Awel y Môr Offshore Wind Farm

Applicant's Response to the Examining Authority's First Written Questions

Deadline 1

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1 Introduction

1 Following the issue of First Written Questions by the Examining Authority (ExA) outlines in the Rule 8 Letter of 27 September 2022, 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 List of Appendices:

- Appendix A – Figure of French Sites Screened into RIAA;
- Appendix B – Table of Temporary Plots;
- Appendix C – Update on Negotiations with Landowners, Occupiers, Statutory Undertakers and Other Utilities;
- Appendix D – N/A (Note Appendix D has been superseded by Document 1.47 of the Applicant's Deadline 1 submission);
- Appendix E – Indicative Temporary Construction Compound Annotated Plan Layout;
- Appendix F – Annotated Draft Substation Layout Plan;
- Appendix G – Indicative Image of Jack-Up Barge in the Shallow Sub-tidal Zone;
- Appendix H – Plan Showing Main Woodlands;
- Appendix I – Update to Habitat and Hedgerow Survey;
- Appendix J – Technical Note on Non-Road Mobile Machinery;
- Appendix K – Waste Management Sites in North Wales;
- Appendix L – Predictive Agricultural Land Classification Overview;
- Appendix M – Agricultural Land Classification (Wales) Surveys;
- Appendix N – Socio-Economics Chapter (APP-064) Figures 1 and 4 at 1:50,000 scale;
- Appendix O – Tourism and Recreation Chapter (APP-065) Additional Plan of Study Area used;
- Appendix P – Land Referencing Methodology;

- Appendix Q – Table of Wind Turbine Generator Maximum Design Scenarios;
- Appendix R – Land Registry Title Area by Agricultural Land Classification; and
- Appendix S – Land Registry Title Area and Draft Order Limits.

2 Applicant's response to Examining Authority's First Written Questions

2.1 General and Cross-Topic Questions

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
0.1	The Applicant	**Plans and documents** Please provide a list of all plans and other documents that will require Secretary of State (SoS) certification (including plan / document references). This should be updated throughout the examination process for ease of tracking document versions and a final list supplied to the Examining Authority (ExA) before the close of the examination.	A new document has been provided by the Applicant which lists the Application documents and provides information as to which documents have been updated and the current version numbers (Document 1.13 of the Applicant's Deadline 1 submission). This will be updated and submitted at each Deadline of the examination. This document also clarifies which documents are secured under the DCO and which are secured under the marine licence. A40 of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) has been amended to remove documents which will be secured in the marine licence, namely 8.3 the Outline Offshore Archaeological Written Scheme of Investigation (APP-304) and 6.4.9.1 the Navigation Risk Assessment (APP-111). These documents are not referred to elsewhere in the dDCO.
0.2	The Applicant, DCC, IoACC, CCBC, GC, FCC, SNP	**The Development Plan** Please provide full copies of any relevant Development Plan policies (or other documents e.g. management plans, supplementary guidance) that you have referred to in any of your submissions. Should you refer to any additional Development Plan policies at any time in your future submissions (for example in a Local Impact Report) then, if they have not already been provided, please also submit copies of these into the Examination. a) Have there been any relevant updates to the statutory Development Plan since the compilation of the application documents? b) Are local planning authorities content with the Applicant's policy analysis?	The Applicant has provided the following list of Development Plan documents and relevant Development Plan policy documents that have been referred to in the application. The Applicant has undertaken a review and is not aware of any changes to the Development Plan documents or policies listed below. **Denbighshire Local Development Plan 2006-2021 (adopted 2013)** • Policy RD 1 - Sustainable Development and Good Standard Guidance; • Policy RD 2 – Green Barriers; • Policy RD 5 - The Welsh language and the social and cultural fabric of communities; • Policy BSC 2 - Brownfield Development Priority; • Policy BSC 3 – Securing Infrastructure Contributions from Development; • Policy BSC 5 – Key Strategic Site – Bodelwyddan; • Policy BSC 11 – Recreation and Open Space; • Policy PSE 15 - Safeguarding Minerals; and

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			Policy PSE 13 - Coastal Tourism Protection Zones. • Policy VOE 1 – Key Areas of importance; • Policy VOE 2 - Area of Outstanding Natural Beauty and Area of Outstanding Beauty; • Policy VOE 5 – Conservation of Natural Resources; • Policy VOE 6 - Water Management; • Policy VOE 9 - On-shore Wind Energy; • Policy VOE 10 Renewable Energy Technologies; • Objective 8 – Public Open Space; • Objective 15 – Tourism; and • Objective 16 – Areas of Protection. **Denbighshire County Council Draft Preferred Strategy (2019)** • Strategic Objective 3; • Strategic Objective 5; and • Strategic Objective 6 . **Denbighshire County Council Supplementary Planning Guidance Note: Recreational Public Open Space (2017)** (Document referred to as a whole). **The Conwy Local Development Plan (2007 – 2022)** • Spatial Objective 4; • Spatial Objective 11; and • Spatial Objective 13. **Conwy Preferred Strategy (2019)** • Objective 4; • Objective 5; • Objective 7; and • Objective 10. **Flintshire Unitary Development Plan 2000-2015 (2011) expired at the end of 2015**

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			(Document referred to as a whole). **The Flintshire Deposit Local Development Plan 2015-2030 (Flintshire County Council, 2019) was submitted for examination in October 2020** ▲ Objective 1; ▲ Objective 8; and ▲ Objective 15. **The Anglesey and Gwynedd Joint Local Development Plan (2011 to 2026)** ▲ Theme 1: Strategic Objective 2; ▲ Theme 2: Strategic Objective 6; ▲ Theme 3: Strategic Objective 10; and ▲ Theme 3: Strategic Objective 11. **Draft Review Report (Anglesey County Council and Gwynedd Council, 2021)** (Document referred to as a whole). **Wrexham Unitary Development Plan 1996-2011 (2005)** ▲ Strategic Policy PS12. **Deposit Wrexham Local Development Plan 2 2013 to 2028 (2018)** ▲ Strategic Objective 2; ▲ Strategic Objective 8; and ▲ Strategic Objective 10.
0.3	The Applicant, Any Interested Party	**National Policy** Are you aware of any updates or changes to UK or Welsh Government Policy or Guidance relevant to the determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications, if any, for the application?	The Applicant has undertaken a review and is not aware of any changes to UK or Welsh Government Policy or Guidance.
0.4	The Applicant, DCC, CCBC	**Planning applications** Please provide an update on any planning applications that have been submitted, or consents that have been granted, since the Application was submitted that could either affect the Proposed Development or be affected by the Proposed	The Applicant has undertaken a review of planning applications. The following applications were identified within the vicinity of onshore works for AyM, however, the stated timing, scale and location of the other

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		Development and whether these would affect the conclusions reached in the ES (e.g. Rhyl and Prestatyn sea defence schemes).	schemes mean that none require detailed consideration as cumulative sites and so the conclusions reached in the ES remain unchanged. The Applicant notes that the proposals by Elwy Solar Energy for the construction of a solar farm and energy storage hybrid park, together with all associated works, equipment and necessary infrastructure (62W), has been refused by the Welsh Government. The Elwy Solar farm was included in the potential cumulative sites considered within the submitted ES, however, the refusal of this application does not alter the findings of the chapters where it has been considered. **Planning Ref: DCC 46/2022/0694** - 6, The Paddock, St Asaph, DENBIGHSHIRE, LL17 0AQ; - Erection of 8 no. dwellings construction of a new vehicular access and associated works; and - 29/09/2022. **Planning Ref: DCC 47/2022/0610** - The Fifth Wheel, Llwyn Derw, B5429 Waen Gate Roundabout To Pistyll, Rhuallt, St Asaph, DENBIGHSHIRE, LL17 0AW; - Installation of Biomass boiler and flue (retrospective application); and - 05/07/2022. **Planning Ref: DCC 40/2022/0153** - Min Y Morfa Farm, Borth Roundabout To Ty Byw Road, Abergele, DENBIGHSHIRE, LL22 9SB; - Erection of 8 industrial units (Use Class B1 and B8) and associated works; and - 27/04/2022. **Planning Ref: DCC 43/2022/0327** - Street Record, Broadway, SIR DDINBYCH; - Installation of 15m high telecommunications monopole and associated equipment; and - 04/04/2022. **Planning Ref: DCC 45/2022/0271**

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			▲ Street Record, East Parade, DENBIGHSHIRE; ▲ Construction of coastal protection scheme, incorporating. new sea wall, repair works and engineering operations including scour protection to existing sea wall. Installing new concrete step revetments. Raising and widening of promenade including new and amended accesses, landscaping and associated works. Ecological mitigation and access works at Barkby Beach; and ▲ 31/03/2022.
0.5	DCC	**National Park progression** Please provide an update on progress and likely timescales for the potential new National Park for the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).	N/A
0.6	The Applicant	**Gwynt y Môr** Noting paragraph 121 of ES Chapter 1: Offshore Project Description [APP-047], please further clarify why Gwynt y Môr's (GyM) transmission network is not sufficient to allow full export from the Proposed Development (or vice versa)? Has the potential to upgrade the GyM transmission network to allow for this been considered?	Gwynt y Môr's (GyM) transmission network consists of two offshore substation platforms (OSPs), four export cables, an onshore substation and two short interface cables leading into the National Grid Bodelwyddan substation. The network was designed and constructed for a maximum export of 576MW, which is reflected in National Grid's TEC register. The network has been integrated into the National Grid through the OFTO (Offshore Transmission Operator) regime and is now owned and operated by Gwynt y Môr OFTO plc, who are owned by Balfour Beatty Investments and Equitix. Hence neither RWE, Gwynt y Môr Offshore Wind Farm Limited nor Awel y Môr Offshore Wind Farm Limited own or operate the network. The 576MW GyM generating capacity is split between the two OSPs, with each rated to a maximum of 288 MW. The westerly GyM OSP is adjacent to Awel y Môr (AyM) and hence only this OSP has been included within the order limits. AyM investigated the feasibility of an upgrade of the GyM transmission network to enable the full capacity of both windfarms to be exported. As the GyM network has no spare capacity, this upgrade would require at least 2 additional export circuits (or if the upgrade used the same voltage as GyM then at least four new circuits would be required). The GyM substation would also require a significant extension as none of the existing equipment has sufficient spare capacity. The Applicant's site selection process included landfall locations and an onshore substation zone which

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			corresponded with possible GyM alignment. Onshore substation Zone 1, also referred to in response to ExQ1.10.12, was progressed to the AyM shortlisting stage of the site selection process, however it was subsequently discounted for a number of reasons including available space, uncertainty over future NGET works, and the potential for visual effects on designated assets including St Asaph's Cathedral, and visual effects on a number of residential receptors within the likely Zone of Influence. Further to the onshore substation zone, a landfall location (landfall 4) was also aligned with the GyM infrastructure. Landfall 4 was also progressed through to the shortlisting stage of the AyM site selection process, however it was subsequently discounted due to the risk of significant effects on noise sensitive, and traffic, receptors within the likely Zone of Influence. Receptors included sensitive receptors on the A548 at Pensarn, and noise sensitive receptors within 200m of likely landfall and drill locations which would be very challenging to adequately mitigate. It was concluded that an upgrade of the GyM network, or following the same cable route and substation location, would have an impact that was identical (or larger) than the construction of the new AyM transmission network and that upgrading the GyM network would involve significant interruption to the operation and generation of GyM. With regard to the 'vice versa' arrangement: it would be technically possible to design AyM's transmission network such that it could allow the full export from GyM. However, this would require additional export circuits and would require upgrades and connections to both of GyM's OSPs. Under the terms of the transmission license, AyM has an obligation to design a transmission system that is economic and efficient (as assessed by OFGEM during the OFTO transfer process). Given that GyM already has a suitable transmission system, there is no benefit of AyM constructing this additional equipment and it has not been considered in the AyM design.
0.7	The Applicant	**National Grid substation** Please fully justify the reasons in detail for including land within the Order limits relating to the extension of the National Grid substation, given that the extension would be determined under a	For the avoidance of doubt, the Awel y Môr project does not include any of National Grid's works to extend its substation at Bodelwyddan. These works are the responsibility of National Grid and it is the Applicant's understanding that National Grid will be making an application for planning permission for those works when the design has been finalised. It is also the Applicant's understanding that National Grid's works to extend

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		separate application. Has any progress been made on this application?	its substation at Bodelwyddan involve the connection of other new generating capacity as well as Awel y Môr. The extent of the Order Limits around the National Grid Bodelwyddan substation is to ensure that, in the absence of a design from National Grid the Applicant can undertake its works to connect Awel y Môr without changes being needed to the Order Limits either during or after the DCO examination and decision. The Applicant is in discussions with National Grid regarding its connection, and although a wide area has been included, only the land and rights required for the identified connection will be taken.
0.8	The Applicant	**Operational period** The assessments in the ES assume an operational period of 25 years for the Proposed Development before it is to be decommissioned. Therefore, should this period of time be specified and secured as a requirement of the dDCO? If not, might this allow for a longer operation period to occur and what implications might this have for the assessments of the ES?	The Applicant does not consider that an operational period should be specified in the dDCO. The indicative operational project lifetime of 25 years has been developed for the purposes of undertaking an assessment, based on the likely operational lifespan of the wind farm. The EIA considers duration as a component of impact magnitude, which for the operational phase are generally described as 'long-term' or 'irreversible for the operation of the project', which are described in the methodology sections of the topic-specific ES chapters. Should AyM be operational for a longer duration, this would not affect the conclusions of the ES. The Applicant is not aware of operational limits being applied to the DCOs of other offshore wind projects in the UK and refers to the Applicant's response to ExQ1.6.5 regarding the dDCO.
0.9	The Applicant	**Carbon Assessment** Draft NPS EN-1 section 5.3.4 sets out that all proposals for energy infrastructure projects should include a carbon assessment as part of their ES, along with the type of information which should be included within the assessment. Section 4.2 of draft NPS EN-1 makes reference to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which refer to, amongst other things, climate. In addition, during consultation for the redetermination of the Norfolk Vanguard project, the Secretary of State (SoS) highlighted the desirability of a carbon footprint and impact assessment that considered embedded carbon and greenhouse gases from the extraction, refinement and manufacture of elements of the project, along with the emissions from the construction (including trenching and excavation of	The Applicant notes that paragraph 5.3.4 of the Draft NPS EN-1 does not occur in the extant NPS EN-1, and that the timescale for adoption of the draft NPS (or likely amendment to it), is not currently known. However, the Applicant has noted the request from the ExA for a Carbon Assessment and will submit the report at Deadline 4.

