park.</p> <p>The colour of the upper parts of the WTGs is likely to be a light grey, similar to those of the existing OWFs and will be agreed through the discharge of DCO conditions. Light grey is considered to be the colour that is mostly likely to recede in views from the AONB and National Park where seen against a background of grey or lighter sky colour of the most distant parts of the sky, which are seen nearest the horizon and a grey/blue sea.</p> <p>In view of the sensitivity of the dark skies that are characteristic within parts of the AONB and National Park a design decision has been taken to reduce the intensity of aviation lighting when visibility conditions allow as set out in Requirement 3(2) of the dDCO (Document 7.6 of the Applicant's Deadline 7 submission.</p> <p>The Applicant would seek to further reduce the effects on the dark skies of the AONB and National Park designations through agreement with the Civil Aviation Authority whereby a reduction in the number of WTGs requiring aviation lights would be sought subject to overall safety requirements being met.</p>

## 2.13 Socio-Economic

Table 13: Socio-Economic.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
18.1	Applicant	<p><b>Outline Skills and Employment Strategy (oSES) – Priorities</b></p> <p>Paragraph 40 of the oSES [REP4-007] details education and training as one of the communities top four priorities: please provide a full list of all identified priorities.</p>	<p>Paragraph 40 of the outline Skills and Employment Strategy (oSES) (REP4-007) refers to the community benefits consultation; a separate exercise to the consultation undertaken to inform the oSES and undertaken by the community benefits team in late 2021/2022.</p> <p>The two-stage consultation commenced with qualitative structured stakeholder conversations including local authorities' representatives, voluntary sector leaders and grass roots community representatives. The results of these conversations were used to create an online survey. More than 400 individuals provided feedback through the survey.</p> <p>The top priorities identified by the community as part of this community benefits consultation were: Local Community; Natural Environment; Training and Employment and Climate Change. The majority of respondents also strongly agreed that any benefits package should be led by local people and take a strategic approach across North Wales by taking into account the other support available from renewable energy projects, as well as involving young people specifically in the decision-making.</p> <p>This consultation was the first step in what the community benefits team expect to be an ongoing conversation with the local community, in order to understand how any additional community benefits package, offered separately from the planning process, could best support the local area.</p>
18.2	Applicant	<p><b>Outline Skills and Employment Strategy (oSES) - Stakeholders</b></p> <p>Paragraph 69 of the oSES [REP4-007] states that consultation of the final SES will include other key stakeholders. Please confirm when such consultation will take place and why early consultation with such stakeholders is not deemed necessary? Please also confirm which stakeholders will be included in the 'other' category?</p>	<p>Consultation to inform the subsequent Skills and Employment Strategy (SES) and its delivery is ongoing by the Applicant. The purpose of the early stage, or initial consultation, was to gain a comprehensive understanding of the relevant issues, concerns and challenges, for the region's key skills and employment stakeholders. As well as continuing to work with stakeholders that AyM engaged during this first phase of engagement (which was also significant for relationship-building purposes), this next phase of engagement that is already in process, will ensure proposed delivery aligns with local plans and complements</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>local initiatives, and that it focuses on potential delivery of the SES's initiatives, in hand with key partners. Stakeholders included in the 'other' category will be varied and will be heavily informed by those recommended by key stakeholders such as Welsh Government and the North Wales' Regional Skills Partnership. These stakeholders are likely to include more 'local' delivery organisations such as educational institutes, community and business initiatives and organisations, and others. Stakeholder engagement on skills and employment-related matters will continue and will inform the SES.</p>
18.3	Applicant	<p><b>Outline Skills and Employment Strategy (oSES) - Evaluation</b></p> <p>Paragraph 100 of the oSES [REP4-007] confirms that the evaluation of the success of the activities within the final SES will be undertaken on a periodic basis in order to understand if the objectives of the strategy are being met and to understand the wider economic benefits the Proposed Development is having within the local region.</p> <p>Please confirm:</p> <p>a) How the evaluation will be undertaken?</p> <p>b) How often the evaluation will occur?</p> <p>c) Who will undertake the evaluation? Is this to be an independent body/organisation?</p> <p>d) How will success be measured?</p> <p>e) If the activities are not deemed successful what steps will be taken to rectify this?</p> <p>In respect of the findings of the proposed evaluation, paragraph 100 further states that “Where relevant, this will be communicated to key stakeholders and the Skills and Employment Strategy updated with feedback as it is received”. Please confirm how the decision will be made to provide feedback to the key stakeholders and if it is not considered necessary to communicate all findings?</p>	<p>Paragraph 100 of the oSES (REP4-007) contains information that will be developed by the Applicant through the formation of the forthcoming SES</p> <p>The level of evaluation needs to ensure each initiative meets its objectives and reflects any changes in the skills and employment landscape.</p> <p>The Applicant anticipates evaluation to happen more frequently in the earlier years of the project, to ensure feedback from external consultees is used to shape the relevant initiatives or programmes, and to ensure that the implemented outcomes are delivering results.</p> <p>As part of the formation of the SES, decisions will be made on who might be best to undertake and monitor the success of the SES' outcomes and, where relevant, the Applicant has committed to communicate findings to key stakeholders to ensure transparency.</p>
18.4	Applicant	<p><b>Outline Skills and Employment Strategy (oSES) – Apprenticeship Programme</b></p> <p>Please confirm the anticipated number of apprenticeships at Grŵp Llandrillo Menai's Coleg Llandrillo for 2023. If consent is granted for the</p>	<p>The anticipated number of new recruits for the apprenticeship programme at Grŵp Llandrillo Menai's Coleg Llandrillo for 2023 is 10.</p> <p>AyM commits to taking on Coleg Llandrillo apprentices and is currently exploring how apprentices can be trained in advance of the project's</p>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		Proposed Development, is there a commitment to employ any of the 2023 apprentice cohort onto the AyM project?	needs. The technical apprentices will be trained at the college, and AyM will look for appropriate delivery for non-technical apprentices also (including degree apprentices).
18.5	Applicant	<p><b>Outline Skills and Employment Strategy (oSES) – Technician Career Pathway</b></p> <p>If consent is granted for the Proposed Development, is there a commitment to employ any of the individuals on the technician career pathway onto the AyM project?</p>	If AyM is granted consent, and if it is deemed the appropriate route to upskill existing AyM employees as part of their career development, then they will be placed into the Technician Career Pathway and trained accordingly through the Grŵp Llandrillo Mena route at the relevant college.
18.6	Welsh Government	<p><b>Community Linguistic Statement</b></p> <p>Noting your response made in respect of the CLS at ExQ2.18.5 [REP5-044], are you satisfied with the amendments made to the CLS by the Applicant at D6 [REP6-023]? If not please list your specific concerns.</p>	N/A

## 2.14 Tourism and Recreation

Table 14: Tourism and Recreation.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
19.1	Applicant	<p><b>Outline Public Access Management Plan (oPAMP)</b></p> <p>Table 1 of the oPAMP [REP4-034] appears to have some inconsistencies with Schedule 4 of the dDCO. Please rectify as necessary.</p>	Table 1 of the oPAMP has been updated (Document 7.14 of the Applicant's Deadline 7 submission) to be consistent with Schedule 4 of the draft DCO.
19.2	CCBC	<p><b>Statement of Common Ground (SoCG) and EIA Baseline Characterisation</b></p> <p>The comments made in your draft SoCG [REP4-013] regarding baseline characterisation and assumptions are noted. Are you aware of any additional information/evidence which has become available since the drafting of the ES which would alter the tourism and recreation baseline? If so, please provide further detail.</p>	N/A
19.3	CCBC	<p><b>Llandudno and the Great Orme – Visitor Economy</b></p> <p>Noting the comments made in your SoCG [REP4-013] regarding Llandudno and the Great Orme visitor economy, please confirm the level significance CCBC consider to be correct.</p>	N/A

## 2.15 Traffic and Transport

Table 15: Traffic and Transport.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
20.1	Applicant	<p><b>Number, Weight and Dimensions of Proposed Onshore Sub-Station Transformers</b></p> <p>Please confirm the number, weight and overall dimensions of the transformers for the proposed onshore sub-station transformers that will be delivered to the site as abnormal indivisible loads.</p>	<p>The expected number of transformers (400 kV) for the AyM is two. As the final configuration of the electrical infrastructure has not been determined, it is not possible to provide definitive answers to the weight and overall dimensions of these transformers.</p> <p>However, the GyM report referred to transformers that are expected to be of a similar size and weight (<i>circa</i> 200-tonnes) to those that would likely be used at AyM.</p> <p>It is worth noting that the recently constructed RWE project Triton Knoll used transformers of a similar weight to those in the GyM report and they were delivered to that site in 2019. Their weight was 230-tonnes.</p> <p>Therefore, the Applicant believes the GyM report provides a sound indicative estimate of the type and size of equipment to be used on the AyM project and reflects a sound representation of how they will be delivered.</p>
20.2	Applicant	<p><b>Relevance of Previous GyM ALAR to AyM</b></p> <p>It is noted that the GyM ALAR [REP5-005] was completed in 2006 and the proposed site access for AyM is located on a different section of the B5381 with a different vertical and horizontal alignment. Would you please:</p> <p>a) Demonstrate that the abnormal indivisible loads required for AyM are directly comparable to those required for GyM and considered in the ALAR;</p> <p>b) Confirm that there has been no material changes to the route adopted for GyM up to the point it diverges from that proposed for AyM since the GyM ALAR was published; and</p> <p>c) Demonstrate that the route proposed for AyM from the point it diverges from that adopted for GyM can safely accommodate the abnormal indivisible loads required for AyM including achieving the required visibility at the proposed site access on the B5381.</p>	<p>The Applicant acknowledges that there are some slight differences between the GyM and AyM projects, in terms of the delivery route, but this relates solely to the turning off the business park, westwards along the B5381 Glascoed Road to access the proposed AyM onshore substation site. In response to the three questions below:</p> <p>a) Swept Path Analysis of the type of vehicle expected to be used for delivery to site are included in Appendix D. This shows a slightly larger vehicle (62m in length) than that in the GyM report (59m in length), noting that these measurements relate to the indicative leading pulling tractor unit, draw bar and transformer trailer. Whilst the GyM drawings also include a draw bar and tractor unit at the back, these two elements always track behind the rear of the trailer and therefore do not influence the final swept path, hence their exclusion from the AyM drawings.</p> <p>The SPAS clearly demonstrates that the vehicles are comparable and that the slightly larger AyM assessed vehicle can reach the AyM OnSS</p>



QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			<p>site entrance The remaining road to AyM is not considered to have any vertical alignment issues given the relatively flat nature of Glascoed Road.</p> <p>b) Comparison of historical aerial photograph has been completed and is shown in Appendix E. This clearly demonstrates the road alignments have not changed since the GyM report was produced. There are no bridges crossed from the A55 exit to the site entrance.</p> <p>c) The Swept Path Analysis referred to earlier demonstrates that the route from where the AyM access diverges from that in the GyM report is acceptable. There is mention of acceptable visibility splays for the delivery, but this is not relevant as the movement of the AIL vehicle will be under escort and all traffic on the road will be managed so not to be an obstruction to the AIL vehicle, which will have priority when under escort. This means any entry and exit into the AyM OnSS site will be done with road management in place through the escort vehicles used in the delivery, thereby negating the need for extensive visibility splays.</p>
20.3	DCC	<p><b>Abnormal Load Routing</b></p> <p>Do you have any concerns regarding the proposed routing of abnormal indivisible loads to the onshore sub-station site, as set out in Volume 3, Chapter 9: Traffic and Transport of the ES [APP-070].</p>	N/A

## 3 References

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- Woodward, I. et al. (2019). Desk-based revision of seabird foraging ranges used for HRA screening. BTO research report number 724. Theford.

