

Secretary of State for Energy Security and
Net Zero
C/O Jake Stephens
National Infrastructure Directorate
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Date: 08 September 2023
Jo Pickard
t: 0800 1978232
e: awelymor@rwe.com

08 September 2023

RE: Responses to the Secretary of State Consultation Letter dated 14 August 2023

Dear Mr Wheadon,

I am writing on behalf of Awel y Môr Offshore Wind Farm Limited (the Applicant) in relation to the Development Consent Order (DCO) application for the Awel y Môr Offshore Wind Farm project (the Project).

On 14 August 2023, the Secretary of State (SoS) issued a Request for Information (RFI) letter. The Applicant and 12 interested parties responded to this request. This letter responds to new matters raised in responses from interested parties and highlights to the Secretary of State where new matters raised by interested parties have already been addressed in the Awel y Môr (AyM) application and examination.

Natural Resources Wales

The Applicant welcomes Natural Resources Wales' (NRW) advice that the Applicant has taken a reasonable approach to consideration of additional cumulative effects from the Morgan, Mona and Morecambe projects.

Marine Mammals

NRW confirm agreement with the Applicant's conclusion in respect of marine mammals. NRW consider that further ongoing discussion with the applicants for Mona, Morgan and Morecambe will be needed to refine the proposals for those projects as they work to finalise application submissions, including in respect of cumulative effects.

Designated Landscapes

The Applicant notes that NRW are in broad agreement with the Applicant's assessment of impacts to designated landscapes, although comments made in its Deadline 1 submission (REP1-080) that some effects have been underestimated are re-stated. The

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Applicant has responded in detail to these comments previously in its submissions through the examination process.

The Applicant considers that while additional cumulative effects could occur, these will be given appropriate consideration by Mona in its Environmental Statement (ES) as it progresses to the application and examination phases, including consideration of the necessity for further mitigation and consultation for that project.

Joint Nature Conservation Committee (JNCC)

Liverpool Bay Special Protection Area (SPA)

JNCC requested clarity as to how the conclusions for the Liverpool Bay SPA were reached in the AyM review of cumulative and in-combination effects.

Bullet 1

This re-iterates the original Environmental Impact Assessment (EIA) conclusion for offshore ornithology presented for AyM alone, as detailed within the Offshore Ornithology chapter of the Environmental Statement (ES) (REP8-085), in which no significant cumulative effects were identified.

Bullets 2 and 3

Table 1 of the Applicant's CEA review identifies the potential for significant effects to occur from AyM cumulatively with all of Mona, Morgan and Morecambe. Further justification is provided in Table 2 of the Applicant's CEA review, from which the conclusion of no additional cumulative LSE was made.

North Anglesey Marine Special Area of Conservation (SAC)

JNCC advise that because the potential for adverse cumulative or in-combination effects can no longer be ruled out, the approach to management measures including the need for a Site Integrity Plan should be reviewed. The Applicant considers that should further management be required, whether in the form of a Site Integrity Plan or otherwise, no significant effects are predicted from AyM alone and therefore any measures required to address a future cumulative breach of effect thresholds should be a consideration for those developments which follow AyM in the planning process.

Department of Agriculture, Environment and Rural Affairs (DAERA)

DAERA note in their response that there is a potential for introduction and/or spread of Invasive Non-Native Species (INNS) as a result of AyM. Whilst no additional cumulative effects in relation to this impact were identified in the Applicant's review of cumulative and in-combination effects, the Applicant re-iterates that agreement of a Marine

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Biosecurity Plan is anticipated to be required as a condition of any Marine Licence granted by NRW (see Condition 16 of the Marine Licence Principles (REP8-014)). This will detail the measures to be applied to ensure the risk of introduction and/or spread of INNS is reduced as far as practicable.

David Meade Property Consultants (DMPC) on behalf of Mr JB & Mrs E Evans

This response is noted by the Applicant, who welcomes confirmation of progress made on Heads of Terms applying to voluntary agreements.

Cefn Meiriadog Community Council and residents Mr Hussey, Mr M Barlow, Mr R Barlow, Ms Bowers, Ms Williams and Ms Griffiths

The Applicant notes the concerns raised by the community council and residents relating to the energy projects seeking to supply electricity into the National Grid via the existing grid connection point at Bodelwyddan which is located within the Cefn Meiriadog area.

The representations provided by the local community raise the following:

- That the cumulative effects assessment (CEA) provided by the Applicant does not consider all proposed developments in the area;
- That the methodology used to assess environmental impacts is incorrect; and
- That the area of land identified for the AyM onshore substation is unreasonably large.