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		arable land and loss of greenhouse gas absorption capacity from farming, plants and trees), operation, maintenance and decommissioning. Could the Applicant signpost any assessment work of this nature that has been undertaken and does the Applicant intend to provide anything further in this respect? If so, by what deadline will be this be submitted by?	
0.10	The Applicant	**Offshore transmission network review** a) Has the Applicant considered the Department for Business, Energy and Industrial Strategy (BEIS) / Ofgem Offshore Transmission Network Review? If not, why not? b) If it did, has it influenced the design of the Proposed Development in any way? c) Has the Applicant identified any opportunities for a more co-ordinated approach to the design and delivery of the transmission infrastructure of this Proposed Development and other projects in the same region? d) Are any of the Secretary of State's observations on the offshore transmission network review in DCO decision letters relating to other offshore wind farms relevant in this respect?	The below text answers sub-questions a) to d) in a single response. The Applicant has given careful consideration to the Offshore Transmission Network Review, and the Applicant's position is set out in paragraphs 35-41 of the Grid Connection and Cable Details Statement [APP-296]. The Grid Connection and Cable Details Statement describes the position at the time of drafting. In reviewing recent Secretary of State (SoS) decision letters for other offshore wind farm projects the Applicant considers a number of observations are of relevance. In consenting Norfolk Boreas and Norfolk Vanguard the SoS recognised that the designated version of NPS EN-3 states: "*When considering grid connection issues, the IPC should be mindful of the constraints of the regulatory regime for offshore transmission networks*" (paragraph 2.6.36). NPS EN-3 also states: "*Applicants for consent for offshore wind farms will have to work within the regulatory regime for offshore transmission networks established by Ofgem*" (2.6.34). These statements are repeated in the draft revisions to NPS EN-3 (though these statements may be subject to change before designation), which state: "*Applicants for consent for offshore wind farms will have to work within the regulatory regime for offshore transmission networks established by Ofgem*" (2.22.18); and

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			"When considering grid connection issues, the Secretary of State should be mindful of the requirements of the regulatory regime for offshore transmission networks" (2.23.1). The transmission infrastructure for Awel y Môr has been developed in accordance with the existing regulatory regime and the Applicant considers it should be assessed on that basis. Since submission of the Project's DCO application the OTNR has been advanced by Ofgem, with publication of the Holistic Network Design (HND) recommendations in June 2022. National Grid Electricity System Operator (NGESO) has confirmed projects in-scope for the HND and Pathway to 2030 are primarily those which were awarded leases in The Crown Estate Leasing Round 4 and those which will receive them in Crown Estate Scotland's ScotWind leasing round. The workstream scope will also include offshore projects within the Celtic Sea and potentially a handful of other offshore projects which are potentially spatially and/or temporally relevant to other in-scope projects for the Pathway to 2030 workstream where it is efficient to consider them as part of the scope of the HND. The recommendations consider 4 generation projects within scope of the HND in the 'North West' region, where AyM is located, and does not include AyM itself (see p36 in 'The recommended design' section of NationalGridESO's (NGESO) July 2022 Pathway to 2030 report). There is no coordination proposed between projects in the Early Opportunities and Pathway to 2030 workstream, and AyM has not been deemed spatially and/or temporally relevant by NGESO for inclusion within the scope of the HND. Ofgem consulted on both the Early Opportunities workstream (with a focus on anticipatory investment) and the Pathways to 2030 workstream (focusing on the delivery model to achieve the HND) in April and May 2022, respectively. Decisions from Ofgem were expected in Q3 2022 but have been subject to delay. The final policy position for several aspects of both the Early Opportunities and Pathways to 2030 workstreams remain uncertain but the Applicant does not expect any changes to its connection at Bodelwyddan. The existing regulatory regime is based on radial connections and this is the approach that has been taken by the Applicant which has been supported by NGESO and now has been indirectly endorsed by the HND recommendations.

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0.11	The Applicant	**Other consents and licences** Application document [APP-037] confirms that other consents, licences and permits would be required for the Proposed Development. Please provide an update on any progress with obtaining these consents, licences and permits include a section providing an update on these consents, licences and permits in any emerging Statements of Common Ground (SoCG) that are being drafted with the relevant consenting authorities.	Following acceptance of the AyM DCO Application for Examination, the Applicant submitted an application for marine licences under the Marine and Coastal Access Act 2009 to NRW, which was duly made on 20 June 2022. The Marine Licence determination process is anticipated to run in parallel with the DCO process, with a determination expected shortly after determination of the DCO. The Applicant has developed SoCGs with NRW on matters relevant to both the Marine Licence and DCO processes and has provided an updated Marine Licence Principles document (Document 1.24 of the Applicant's Deadline 1 submission). The Applicant has also provided an update on the submission and progress of the Marine Licence application in Document 1.14 of the Applicant's Deadline 1 submission. Both the DCO and Marine Licence processes require an Appropriate Assessment (AA)to be made by the Competent Authority under the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (together the "Habitats Regulations"). The AAs for AyM are expected to be completed in parallel as part of the determinations of both consents. The Applicant is currently in discussions with NRW regarding the disapplication of legislation relating to Flood Risk Activity Permits (FRAP) in the DCO. As noted in Application Document APP-037, the Applicant is seeking to disapply this legislation in the DCO. Progress on these discussions with NRW will be detailed within SoCGs. All other consents, licences and permits referenced in APP-037 will be obtained post-determination of the DCO application and therefore there is no update necessary on their progress.
0.12	The Applicant	**Significant effects** Please provide a summary table listing the likely significant residual effects identified within the ES Chapters.	The Applicant included summary chapters of the offshore and onshore volumes of the ES within the Application Documents (AS-028 and APP-074, respectively). The Applicant has provided a table of residual effects as identified within the ES in document 1.47 of the Applicant's Deadline 1 submission.
0.13	The Applicant	**Mitigation** Please can you provide copies of the mitigation measures prescribed in the EIA and referenced in the schedule of mitigation	The mitigation plans referenced are expected to be secured by conditions of any Marine Licence granted and will be drafted, finalised and approved by NRW post-consent during the detailed design phase. It is

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		[APP-310]. The following list is not exhaustive, Project Environmental Management Plan, Marine Pollution Contingency Plan, UXO specific Marine Mammal Mitigation Protocol, Dropped Object Plan, Scour Protection Management Plan etc.	therefore not possible to provide copies of these documents at this stage. Outline versions of the Marine Mammal Mitigation Protocol (MMMP) (APP-107) and Outline Marine Written Scheme of Investigation (WSI) (APP-304) have been provided as in-principle plans with the Application to agree key principles of those mitigations in the pre-consent phase. The Applicant has provided an updated Schedule of Mitigation (Document 1.18 of the Applicant's Deadline 1 submission).
0.14	The Applicant	**General review** Please can you review the application documents and address any inconsistencies particularly those attributed to the MDS; For instance, the Report to Inform Appropriate Assessment – Paragraph 44 [APP-027] "The onshore cable corridor will be approximately 14 km in length", whilst ES Volume 3, Chapter 1, Onshore Project Description Para 30 [APP-062] states that the onshore cable corridor will be approximately 12 km in length.	The Applicant has undertaken a thorough review of the Application documents post-application. Typographical errors and inconsistencies in the Application documents have been highlighted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
0.15	The Applicant	**General climate change and policy issues** In relation to NPS EN-1, paragraph 4.8.8, please explain how the ES demonstrates that there would be no critical features of the scheme which might be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections?	Each chapter of the ES includes a description of the evolution of the baseline environment relevant to that ES topic, that would occur without the implementation of the development, so far as natural changes from the baseline scenario can be assessed. The baseline environment is expected to change in response to natural variation, including through wider changes in climate expected over the lifetime of AyM. The ES also demonstrates AyM's resilience to such changes through consideration of the Maximum Design Scenario (MDS). The MDS for AyM has been produced to anticipate any potential changes between application and detailed design based on conservative estimates of UK climate projections. These changes could be technological (with the introduction of new technology) or environmental (such as new climate change predictions). At the detailed design stage, the Applicant will have regard to the latest set of climate change projections, examples include: - Changes in marine conditions (sea level, wave heights, currents, salinity etc.) that affect the elevation and design strength of offshore foundation components; - Changes in wind speed, turbulence, air density or humidity that affect wind turbine loads and generation. Onshore this affects the design of

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			substation buildings and components; - Changes in air temperatures that affect the cooling systems of key components, onshore and offshore; - Changes in water and soil temperatures, affecting the maximum rating of buried cables; - Changes in rainfall that affect the design of drainage systems; and - Changes in air composition and climatic conditions (i.e. rainfall, seawater aerosols) that affect component degradation rate and lifetime. Once construction is complete, the O&M (operation and maintenance) strategy will be adjusted to fit any added contingency coming from climate change induced variability. This list is not exhaustive but illustrates how the Applicant is taking the necessary action to ensure the operation of the infrastructure over its estimated lifetime.
0.16	NRW, CCBC, DCC, FCC, GC, IoACC, SNP	**Code of Construction Practice (CoCP)** The CoCP would be an important part of the mitigation strategy for dealing with and controlling potentially adverse effects from the various construction activities. Do you consider that as drafted it is sufficiently robust and precise and consequently enforceable?	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. The final Code of Construction Practice (CoCP) will include robust and precise measures which will manage the potential environmental impacts of the onshore construction of AyM and limit the disturbance from onshore construction activities such as site preparation, material delivery and removal, works activities and site reinstatement as far as is reasonably practicable. The Outline Code of Construction Practice (APP-312; Document 1.49 of the Applicant's Deadline 1 submission), the Outline Construction Method Statement (CMS) (APP-313; Document 1.50 of the Applicant's Deadline 1 submission) and associated environmental management plans (APP-314 to APP-324) submitted with the application sets out the key elements that will be secured in the final CoCP which the Applicant will be required to submit to Denbighshire County Council (DCC) for approval, as relevant planning authority, under R10 of the draft DCO. The scale and complexity of the construction process means that there may be instances where a degree of flexibility in the CoCP is both necessary and appropriate. The proposed monitoring arrangements

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			secured in the CoCP will enable DCC to ensure that relevant measures and commitments can be monitored and enforced.
0.17	Natural England	**Participation** The ExA thank you for your letter dated 19 August 2022 stating that you have not registered as an Interested Party for the Examination and that you will not be attending the Preliminary Meeting [AS-037]. For the avoidance of doubt, please could you confirm that you have no concerns with the environmental effects of the proposed development. If you do have concerns, please provide details.	The Applicant acknowledges that this question is directed at Natural England, however it notes that it may be useful for the ExA to understand the engagement with Natural England on AyM to date. The Applicant notes that Natural England were engaged via the Evidence Plan process in the pre-application phase on marine mammal and offshore ornithology matters (see the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303, respectively).
0.18	The Applicant	**Cumulative effects** The proposed offshore wind farms of Mona and Morgan appear in various places within the ES. Provide updates, if necessary, on the progress of these proposals since the ES was written and any changes this may make to the assessment of the proposed development.	At the time of writing of the ES, Morgan and Mona were included in the long-list of projects for consideration in the Cumulative Effects Assessment Methodology (APP-042) but screened out of further assessment on the basis that there was not enough detailed design information, nor enough certainty on timescales, to enable a meaningful cumulative assessment to be undertaken. Since the time of writing of the ES, both the Morgan and Mona offshore wind projects have received Scoping Opinions from the SoS. However these are high level documents and there is insufficient detailed information regarding the design, or certainty regarding timescales, to enable a meaningful cumulative assessment of these projects to be undertaken. Furthermore, under the EIA Regulations the Morgan and Mona projects will be required to undertake cumulative effects assessments of their own that would include detailed consideration of the proposed AyM project. The Applicant is aware that the Mona Offshore Wind Farm project is anticipating grid connection to Bodelwyddan and is currently consulting on onshore substation locations in the vicinity of the AyM substation. However the Applicant maintains that there is still limited information and certainty over the plans to enable a detailed cumulative assessment to be undertaken.
0.19	All Interested Parties	**Other Projects and Proposals** Are there any other projects that are not documented in the ES that are relevant and need to be considered by the ExA? If so,	N/A

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		please identify these projects and the public information source(s) from which you have made your assessment that they are relevant.	

2.2 Aviation

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1.1	The Applicant	The 'Environmental assessment: cumulative effects' (13.13) section of Volume 2, Chapter 13 of the ES (Aviation) [APP-059] does not refer to either the proposed Mona or Morgan offshore wind farms, both of which appear on the National Infrastructure Planning website, to varying levels of detail. Please update the chapter to refer to these proposals or provide justification for not doing so.	See Applicant's response to ExQ1.0.18 in which the Applicant has provided justification for not including the Morgan and Mona proposals beyond the screening stage. It is therefore not considered necessary to update the Aviation chapter of the ES (APP-059).
1.2	The Applicant, NATS	Please provide an update on the proposed commercial agreement to mitigate the identified required mitigation of the Great Dun Fell and St Anne's Primary Surveillance Radars.	A draft Radar Mitigation Contract (addressing the mitigation of the Great Dun Fell and St Anne's Primary Surveillance Radars and including proposed wording for an aviation requirement for the dDCO) has been through two rounds of review by the Applicant and NATS. A meeting was held on 12 October 2022 to discuss the outstanding issues. The Applicant expects all matters to be resolved and the contract to be signed in good time during the examination. The Applicant will keep the ExA informed of progress at all relevant deadlines.