# Appendix A: Table showing holdings

Table showing breakdown of Draft Order Limits by holding (where relevant), land title number showing the area of DOL within ALC.

HOLDING NAME	DESCRIPTION OF HOLDING/LAND USE	LAND PARCEL	PLOT	AYM INFRASTRUCTURE	ALC GRADE 1 LAND (HA)	ALC GRADE 2 LAND (HA)	ALC GRADE 3A LAND (HA)	ALC GRADE 3B LAND (HA)	OTHER (HA)	URBAN (HA)	TOTAL TEMPORARILY AFFECTED (HA)	TOTAL PERMENTLY AFFECTED (HA)
Faenol Bropor	Livestock & Arable Farming	WA607191	N/A	ECC, OnSS, OnSS TCC & permanent landscape mitigation and ecological compensation/enhancement.			1.50	29.58	1.47			32.55
Faenol Bropor	Livestock & Arable Farming	WA865775/ NOW CYM823327	N/A	ECC, mitigation (permanent), utilities connection			5.35		0.16		4.47	1.04
Amenity Use (Foreshore)	Amenity	CYM241160	N/A	Beach access & operational access				0.52			0.52	
Amenity Use (Golf Course)	Amenity (Golf Course)	CYM255759	N/A	Landfall (HDD)				15.98		1.02	17.00	
Bank of the River Clwyd	Bank of the River Clwyd	Unregistered 1188	N/A	HDD		0.40		0.04			0.44	
Beach Foreshore	Beach Foreshore	CYM347373	N/A	Landfall (HDD)				2.83			2.83	
Beach Foreshore	Beach Foreshore	CYM679016	N/A	Landfall (HDD)				2.83			2.83	
Beach Foreshore	Beach Foreshore	Unregistered 42	N/A	Landfall (HDD)				1.59			1.59	

HOLDING NAME	DESCRIPTION OF HOLDING/LAND USE	LAND PARCEL	PLOT	AYM INFRASTRUCTURE	ALC GRADE 1 LAND (HA)	ALC GRADE 2 LAND (HA)	ALC GRADE 3A LAND (HA)	ALC GRADE 3B LAND (HA)	OTHER (HA)	URBAN (HA)	TOTAL TEMPORARILY AFFECTED (HA)	TOTAL PERMENENTLY AFFECTED (HA)
Beach Foreshore	Beach Foreshore	WA3605	N/A	Beach access & mitigation (temporary)				0.35			0.35	
Bryn Carrog Farm	Livestock Farming	WA982018	N/A	ECC, TCC & operational access				2.73			2.73	
Bryn Carrog Farm	Livestock Farming	WA982308	N/A	Visibility splay			0.17				0.17	
Bryn Cwnin Farm part of The Bodrhyddan Estate	Arable Farming	CYM250395	N/A	ECC & mitigation (temporary)			1.05	0.01			1.05	
Bryn Cwnin Farm part of The Bodrhyddan Estate	Arable Farming	CYM298742	N/A	ECC & mitigation (temporary and permanent) & operational access	0.07	4.54	6.09	0.70	0.13	0.01	11.55	
Bryn Cwnin Farm part of The Bodrhyddan Estate	Arable Farming & Woodland	CYM332543	N/A	ECC & operational Access		0.84			0.66	0.01	1.50	
Caravan Park	Caravan Park	WA857004	N/A	Landfall (HDD)				2.72		2.20	4.92	
Cwybr Fawr	Mixed Use - livestock farming, equine & business (leisure facilities)	CYM651103	N/A	ECC, TCC & operational access		3.66	0.99	0.86		0.02	5.53	

HOLDING NAME	DESCRIPTION OF HOLDING/LAND USE	LAND PARCEL	PLOT	AYM INFRASTRUCTURE	ALC GRADE 1 LAND (HA)	ALC GRADE 2 LAND (HA)	ALC GRADE 3A LAND (HA)	ALC GRADE 3B LAND (HA)	OTHER (HA)	URBAN (HA)	TOTAL TEMPORARILY AFFECTED (HA)	TOTAL PERMENENTLY AFFECTED (HA)
Cwybr Fawr	Livestock Farming	WA5943	N/A	ECC & operational access		0.06	0.02	2.14			2.21	
Fferm	Livestock Farming	WA613551	N/A	ECC & operational access			0.02	0.97			0.98	
Fferm	Livestock Farming	CYM742002	N/A	Operational Access & Visibility Splay			0.18				0.18	
Fferm	Equine	WA730271	N/A	ECC & operational access			0.60	0.02			0.62	
Ffrith Beach Festival Gardens	Ffrith Beach Festival Gardens	CYM360437	N/A	Beach access, TCC & mitigation (temporary)				0.49		0.06	0.54	
Groesffordd Farm	Livestock Farming	CYM456237	N/A	ECC & operational access		0.01	0.07	1.05			1.13	
Hafod Llwyd	Livestock Farming	CYM735650	N/A	ECC & operational access		0.00		2.58			2.58	
Highway	Highway	CYM185643	N/A	A525/A547		0.01	0.34			0.01	0.35	
Holding name hasn't been identified by landowner	Arable Farming	CYM182785	351, 357, 358, 359, 360, 361, 362, 366, 367, 368	ECC, mitigation (temporary) & operational access			4.80	1.96	0.22		6.99	
Holding name hasn't been identified by landowner	Arable Farming	CYM542758	189, 192, 193, 194, 195, 196, 197, 198,	ECC, TCC, mitigation (temporary and permanent)		0.33	2.97	1.15	0.01	0.02	4.49	

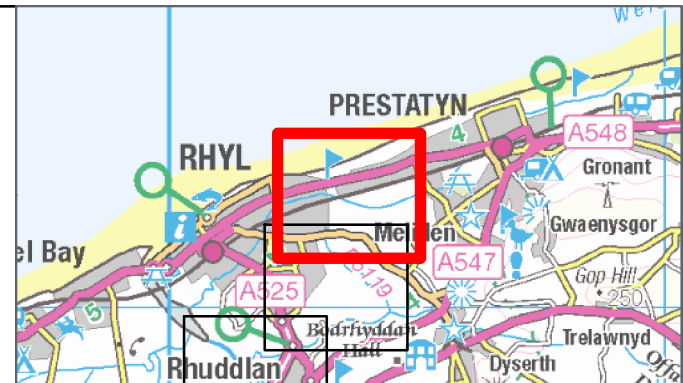
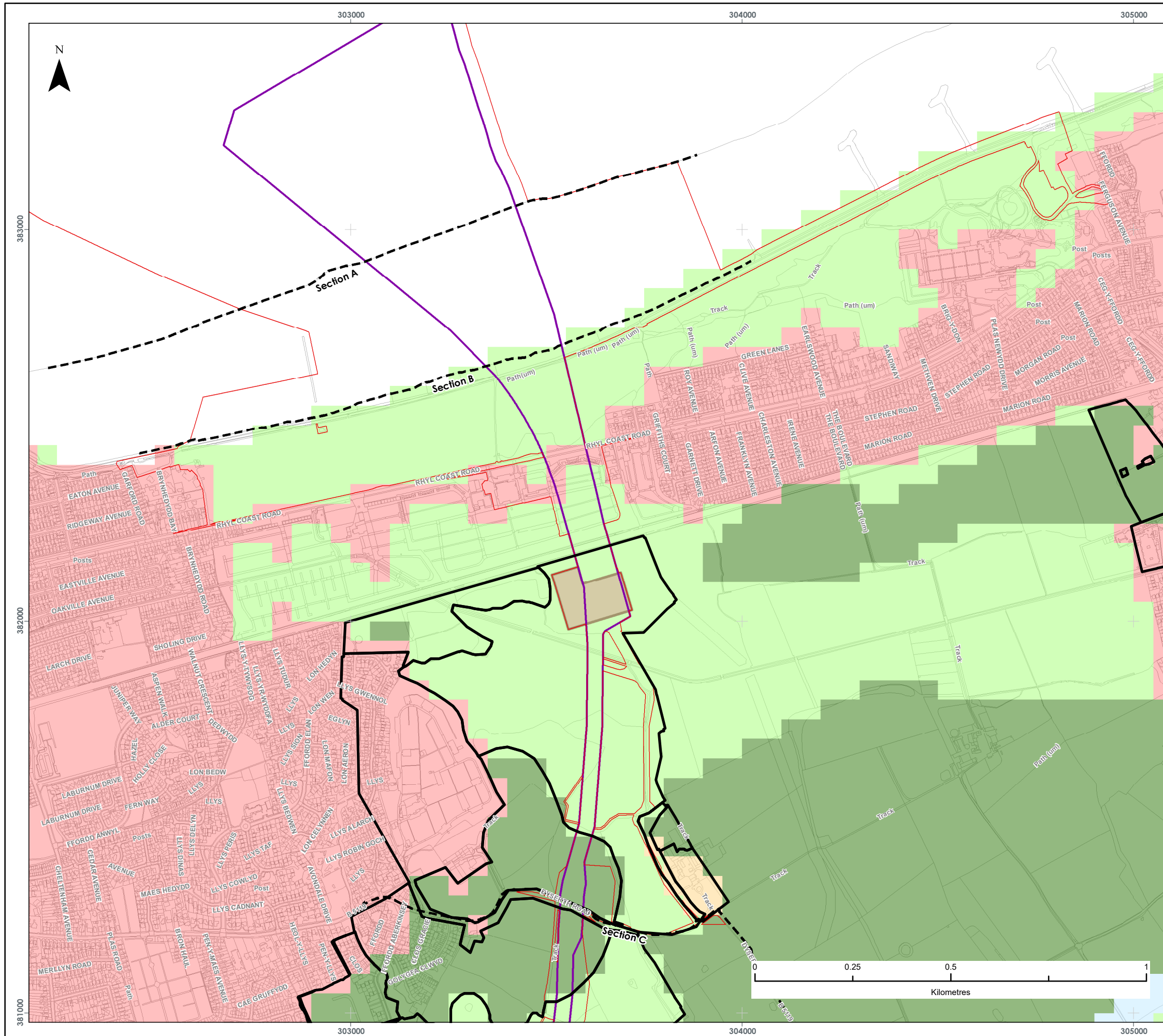
HOLDING NAME	DESCRIPTION OF HOLDING/LAND USE	LAND PARCEL	PLOT	AYM INFRASTRUCTURE	ALC GRADE 1 LAND (HA)	ALC GRADE 2 LAND (HA)	ALC GRADE 3A LAND (HA)	ALC GRADE 3B LAND (HA)	OTHER (HA)	URBAN (HA)	TOTAL TEMPORARILY AFFECTED (HA)	TOTAL PERMENENTLY AFFECTED (HA)
			201, 202, 209, 213	& operational access								
Holding name hasn't been identified by landowner	Livestock & Arable Farming	WA859967	132, 136, 137, 138, 140, 141, 142, 143, 144, 145, 146	ECC, mitigation (temporary) & operational access			4.10	2.29			6.39	
Holding name hasn't been identified by landowner	Livestock Farming	WA641203	292, 293	ECC & operational access				2.12			2.12	
Holding name hasn't been identified by landowner	Livestock Farming	CYM475317	477, 488, 489	Unlicenced works, and operational access				0.36	0.03		0.39	
Holding name hasn't been identified by landowner	Livestock Farming	WA588181	401, 403, 404	ECC			0.37				0.37	
Leisure Facilities	Leisure Facilities	CYM249083	N/A	Beach access & mitigation (temporary)				3.28		0.24	3.52	
Leisure Facilities - Golf Course	Leisure Facilities - Golf Course	CYM454876	N/A	Landfall (HDD)				4.48		0.06	4.54	
Leisure Facilities - Golf Course	Leisure Facilities - Golf Course	CYM455759	N/A	Landfall (HDD)				18.87		0.76	19.64	
Marli Farm	Livestock Farming	WA898992	N/A	ECC & TCC				1.33			1.33	