Cumulative Effects Assessment

The Applicant's review of cumulative and in-combination effects was produced in response to a commitment given to the Examining Authority (ExA) by the Applicant at Deadline 8 (REP8-039); namely that should sufficient additional information on Morgan and Mona offshore wind farms become available, further submissions could be sought by the Secretary of State. Preliminary Environmental Information Reports (PEIRs) were published by Mona, Morgan and Morecambe offshore wind farms in April 2023 after the AyM examination closed. Paragraph 11 of the Applicant's CEA review confirms its scope and approach.

The following table sets out how the developments listed in the community council and resident's representations have been considered by the Applicant:

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Development	Status	How addressed by Applicant
National Grid 'Bodelwyddan' substation	Existing development	Considered as part of the existing baseline within the Environmental Statement.
Burbo Bank substation and underground cable route	Existing development	Considered as part of the existing baseline within the Environmental Statement.
Gwynt y Môr substation and underground cable route	Existing development	Considered as part of the existing baseline within the Environmental Statement.
Scottish Power energy network substation	Existing development	Considered as part of the existing baseline within the Environmental Statement.
Overhead pylon line from Clocaenog into Scottish Power substation	Existing development	Considered as part of the existing baseline within the Environmental Statement.
STOR reserve storage facility	Existing development	Considered as part of the existing baseline within the Environmental Statement.
AyM onshore substation and cable route	Pending decision	Considered within the AyM Environmental Statement.
Mona onshore substation and cable route	Pre-Application	Considered within the 11 July 2023 Cumulative Effects Assessment.

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Development	Status	How addressed by Applicant
National Grid 'Bodelwyddan' substation extension	EIA Screening	The Applicant notes that National Grid has submitted a formal request for an EIA Screening Direction to Denbighshire County Council (DCC) on 21 July 2023 (DCC Ref 31/2023/0525). EIA Screening represents an initial stage in the planning process and typically does not provide enough detailed design information, nor enough certainty on final design or timescales, to enable a meaningful cumulative assessment to be undertaken.
National Grid replacement of single pylon line by two pylon lines	Pre-Application	It is understood this will require consent under the Electricity Act 1989 (Section 37) and that a separate EIA Screening request will be issued to the Department for Energy Security and Net Zero (DESNZ). To date an EIA screening opinion has not been provided for this development.
MaresConnect Interconnector	Pre-Application.	See the Applicant's response to question 0.7 of the ExA's second round of written questions (REP5-004).
St Asaph Solar Farm	EIA Screening	The St Asaph Solar Farm is also at EIA Screening stage and therefore there is insufficient information or certainty to enable a detailed cumulative assessment to be undertaken.

The points raised in relation to EIA methodology and substation land take were addressed in detail as part of the AyM examination and the statements of common ground agreed with Denbighshire County Council and other stakeholders.

Rhyl Flats Wind Farm Limited (RFWFL)

RFWFL's additional submissions suggest that the proposed revisions to the Energy National Policy Statements (NPS) fundamentally alter the interpretation of the draft NPS. For the reasons given below, this is incorrect.

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RFWFL notes that reference to oil and gas has been removed from the sub heading on page 56 of revised draft NPS EN-3. Furthermore, the list of offshore infrastructure included in paragraph 2.6.176 has been removed in paragraph 3.8.212 of revised draft NPS EN-3.

Whilst changes are clearly being proposed to the drafting of these sections, it is not appropriate, as RFWFL has done, to take amendments to individual paragraphs in isolation rather the totality of the changes to section 3.8 (Offshore Wind) must be considered.

When read as a whole, it is clear that paragraph 3.8.212 needs to be read alongside additional wording included in paragraph 3.8.56 of revised draft NPS EN-3 which now provides examples of what is meant by 'other offshore infrastructure' for the purposes of the NPS. This is similar to the previous examples of offshore infrastructure provided in paragraph 2.6.176 of the extant NPS EN-3 and includes oil and gas, carbon capture usage and storage, co-location of electrolyzers for hydrogen production, marine aggregate dredging and telecommunications. As previously stated in the context of the extant NPS EN-3 (REP6-003), the examples of other offshore infrastructure provided indicates that another offshore wind farm would not fall within this category. The Applicant considers that had it been the Government's intention for other offshore wind farms to fall within this paragraph it would have taken the opportunity of the revised draft NPS to do so. It has not done this.

The Applicant trusts that this letter assists the Secretary of State in her consideration of the responses to the RFI.

Yours sincerely,



Jo Pickard CEnv, MCIEEM
Senior Consents Manager
Awel y Môr Offshore Wind Farm Ltd.

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t: 0800 1978232

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