2.3 Biodiversity, Ecology and Natural Environment

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2.1	The Applicant	**General** a) Can you please confirm when the word 'may' is used as in Schedule of Mitigation [APP- 310] and also within the ES such as "A PAMS may be used" Paragraph 31 [APP-107], whether the resulting conclusions on the impacts following mitigation is based on all or just some of the mitigation measures being employed. b) Can you please confirm when the words 'if required' within mitigation measures is used as in ES Volume 3, Chapter 5 (APP-066) and also statements such as "If an ADD is chosen as part of the suite of mitigation measures set out in the final MMMP" paragraph 32 [APP-107] , whether the resulting conclusions on the impacts following mitigation is based on all or just some of the mitigation measures being employed.	a) As identified within in ES Chapter 7: Marine Mammals (AS-026) the conclusions for the PTS assessment are based on the assumption that embedded mitigation measures (any method or combination of methods) outlined in the piling MMMP will reduce the risk of PTS to negligible levels. At this stage, it is not appropriate to be definitive on the final mitigation measure(s) since they will be based on the final design of the scheme post-consent. Instead, the draft MMMP (APP-107) provides information on potential mitigation options that could be used to reduce the risk of PTS to negligible levels. The final mitigation measures will be informed by the results from detailed ground investigation works, the final scheme design, and the appointed contractor's installation methods. The mitigation measures will be discussed and agreed with NRW at the time of drafting the final MMMP. Therefore, at this stage it is appropriate to use phrases such as 'may' and 'if required' in the context of discussing possible mitigation options that could be deployed. The MMMP will not be approved until the undertaker has demonstrated that (based on the final scheme design and construction methodology) it has put in place suitable mitigation that will reduce PTS effects to negligible levels. Accordingly, the conclusion is applicable to any mitigation measure(s) scenario that is capable of achieving this outcome. b) With regards to the assessment of onshore effects the Applicant has included the words 'if required' when referring to mitigation measures in ES Volume 3, Chapter 5 (APP-066) as the requirement for mitigation will be confirmed following review of the detailed scheme design that will be informed by pre-construction ecology surveys and discussion with consultees. The final scheme design will affect the location, timing, duration and methods used during construction as well as the location and design of permanent structures. The assessment has been undertaken on the basis of a Maximum Design Scenario (MDS) that includes the maximum development footprint (temporary and permanent) and therefore the largest possible area of disturbance to ecological receptors, and use of the technologies

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			likely to cause most damage where the technology to be used is still uncertain. The MDS approach means that the assessment is based on all of the mitigation measures being employed.
2.2	The Applicant	**General** The application references to professional EIA guidance documents: Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal (CIEEM, 2016) within [APP-041]; and Chartered Institute of Ecology and Environmental Management (CIEEM) (2019). 'Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.1' within (APP-066). Please can you explain and describe the effect upon the EIA as a result of the latest version Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal (CIEEM, September 2018, version 1.2 updated April 2022).	The Applicant confirms that the reference to CIEEM, 2016 within (APP-041) is incorrect. The reference in (APP-066) refers to the latest version available at the time the ES was submitted. The April 2022 update to the CIEEM guidelines affects paragraph 5.35 (of the guidelines), which now states: "*The evaluation of significant effects should always be based on the best available scientific evidence proportionate to the severity of those effects. If sufficient information is not available further survey or additional research may be required. In cases of reasonable doubt, where it is not possible to robustly justify a conclusion of no significant effects, mitigation/compensation measures should be applied in accordance with the precautionary principle. Where uncertainty exists, it must be acknowledged in the EcIA.*" The changes to paragraph 5.35 do not affect the EIA and do not require amendments of the onshore and offshore ecology ES chapters (APP-041 and APP-066), in which the precautionary principle has been applied and uncertainties are stated (see, for example, Section 5.6 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) and Section 5.5 of the Benthic Intertidal and Subtidal Ecology chapter of the ES (APP-051)). The April 2022 update also amends the glossary to clarify the source of the definition for 'precautionary principle'. This does not affect the conclusions of the EIA. There are no other amendments to the 2019 version of the CIEEM guidelines within the April 2022 update. This is also noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
2.3	The Applicant	**General** Please can you advise and explain your approach to UK Habitat Classifications (UKHabLtd) intending to release a version 2.0 of the UK Habitat Classification in early 2023.	The onshore ecology baseline surveys undertaken for AyM have followed UKHab v1.1 classification and guidance, which is the current version, for all surveys. UKHab Ltd (the organisation that manages and updates the classification) has indicated that an update will be published in early 2023, but no firm publication date is available. UKHab Ltd has indicated that any changes between v1.1 and v2.0 will be clearly indicated, with translation

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			tables and guidance made available for any more substantial changes. The surveys undertaken using UKHab v1.1 will therefore continue to provide a suitable baseline for AyM and UKHab Ltd has confirmed that comparisons between datasets collected in either v2.0 or v1.1, e.g., for monitoring purposes, will be straightforward. It is therefore not necessary to update the baseline data to UKHab v2.0.
2.4	The Applicant	**General** Please can you explain how the application considers Future Wales (the nation plan 2040), policy 9 – resilient ecological networks and green infrastructure references to safeguarding ecological networks and securing biodiversity enhancements (net benefit).	Future Wales (the nation plan 2040), policy 9 – resilient ecological networks and green infrastructure is considered in Table 1 of ES Volume 3, Chapter 5, Biodiversity and Nature Conservation (APP-066). Designated sites, protected species, and habitats and other species identified as being of importance for the conservation of biodiversity, are identified in Section 5.7 (APP-066). Effects upon important ecological features arising from AyM are assessed in Sections 5.10-5.13 (APP-066). Embedded mitigation measures are set out in Section 5.9 (APP-066). Outline proposals for mitigation and compensation, along with proposals for biodiversity enhancement are included in the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Enhancement measures represent the provision of new benefits for biodiversity that are additional to those provided as part of mitigation or compensation measures, although they can be complementary. The oLEMP sets out the key elements that will be secured in the final Landscape and Ecology Mitigation Plan (LEMP) which will be agreed with Denbighshire County Council (DCC), in consultation with Natural Resources Wales (NRW) prior to any construction works commencing. These include woodland planting proposals that seek to address the requirement to promote the resilience of ecosystems. Some ongoing management would be required to maintain the value of the biodiversity enhancements, following the end of the aftercare period. The Final LEMP would provide details of long-term management. NRW has confirmed (RR-0.15) that it agrees with the conclusions in the ES and the recommendations and proposed principles for mitigation of

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			protected species in the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission).
2.5	The Applicant, NRW, DCC	**General** Paragraph 5.3.4 of NPS EN-1 states that the Applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. Please can you outline if and how does the application take advantage of opportunities to enhance biodiversity?	The Applicant has taken advantage of the opportunity to enhance biodiversity within the area around the Onshore Substation (OnSS). Proposals to provide biodiversity enhancement have been discussed with Natural Resources Wales (NRW) and Denbighshire County Council (DCC) via Onshore Ecology Expert Topic Group 5 (ETG 5) meetings held in November 2021 (APP-301). The proposals, which were agreed in principle with ETG 5 members, are presented within Section 7.1 and Figure 2 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). The oLEMP sets out the in-principle measures which will be implemented to avoid, reduce, mitigate or compensate for potential impacts on landscape and biodiversity resources and measures intended to provide biodiversity enhancements due to the onshore elements of AyM. The oLEMP sets out the key elements that will be secured in the final Landscape and Ecology Mitigation Plan (LEMP) which will be agreed with DCC, in consultation with NRW, prior to any construction works commencing. Proposals for biodiversity enhancements include: • Creation of five additional ponds/ pools located to the south east of the OnSS and ongoing management of the new ponds plus two existing ponds; • Creation of five reptile/amphibian hibernacula each measuring at least 1m^3 and constructed from on site materials including soil, logs, brash and stone; • Creation of twenty reptile/amphibian refugia, each comprising brash piles or log stacks, at least 0.25m$^{3;}$ • Erection of ten bat boxes (additional to those required as compensation for potential roost features (PRFs) to be lost) and ten bird boxes, including two pole mounted barn owl boxes; • Scrub management to promote structurally diverse grassland habitat and benefit reptiles and amphibians;

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			▲ Creation of 9.8ha of species-rich, lowland meadow Priority Habitat and 6.05ha of diverse neutral grassland, plus management thereafter to ensure its nature conservation interest is maintained; and ▲ Creation of 2.96ha of locally native broadleaved woodland, including locally sourced black poplar *Populus nigra*. NRW has confirmed (RR-0.15) that it agrees with the proposed principles for mitigation of protected species in the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission).
2.6	The Applicant	**General** Please can you identify if there is a recognised biodiversity metric tool (such as Natural England current biodiversity metric or similar) to calculate biodiversity net gain (or loss) for the project and whether you would be able to use it for the project. If no, please explain and describe how biodiversity net gain or loss of the project would be determined.	In Wales, there is currently no requirement within an ecological impact assessment to quantify losses and gains, e.g. using a metric, and the approach not to use a metric in this case has been agreed with NRW in December 2021 (APP-303). The Welsh Government has recently confirmed its approach to net benefits for biodiversity ('Welsh Government's Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System', CIEEM Briefing Paper, September 2022), which aligns with the qualitative approach the Applicant's assessment has used. The Welsh Government briefing paper states that: 'The net-benefits for biodiversity approach by Welsh Government has the same intent – to deliver an overall improvement in biodiversity - but does not utilise a metric. Instead, it puts the emphasis on proactive consideration of biodiversity and wider ecosystem benefits within a placemaking context early in the design process. The aim is that the planning system will encourage the use of high calibre ecological expertise and early discussions with planning teams to design developments on a case-by-case basis that positively impact ecosystem resilience.' In developing the proposed enhancement measures as set out in Section 7.1 and Figure 2 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), the Applicant has employed ecological specialists to undertake baseline ecology surveys (APP-125 to APP-134), an ecological assessment (APP-066), whilst engaging closely with Natural Resources

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			Wales (NRW) and Denbighshire County Council (DCC) (APP-301 and APP-025) to develop and agree the enhancement proposals. The Applicant considers that biodiversity net gain (net benefits for biodiversity if using Welsh Government terminology) has been achieved through the provision of enhancement measures that provide new benefits for biodiversity in addition to sufficient mitigation (to reduce and/ or eliminate the potential for significant effects) and compensation (to offset residual effects resulting in the loss of, or permanent damage to, ecological features despite mitigation). The Applicant has confirmed with NRW in December 2021 (APP-303) that: '*the mitigation/compensation/biodiversity enhancement quantum for the application is agreed and therefore meets the relevant Policy requirements*'. Given the agreement that has been reached to date with NRW and approach taken by the Welsh Government, the Applicant does not consider a metric-based approach is required to confirm AyM would deliver biodiversity net gain.
2.7	The Applicant	**General** Statutory / Non-statutory Nature Conservation Sites Plan [AS-010] Please can you address the following points: a) Sheet 1 of 11 - The legend does not reflect all hatch colours shown and the extents of SPA hatch appears to be different on sheets 2 and 3; b) Sheet 2 of 11 –does the drawn shape and extent of Local Wildlife Sites at western edge reflects y Ffrith D011; c) differentiate the woodland area to help identify other ancient semi-natural woodland, plantation on ancient woodland site and local other woodland; d) label the name of the other nature reserves on the relevant sheet.	The Applicant has provided a revised version of the Statutory / Non-statutory Nature Conservation Sites Plan at Document 1.29 of the Applicant's Deadline 1 submission to address the points raise by the ExA. In response to the specific points: a) The Applicant has reviewed the plan and can confirm the extent of the SPA on sheets 2 and 3 are the same (where the sheet views show the same information) and are therefore shown correctly. The Applicant has reviewed the colouring on Sheet 1. As sheet 1 is principally showing the offshore area it uses a nautical chart basemap. The nautical basemap is a dataset that cannot be amended, therefore any colouring in the base mapping, in addition to the hatch colours as displayed in the legend, cannot be removed. In order to display sheet 1 without this colouring the plan would need to be updated using the onshore basemap used for sheets 2 to 11, but this would remove all the offshore information on the nautical basemap. The Applicant has

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			therefore not revised the Sheet in the updated plan, in order to retain that information; b) The Applicant can confirm the drawn shape and extent of Local Wildlife Sites at western edge reflects y Ffrith D011. The updated plan includes an additional label for this Local Wildlife Site to make this clearer for the reader; c) The updated plan now differentiates: ▪ Ancient Semi Natural Woodland; ▪ Plantation on Ancient Woodland Site; ▪ Restored Ancient Woodland Site; ▪ Ancient Woodland Site of Unknown Category; and ▪ Woodland that is not listed in the Ancient Woodland Inventory. The Applicant has only made these changes to the woodland areas on the Statutory / Non-statutory Nature Conservation Sites Plan and has not made these changes to other updated plans submitted at Deadline 1. The differentiation of woodland types was not thought relevant to those other plans and would burden the mapping, drawing the reader from other more relevant information on those plans; and d) Additional labels have been added as required to ensure all sheets show labels for relevant designations.
2.8	NRW, JNCC, RSPB, NWWT	**Offshore – General** Are you satisfied that there is no disturbance assessment available to assess other construction activities such as drilling, dredging, vessel activity? If no, please explain your reasons and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. The Applicant notes that ES Chapter 7: Marine Mammals (AS-026) provides an assessment of the impact of disturbance from other construction activities on marine mammals. It is highlighted in (AS-026) paragraph 51 that: *"There is currently no guidance on the thresholds to be used to assess disturbance of marine mammals from drilling, dredging or vessel activity. Therefore, this impact assessment provides a qualitative assessment for these impacts. The assessment is based on the limited evidence that is*

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			available in the existing literature for that impact pathway and species combination, where available". Likewise, ES Chapter 7: Marine Mammals (AS-026) provides an assessment of the impact of disturbance from vessels on marine mammals (1.10.8 Disturbance from construction vessels). Disturbance from vessels is assessed as minor adverse for all species except grey seal, for which it is assessed as negligible adverse.
2.9	The Applicant	**Offshore – General** Please can you describe your approach to the marine environment and marine net gains principles.	The Applicant confirms that it is committed to reducing the environmental impact of the Project wherever possible, an example of this is where the offshore Project boundary has been refined to reduce the impact on the marine environment (the cable route selection process has for example avoided Constable Bank). The Applicant has been actively participating in the recent Marine Net Gain principles consultation and will continue to follow the development of this process. At present the Welsh equivalent of this process 'Net Benefits for Biodiversity' has not been established for the Marine Environment and there is therefore no requirement to include Marine Net Gain as part of the Project application. However, the Applicant will engage positively with the process when the approach has become clearer and stipulated within policy. However, the Applicant is cognisant that there are emerging solutions to ecological engineering for example, cable protection with biodiversity in mind. The Applicant will ensure these options are thoroughly appraised at post-consent (within the CSIP) when the specific cable protection design is to be agreed (see also Condition 20 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission)).
2.10	The Applicant	**Offshore – definition of MDS** In relation to piling for pin-piled multi-leg turbine foundations, Table 18, ES Chapter 7: Marine Mammals [AS-026] specifies a maximum of 200 legs in total. The ExA notes that the parameters set out in the draft outline Marine Mammal Mitigation Protocol [APP-107] (Table 3) specify 400 pin piles. Can the Applicant explain this apparent discrepancy and confirm the correct figure?	The value in the draft outline Marine Mammal Mitigation Protocol (APP-107) (Table 3) is incorrect. This should read: number of pin piles = 200 (50 WTGs, each with 4 pin piles legs = 200 pin piles total) and this is also referenced in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission). The Applicant can confirm that the other data in Table 3 is correct (total number of piling days). The Applicant can confirm that this error has no implications on the assessment or its conclusions.