HOLDING NAME	DESCRIPTION OF HOLDING/LAND USE	LAND PARCEL	PLOT	AYM INFRASTRUCTURE	ALC GRADE 1 LAND (HA)	ALC GRADE 2 LAND (HA)	ALC GRADE 3A LAND (HA)	ALC GRADE 3B LAND (HA)	OTHER (HA)	URBAN (HA)	TOTAL TEMPORARILY AFFECTED (HA)	TOTAL PERMENENTLY AFFECTED (HA)
Morfa Cwybr	Livestock & Arable Farming	CYM169738	N/A	ECC, TJB, TCC and operational access			1.92	5.83	0.14		7.88	.01
Morfa Cwybr	Livestock Farming	WA908330	N/A	ECC & operational access				1.04			1.04	
Morfa Cwybr	Arable Farming	WA2529	N/A	ECC & operational access			0.60	2.22			2.82	
National Grid Substation	National Grid Substation	CYM472358	N/A	Existing substation				0.95			0.95	
Pengwern Farm	Livestock & Arable Farming	WA892656	N/A	ECC & operational access			2.88	1.94	0.19		5.01	
Pentre Mawr	Livestock & Arable Farming	CYM130979	N/A	Unlicenced works, ECC, TCC, mitigation (permanent) & operational access			0.61	4.81			5.42	
Tan Y Bryn	Livestock Farming	WA444662	N/A	ECC & mitigation (temporary and permanent)		0.06		0.05	0.33		0.44	
The land does not form part of a recognised agricultural holding	Woodland	Unregistered 1190	349	HDD			0.01	0.00	0.27		0.27	

HOLDING NAME	DESCRIPTION OF HOLDING/LAND USE	LAND PARCEL	PLOT	AYM INFRASTRUCTURE	ALC GRADE 1 LAND (HA)	ALC GRADE 2 LAND (HA)	ALC GRADE 3A LAND (HA)	ALC GRADE 3B LAND (HA)	OTHER (HA)	URBAN (HA)	TOTAL TEMPORARILY AFFECTED (HA)	TOTAL PERMENENTLY AFFECTED (HA)
Ty Fferm	Livestock Farming	WA982015	N/A	ECC, TCC & operational access				0.92			0.92	
Ty Isa	Livestock Farming	WA888504	N/A	ECC & HDD			2.43	0.95			3.38	
Tyddyn Isaf	Livestock Farming	WA398993	N/A	ECC, TCC, mitigation (temporary) & operational access			1.24	4.69	0.07		6.00	
Tyddyn Isaf	Livestock Farming	WA840017	N/A	ECC & operational access			0.46	0.07			0.53	
Waen Meredydd Farm part of the Cefn Estate	Livestock & Arable Farming	CYM568240	N/A	Unlicensed works, ECC, TCC, mitigation (permanent) & operational access			1.32	8.52	0.11		9.94	

# Appendix B: Response to ExQ3.9.8, Revised Plan showing Predictive Agricultural Land Classification and results of 2023 ALC Survey at Faenol Bropor



**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor
- Proposed Transition Joint Bay Construction Compound
- Post 1988 Agricultural Land Classification Survey Boundary

**Predictive Agricultural Land Classification (Grade)**

- 2
- 3a
- 3b
- Non Agricultural
- Urban

Note:  
 Data from the soils and agricultural land quality assessment associated with the report provided by Land Research Associates (Report Ref: 2094/1 - Date 13/01/2023) has been merged into the Predictive Agricultural Land Classification. The data has been merged by overlaying the surveyed data and removing the Predictive Agricultural Land Classification where overlaps occurred. Source data for Predictive Agricultural Land Classification can be found at the address below:  
[https://datamap.gov.wales/layers/inspire-wg:wg\\_predictive\\_alc2](https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2)

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 PREDICTIVE AGRICULTURAL LAND CLASSIFICATION (ALC) AND 2023 ALC SURVEY RESULTS

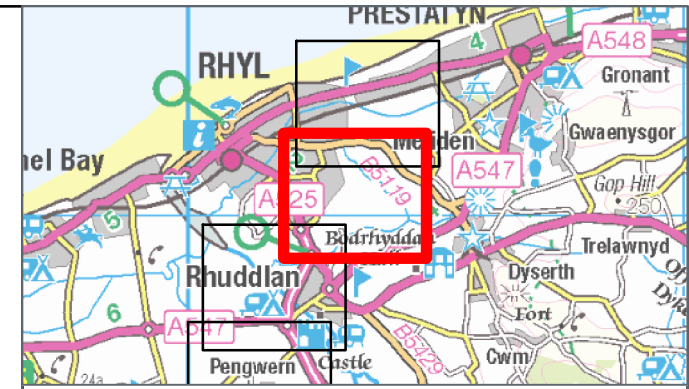
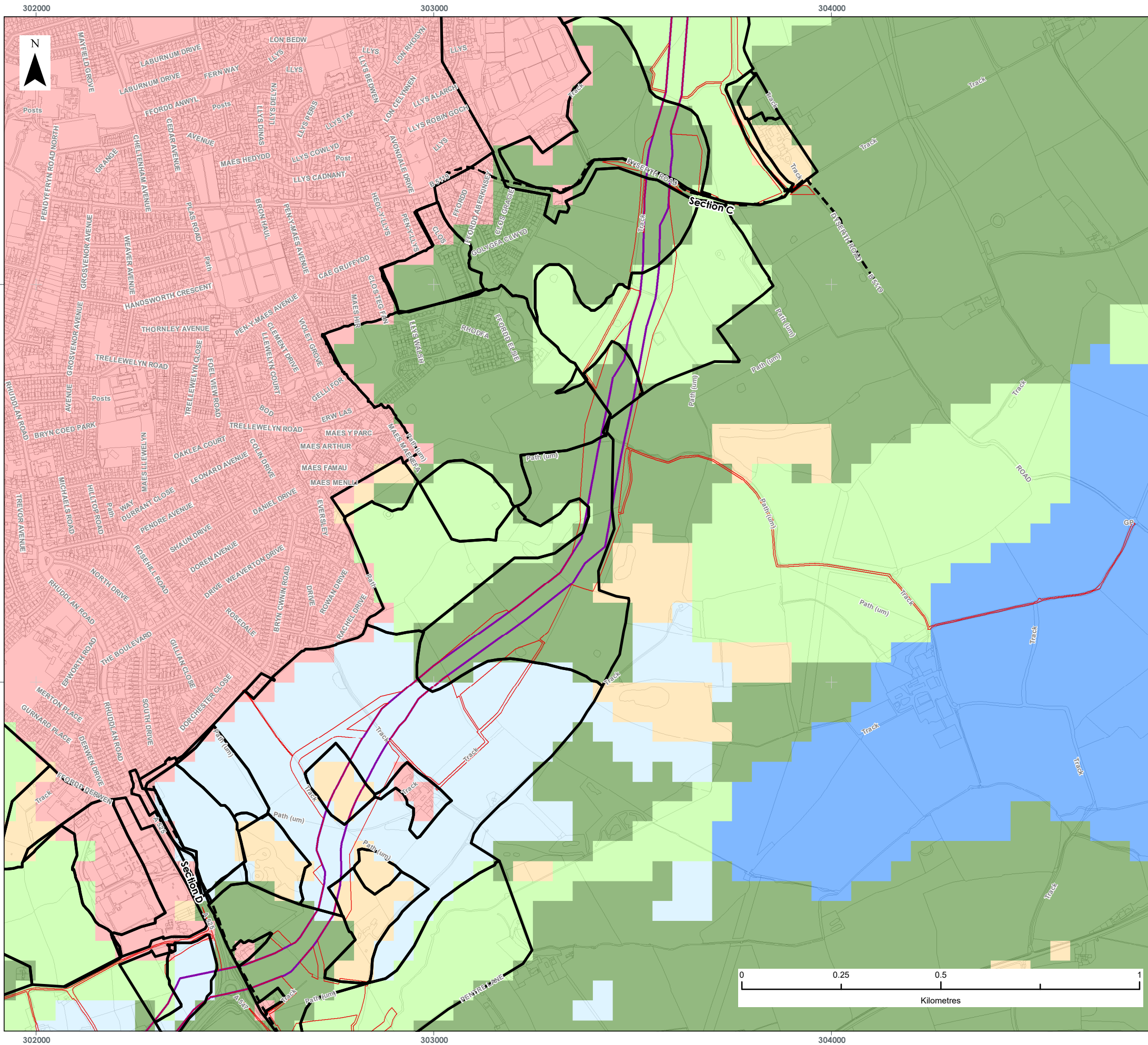
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**FIGURE NUMBER:**  
 FIGURE 1  
 Page 1 of 5

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**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor
- Post 1988 Agricultural Land Classification Survey Boundary

**Predictive Agricultural Land Classification (Grade)**

- 1
- 2
- 3a
- 3b
- Non Agricultural
- Urban

Note:  
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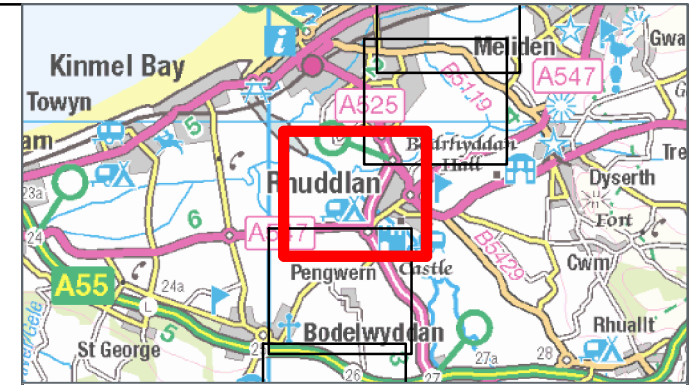
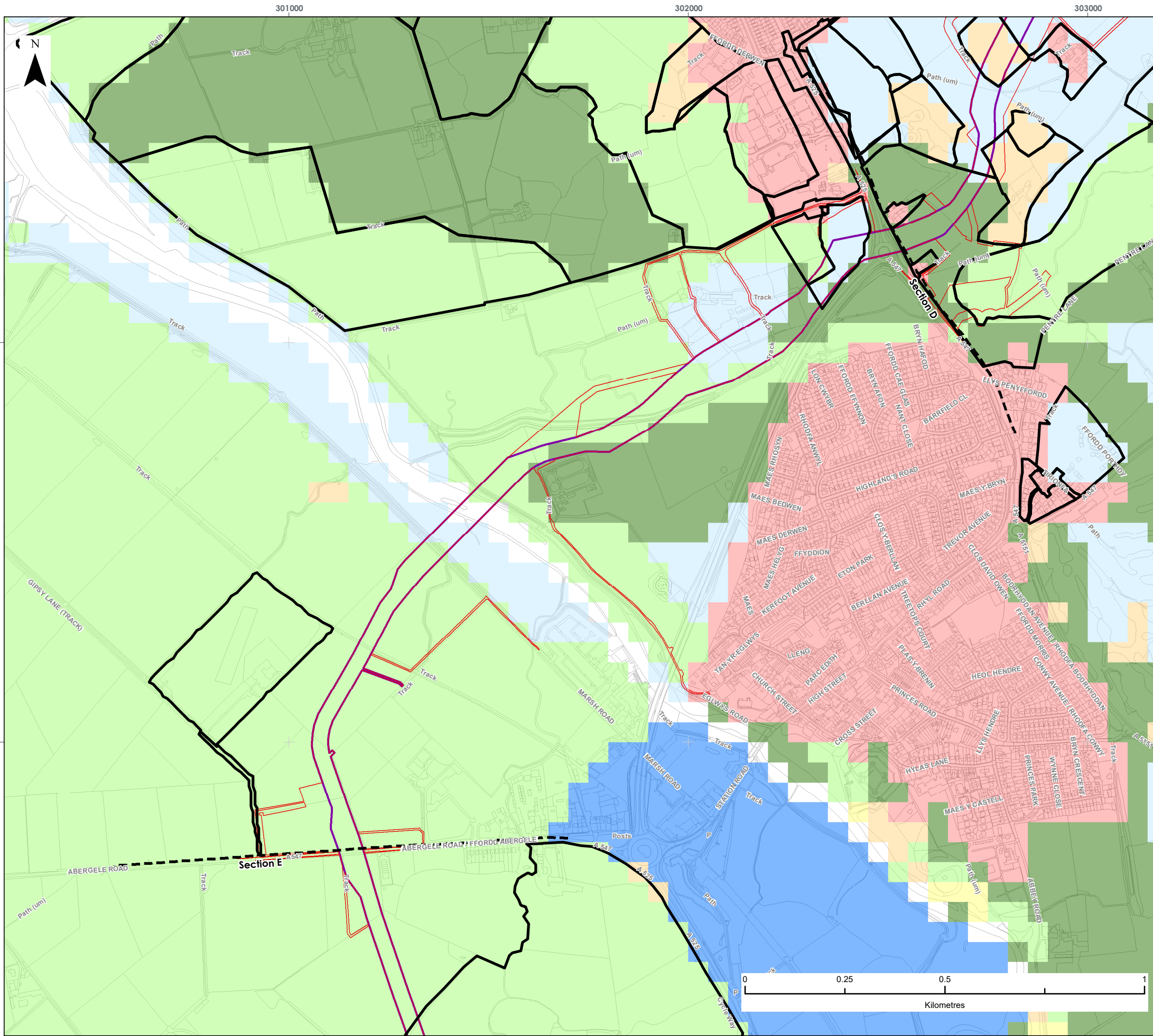
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 FIGURE 1  
 Page 2 of 5

