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Eich cyf/Your ref: EN020014/ NWWFC-002

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Dear Sir/Mdm

North Wales Wind Farms Connection Project Proposed Development Consent Order: Natural Resources Wales's (NRW's) Answers to Examining Authority's Second Round of Questions

Please find below our answers to question number 6.1 concerning Greenland White Fronted Geese, which was directed specifically at NRW, and question 12.8 concerning DCO Requirement 16, an item about which NRW commented in our answers to the Examining Authority's first round of questions.

Question 6.1

This is directed at Welsh Government and NRW. It asks:-

- (a) Please could the Welsh Government explain what they meant in their Deadline 1 comment regarding Greenland White Fronted Geese, ".....general precautions in respect of large birds would probably minimise any risk to this endangered and iconic species." What are those "general precautions"?
- (b) For the avoidance of doubt, please could NRW provide their views on this matter

NRW's views are:-

The Examining Authority should, consider Regulation 61 of The Conservation of Habitats and Species Regulations 2010 (as amended). If it considers that the scheme is likely to have a significant effect on a European site it should make an appropriate assessment of the implications for that site.

Our advice is that, the project is not likely to have a significant effect on a European Site.

The Greenland White Fronted Goose is a feature of the Dyfi Estuary Special Protection Area (SPA). We do not consider the project is likely to have a significant effect on the SPA because:-

- The principal risk to geese and swans from power lines and associated structures is that of collision while taking off from or landing at roosting or feeding sites.
- When migrating, geese fly at relatively high altitudes.
- The Dyfi Estuary SPA is approximately 68km from the DCO boundary
- There is no evidence of species members from any Greenland White Fronted Goose population, irrespective of that from the Dyfi Estuary SPA, roosting in the area around the DCO boundary.
- There is insufficient evidence to know which route birds from Dyfi Estuary SPA use for migration but energy optimisation would favour as straight a route as possible. Such routes from Greenland or Iceland do not pass over the proposed development.
- Despite this, in the event that birds from the population were to migrate over the proposed powerlines, at such a distance from the Dyfi Estuary they would be flying at a considerable altitude.
- The only circumstance in which we envisage the birds might be at risk from ground based structures would be if they were forced to land by bad weather. This in itself is unusual and therefore the compound probability of the route of migration and a weather induced landing event occurring at any one location, coupled to the risk of a bird from the population concerned colliding with, and being injured by the power lines, is likely to be low.

The general precautions referred to by the Welsh Government may refer to the use of 'diverters', which are attachments to lines that make them more visible to birds. As NRW believes that the submitted scheme is unlikely to have a significant effect on the Dyfi Estuary SPA for the reasons stated above, we would not advocate an additional requirement to fit diverters.

Question 12.8

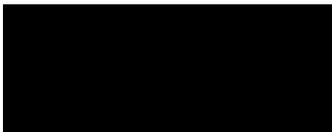
This question is directed at "The Applicant, DCC, CCBC and other Interested Parties". It asks:-

Draft DCO v3 R16 has been modified slightly to include a need for consultation with NRW during the approval process and the deletion of "the parameters specified in requirement 3(2)" in R16(1). Do draft DCO R3(2) and R16 now give the applicant the ability to change the design parameters in such a way that the development could be modified in such a way that it no longer would be in line with the scheme as assessed in the Environmental Statement (ES)?

We reiterate our previous advice concerning Requirement 16, which is that the ExA must ensure that the authorised development remains within the scope of what has been assessed in the Environmental Statement and that the DCO establishes sufficiently clear parameters on subsequent decision makers.

Please contact David Hatcher (david.hatcher@cyfoethnaturiolcymru.gov.uk) should you wish to discuss this matter further.

Yours faithfully,



Richard Ninnes
Head of Ecosystems, Planning and Partnerships: North and Mid Wales