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2.11	NRW, JNCC, NWWT	**Offshore - Baseline data and modelling** Are you satisfied with: a) the information contained in table 22, ES Volume 4 [APP-106] with the listed species, mu size and density estimates recommended for use in the quantitative impact assessment; b) the two modelling locations northwest & southeast of the array area represent the locations closest to important marine mammal areas; c) the swimming speeds per mammal assumed in the impact assessment. If no to any of the above points, please explain reasons and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. The modelling locations were agreed as appropriate via the Marine Ecology ETG (see the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303).
2.12	The Applicant	**Offshore - Baseline data and modelling** Please confirm SCANS II Block O common dolphin/km2 coverage. Is it 0.018km^2 or 0.0081 km^2? [APP-106]	The Applicant confirms that the correct value is 0.0081 dolphins/km^2 in SCANS II Block O. This value was obtained from Table 11 in: Burt, M., D. Borchers, and F. Samarra. 2006. SCANS II Appendix D3.4 Design-based abundance estimates from SCANS-II. The Applicant confirms that the value of 0.0081 was used in the quantitative impact assessment.
2.13	NRW, JNCC, NWWT	**Offshore – Marine Mammal** Are you satisfied that as there is no threshold for temporary threshold shift (TTS) onset (that would indicate a biological significant amount of TTS), it is not possible to carry out a quantitative assessment of magnitude or significance of the impact of TTS on marine mammals? [AS-026]. If no, please explain you reason and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. The Applicant highlights that the approach used in the ES follows the advice provided in: Natural England (2022) Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards Phase III: Expectations for data analysis and presentation at examination for offshore wind applications. "The Applicant should present the TTS ranges and assess the number of animals that may be exposed to TTS. However, TTS onset thresholds and the biological consequences of TTS are not currently understood (Faulkner et al., 2018), so there is not a requirement to assess the potential significance of this impact." Please note, in their section 42 response, JNCC stated that they were *"content for the TTS assessment to be qualitative in nature, on the basis*

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			that injury is defined as the onset of PTS, not TTS" (see APP-024 paragraph 302).
2.14	NRW, JNCC, NWWT	**Offshore – Marine Mammal** To assess potential for behaviour disturbance in marine mammals from unexploded ordnance (UXO) detonations the Applicant has presented impact assessment for 26km effective deterrence range (EDR) for high-order detonations; 5km EDR for low-order detonations; and TTS-onset thresholds for high-order detonations in [AS-026]. Are you satisfied with these assessments? If no, please explain the reasons and provide evidence justification.	The potential thresholds for the UXO disturbance assessment are detailed in (APP-108) ES Volume 4, Annex 7.3: Marine Mammal Quantitative Noise Impact Assessment – Assumptions, Limitations and Uncertainties. This includes assessment of the following thresholds: EDR, TTS, Lucke et al (2009), Level B harassment; as well as information on noise propagation models (e.g. Soloway & Dahl 2014). (AS-026) ES Volume 2 Chapter 7 Marine Mammals, Section 7.10.6 "Disturbance from UXO" assesses disturbance using a 26 km EDR (high order), a 5 km EDR (low order) and TTS-onset thresholds. The Applicant notes that NRW and JNCC differ in their opinion on the use of EDRs to assess disturbance, which is why a range of potential disturbance assessment methods were presented in the ES. 22/12/2021 - JNCC response to ETG actions: JNCC agreed with the use of EDRs to assess disturbance from UXO clearance.
2.15	The Applicant	**Offshore – Marine Mammal** Please can you confirm the assessment for Permanent Threshold Shift (PTS)-onset from unmitigated pile driving for Bottlenose dolphin, Common dolphin and Risso's dolphin? Paragraph 132 (page 128) concludes medium significance whilst table 25 (page 133) states significance is minor adverse significance [AS-026].	The Applicant confirms that the significance value is correct in Table 25 (Page 133). Paragraph 132 (Page 128) should read: "The magnitude of the impact has been assessed as negligible adverse and the sensitivity of receptors as medium. Therefore, the significance of the effect of PTS-onset from unmitigated pile driving for bottlenose, common and Risso's dolphins is concluded to be of Minor adverse significance, which is not significant in terms of the EIA regulations." This update has been made in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission). Table 11: Matrix to determine effect significance confirms that Negligible Magnitude + Medium Sensitivity = Minor Significance.
2.16	The Applicant	**Offshore – Marine Mammal** Please can you explain and describe the residual effects and any mitigation measures for marine mammals if jack-up barges are required in the shallow sub-tidal. (ES Volume 2, Chapter 1, paragraph 143 [APP-047]).	ES Volume 2 Chapter 7 Marine Mammals (AS-026) provides an assessment of vessel collision risk and vessel disturbance during construction (see AS-026 Section 1.10.7: Collision risk from construction vessel and Section 1.10.8: Disturbance from construction vessels). This assessment encompassed all vessel types associated with construction. The commitment to the

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			adoption of best practice vessel-handing protocols (e.g. following the Codes of Conduct provided by the WiSe Scheme, Scottish Marine Wildlife Watching Code or Guide to Best Practice for Watching Marine Wildlife) during construction will minimise the potential for any impact (see AS-026 Table 19: Mitigation measures relating to marine mammals). Once in-situ, it is not expected that jack-up barges would have any disturbance effect on marine mammals.
2.17	The Applicant	**Offshore- Marine Mammals** Please can you explain and provide evidence justification to address the NRW Relevant Representation [RR-015] that: a) The justification for the absence of Cumulative Permanent Threshold Shift (PTS) in the Habitats Regulations Assessment (HRA) is inadequate and as such the assessment is incomplete; b) There are insufficient grounds to conclude that PTS-onset risk has a negligible impact on harbour porpoise when cumulative PTS-onset has been excluded from the Marine Mammal Mitigation Protocol; c) That further modelling is required to inform the assessments of underwater noise and PTS onset; and d) There is insufficient justification to support a conclusion of no Likely Significant Effect from vessel collision for bottlenose dolphin, grey seal, or harbour porpoise features of relevant SACs.	The Applicant has responded in detail to the NRW Relevant Representation on these matters in Document 1.2 of the Applicant's Deadline 1 submission, which has included the provision of a Marine Mammal Clarification Note (Document 1.2 of the Applicant's Deadline 1 submission). The Clarification Note provides further justification for the Applicant's position on these matters, which can be summarised as follows: **Cumulative PTS** The Applicant will maintain awareness of current research and maintain ongoing dialogue with NRW post-consent to ensure that the final MMMP presents an updated assessment of cumulative PTS impact ranges and mitigation measures reflecting the state of knowledge and best modelling practice available at the time. Thus, the Applicant can confirm that cumulative PTS will be mitigated in the final MMMP if guidance and evidence at the time suggest that it is appropriate to do so. Therefore, it remains the case that the magnitude of PTS impact is negligible to all marine mammal species. **Vessel collision LSE** The Applicant notes that the issue of concern here is the fact that the Applicant used the commitment to best practice vessel handing protocols to scope out LSE. NRW have highlighted that commitment to embedded mitigation cannot be used to scope out an impact from LSE. Thus, additional text is provided in the Marine Mammal Clarification Note (Document 1.2 of the Applicant's Deadline 1 submission) to justify the conclusion. Discussion with NRW on this matter in post-application consultation has highlighted that

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			NRW are now broadly content with the statement, and it is expected that this will be closed out via the SoCG.
2.18	NRW	**Offshore – Marine Mammals** With reference to your Relevant Representation [RR-015] please can you explain with evidence justification: a) What is meant by "*area-based assessment should be carried out where the extent of habitat that is insonified to a level that might produce significant disturbance is determined*"; b) the alternative to the "*use of dose/response curves to conduct an area-based assessment to estimate area of harbour porpoise habitat disturbed*"; and c) your reasons for "*insufficient justification to support a conclusion of no Likely Significant Effect from vessel collision for bottlenose dolphin, grey seal or harbour porpoise features of relevant SACs*".	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. These topics were discussed with NRW at the meeting: Awel y Môr Offshore Wind Farm - NRW discussion on Representations (Marine Ecology) on 6 September 2022. Responses to these specific points have been detailed in the Marine Mammal Clarification Note (Document 1.2 of the Applicant's Deadline 1 submission).
2.19	NRW, JNCC, NWWT	**Offshore – Marine Mammals** Draft Outline Marine Mammal Mitigation Protocol - Paragraph 20 [APP-107] states "Given these levels of uncertainty and over-precaution, and given that this is an evolving field of research, the Project does not consider it necessary to commit to mitigating cumulative PTS-onset at this stage". Please can you respond to this statement and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. The Applicant refers the ExA to its response to ExQ1.2.17 on this matter.
2.20	The Applicant	**Offshore - Marine Mammals** Please can you explain the reason for residual effects for Bottlenose dolphin, Common dolphin and Risso's dolphin in table 6 [AS-028] (being all minor adverse) whilst significance in table 5 [APP-107] for bottlenose dolphin, common dolphin and Risso's dolphin are all negligible adverse significance.	The Applicant confirms this is an error in Table 5 of APP-107. The correct conclusions for dolphin species for PTS from piling is: • Magnitude = Negligible; • Sensitivity = Medium; and • Significance = Minor (adverse). This update has been noted in the Application Errata List (Document 1.4 of the Applications Dadline 1 submission.
2.21	The Applicant	**Offshore - Marine Mammals** Please can you explain and provide evidence for the marine mammal underwater noise impact assessment approach for offshore archaeological works and residual effects?	The Applicant is not sure what the ExA is referring to as there are no "archaeological works" as such. Disturbance from geophysical surveys is not considered to result in significant disturbance and was therefore scoped out of assessment. In relation to the clearance of Unexploded Ordnance (UXO), this has been assessed (but will be licensed separately)

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			in Section 7.10.5 and 7.10.6 of the Marine Mammals chapter of the ES (AS-026). The Applicant cross refers the ExA to its response to ExQ1.2.14 on this matter.
2.22	The Applicant	**Offshore – Marine Mammals** Please can you explain and describe the marine mammals impact assessment to the works associated with the WTC Array that overlaps with the Liverpool Bay Sludge B site?	The Liverpool Bay Sludge B Site is closed and so was not a material consideration in the CEA. Therefore, there was no required impact assessment for marine mammals from this site.
2.23	NRW, JNCC, NWWT	**Offshore – Marine Mammals** Are you satisfied with the list of projects in [AS-026] screened into the marine cumulative effects assessment (CEA) for disturbance from underwater noise? If not, please explain your reasons and provide evidence justification.	N/A
2.24	The Applicant	**Offshore – Marine Mammals** Please can you provide a definition of WCS. (Paragraph 9 [APP-107])	The Applicant confirms that the WCS (Worst-case Scenario) is the same as the MDS (Maximum Design Scenario). MDS is defined in the ES as: "*The maximum design parameters of the combined project assets that result in the greatest potential for change in relation to the impacts assessed*". In the draft MMMP (APP-107) the MDS is described fully in Table 2 (Monopile MDS parameters) and Table 3 (Pin-pile MDS parameters).
2.25	The Applicant	**Offshore – Marine Mammals** Please explain why ES Volume 2 Chapter 7 assessment of disturbance from piling includes the use of the interim PCOD modelling for bottlenose dolphins and grey seals but not for harbour porpoise.	The Applicant confirms that the decision to conduct iPCoD modelling was based on the proportion of the MU that was predicted to be impacted by disturbance. For both bottlenose dolphins and grey seals, the portion of the MU predicted to be disturbed per piling day was >1% and thus it was deemed prudent to conduct population modelling to confirm that this resulted in no significant impact to the MU population. For harbour porpoise, using the JCP data tool density estimate of 0.13 porpoise/km^2, the portion of the MU predicted to be impacted was <1% and thus it was not expected that this would result in a population level effect. Using the SWF density estimate (1 porpoise/km^2), the proportion of the MU predicted to be impacted reached 3.38%, however, since this density estimate was considered to be highly precautionary, iPCoD was not run. For completeness, this has now been run and the results have been

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			included in the Marine Mammal Clarification Note (Document 1.2 of the Applicant's Deadline 1 submission). The additional iPCoD modelling resulted in no population level change and thus the conclusions presented in the marine mammal impact assessment (ES Volume 2, Chapter 7 marine mammals (AS-027)) therefore remain the same (Magnitude = Medium, Sensitivity = Low, Significance = minor adverse significance, which is not significant in terms of the EIA regulations). In post-application consultation with NRW, it is noted that NRW agree with this clarification in principle, and this will be confirmed through NRW's Written Representation and will form a statement in the SoCG.
2.26	NRW, JNCC, NWWT	**Offshore – Marine Mammals** Are you satisfied with: a) The impact magnitude definitions given in Table 9, [AS-026]; and b) The description/reason in Table 10 Sensitivity/importance of the environment? [AS- 026]. If not, please explain your reasons and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. Agreement on marine mammal sensitivity definitions was reached with NRW and JNCC via the Evidence Plan process (APP-301, APP-302 and APP-303). This was confirmed in the NRW and JNCC responses received Jan 2020 to the PTS sensitivity note submitted (see AS-026, Table 3: Summary of consultation relating to marine mammals).
2.27	The Applicant	**Offshore – Marine Mammals** Paragraph 55 [APP-026] states "the magnitude of potential impacts is defined by a series of factors including the spatial extent of any interaction, the likelihood, duration, frequency and reversibility of a potential impact". Please can you list any other factors that have been considered.	The Applicant can confirm that the magnitude of potential impacts was also informed by the predicted extent of the change in behaviour and distribution of individuals with regards to the favourable conservation status of the species and/or the long-term viability of the population.
2.28	The Applicant	**Offshore – Marine Mammals** For inter-related effects [APP-060] please can you confirm: a) If the interaction of underwater noise, vessel interactions, and effects on prey species during construction may lead to effects of greater significance on marine mammals; b) The significance of effects pre mitigation and post mitigation.	a) Table 6 of the Inter-relationships chapter of the ES (APP-060) confirms that the interaction would not lead to effects of greater significance than when considered in isolation. b) The mitigation measures are considered to be embedded into the assessment in order to ensure that there will not be significant effects on marine mammals. The mitigation measures are expected to form licence conditions of any Marine Licence granted by NRW and therefore will be in place regardless of any assessment in the absence of mitigation. Because these measures will be required in

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			order to meet European Protected Species (EPS) licensing requirements, they are considered to be embedded mitigation measures inherent in the assessment, rather than additional mitigation applied after the assessment in absence of mitigation.
2.29	The Applicant	**Offshore – Marine Mammals** Please can you confirm if the noise levels per construction activity source as listed in Table 39, [AS-026] will be validated and monitored during the works. If no, please explain your reasons and provide evidence justification.	The Applicant can confirm that NRW are expected specify the noise monitoring requirements within Marine Licence granted (see Document 1.24 of the Applicant's Deadline 1 submission). Typically for offshore wind farm projects across the UK there is a requirement to measure the underwater noise from the installation of the first four piles for each foundation type, or a representative number of pile locations, or the four largest piles. There has never (to our knowledge) been a requirement for an offshore wind farm project within the UK to measure anything beyond a specified number of piles for WTG and/or Met Mast foundations. The Applicant would expect NRW to adopt a standard approach to its monitoring requirement in any Marine Licence granted.
2.30	The Applicant	**Offshore – Mitigation** Please can you advise on key competencies (such as skills, knowledge, experience, qualification, and behaviour) to undertake specialist role of marine mammal observer (MMOb) and how it is secured in the dDCO [AS-014]?	JNCC (2010) Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise states the following: • Marine Mammal Observer (MMO): Individual responsible for conducting visual watches for marine mammals. It may be requested that observers are trained, dedicated and/or experienced. The MMO may also be a PAM operative; • Trained MMO: Has been on a JNCC recognised course; • Dedicated MMO: Trained observer whose role on board is to conduct visual watches for marine mammals (although it could double up as a PAM operative); and • Experienced MMO: Trained observer with 3 years of field experience observing for marine mammals, and practical experience of implementing the JNCC guidelines. The requirement for the MMOb is set out within the MMMP, which is anticipated to be a requirement of any Marine Licence issued by NRW (see APP-107 and Document 1.24 of the Applicant's Deadline 1 submission).
2.31	The Applicant, NRW	**Offshore – Mitigation** [AS-026] (Table 3) states that "*NRW agreed with the proposed*	The Applicant cross refers the ExA to its response to ExQ1.2.1.