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**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor
- Post 1988 Agricultural Land Classification Survey Boundary

**Predictive Agricultural Land Classification (Grade)**

- 1
- 2
- 3a
- 3b
- 4
- Non Agricultural
- Urban

Note:  
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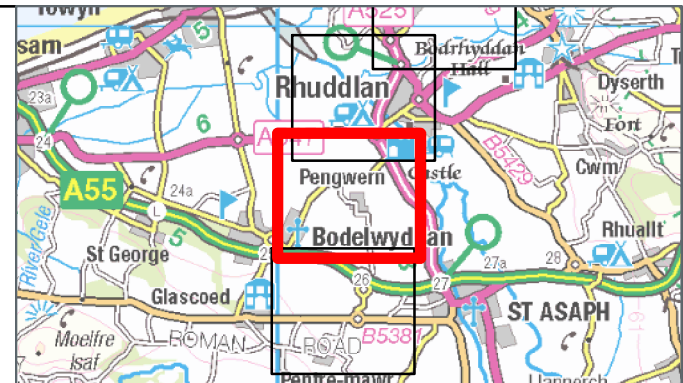
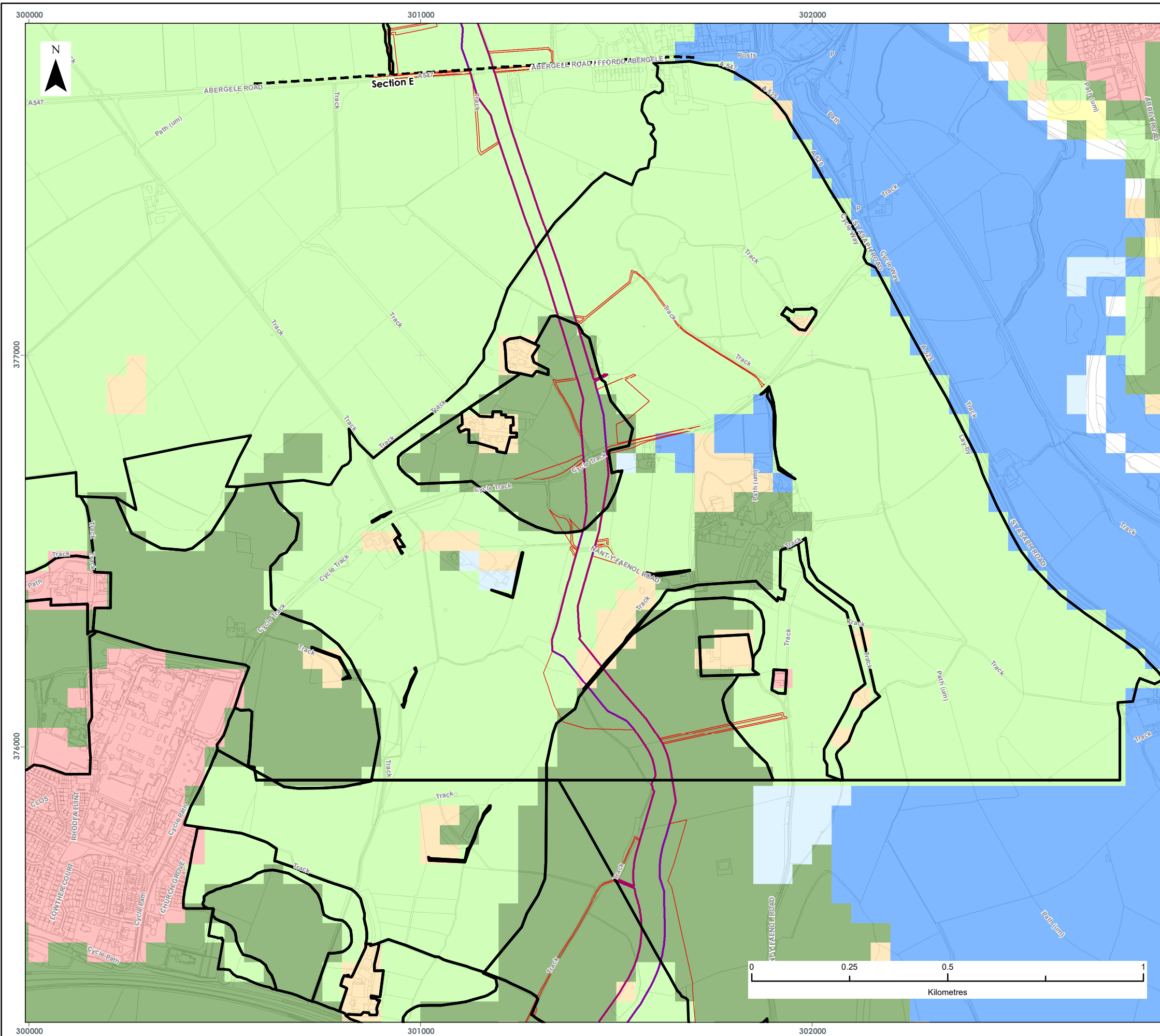
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**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor
- Post 1988 Agricultural Land Classification Survey Boundary

**Predictive Agricultural Land Classification (Grade)**

- 1
- 2
- 3a
- 3b
- 4
- Non Agricultural
- Urban

Note:  
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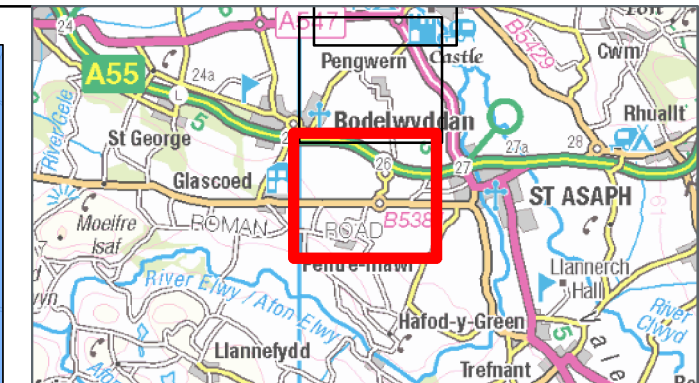
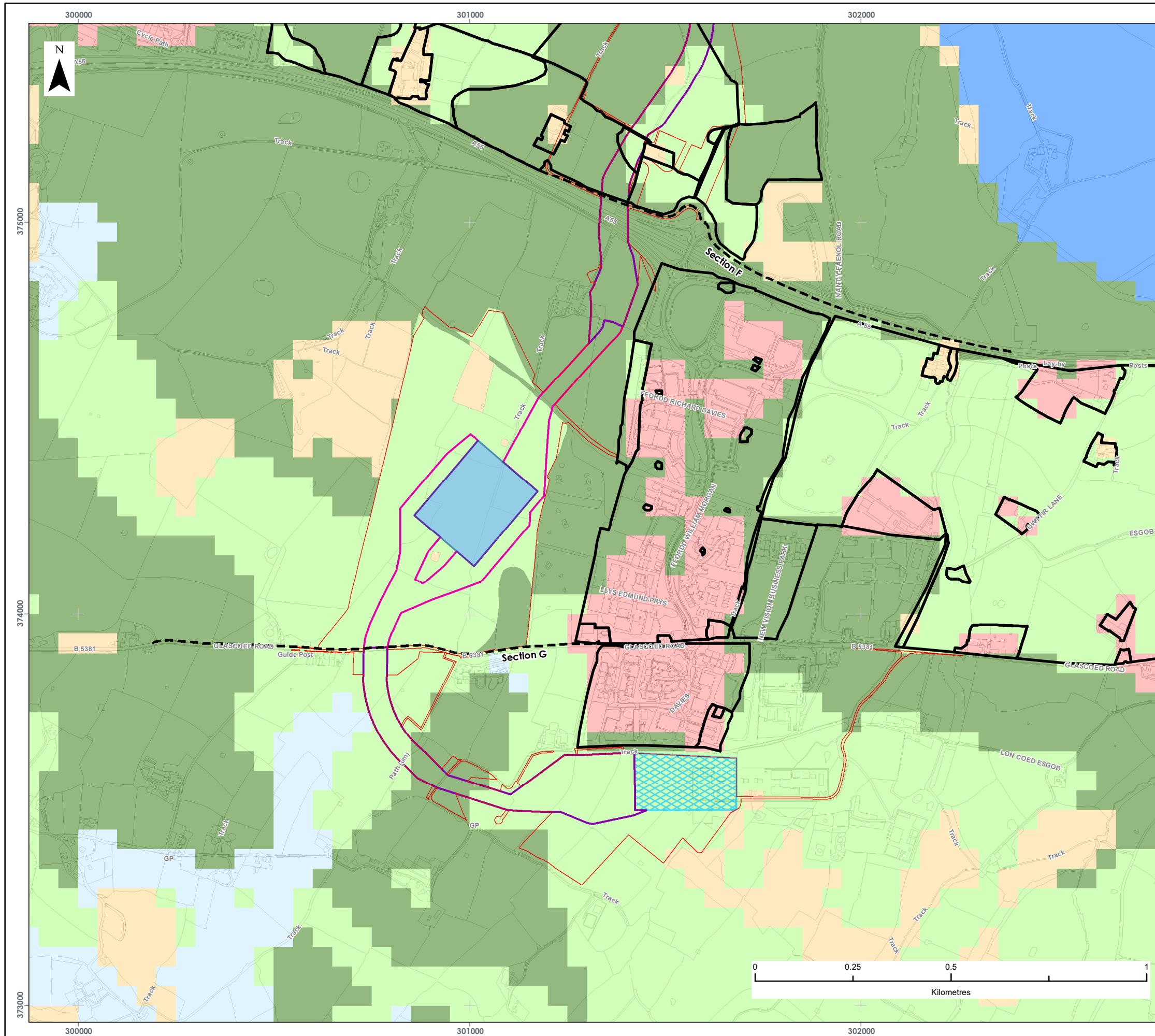
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 PREDICTIVE AGRICULTURAL LAND CLASSIFICATION (ALC) AND 2023 ALC SURVEY RESULTS

