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To: [AwelyMor](#)
Subject: DESNZ letter 14th August Response
Date: 15 August 2023 15:36:17

Awel y Mor Offshore Wind Farm limited

In response to the Department for Energy Security and Net Zero letter dated 14th August 2023 asking for comments on the applicants environmental assessment in relation to additional cumulative effects, I would like to make the following comments.

- Throughout this process there has been a distinct lack of consideration and importance given to the onshore cumulative impacts on Cefn Meiriadog and the surrounding areas resulting from several other large renewable energy schemes and major infrastructure proposed developments. I refer to the following;
 - Mona Offshore Wind Farm
 - Mares Interconnector
 - St Asaph Solar Farm
 - National Grid Bodelwyddan substation extension and 400Kv overhead line reconstructure.

Whilst these schemes have not applied for 'formal' application at the time of this review, the omission of their cumulative impact appears to be an error given that:-

- Vol1 Annex 3.1 under 1.2 Definition of cumulative and in combination effects for AYM states ' other foreseeable projects and activities',
- 6.1.3.1 April 2022 rev b referring to Advice note 17 pins 2019 says that ' identified in other plans and programmes which set the framework for future development consents and approvals, where such development is likely to come forward.
- Each of the above would appear to fit these categories
- I understand that Awel y Mor, attended joint meetings with several of these developers so were well known about and that they plan major construction in and around Cefn Meiriadog at similar time to Awel Y Mor

Despite this and the fact that the National Grid Bodelwyddan substation extension is an integral part of AYM being able to connect to the grid, none of these major developments appear to have warranted an assessment under cumulative impacts.

I note that National Grid are not listed in Volume 1 Annex 3.1 of stakeholders and interested parties in collating data for onshore developments that would have cumulative impact, this is a surprising omission since they would actually have the best view of likely developments moving forward.

On a further note, although not directly associated with responses that were requested by the letter, I would like to make a further observation for your awareness and consideration.

- Awel Y Mor is an extension to the applicants existing Gwynt y Mor wind farm and is of similar Mega Wattage.
- Gwynt y Mor onshore substation occupies approximately 7 acres of land

- Awel y Mor plan on acquiring 83 acres of freehold for their onshore substation
- Whilst Gwynt y Mor installed gas insulated switchgear and Awel Y Mor are likely to install Air insulated switchgear and thus a bigger footprint of around 21 acres, it seems unreasonable that an additional 60 acres is required for screening/mitigation/drainage, unless there is an ulterior motive for such a large land acquisition?
- Perhaps they intend to follow Hornsea3 example and apply for further development (battery storage)in the future

I would therefore politely ask that you clarify the reasons for such a large land uptake and if indeed it is necessary for screening/mitigation/drainage then as part of any approval (should it be given) that these lands are protected from further development.

Thank you

Martyn Hussey