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		approach to incorporation of ADDs [acoustic deterrent devices] *into the MMMP*". The draft outline Marine Management Mitigation Protocol (MMMP) suggests some uncertainty as to whether an ADD is to be delivered – for example, paragraph 32 states "*If an ADD is chosen as part of the suite of mitigation* *measures set out in the final MMMP…*". a) Can the Applicant explain what factors would affect the decision on whether to select an ADD as part of the suite of mitigation measures set out in the final MMMP? b) Can the Applicant and NRW comment on whether it is necessary to secure provision of an ADD through the DCO?	a) The potential use of ADDs as mitigation will be determined in the final MMMP once updated underwater noise modelling has been undertaken on the final piling parameters. The use of ADDs will be assessed considering the mitigation efficacy for the final mitigation zone but also balancing the potential for disturbance resulting from the use of the ADDs. The final mitigation measures will be discussed and agreed with NRW at the time of drafting the final MMMP in the detailed design phase (see Document 1.24 of the Applicant's Deadline 1 submission). b) ADDs are not considered to be required in the DCO as they will be adequately secured via the MMMP, which will be secured as a standard condition of any Marine Licence granted by NRW (see APP-107 and Document 1.24 of the Applicant's Deadline 1 submission.
2.32	The Applicant	**Offshore – Mitigation** Sections 1.11 and 1.12 of [APP-107] describe proposed monitoring for marine mammals, pre- piling and during the soft-start period. Should any unexpected changes in animal behaviour be noted during the soft-start period, what (if any) actions would be undertaken in response?	The Applicant can confirm that the detail of marine mammal monitoring prior to and during soft-start period will be set out in detail within the MMMP (see APP-107 and Document 1.24 of the Applicant's Deadline 1 submission). The monitoring would typically be undertaken using MMObs and or Passive Acoustic Monitoring Systems (PAMS) to detect mammal presence / absence. In terms of a response, should a mammal enter the mitigation zone, it is standard practice to follow the JNCC (2010) Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise, which states the following: *"If a marine mammal enters the mitigation zone during the soft-start then, whenever possible, the piling operation should cease, or at the least the power should not be further increased until the marine mammal exists the mitigation zone, and there is no further detection for 20 minutes. The feasibility of this approach should be agreed with the relevant agency and regulator as part of the approval process. It is recognised that the ability to cease operations may be constrained by the substrate type or pile design."*
2.33	The Applicant	**Offshore – Marine Management Mitigation Protocol** Table 18 of [AS-026] specifies MDS parameters in respect of piling for the cofferdam. Can the Applicant update the draft outline	The Applicant can confirm that a MMMP will be required for any piling associated with a cofferdam, if it is included within the final scheme design. If piling for a cofferdam is required, provisions relevant to the

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		Marine Mammal Mitigation Protocol [APP-107] to include these parameters?	activity will be applied in agreement with NRW, including a cofferdam-piling specific MMMP, if necessary. The Applicant highlights that the maximum PTS-onset impact ranges from cofferdam sheet piling are <100 m (see Table 24 of (AS-026)) and thus the impact of PTS-onset from piling of sheet piles for all marine mammal species is assessed as having a negligible adverse magnitude. Therefore, additional mitigation in the MMMP is not required to reduce the risk of PTS to negligible levels.
2.34	The Applicant	**Offshore – Mitigation** The Cable Specification and Installation Plan (CSIP) (anticipated to be secured as a Marine Licence condition) would also ensure that cable crossings are appropriately designed to mitigate environmental effects. Please can you explain with evidence justification of appropriate design to mitigate environmental effects.	The CSIP is required to specify to NRW the final design of the offshore cables, including details of their installation methods, including at cable crossings. The CSIP will also include a detailed Cable Burial Risk Assessment (CBRA) highlighting where cables can be buried to the required target depth, and where any additional cable protection is required in order to ensure asset integrity. The CSIP is not required as mitigation for environmental effects but will ensure that the final design is within the design envelope assessed in the ES, which has assessed a worst-case and concluded no significant adverse effects on the marine environment from subsea cables or cable crossings. This condition is suggested in Condition 20 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission).
2.35	The Applicant	**Offshore – Mitigation** Table 63: Summary of effects in Offshore ornithology [APP-050] states N/A but [APP-310] states the following mitigation measures for Offshore Ornithology, a minimum blade clearance of 22m above mean high water springs, a Project Environmental Management Plan (that will include a Marine Pollution Contingency Plan), and a Scour Protection Management Plan. Please can you confirm the mitigation measures (if any) used to determine the range of residual effects for offshore ornithology.	The mitigation measures outlined within 8.11 Schedule of Mitigation (PINS ref: APP-310) relate to project specific minimum design requirements (a minimum blade clearance of 22 m) and required managements plans. Although these may offer benefits to reduce potential effects on offshore ornithology receptors, they are not considered additional mitigation, as they are embedded within the project design plans, hence being referred to in Volume 2, Chapter 4: Offshore Ornithology (APP-050) as N/A. The Applicant has provided a revised Schedule of Mitigation (Document 1.18 of the Applicant's Deadline 1 submission) and a list of anticipated conditions in the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission).
2.36	The Applicant	**Offshore – Mitigation** [APP-310] states a scour protection management plan would be secured through the Marine Licence. The Marine Licence	A scour protection management plan (or similar) is anticipated to be secured as a standard condition of any Marine Licence granted by NRW in order to ensure the relevant controls are in place to protect asset

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		principles [AS-023] references to scour protection management plan and swath bathymetric survey on sample of turbines and says that is not anticipated to be needed given minimal scour predictions. Please can you confirm whether the scour protection management plan is a mitigation measure.	integrity from scour effects. Whilst this mitigation is not necessary to mitigate significant adverse effects in EIA terms, the plan does ensure impacts on benthic ecology via scour are minimised.
2.37	NRW	**Offshore – Monitoring** Could NRW comment on the scope of the proposed monitoring during piling procedures, as described in Volume 4: Annex 7.2: Draft Outline Marine Mammal Mitigation Protocol [APP- 107]?	The Applicant notes that the monitoring during piling presented in the draft MMMP (APP-107) is in line with that outlined in JNCC (2010) Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise.
2.38	RSPB	**Offshore – Ornithology** Are you satisfied with the applicant's approach to Statutory Nature Conservation Bodies Interim Advice on The Treatment of Displacement for Red-Throated Diver (2022)? If not, please explain your reasons and provide evidence in justification.	The Applicant undertook the 24 months of aerial digital surveys prior to the update to the Statutory Nature Conservation Bodies Interim Advice on The Treatment of Displacement for Red-Throated Diver (2022). Prior to commencement of the digital aerial surveys, the Applicant consulted with the Offshore Ornithology ETG members (including RSPB) on the most appropriate survey buffers to ensure any displacement effects on red-throated diver can be appropriately assessed. As stated within Volume 4, Annex 4.5: Offshore Scoping and Consultation Responses (APP-099), an asymmetric 8 km buffer was agreed with NRW as the relevant SNCB as appropriate for characterisation and assessment for AyM.
2.39	NRW, JNCC, RSPB, NWWT	**Offshore – Ornithology** Are you satisfied with the existing baseline data and for a future baseline to be informed by extrapolation of the currently available data by reference to policy and plans, other proposal applications and expert judgement? (Paragraph 40, [APP-050]). If not, please explain your reasons and provide evidence justification.	As detailed in Volume 4, Annex 4.5: Offshore Scoping and Consultation Responses (APP-099), during ETG#1 the Applicant and the Offshore Ornithology ETG discussed and agreed on which data sources are required to inform baseline characterisation for AyM.
2.40	The Applicant	**Offshore – Ornithology** Table 1 turbine and array parameters used to inform Collision Risk Models (CRM) [APP-097] references to mean, minimum and maximum rotor radius of 125m. Please can you explain the reason and describe the effects of a different rotor radius in the collision risk model if the rotor radius was 153m (to reflect table 16 design envelope for WTS's of larger WTG rotor diameter of 306m) [APP-047].	The Applicant's rationale for modelling using the 125 m rotor radius scenario was due to this design being the worst-case scenario in terms of predicted collisions per annum. Using kittiwake as an example the difference in predicted collisions between the two design envelopes in Table 16 of Volume 2, Chapter 1: Offshore Project Description (APP-047) is approximately 38 collisions per annum for the larger WTG (153 m rotor radius), whereas for the smaller WTG (125 m rotor radius) the annual predicted collisions is approximately 54 collision per annum. The main

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			factor causing the difference between the two scenarios is the number of turbines. The larger WTG design envelope has fewer turbines (34 vs. 50) which means an overall reduction in the potential collision zones within the array area. If the number of turbines remained the same for the two design envelopes, there would still only be a minor difference between the two scenarios. This is because the minimum air gap (22 m above Mean High Water Springs (MHWS)) between the lower blade tip height and the MHWS sea level remains the same for both designs. There will be a minor increase in the number of predicted collisions due to the wider collision zone above 22 m using the larger WTG design. Due to the majority of seabirds being predicted to fly below 22 m (for kittiwake 87% predicted to fly at a height between 1 – 22 m) using the Johnston *et al.,* (2014) dataset this would not be significant. The parameters secured in Requirement 2 of the dDCO (Document 1.8 of the Applicant's Deadline 1 submission), including maximum rotor diameter, minimum blade tip height and maximum total rotor swept area ensure that the final design will not result in greater environmental effects beyond the worst-case assessed.
2.41	NRW, JNCC, RSPB, NWWT	**Offshore – Ornithology** Are you satisfied: a) That the site-specific baseline surveys and sample sizes could not be used to accurately calculate site-specific flight heights for the four species selected for CRM, and consequently band 2 and 3 were applied and presented in the report? Paragraph 2.1 [APP-097]; b) With the list of migratory birds screened in for modelling migropath and broad front modelling in table 1 in ES Volume 4 [APP-098]; c) With the worked example for apportioning gannet collision mortalities to colonies during migration free breeding season (April to August) table 1 [APP-032]; and d) With the potential likely significant effects listed within the Matrixes? ES Report 5.2 [APP-033].	It is acknowledged that this Question is not directed at the Applicant but has provided the following response which may be useful context for the ExA. a) As detailed in Volume 4, Annex 4.5: Offshore Scoping and Consultation Responses (APP-099), it was agreed between the Offshore Ornithology ETG and the Applicant during ETG#3 that he Jonhston *et al.,* (2014) would be the most appropriate datasets for informing flight heights. b) The Applicant shared the screening matrix of migrant species scoped in and out for assessment with the Offshore Ornithology ETG for discussion. As detailed in Volume 4, Annex 4.5: Offshore Scoping and Consultation Responses (APP-099), the Applicant included pintail within migratory assessments at the request of NRW. The Applicant also provided a response to JNCC as to why some of the species they queried were screened out, further details of which can be found in Appendix A of Volume 4, Annex 4.4: Migratory Collision Risk Modelling (APP-097).

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		If not, please explain your reasons and provide evidence justification.	c) The Applicant intends to provide an update to the Ornithology Apportioning Note at the request of JNCC in response to technical feedback via their Marine Licence response to provide the apportionment calculations for review for all offshore ornithology receptors and this will be submitted to the ExA at a subsequent Examination deadline for completeness. d) The potential likely significant effects listed within the screening matrices were consulted on during the consultation process as detailed in Table 1 of Report 5.2: Report to Inform Appropriate Assessment (APP-027).
2.42	The Applicant	**Offshore – Ornithology** It is referenced in paragraph 441 [APP-050] that there would be likely temporal overlap within the operational phases of some of the Irish offshore renewable energy projects and that consideration of potential transboundary effects is limited by the data available upon which to base the assessment. Please can you explain the reasons for not including offshore ornithology monitoring [APP-311].	The Applicant reviewed the status and available data from all Irish offshore renewable energy projects for the potential for any transboundary effects. At the point of application, no data were available on the potential level of impacts from any Irish offshore renewable energy projects, which is the reason for such data not being included within AyM assessments. The Applicant expects an ornithological monitoring plan to be secured as a condition of any Marine Licence granted by NRW as part of the monitoring programme referenced in Condition 34 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission).
2.43	The Applicant	**Onshore – General** Please can you check paragraph 115, reference to habitat survey report application ref: 6.5.5.3 (should it be 6.5.5.2?) (APP-066).	The Applicant confirms that paragraph 115 (APP-066) should indeed reference 6.5.5.2 (APP-125) and has included this in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
2.44	The Applicant	**Onshore – General** Please can you review and cross check the information in the following 3 tables and address any inconsistencies: ES Volume 3, Chapter 13, Table 5 [APP-074], Table 15 and Table 21 [APP-066].	The Applicant has reviewed and cross-checked information in the referenced tables and confirms that there are a number of instances where summary and conclusion information presented in ES, Volume 3, Chapter 13: Onshore Conclusions (APP-074), does not match similar conclusions tables within ES Volume 3, Chapters 2 to 12 (APP-063 to APP-073). This relates to relevant or contextual information being removed when summarising for the conclusions chapter, however, summary tables within Chapters 2 to 12 retain this information and, except where stated in responses to questions, are correct. These inconsistencies have been corrected within the table of residual effects as identified within the ES in document 1.47 of the Applicant's Deadline 1 submission