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 FIGURE 1  
 Page 4 of 5

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**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor
- Proposed Substation Cable Corridor Zone
- Proposed Onshore Substation (OnSS) Footprint
- Unlicensed Work Zone
- Post 1988 Agricultural Land Classification Survey Boundary

**Predictive Agricultural Land Classification (Grade)**

- 1
- 2
- 3a
- 3b
- Non Agricultural
- Urban

Note:  
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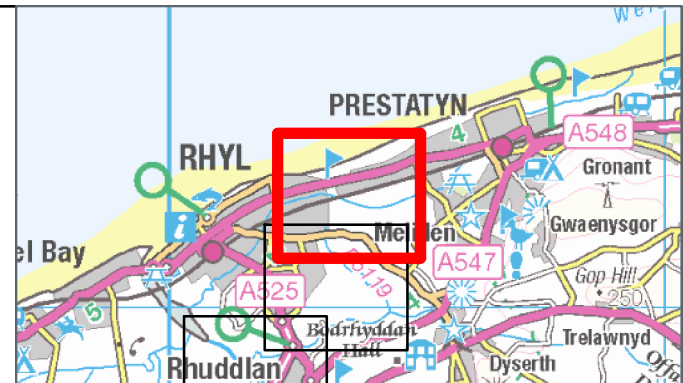
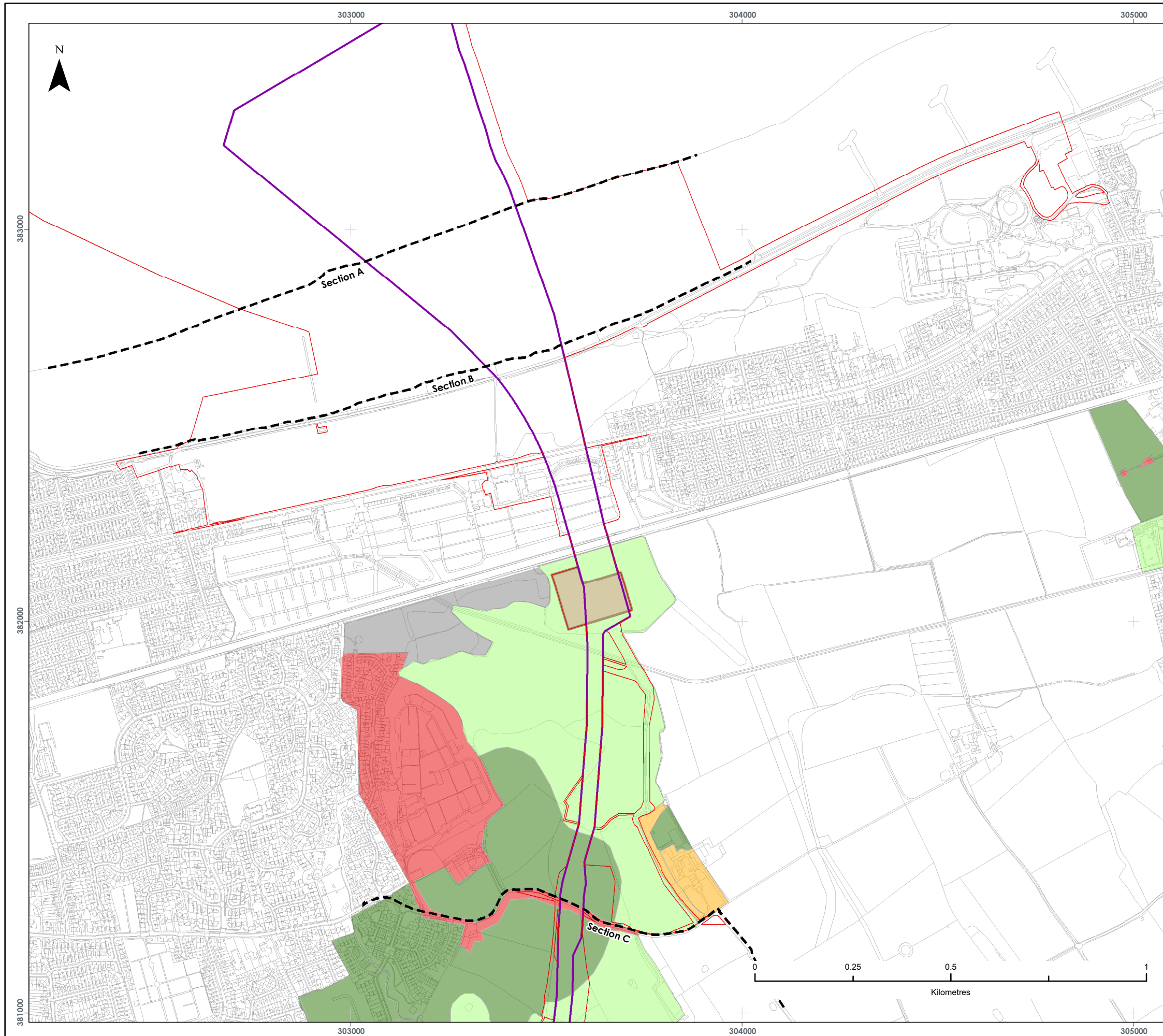
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Page 5 of 5

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# Appendix C: Response to ExQ3.9.8, Revised Plan showing Agricultural Land Classification (Wales) Surveys and results of 2023 ALC Survey at Faenol Bropor





- LEGEND**
- Order Limits
  - Onshore Cable Route Section Breaks
  - Proposed Onshore Export Cable Corridor
  - Proposed Transition Joint Bay Construction Compound
- Post 1988 Agricultural Land Classification Grades**
- Grade 3a
  - Grade 3b
  - Non - Agricultural
  - Not Surveyed
  - Urban

**Note:**  
 Data from the soils and agricultural land quality assessment associated with the report provided by Land Research Associates (Report Ref: 2094/1 - Date 13/01/2023) has been merged into the Post 1988 Agricultural Land Classification (Wales) Surveys. The data has been merged by overlaying the surveyed data and removing the Post 1988 Agricultural Land Classifications where overlaps occurred.  
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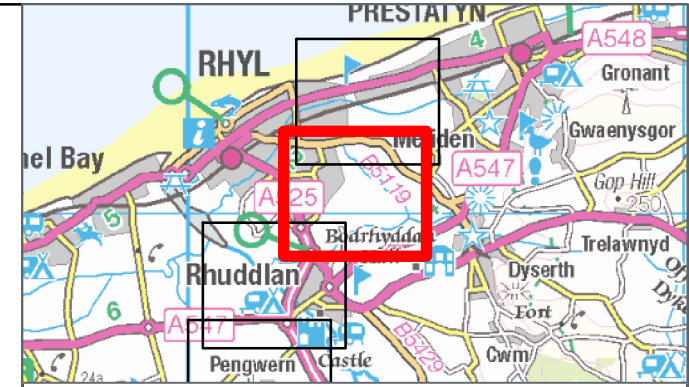
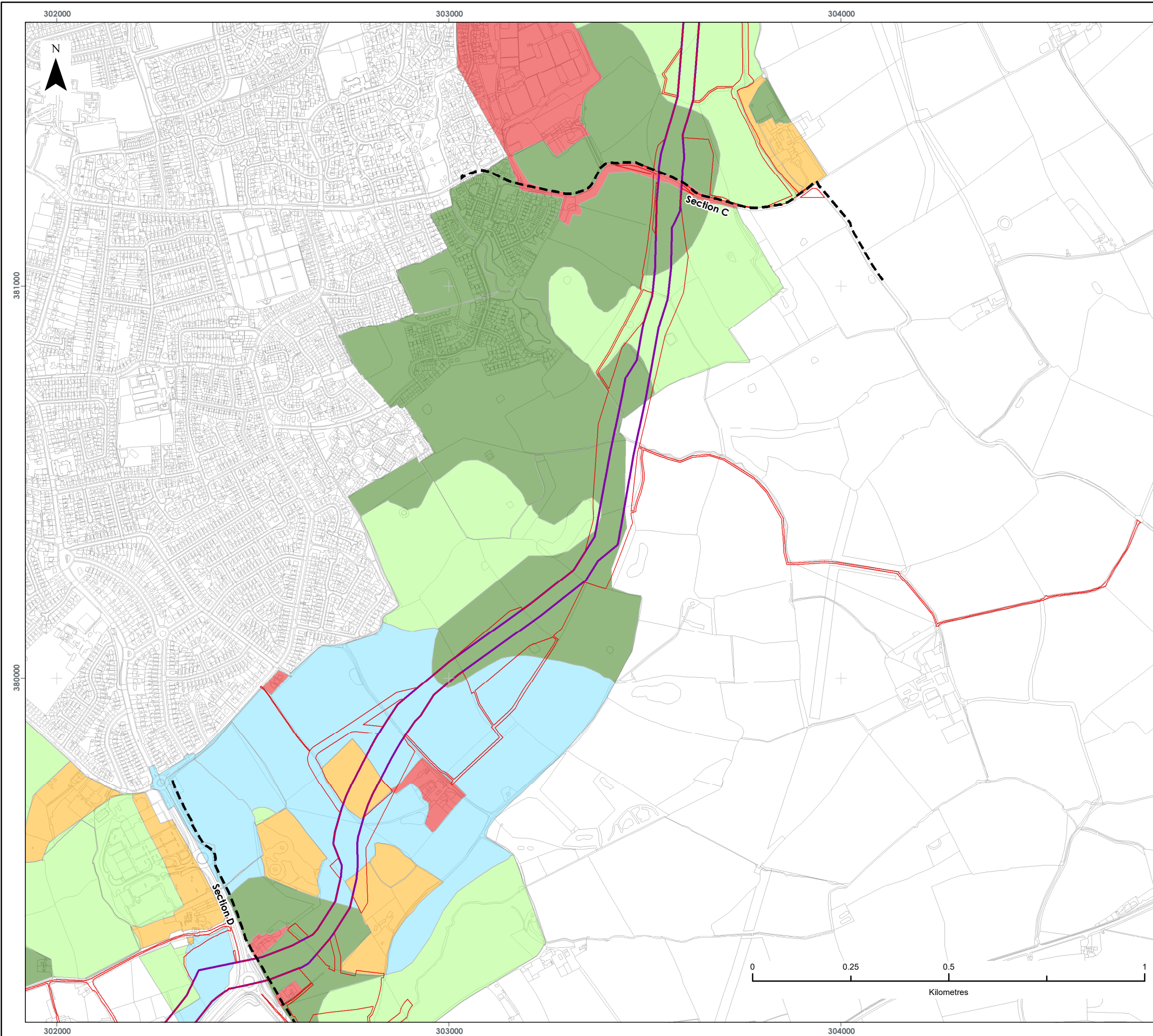
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 FIGURE 1  
 Page 1 of 5

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**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor

**Post 1988 Agricultural Land Classification**

- Grade 2
- Grade 3a
- Grade 3b
- Non - Agricultural
- Urban

Note:  
 Data from the soils and agricultural land quality assessment associated with the report provided by Land Research Associates (Report Ref: 2094/1 - Date 13/01/2023) has been merged into the Post 1988 Agricultural Land Classification (Wales) Surveys. The data has been merged by overlaying the surveyed data and removing the Post 1988 Agricultural Land Classifications where overlaps occurred.  
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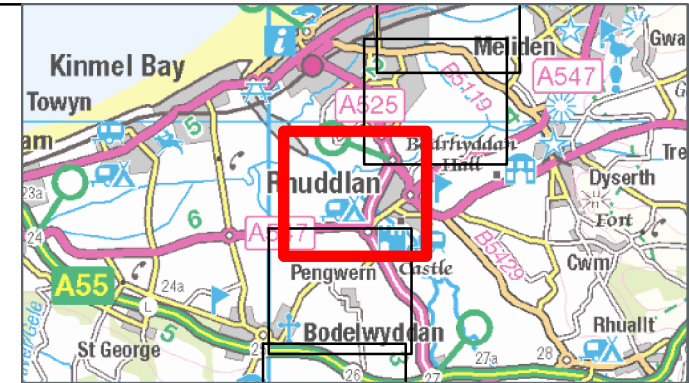
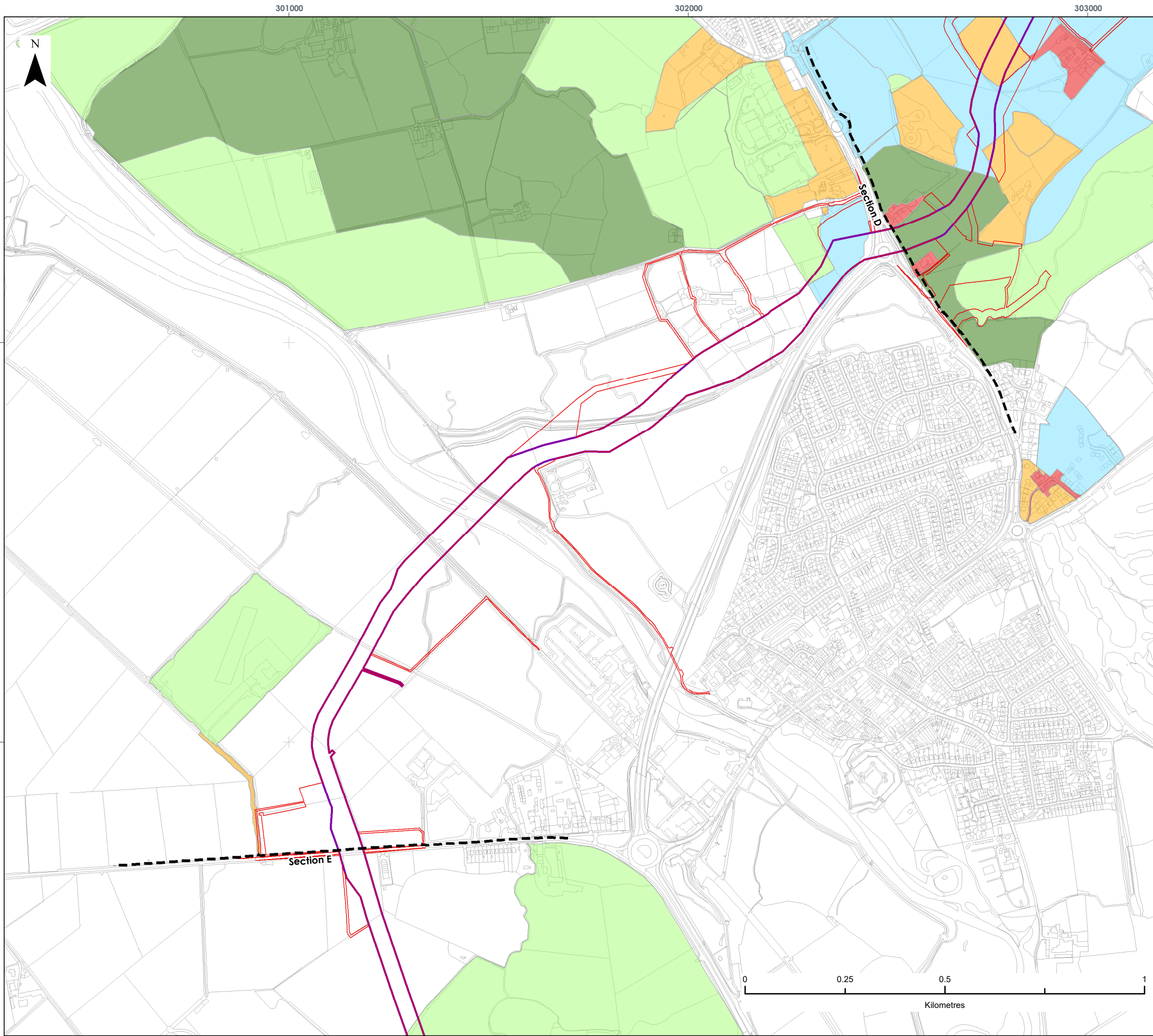
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 FIGURE 1  
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**LEGEND**

- Order Limits
  - Onshore Cable Route Section Breaks
  - Proposed Onshore Export Cable Corridor
- Post 1988 Agricultural Land Classification**
- Grade 2
  - Grade 3a
  - Grade 3b
  - Non - Agricultural
  - Urban

Note:  
 Data from the soils and agricultural land quality assessment associated with the report provided by Land Research Associates (Report Ref: 2094/1 - Date 13/01/2023) has been merged into the Post 1988 Agricultural Land Classification (Wales) Surveys. The data has been merged by overlaying the surveyed data and removing the Post 1988 Agricultural Land Classifications where overlaps occurred.  
 Source data for Post 1988 Agricultural Land Classification (Wales) Surveys can be found at the address below:  
[https://datamap.gov.wales/layers/inspire-wg:Post\\_1988\\_ALC\\_Wales\\_Surveys](https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys)

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**PROJECT TITLE:**  
 AWEL Y MÔR OFFSHORE WINDFARM

**FIGURE TITLE:** APPENDIX C - RESPONSE TO ExA3 Q9.8  
 AGRICULTURAL LAND CLASSIFICATION (ALC) (WALES)  
 SURVEY AND 2023 ALC SURVEY RESULTS

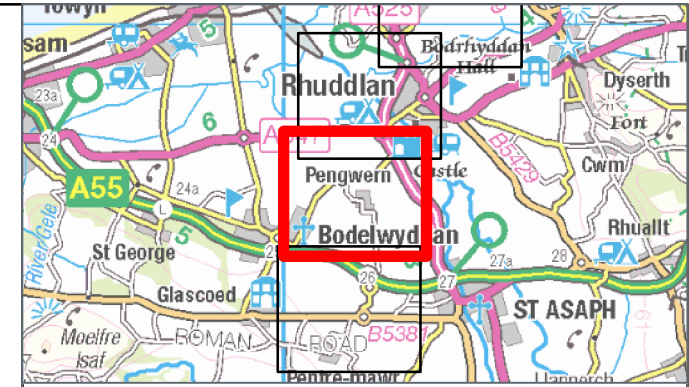
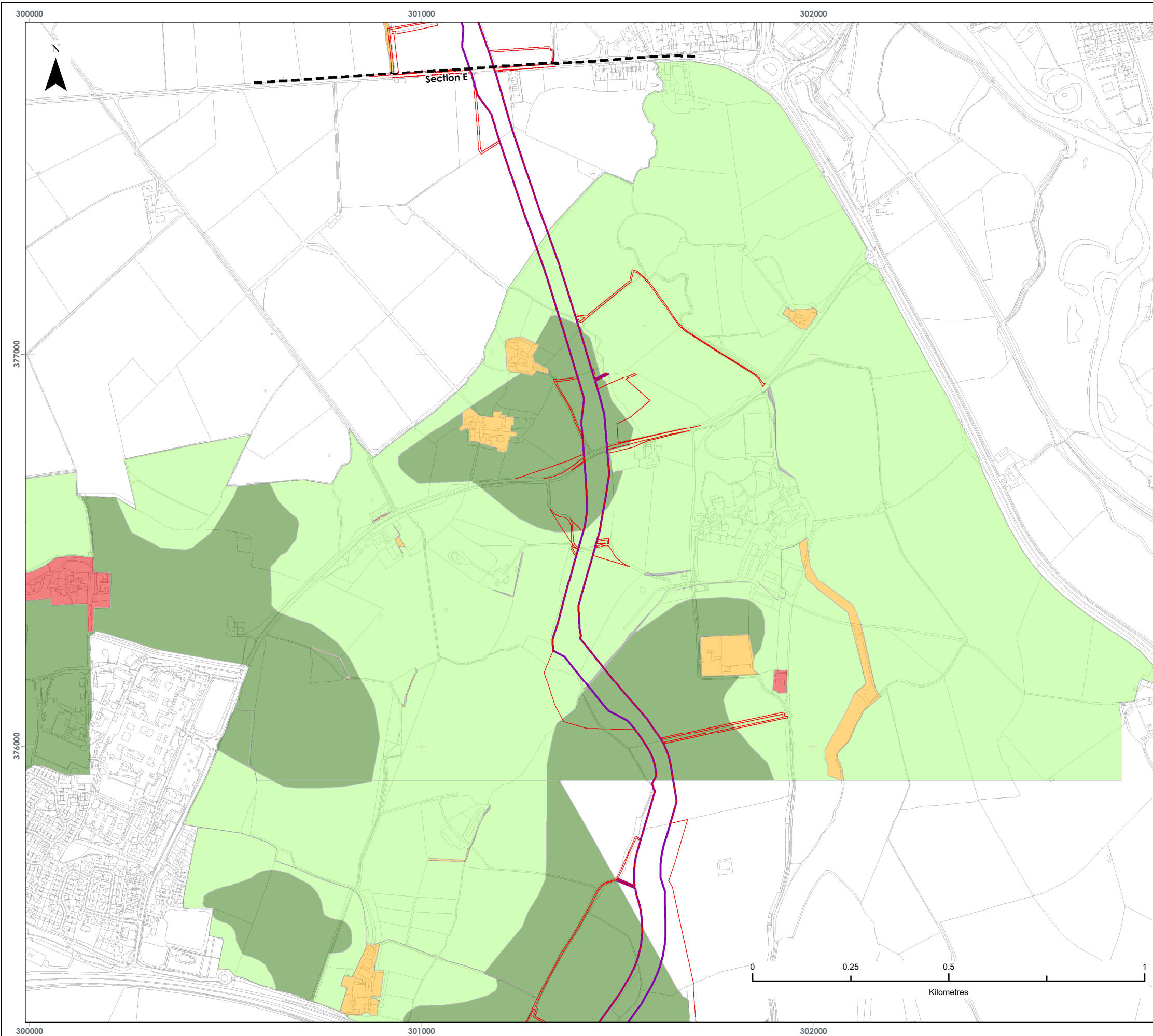
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1	08/03/2023	First Issue	FG	MF

**FIGURE NUMBER:**  
 FIGURE 1  
 Page 3 of 5

SCALE: 1:10,000    PLOT SIZE: A3    DATUM: ODN    COORDINATE SYSTEM: British National Grid