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			The Applicant can confirm that the number of trees stated in relation to the Section 7 habitat hedgerows (all three tables) relates only to those trees which include potential roost features for bats; additional trees may also be present and/or affected but have not been explicitly counted. In addition, in relation to bats, the number of trees with potential for roosting bats that would be lost should read 49 rather than 41, as stated in Tables 16 and 21 in ES Volume 3 Chapter 5 (APP-066) and Table 5 in ES Volume 3 Chapter 13 (APP-074). These errors have been included in the Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
2.45	The Applicant	**Onshore – General** Please can you confirm the reference for the results of wintering bird surveys? ES Volume 3, Chapter 5 paragraph 148 appears to refer to ES Volume 5, Annex 5.2 application ref: 5.5.5.2 rather than ES Volume 5, Annex 5.3 application ref 6.5.5.3.	The Applicant confirms that paragraph 148 (APP-066) should indeed reference 6.5.5.3 (APP-126) and has included this in the Errata sheet (Document 1.4 of the Applicant's Deadline 1 submission).
2.46	The Applicant	**Onshore – General** a) Please can you confirm definition of "*All important ecological features*" - under operation heading Table 5, section 13.3.5 [APP-074] b) Should this definition be added to the dDCO?	a) The term 'All Important Ecological Features' used in the Operation, Decommissioning and Cumulative Effects sections of Table 5 (APP-074) refers to all of the important ecological features listed specifically within the Construction section of the same table. The process for identifying Important Ecological Features is defined in Section 5.5.1 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) and Important Ecological Features considered in the EIA are listed in Table 11 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). b) Based on the above, and as they are not related to R14 and R15 the Applicant does not consider that the term 'All Important Ecological Features' needs to be added to the dDCO.
2.47	The Applicant	**Onshore – General** Under decommissioning heading in Table 5, section 13.3.5 [APP-074] please can you explain and describe which cases would be similar in impact magnitude and which cases would be much lower during construction.	Under the decommissioning heading in Table 5 in ES, Volume 3, Chapter 13: Onshore Conclusions (APP-074), the potential impacts that could affect all important ecological features are identified as "similar to construction but in most cases impact magnitude will be much lower than during construction". Table 12 of ES Volume 3 Chapter 5 (APP-066) sets out in more detail that decommissioning impacts are likely to be similar in nature to those during construction but would be more limited in geographical extent and

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			timescale. This is based upon the premise that removal of the OnSS including areas of hardstanding would occur, however, buried cables would be de-energized with the ends sealed and left in place to avoid ground disturbance. TJBs would also be left in place. Further explanation is provided below: **Permanent and temporary loss of important habitat** ▲ Less impact magnitude compared with construction impacts; and ▲ Due to the significantly smaller extent across which impacts could occur. **Indirect impacts to Bryn Cwnin Wetland CWS** ▲ Less impact magnitude compared with construction impacts; and ▲ Since this CWS is along the onshore ECC which is being left in place, there are no anticipated decommissioning impacts to it. **Impacts upon protected or notable species or upon their resting or breeding sites, including habitat fragmentation and isolation** ▲ Less impact magnitude compared with construction impacts; and ▲ Due to the significantly smaller extent across which impacts could occur. **Spread of invasive non-native species** ▲ Equal or Less impact magnitude compared with construction impacts; and ▲ It would be a significantly smaller extent across which impacts could occur. However, depending on the species and location of INNS spread, the magnitude may equal that possible during construction. **Accidental pollution** ▲ Equal or less; and ▲ It would be a significantly smaller extent across which impacts could occur. However, depending on the type and location of an accidental pollution occurrence, the magnitude may equal that possible during construction.
2.48	The Applicant	**Onshore – General** Please can you provide a plan drawing identifying the areas deemed a) Temporary; and	The Applicant has provided a revised version of the outline Landscape and Ecology Management Plan (oLEMP) (APP-305) with updated Figures 3 to 7 showing the temporary and permanent mitigation areas, noting that

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		b) Permanent mitigation and compensation works. to help clarify and address Work No. 41 – Access roads to provide operational access from the public highways to Work Nos. 4 to 40 and any associated development, and in connection with Work Nos. 4 to 41 provision of temporary and permanent ecological and environmental mitigation and compensation works [AS-014].	mitigation could also be provided within areas of the onshore ECC. This is Document 1.33 of the Applicant's Deadline 1 submission.
2.49	The Applicant	**Onshore – General** Please can you provide or draw attention to a plan drawing labelling the main woodlands as referenced in table 3-2 main woodlands within survey area in the Habitat and Hedgerow Survey Report [APP-125].	The Applicant has provided a plan showing the location of the main woodlands (See Appendix H of this document).
2.50	The Applicant	**Onshore – Mitigation - Outline Landscape and Ecology Management Plan [APP-305]** Please could you: a) Identify the type of habitat creation and ecological measures deemed to be potential temporary mitigation area as shown on Figures 3-7; b) Identify wildlife corridor connectivity, sheltering, foraging habitats during construction and operation; c) Explain and describe habitat management and monitoring regimes including any habitats and species targets; d) Explain and describe the methodologies including any established best practices/ guidelines employed for creating the habitats; e) Explain if all of the "if required" mitigation measures are to be shown on the Figures 3-7 as Potential Temporary Mitigation Areas. For example, ES Volume 3, Chapter 5 (APP-066), mentions that a mitigation measure for HDD pits and other working areas at the landfall and River Clwyd crossing would be screened if required, however this potential temporary mitigation area does not seem to be indicated on the relevant figure; f) Confirm the survey area for preconstruction surveys for Bats i.e. DOL or OL; and g) Table 1: Pre-Construction Surveys states the survey timings	Full details are not considered necessary at this stage and will be provided in the Final Landscape and Ecology Management Plan that will be secured by DCO R13 and prepared in light of pre-construction survey results and detailed design information, in collaboration with key stakeholders. However, the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) has been updated to provide additional clarity, as follows: a) The areas identified as "Potential Temporary Mitigation Areas" on Figures 3 -7 are to allow for the following: **Reptiles** In the event that a reptile(s) is discovered whilst undertaking reasonable avoidance measures or during construction, it would be removed by the ECoW to the nearest area of suitable habitat, within the temporary mitigation areas shown on Figures 2 – 7 in respect of the route. At the OnSS, it would be removed to a refugia or hibernaculae within the nearest habitat enhancement area, shown on Figure 2 of the oLEMP. **Great Crested Newt** Great crested newt mitigation, as described in Section 6.3.1 of the Outline Landscape and Ecology Management Plan (oLEMP) APP-305. Depending on the outcome of pre-construction surveys, cropland or agricultural grassland habitats within these areas would

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		during the season prior to construction commencing. Confirm the survey timings for Preliminary works.	be managed for the benefit of great crested newts. Temporary mitigation measures may also include provision of refugia and/or hibernaculae at field boundaries. **Water Vole** Reasonable avoidance measures for water vole would be accommodated within the corridor. At the Glanfyddion Cut where a single outfall is proposed outside of the corridor, an additional area for temporary mitigation for water vole has been allowed for, as a precautionary measure in the event the species is present at the location at the time of construction and impacts cannot be avoided. The applicant has provided a plan specifying these areas in the response to ExQ1.2.48. b) c) d) These elements will be addressed in the Final LEMP. e) Figures 3-7 do not show all the "if required" mitigation measures. The Final LEMP will provide full detail of all mitigation measures. f) The Applicant confirms that Table 1 of the oLEMP (APP-305) should reference OL not DOL and has included this within the updated oLEMP that is provided at Deadline 1 (Document 1.33 of the Applicant's Deadline 1 submission). g) "Pre-construction Surveys" will occur during the season prior to any ground or vegetation disturbance associated with the project, whether part of construction or preliminary works.
2.51	The Applicant	**Onshore – Mitigation** The Outline Invasive Non-Native Species Management Plan [APP-323] references to general control measures, biosecurity and monitoring. Please can you explain and describe your approach to treatment and removal of INNS required as a result of the works and the environmental impact assessment.	As stated in Section 3.1 of the Outline Invasive Non-Native Species Management Plan (oINNSMP) (APP-323; Document 1.39 of the Applicant's Deadline 1 submission) a pre-construction survey will be undertaken to establish the location and level of infestation of any invasive non-native species (INNS) that could be disturbed or mobilised by construction work. The final scheme design and the results of the pre-construction survey will determine the location and nature of any INNS that may be affected and methods for their treatment and removal would be confirmed at that stage. To illustrate the methods that may be used, information on treatment and/or removal is provided below for INNS listed on Schedule 9

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			of the Wildlife & Countryside Act 1991 (as amended) that have previously been identified within the AyM ecology survey areas (see Section 2 of the oINNSMP (APP-323; Document 1.39 of the Applicant's Deadline 1 submission)). The actual methods to be employed for the treatment and removal of any identified INNS will be agreed with Denbighshire County Council (DCC), in consultation with Natural Resources Wales (NRW), via approval of DCO R10. <u>Japanese knotweed.</u> In the case of Japanese knotweed a specialist eradication company would be employed and a suitable strategy for removal and disposal would be determined through consideration of the location and extent of any stands in relation to construction works. The method used would be either the "dig and dump" method or could use an alternative method such as Xtract™. The "dig and dump" method removes all Japanese knotweed and the appropriate volume of soil based on the size/extent of the Japanese knotweed stands which is removed by a suitably licenced carrier to be disposed of at a licensed waste disposal facility. The Xtract™ method enables the removal of just the viable rhizome thereby avoiding the need to consign vast quantities of affected soil to landfill. The rhizomes are removed off site and disposed of by the contractor via a licenced waste disposal facility. <u>Giant Hogweed.</u> In this case it is assumed that the location where the giant hogweed is located would be directly impacted and therefore treatment in-situ via methods such as chemical treatment would not be an option. Therefore, treatment would be via dig and dump to ensure that all plant material and any seed within the soil are removed. The soil and plant material would be taken to a suitably licenced waste disposal facility. It is anticipated that the specialist eradication company would be employed, as for Japanese knotweed, and that they would determine the extent of soil to be removed with the plant material, this would be based on the size and extent of the stand of giant hogweed. Extra precautions for staff would be employed due to the H&S risks giant hogweed poses.

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			Other INNS For other terrestrial INNS identified within the AyM ecology survey areas that spread via underground roots or rhizomes, such as Japanese rose and Hottentot fig, a bespoke strategy would be developed but would likely involve the careful removal and disposal of the plants and soil immediately surrounding their roots to a suitably licensed waste disposal facility. For terrestrial species such as Rhododendron and Himalayan balsam, which spread via viable seed, the bespoke strategy would likely involve removal of the plants at a time of year prior to them setting seed. Aquatic INNS such as water fern and floating pennywort are restricted to ponds and are unlikely to be affected by construction works. The information provided above has been included within an amended version of the oINNSMP (APP-323; Document 1.39 of the Applicant's Deadline 1 submission).
2.52	The Applicant	**Onshore – Mitigation** Please can you advise on key competencies (such as skills, knowledge, experience, qualification, and behaviour) to undertake specialist roles of Ecological Clerk of works (ECoW) and how it is secured in the dDCO [AS-014]?	It is anticipated that an Ecological Clerk of Works (ECoW) team would be required, with the lead ECoW delegating duties to an appropriately skilled and experienced deputy/assistant ECoW(s), where necessary. The lead Ecological Clerk of Works (ECoW) would be expected to have a minimum of three years' experience as a professional ecologist including suitable ECoW experience, preferably on large linear infrastructure projects with knowledge of Welsh ecological policy and legislation. The lead ECoW would be a member or an appropriate professional body, in the case of the Chartered Institute of Ecology and Environmental Management this would be Associate grade (ACIEEM) or above. They would also hold a CSCS card (or equivalent). Deputy/assistant ECoWs would also be expected to possess a suitable qualification and/or relevant professional experience. Curriculum vitae (CVs) for the lead ECoW and other members of the ECoW team would be provided to Denbighshire County Council (DCC) in consultation with Natural Resources Wales (NRW) for approval, prior to construction commencing, thereby ensuring that proposed ECoW team members are suitably qualified and experienced. The Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) has been

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			updated, and a revised version provided at Deadline 1, to include the information above and so this will be secured by DCO R13.
2.53	The Applicant	**Onshore – Mitigation** Please can you describe what the reasonable avoidance measures to minimise impact for other S7 Mammals would be? (APP-066).	As noted in Table 13 of ES Volume 3, Chapter 5, Biodiversity and Nature Conservation (APP-066), and Section 6.3.8 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), checks for the presence of hedgehogs, polecats and hares will be carried out by the ECOW prior to vegetation clearance. Reasonable avoidance measures that would be employed if these species are present would be as follows: Hedgehog: Towards the end of the autumn period (typically in November but dependant on temperature), all suitable habitat for hedgehogs to use for hibernating, such as tree roots, hedgerows, old mammal burrows, under timber buildings or compost heaps will be removed where possible thus minimising the risk of any hedgehogs hibernating within the development site (British Hedgehog Preservation Society 2009 *Hibernation. From Know Your Hedgehog Series*). If an area of potentially suitable habitat could not be removed ahead of when hedgehogs would be expected to commence hibernating, then the areas of remaining habitat would be carefully inspected by the ECOW before they are removed. Any hedgehogs found would be relocated, with any nesting material to a hedgehog box. Brown hare Areas of suitable habitat with vegetation greater than 200mm in height would be subject to a two-stage cut of vegetation which would remove any suitable habitat for brown hare and lead to them leaving the area. Polecat Vegetation in areas where polecats are considered potentially to be present should be cleared before earth-moving work, so as to encourage any polecats to vacate resting sites due the disturbance (Birks *et al*. (2012). Any mammal burrows identified during pre-construction checks would be carefully dug back, under supervision of the ECoW, to ensure there is no risk of killing or injuring of any mammals which may be using them, polecat have been known to use rabbit burrows for foraging and resting, this is

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			standard good practice. Trenches or excavations should have a suitable ramp within in them to enable any animals to escape. Trenches are to be inspected each morning before they worked on to ensure no mammal species are within the trench. If animals are present these should be safely relocated by the ECoW. Note this methodology would also minimise the risk to other species such as hedgehog, brown hare etc. The Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) has been updated, and a revised version provided at Deadline 1, to include the information above.
2.54	The Applicant	**Onshore – Mitigation** (APP-066) states that additional reasonable avoidance measures for badger, otter and reptiles will be implemented. Please can you explain and describe what these would consist of.	As noted in Sections 6.3.5, 6.3.7 and 6.3.9 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), reasonable avoidance measures that would be employed if these species are present would be as follows: *"6.3.5 Para 110 Badgers: Reasonable avoidance measures shall be implemented and may include micrositing certain elements and/or installing protective fencing to minimize disturbance to retained setts, ensuring excavations remain closed overnight or contain ramps such that badgers cannot become trapped and ensuring stockpiled soil is fenced or regularly disturbed so as to deter badger sett creation within it.* *6.3.7 para 117 Otter: Reasonable avoidance measures would be used to reduce the risk of committing an offence under the protecting legislation. These would be broadly similar to those described for badger (above)."* Section 6.3.9, paragraph 123 – 125 Reptiles notes: *"123 Given that large areas of suitable habitat will remain unaffected by the works and most habitats will be reinstated or restored following construction, long term impacts on reptiles, if present, are not likely. However, reasonable avoidance measures will be employed where works take place within areas of potentially suitable habitat (as outlined above and as identified by the ECoW) to reduce the potential for inadvertently killing or injuring individual animals. Mitigation will involve the management of vegetation (e.g. strimming long grass) to discourage occupation by reptiles and the identification and removal of potential refugia and hibernacula (if present) prior to construction works taking place in the relevant areas. These works will be undertaken under the supervision of the ECoW.* *124 The management of vegetation (by strimming or flailing) and removal of potential refugia should only be undertaken during the reptile active period of*

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			March to October and therefore may need to be carried out well in advance of construction in areas where work is scheduled to commence during the winter months. At least 24 hours will be left between vegetation management and construction works commencing in affected areas. *125 To minimise the potential for reptiles to become trapped in excavations, during the reptile active season (March to October) all excavations left open outside normal working hours will include a ramp at one end to enable reptiles (and other animals) to escape."* Full details are not considered necessary at this stage and will be provided in the Final Landscape and Ecology Management Plan that will be secured by DCO R13 and prepared with regard to pre-construction survey results and detailed design, in collaboration with key stakeholders.
2.55	The Applicant	**Onshore – Mitigation** Please can you explain and describe the range of measures to mitigate the temporary loss of 11ha of coastal and Flood plain grazing marsh, Clwyd estuary and adjacent LWS (Table 5, section 13.3.5 [APP-074]).	A range of measures relating to vegetation clearance and other construction works are proposed in Section 5.9 of Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation (APP-066) with further details provided in the Outline Construction Method Statement (CMS) (APP-313; Document 1.50 of the Applicant's Deadline 1 submission) and Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Measures to minimise impacts to coastal and floodplain grazing marsh and Clwyd Estuary and Adjacent Fields LWS primarily include protection of retained areas and reinstatement, as set out in Section 4.2 of the OELMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Temporary loss of 11ha of this habitat is considered not significant, based on it currently being of relatively low conservation value, as stated in Table 15 of Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation (APP-066), and being subject to periodic agricultural disturbance via ploughing or reseeding as part of normal farming practice. No additional mitigation is therefore considered necessary.
2.56	The Applicant	**Onshore – Mitigation** Please can you explain and describe how the remaining area of S7 habitat: Lowland Fen (Route Section C) would be protected from damage during the construction works (Table 15 [APP- 066]).	Section 5.1.1 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) includes details in respect of protection of retained habitats, including the S7 Habitat: Lowland Fen (ie fen habitat at the Flash). Measures involve the installation of temporary fencing to prevent inadvertent damage, at locations agreed by the ECoW.

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2.57	The Applicant	**Onshore – Mitigation** Please can you advise how trenching work at smaller water courses and ditches will not take place at night (mitigation for eels) is secured within the dDCO (Table 5, section 13.3.5 [APP-074]).	This is secured through approval of the final Code of Construction Practice (CoCP) under DCO R10. Section 3.2 of the outline Code of Construction Practice (CoCP) (APP-312; Document 1.49 of the Applicant's Deadline 1 submission) restricts 24 hour working to major trenchless crossing locations as follows: *'HDD (or other trenchless crossing works) at the landfall and other major crossing points will require works to take place 24 hours a day. Where continuous 24-hour working is required this will be agreed in advance with DCC through a requirement of the DCO.'*
2.58	The Applicant	**Onshore – Mitigation** Please can you explain and describe the mitigation measures for: a) invertebrates present within the coastal dune habitat being affected by the works; and b) for the common toad found within the habitats affected by the works.	As stated in Table 16 of Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation (APP-066), mitigation measures for invertebrates will be as for the coastal dune habitat described in Table 15 of the same document, i.e. via the re-establishment or creation of dune grassland habitats. Additional detail is provided in Section 4.1 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Measures include pre-construction botanical survey, which is considered in this case to act as a fair proxy to invertebrate survey with regard to identifying important areas, given the mainly degraded nature of the habitat. The survey will identify areas which should be prioritised for salvage or other special measures. Mitigation for common toad is the same as that required/proposed for GCN, as stated in Table 16 of Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation (APP-066), with additional detail provided in Section 6.3.1 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission).
2.59	The Applicant	**Onshore – Mitigation** Please can you explain and describe: a) translocation and receptor sites methodology (including timeframes) for any reptiles found within the habitats affected by the works; and b) translocation and receptor sites methodology (including timeframes) for any water voles found within the habitats affected by the works.	As stated in Section 6.3.9 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), since no reptiles were recorded during surveys at the OnSS, and due to the small number of pre-existing records, it is considered quite unlikely that reptiles will be encountered along much of the route. No translocation or receptor sites are deemed necessary; reasonable avoidance measures will however be employed. Also, note that as stated in Table 16 of Volume 3, Chapter 5: Onshore Biodiversity and

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			Nature Conservation (APP-066), mitigation measures for GCN will also reduce risks to reptiles. In the event that a reptile(s) is discovered whilst undertaking reasonable avoidance measures or during construction, it would be removed by the ECoW to the nearest area of suitable habitat, within the temporary mitigation areas shown on Figures 2 – 7 in respect of the route. At the OnSS, it would be removed to a refugia or hibernaculae within the nearest habitat enhancement area. Also see the response to ExQ1.2.50, which relates to this same issue. As stated in Table 16 of Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation (APP-066), based on current survey data there will be no impacts on water vole and therefore no requirement for translocation. In the unlikely event that water voles are recorded during pre-construction surveys, reasonable avoidance measures would be employed as described in Section 6.3.6 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Full details would be provided in the detailed LEMP, secured by DCO R13. The measures would be accommodated within the corridor. At the Glanfyddion cut where a single outfall is proposed outside of the corridor, an additional area for temporary mitigation for water vole has been allowed for, as a precautionary measure in the event the species is present at the location at the time of construction and impacts cannot be avoided. Also see the response to ExQ1.2.50, which relates to this same issue.
2.60	The Applicant	**Onshore – Mitigation** Please can you describe the range of measures for breeding birds at the OnSS relating to: a) Vegetation clearance; b) Other construction works; and c) Habitat creation and management. (Table 5, section 13.3.5 [APP-074])	Mitigation measures for breeding birds during construction are summarised in Table 13 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066), with further detail provided in Section 6.3.3 of the oLEMP (APP-305; Document 1.33 of the Applicant;s Deadline 1 submission). Proposed biodiversity enhancements at the OnSS, which include measures which will benefit breeding birds, are outlined in Section 7.1 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). The relevant measures are described below. a) Vegetation Clearance All wild birds are subject to protection under Section 1 of the Wildlife and Countryside Act 1981 (as amended), which makes it an offence to

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			intentionally damage or destroy the nest of any wild bird while that nest is in use or being built. To ensure compliance with the relevant legislation, removal of potential nesting bird habitat will either take place outside of the breeding season (March – August inclusive), or where this is not possible a check for the presence of nesting birds by the ECOW will take place no more than two days prior to clearance. Where active nests are located vegetation clearance in the applicable area (to be determined by the ECoW on a nest-specific basis) will be delayed until the relevant nesting attempt(s) has finished. In order to avoid birds potentially nesting within piles of cut vegetation, all cleared vegetation will be removed from working areas immediately following clearance. b) Other Construction Works One species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), barn owl, was recorded breeding within the Order Limits during the surveys in 2021. Bird species listed on Schedule 1 are protected against intentional or reckless disturbance while building a nest; in, on or near a nest containing eggs or young; or with dependent young. Update surveys for barn owl will take place during construction and avoidance of disturbance to barn owls whilst nesting (and therefore compliance with the relevant legislation) will be achieved through the implementation of disturbance-free buffer zones around active nests. The extent of any buffer zones will be determined by the ECoW and the ECoW will then monitor any nesting attempts to determine when nesting attempts have finished and works may proceed and also to check that the buffer zones implemented are successful. c) Habitat creation and management Initial proposals for biodiversity enhancement at the OnSS include the erection of ten bird boxes, including two pole mounted barn owl boxes. Proposals also include: the creation and ongoing management of five new ponds/ pools; scrub management to promote structurally diverse grassland habitat; creation of 9.8 ha of species-rich, lowland meadow and 6.05ha of diverse neutral grassland, plus management thereafter; and creation of 2.96 ha of locally native broadleaved woodland. All of the above will benefit breeding birds. Any vegetation clearance required

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			during habitat creation works would be subject to the same mitigation measures described above in relation to construction. NRW has confirmed (RR-0.15) that it agrees with the conclusions in the ES in respect of protected species, including barn owl, and the recommendations and proposed principles for mitigation in the oLEMP.
2.61	The Applicant	**Onshore – Mitigation** For non-breeding birds a temporary loss of up to 2.4 ha of intertidal habitat at Y Ffrith is stated. Please can you explain and describe mitigation measures for light, noise and visual related to construction works within the shallow sub-tidal, the intertidal zone and landfall (Table 5, section 13.3.5 [APP-074]).	Mitigation measures for noise and visual (including light) disturbance to non-breeding birds during construction works at the landfall are summarised in Table 13 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066), with further detail provided in Section 6.3.4 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). The relevant measures are described below. If required, depending on the final locations and timing of the works, HDD pits and other working areas at the landfall would be screened, where possible, to provide an element of visual and acoustic screening of active working areas. The need for screening and details of proposed screening, if required, will be included in the Final LEMP (secured under dDCO R13 and Construction Method Statement (secured under dDCO R10). Subject to the final design parameters, piling (if required for the establishment of a temporary cofferdam at the landfall) would either take place outside the winter period (October to March) or utilize less noisy, vibro-piling technology (see response to ExQ1.2.62 below for how this is secured in the dDCO).
2.62	The Applicant	**Onshore – Mitigation** Please can you confirm how piling (if required at the landfall) would take place outside the winter period (October to March) or the use of vibro-piling technology is secured in the dDCO [AS-014]?	Table 13 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) states that the timing and type of piling (if required for the establishment of a temporary cofferdam at the landfall) would be agreed with DCC through provision of a Construction Method Statement (CMS) as part of the Code of Construction Practice approved under DCO R10. This would apply if the cofferdam piling were to take place landward of Mean Low-Water Springs (i.e. the intertidal area. If the piling were proposed seaward of Mean Low-Water Springs, the timing and type of piling would be agreed with NRW via the Marine Licence (see response to ExQ1.6.55).
2.63	The Applicant	**Onshore – Mitigation** The Outline Landscape and Ecology Management Plan [APP-305] outlines the Ecological Clerk of Works (ECoW) key duties and the	It is anticipated that an Ecological Clerk of Works (ECoW) team would be required (see response to ExQ1.2.52), with the lead ECoW delegating duties to an appropriately skilled and experienced deputy/assistant

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		Outline Code of Construction Practice – Appendix 1 [APP- 313] states that the ECoW will be employed for the duration of the project to ensure species specific mitigation, method statements and plans are implemented effectively. Please describe how the ECoW fulfil their duties if the onshore works are constructed in two or more stages and /or during 24hr works.	ECOW(s), where necessary. Such an arrangement would allow suitable oversight of concurrent works in different locations, where extended construction hours (such as 24 hour working) would take place, or to cover any periods of annual leave or sickness. The Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) has been updated, and a revised version provided at Deadline 1, to include the information above.
2.64	The Applicant	**Onshore – Mitigation** Please can you explain and describe your client environmental role with the ECoW during preliminary works and construction works.	The ECoW/ ECoW Team will be appointed either by the Principal Contractor or by the Applicant to oversee preliminary works and construction works. It is also possible that separate ECoW/ ECoW Teams will be appointed by the Principal Contractor and the Applicant, with each ECoW/ ECoW team performing different roles. During any pre-commencement works, the requirements of the Outline CoCP and LEMP will apply to those works. The dDCO requirements have been amended in Revision F submitted at Deadline 1 (Document 1.8 of the Applicant's Deadline 1 submission) to clarify that. The OCoCP and oLEMP are being updated to include specific pre-commencement sections to clarify the applicable controls and these updates will be submitted at the next deadline. Roles, responsibilities and lines of communication during construction works would be determined at the detailed design stage, with details provided in the final Code of Construction Practice (CoCP) and detailed Landscape and Ecology Management Plan (LEMP), secured by dDCO R10 and R13 respectively. The Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) has been updated, and a revised version provided at Deadline 1, to include the construction stage update above.
2.65	NRW, DCC, NWWT, Envirowatch.EU, Sustainable Cymru	**Onshore – Mitigation** Are you satisfied the following provide sufficient mitigation measure details and are adequate for preparing future detailed versions: a) outline Code of Construction practice [APP-312];	It is acknowledged that this Question is not directed at the Applicant, but has provided the following response which may be useful context for the ExA. The Applicant provided draft copies of the outline Code of Construction Practice (CoCP) (APP-312; Document 1.49 of the Applicant's Deadline 1

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		b) outline Construction Method Statement [APP-313]; c) outline Landscape and Ecology Management Plan [APP-305]. If not for any of the above points please explain reasons and provide evidence justification.	submission) and Construction Method Statement (CMS) (Document 1.50 of the Applicant's Deadline 1 submission) when undertaking Statutory Consultation between August and October 2021. Feedback was received from both Natural Resources Wales (NRW) and Denbighshire County Council (DCC) regarding the CoCP and associated management plans, which has been incorporated into the submitted versions (for example, within its response to S.42 consultation, DCC requested a Construction Communications Plan that has been included within the application (APP-324)). Proposals to avoid, reduce, mitigate or compensate for potential impacts on biodiversity resources and measures intended to provide biodiversity enhancements were discussed with NRW and DCC via Onshore Ecology Expert Topic Group 5 (ETG 5) meetings held in November 2021 (APP-301). The proposals were agreed in principle with ETG 5 members and are presented within Section 7.1 of the Outline Landscape and Ecology Mitigation plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). NRW has confirmed (RR-0.15) that it agrees with the conclusions in the ES and the recommendations and proposed principles for mitigation for protected species in the Outline Landscape and Ecology Management Plan (LEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission).
2.66	The Applicant	**Onshore – Mitigation** Please can you explain and describe the relationship (including duty holder) between the Outline Construction Method Statement [APP-313] with a Construction Phase Plan and Construction Environmental Management Plan.	The Outline Construction Method Statement (CMS) (APP-313; Document 1.50 of the Applicant's Deadline 1 submission), sets out the construction methods which will be implemented by the Applicant and its contractors during the construction of onshore aspects of AyM, and forms part of the overall outline Code of Construction Practice (CoCP) (APP-312 Document 1.49 of the Applicant's Deadline 1 submission). Alongside the CMS are a number of CoCP Appendices that provide a suite of outline Environmental Management Plans that set out the approach to minimising and managing impacts for a range of topics such as noise, traffic, air quality and public access. The final CoCP (including CMS and Environmental Management Plans), would be approved by DCC prior to the commencement of construction under DCO R10.