**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor

**Post 1988 Agricultural Land Classification**

- Grade 3a
- Grade 3b
- Non - Agricultural
- Not Surveyed
- Urban

**Note:**  
 Data from the soils and agricultural land quality assessment associated with the report provided by Land Research Associates (Report Ref: 2094/1 - Date 13/01/2023) has been merged into the Post 1988 Agricultural Land Classification (Wales) Surveys. The data has been merged by overlaying the surveyed data and removing the Post 1988 Agricultural Land Classifications where overlaps occurred.  
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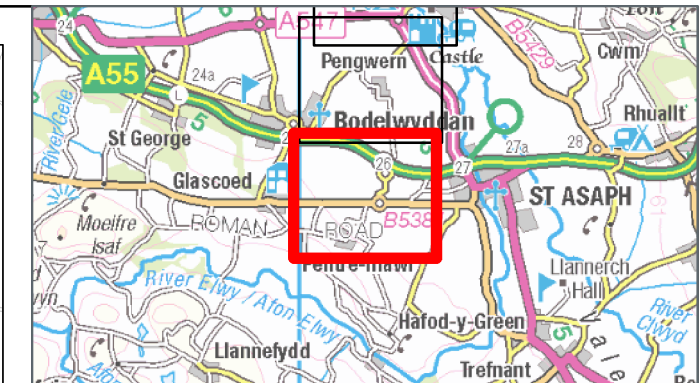
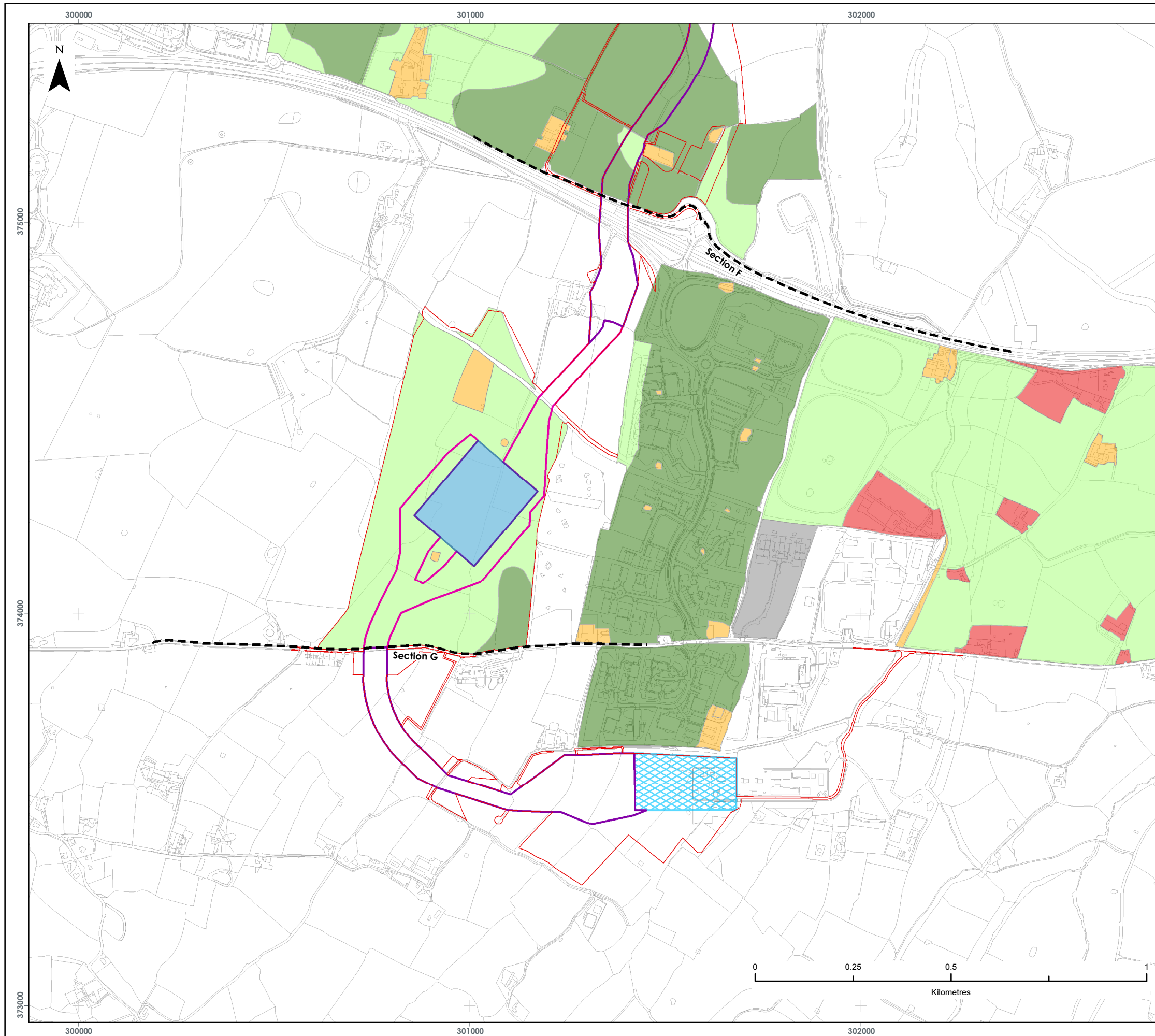
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VER	DATE	REMARKS	Drawn	Checked
1	08/03/2023	First Issue	FG	MF

**FIGURE NUMBER:**  
 FIGURE 1  
 Page 4 of 5

SCALE: 1:10,000    PLOT SIZE: A3    DATUM: ODN    COORDINATE SYSTEM: British National Grid





**LEGEND**

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor
- Proposed Substation Cable Corridor Zone
- Proposed Onshore Substation (OnSS) Footprint
- Unlicensed Work Zone

**Post 1988 Agricultural Land Classification Grades**

- Grade 3a
- Grade 3b
- Non - Agricultural
- Not Surveyed
- Urban

Note:  
 Data from the soils and agricultural land quality assessment associated with the report provided by Land Research Associates (Report Ref: 2094/1 - Date 13/01/2023) has been merged into the Post 1988 Agricultural Land Classification (Wales) Surveys. The data has been merged by overlaying the surveyed data and removing the Post 1988 Agricultural Land Classifications where overlaps occurred.  
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**FIGURE TITLE:** APPENDIX C - RESPONSE TO ExA3 Q9.8 AGRICULTURAL LAND CLASSIFICATION (ALC) (WALES) SURVEY AND 2023 ALC SURVEY RESULTS

VER	DATE	REMARKS	Drawn	Checked
1	08/03/2023	First Issue	FG	MF

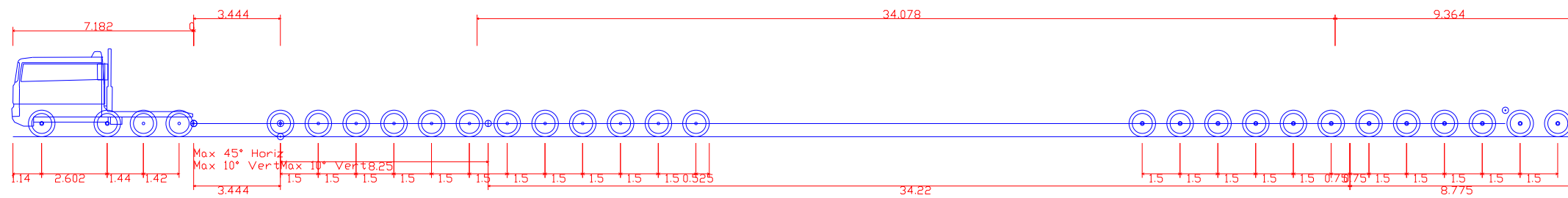
**FIGURE NUMBER:**  
 FIGURE 1  
 Page 5 of 5

SCALE: 1:10,000    PLOT SIZE: A3    DATUM: ODN    COORDINATE SYSTEM: British National Grid



# Appendix D: Swept Path Analysis

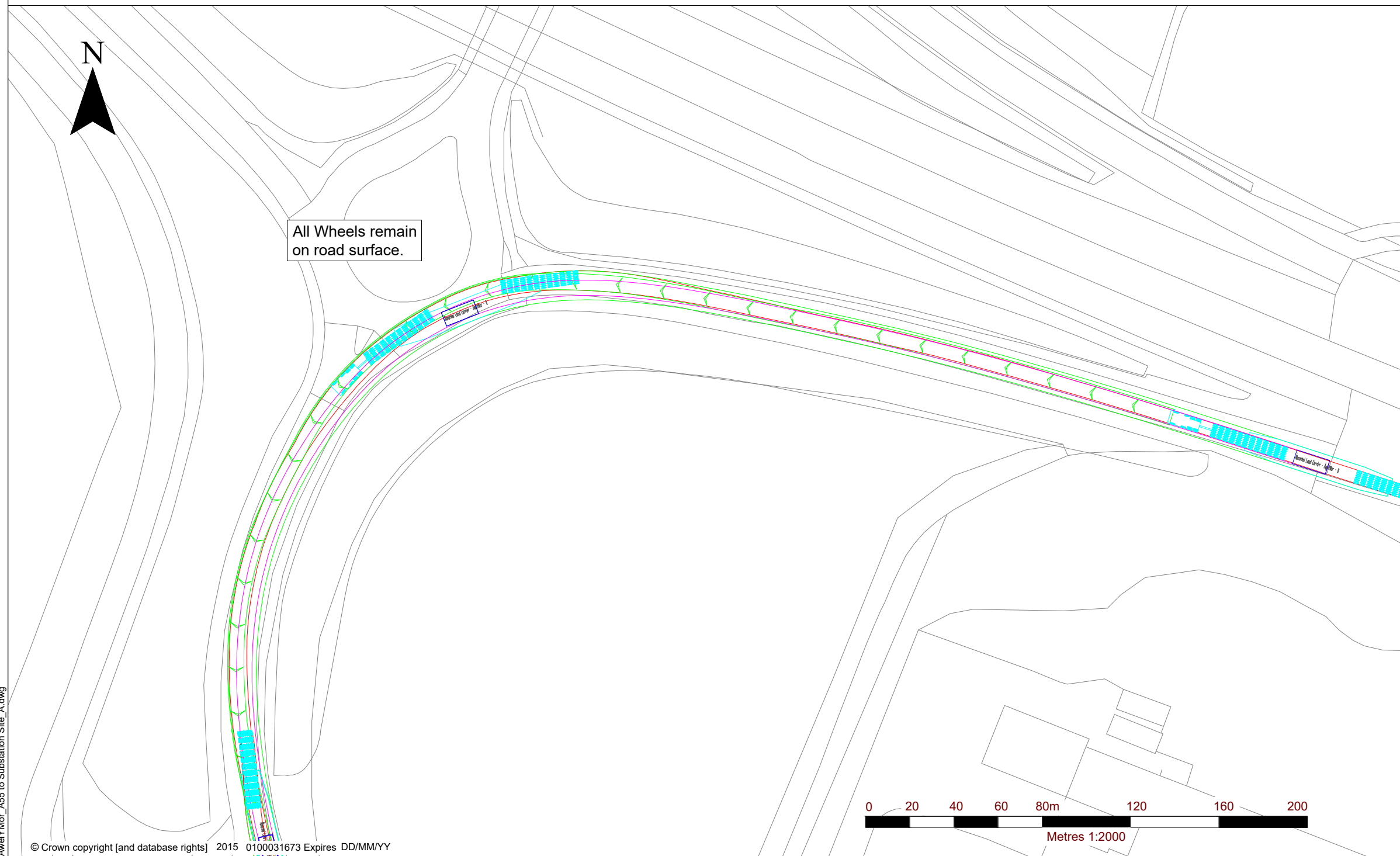




Abnormal Load Carrier - AwelyMor - B  
 Overall Length 61.871m  
 Overall Width 5.300m  
 Overall Body Height 3.495m  
 Min Body Ground Clearance 0.420m  
 Track Width 3.000m  
 Lock to lock time 6.00s  
 Wall to Wall Turning Radius 9.800m

NOTES

LEGEND



Revision	By	Chk'd By	Date	Comments

**SLR**  
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 www.slrconsulting.com

Site  
 AwelyMor Windfarm  
 Substation

Project  
 Transport Assessment

Drawing Title  
**Swept Path Analysis  
 A55 Roundabout**

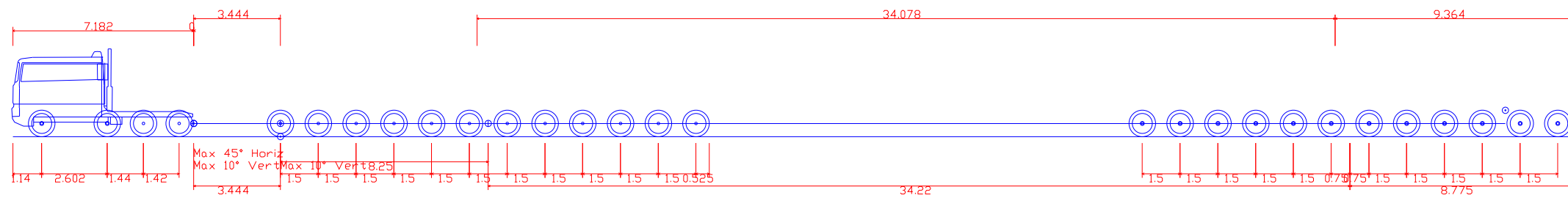
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Date  
 January 2023

Drawing Number  
**001**

Revision  
**0**

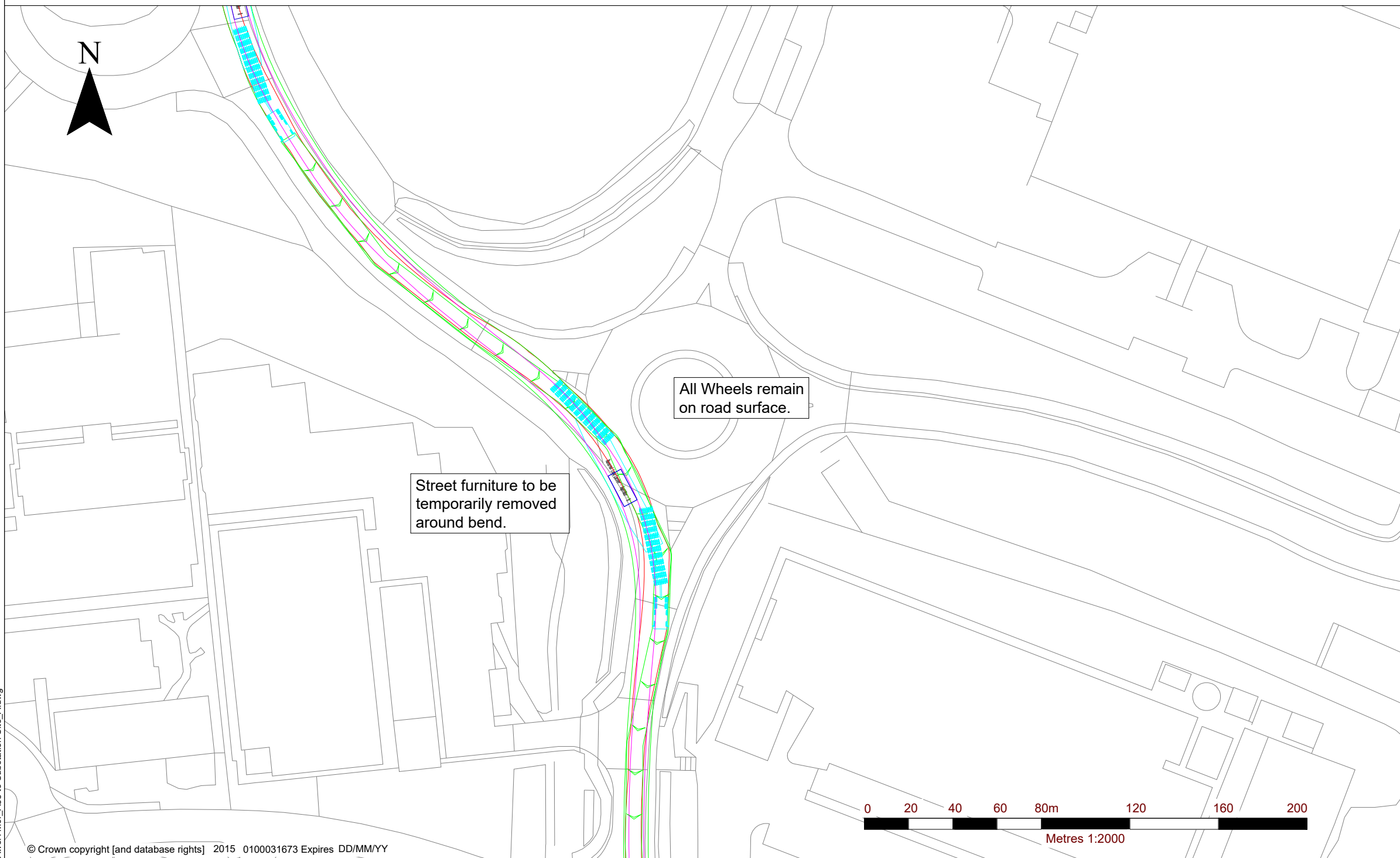
AwelyMor\_A55 to Substation Site\_A.dwg



Abnormal Load Carrier - AwelyMor - B  
 Overall Length 61.871m  
 Overall Width 5.300m  
 Overall Body Height 3.495m  
 Min Body Ground Clearance 0.420m  
 Track Width 3.000m  
 Lock to lock time 6.00s  
 Wall to Wall Turning Radius 9.800m

NOTES

LEGEND



Revision	By	Chk'd By	Date	Comments

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Site  
 AwelyMor Windfarm  
 Substation

Project  
 Transport Assessment

Drawing Title  
**Swept Path Analysis  
 Ffordd William Morgan Roundabout**

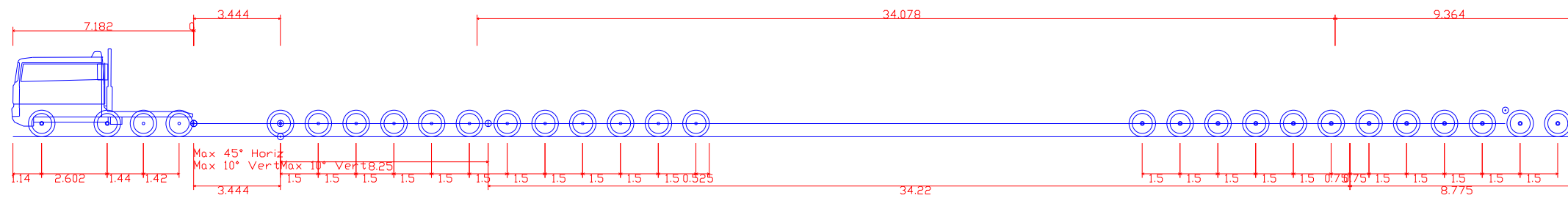
Scale  
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Date  
 January 2023

Drawing Number  
**002**

Revision  
**0**

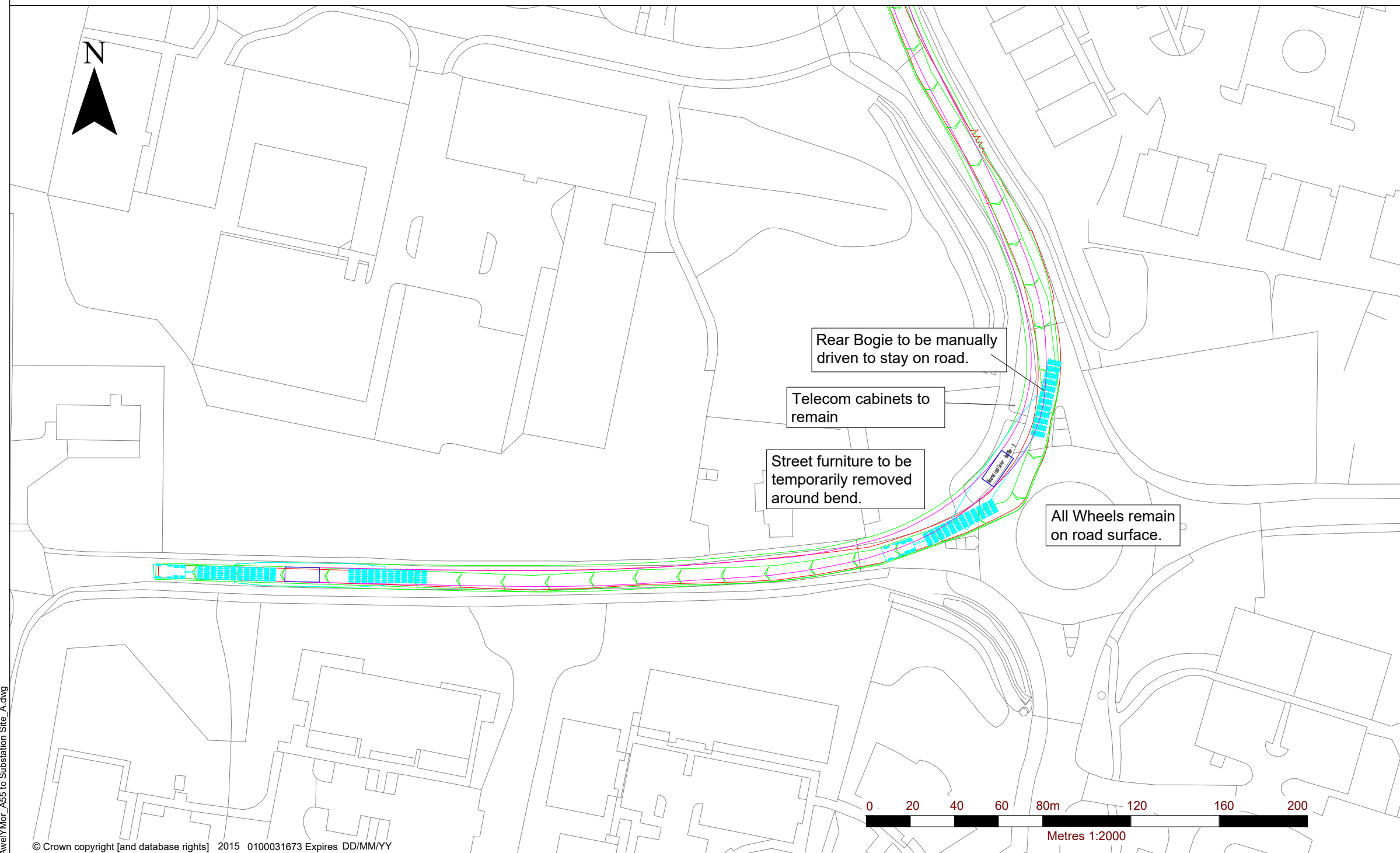
AwelyMor\_A55 to Substation Site\_A.dwg



Abnormal Load Carrier - AwelyMor - B  
 Overall Length 61.871m  
 Overall Width 5.300m  
 Overall Body Height 3.495m  
 Min Body Ground Clearance 0.420m  
 Track Width 3.000m  
 Lock to lock time 6.00s  
 Wall to Wall Turning Radius 9.800m

NOTES

LEGEND



Revision	By	Chk'd By	Date	Comments

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 Substation

Project  
 Transport Assessment

Drawing Title  
**Swept Path Analysis  
 Glascoed Road Roundabout**

Scale  
 1:1000 @ A3

Date  
 January 2023

Drawing Number  
**003**

Revision  
**0**

AwelyMor\_A55 to Substation Site\_A.dwg



# Appendix E: AIL Route Comparison Photographs

Wynns Report (2006)



**Picture 11. Exit from A55 to St Asaph Business Park. Load approaches from centre right of camera from A55 westbound exit slip road and turns left towards camera.**

Latest imagery on Google Earth (2021 or 2022)



**Picture 12. St Asaph Business Park roundabout at OS Grid Ref SJ 016 746. Load approaches from centre left of camera and turns right towards camera. Contraflow of this roundabout is recommended.**





**Picture 13. St Asaph Business Park/B5381 Glascoed Road roundabout. On route 3, loads turn right at this roundabout. For alternative access to the final substation access points already discussed in 3.1 and 3.2, loads would turn left or continue straight over respectively.**



**Picture 14. St Asaph Business Park/B5381 Glascoed Road roundabout. On route 3, loads turn right at this roundabout which for 20 axle frame trailers would be best undertaken in contraflow. Caution is required in relation to lamp posts and street furniture but the turn is considered negotiable.**







**Picture 15. B5381 west from the St Asaph Business Park. Load moves away from camera.**



**Picture 16. Junction of B5381 Glascoed Road/Unclassified Road at OS Ref SJ 013 739. Load turns left away from camera.**





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