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			The final CoCP and CMS will be developed by the Applicant for the relevant stage of the works in consultation with DCC outlining the principles to be adopted by all contractors and subcontractors. The duty holder for the COCP and CMS would either be the Applicant or the Principal Contractor appointed by the Applicant and would be confirmed with DCC via approval of the final versions of the COCP and CMS. Where a staged approach to construction is agreed with DCC under DCO R5 (Stages of Authorised Development), the final CoCP, CMS and accompanying Environmental Management Plans could be approved on a stage-by-stage basis. Under DCO Requirement 5 (2) details must be provided of the stages that are proposed. Such information would represent a 'Construction Phase Plan' (albeit with different terminology). In addition to the construction methods for the onshore works (such as construction of haul roads and temporary construction compounds), the CMS will also include the general management methods employed to limit its environmental impacts (such as working hours and speed limits). These are supplemented by the topic specific Environmental Management Plans in the remaining CoCP Appendices. As such, the CoCP, CMS and Environmental Management Plans fulfil the typical objectives of a Construction Environmental Management Plan (CEMP), and provision of a separate CEMP is not considered necessary.
2.67	The Applicant	**Onshore- Mitigation** Please can you confirm how all pre-construction surveys are to be secured in the dDCO [AS- 014].	A commitment to pre-construction ecology surveys is given in the outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) that is secured under DCO R13 and would also be required for any European Protected Species and species protected under the Wildlife and Countryside Act 1981 under DCO R14. During any pre-commencement works, the requirements of the Outline CoCP and LEMP will apply to those works. The dDCO requirements have been amended in Revision F submitted at Deadline 1 (Document 1.8 of the Applicant's Deadline 1 submission) to clarify that. The OCoCP and oLEMP are being updated to include specific pre-commencement

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			sections to clarify the applicable controls and these updates will be submitted at the next deadline.
2.68	The Applicant	**Onshore – Mitigation** Measures to mitigate for temporary loss/fragmentation of flight lines and foraging habitat include the use of "dead hedges" at discrete locations during construction. Please: a) Provide longitudinal section and cross sections showing how a dead hedge fills temporary hedgerow gaps overnight; b) Explain and describe what happens to the dead hedge during dawn and dusk, and also during the day; and c) Explain and describe how the dead hedge is monitored and maintained during construction and post construction and how is this secured in the dDCO [AS-014].	a) Proposals for the use of 'dead hedges' are set out in Section 6.3.2 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305). Longitudinal sections and cross sections of 'dead hedges' would be provided at detailed design stage to Denbighshire County Council (DCC) for approval, in consultation with Natural Resources Wales (NRW), within the final Landscape and Ecology Management Plan that is secured under DCO R13. Further details regarding the shape and size of 'dead hedges' are provided in response to point b) below. b) At key locations where bat activity is likely to be highest, filling temporary hedgerow gaps overnight during construction (and thereafter) with a "dead hedge" would take place during the bat active season (April to October) until such time as reinstated vegetation has established and is at least 1 m tall. These locations shall be identified in the Final LEMP and will be based upon pre-construction bat activity survey data plus final scheme design details. The dead hedge will be in place at least one hour before dusk and will be removed no earlier than 30 mins after dawn (unless EPSL requirement specify otherwise, or a temporary exemption has been pre-agreed with the ECoW in view of ongoing construction work that finishes late/starts early). During the day the dead hedge will be either left in-situ (if the hedgerow gap is not needed for access/construction) or carefully placed in a nearby location that is not within the active working area. The location would be agreed with the Ecological Clerk of Works (ECoW) and is anticipated to be different for each hedgerow. During construction the "dead hedge" will comprise Heras fencing (or similar, to enable sections to be manoeuvred into/out of position), with brash attached to a height of at least 1.2 m. During construction the ECoW will regularly monitor each section of dead hedge and additional brash will be added to each section of Heras fencing if considered needed.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			c) Post construction the "dead hedge" will comprise brash to a height of at least 1.2 m, held in place with untreated wooden stakes, and will be allowed to degrade naturally. These would be subject to regular monitoring until the reinstated hedgerow(s) are at least 1m tall. Maintenance and repairs would be undertaken, as required. The location, sizing, makeup, deployment, maintenance and monitoring arrangements for dead hedges will be approved by DCC in consultation with NRW through the final LEMP secured under DCO Requirement 13 and potentially also via any EPSL conditions required through DCO R14. The Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) has been updated, and a revised version provided at Deadline 1, to include the information above.
2.69	The Applicant	**Onshore – Mitigation** The mitigation measures consist of pre-construction surveys and reasonable avoidance measures for temporary loss of foraging habitat along the onshore ECC, the permanent loss of c. 5ha of foraging habitat at the OnSS for Badgers, but the Proposed Development is not predicted to significantly adversely affect the local population due to the abundance of adjacent unaffected agricultural grassland [APP-074]. Please can you explain and describe how the abundance of adjacent unaffected agricultural grassland as foraging habitat is secured in the dDCO [AS-014].	The Applicant confirms that Table 5 (APP-074) should be amended to reflect Tables 16 and 21 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) which read: *'The project is not predicted to significantly adversely affect the local population due to the abundance of adjacent unaffected agricultural grassland. However, in view of the species' legal protection mitigation measures are proposed.'* This is reflected in the table of residual effects as identified within the ES in document 1.47 of the Applicant's Deadline 1 submission This clarifies that mitigation measures in the form of pre-construction surveys and reasonable avoidance measures would be used (also specified in the oLEMP (APP-305)), to avoid significant effects on badgers during construction. It is not possible to secure the availability of adjacent agricultural grassland, outside the draft order limits, within the DCO. However, other development proposals within the surrounding area have been assessed within the cumulative assessment (Section 5.13 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) and no significant cumulative effects on badger are predicted. It is expected that any future proposals affecting adjacent agricultural grassland would be subject to their own ecological assessment and that any such assessment would

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			include consideration of badgers and the possible need to mitigate/compensate for possible loss of badger foraging habitat. In addition to the above, Section 7.1 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) includes proposals for the creation of 9.8 ha of species-rich, lowland meadow, 6.05 ha of diverse neutral grassland and 2.96 ha of locally native broadleaved woodland, all of which should provide improved foraging habitat for badgers.
2.70	The Applicant	**Onshore – Mitigation** The Outline Code of Construction references to: a) Screening and fencing - please can you provide typical layout drawing showing the size and type of screens and fence considered in the MDS and describe how the layout will interact with bat and other wildlife corridors to relevant habitats. b) Lighting and visual intrusion – please can you describe how lighting of the construction site will be designed and positioned to minimise the effects upon ecological receptors. c) Noise and vibration – please can you explain and describe any effects of noise and vibration on species and any proposed mitigation.	a) As noted in the outline CoCP (APP-312; Document 1.49 of the Applicant's Deadline 1 submission), the type of fencing will be selected to suit the location and purpose and will be agreed with Denbighshire County Council (DCC) and landowners at the detailed design stage. The location, type, height, and purpose of fencing will be determined by detailed design and informed by pre-construction ecology survey and discussion with consultees. It is therefore not possible to provide a typical layout drawing at this stage. For the purpose of assessment, it has been assumed that Heras fencing (typically 2 m tall) would be used to secure the construction working area, although it is noted that other lower types of fencing may be used along the onshore ECC to demarcate construction areas (for example, Section 2.4 of the outline Construction Method Statement (CMS) (APP-313; Document 1.50 of the Applicant's Deadline 1 submission) makes reference to stock-proof fencing). As noted in Section 3.5 of the outline CMS (APP-313; Document 1.50 of the Applicant's Deadline 1 submission), pre-construction walkover survey of the working area will be undertaken by an appropriately experienced arboriculturist and the guidance set out in BS5837:2012 Trees in Relation to Construction will be adhered to where applicable. The survey will define specific mitigation measures required for all trees situated in or adjacent to the working width, including where practical, measures such as the erection of protective fencing in order to minimise the impacts on trees and their roots. BS 5837:2012 specifies 2m tall weld mesh panels with scaffolding supports (so this represents a barrier to wildlife that is similar to Heras fencing).

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			Based on the assumption that Heras fencing (or similar) would be used, and on the basis that impacts would be temporary, no significant effects on bats or other wildlife corridors were identified by the assessment presented in ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). The Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) proposes that if required, depending on the final locations and timing of the works, HDD pits and other working areas at the landfall and River Clwyd crossing would be screened, where possible, to provide an element of visual and acoustic screening of active working areas. The need for screening for wintering birds and details of proposed screening, if required, will be included in the Final LEMP and CMS. If used, screening would only affect a relatively small area, within otherwise open habitats, and is not likely to affect bats or other wildlife corridors. b) Section 2.1 of the outline Artificial Lighting and Emissions Plan (APP-322) states that lighting will be placed as far from linear features (potentially suitable for foraging and commuting bats) as is conducive with security and engineering requirements. Those lights closest to such features will take into account the following: - Light intensity will be as low as is permissible; - Light spills towards any retained linear features will be reduced to a minimum (using cowls as necessary); - Lighting spillage will avoid or minimise impacts on ecological resources, including nocturnal species; and - Construction lighting will be low intensity and appropriately located/directed in order to minimise lighting disturbance for bats and birds. c) Table 16 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) identifies potential effects due to noise and vibration for wintering birds at the landfall and River Clwyd. Mitigation measures for possible noise disturbance to non-breeding birds during construction works are summarised in Table 13 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066), with further detail

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			provided in Section 6.3.4 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). See also response to ExQ1.2.61. No significant residual effects are predicted.
2.71	The Applicant	**Onshore – Mitigation and Residual Effects** Please can you confirm the significance of residual effects for important ecological features? For example, invertebrates using coastal dune habitat: is it potentially significant, temporary adverse at a county level in the short term and in the mid-term? The additional "*until the proposed mitigation is sufficiently mature and become established*" implies that the conclusion is temporary adverse at a county level until a time where the proposed mitigation is sufficiently mature and become established (which may not be until the long term). Note – Other important ecological features have similar wording, and it would be appreciated if these could be clarified e.g. S7 habitat: Hedgerows (Route Sections B-G); Plant species (at coastal dune habitat) (Table 5, section 13.3.5 [APP-074]).	Table 21 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) describes the residual effects in bold type, with additional explanation in plain type. Timescales are taken into account where relevant; in the example quoted residual effects are potentially significant in the short term but are not significant in mid-term, once proposed mitigation has matured and become established. This is because it will take until the mid-term for mitigation to establish and for the impact to be considered not significant. Definitions of terms used to describe timescales, e.g., short-term, mid-term, etc, are provided in paragraph 84 of the ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). This convention applies to all the ecological features listed in Table 21 (APP-066).
2.72	The Applicant	**Onshore – Mitigation and Residual Effects** It is stated in Table 5, section 13.3.5 [APP-074] that significance of residual effects confirmation requires further development of mitigation/compensation measures. Please can you confirm the significance of residual effect conclusion for: a) S7 habitat: coastal sand dune (Route Section B) mid-term and the proposed mitigation/compensation measure(s). b) S7 habitat: Lowland Fen (Route Section C) short term, and the proposed mitigation/compensation measure(s).	Table 21 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) describes the residual effects in bold type, with additional explanation in plain type. Timescales are taken into account where relevant; for the important ecological features in the question residual effects are as follows: a) **Significant, temporary adverse** at a local level in the short term. **Not significant in mid-term** once proposed mitigation has matured and become established. b) **Not significant** in short term. Definitions of terms used to describe timescales, e.g., short-term, mid-term, etc, are provided in paragraph 84 of the ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). Further details in respect of mitigation/compensation measures for the important ecological features in the question can be found within Tables 15 and 21 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) and in Sections 4.1, 4.3 and 5.1 of the Outline Landscape and

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission).
2.73	The Applicant	**Onshore – Enhancements** a) Paragraph 131 of [APP-305] refers to biodiversity enhancements and states that they will be subject to an initial aftercare period of up to three years. Please can you explain and describe the biodiversity enhancements that would be subject to less than three years. b) Paragraph 134 references to the initial proposals for additional biodiversity enhancements at the OnSS and creation of five additional ponds/ pools located to the southeast of the OnSS and ongoing management of the new ponds. Please can you confirm if the ongoing management of the new ponds includes pools. c) Please confirm the type of bird species able to use the bird boxes that would be erected at the OnSS. d) Please can you explain and describe any biodiversity enhancements to provide net gain beyond the OnSS and within the OL.	Full details of proposed enhancements are not considered necessary at this stage and will be provided in the Final Landscape and Ecology Management Plan (LEMP) that will be secured by DCO R13, and prepared in light of pre-construction survey results and detailed design, in collaboration with key stakeholders. Further clarity is provided below. a) Biodiversity enhancement details, including aftercare periods will be included in the final LEMP. All enhancements will be subject to three years of aftercare, where that is needed. b) "Ponds/pools" refers to the same five features. The word "pools" have been removed from an updated version of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305) and a revised version provided at Deadline 1. c) Bird box specifications will be included in the final LEMP and will be suitable for a range of locally appropriate passerine species. The proposed biodiversity enhancements at the Onshore Substation (OnSS) are considered sufficient to meet the policy requirement for the project to provide net benefits for biodiversity. Biodiversity enhancements beyond the OnSS have not been proposed, due to the requirement to return land to its original use/landowner. However, it is considered likely that in the long term, the re-instated hedgerows may be of greater value than the originals, due to the increased range of species and inclusion of trees during reinstatement. Since the Applicant cannot guarantee the presence or quality of the hedgerows for the lifetime of the development (as the management of the land will revert to owner/occupiers) it has not been considered as enhancement within the assessment or oLEMP.
2.74	The Applicant	**Onshore - Bat** Please can you quantify the permanent loss of flight lines and foraging habitat at the OnSS area for bat population (Table 5, section 13.3.5 [APP-074]).	Flightlines and foraging areas that may be affected comprise the hedgerow network and mature trees. There will be permanent loss of c. 540m of hedgerow including 8 mature trees at the OnSS footprint, temporary loss of parts of 128 other hedgerows, including an additional c. 33 mature trees which would be crossed by the cable route, or affected

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			by TCCs or vis-splays. This is confirmed within Table 15 of the ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). As noted in Section 6.3.2 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), the permanent loss of hedgerows at the OnSS which may be used by commuting and foraging bats will be compensated via creation of new broadleaved woodlands and species rich hedgerows comprising locally appropriate species. These will be located so as to link or buffer existing woodlands, scrub and hedgerows.
2.75	The Applicant	**Onshore - Bat** Please can you confirm the significance of residual effect due to permanent loss of habitat for bat populations at: a) The OnSS, b) The onshore ECC. (Table 5, section 13.3.5 [APP-074]).	Table 21 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) describes the residual effects in bold type, with additional explanation in plain type. Timescales are taken into account where relevant and definitions of terms used to describe timescales, e.g., short-term, mid-term, etc, are provided in paragraph 84 of the ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). For the important ecological feature in the question residual effects are as follows: **Residual effects** as a result of permanent loss of potential bat roost trees (at the OnSS and along the Onshore ECC) and permanent loss of hedgerow (bat foraging/commuting habitat) at the OnSS will be offset via compensatory measures at the OnSS and along the Onshore ECC, detailed in the oLEMP (APP-305). Compensatory measures include replanting of 770m of hedgerow and including heavy standard trees at a 3:1 ratio for any lost (see Section 6.3.2 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission)). The effects of permanent loss of foraging habitat are therefore considered significant in the short term, but not significant in the mid-term (once proposed mitigation has matured and become established as this allows time for new/ replacement hedgerows to establish). Compensation and mitigation measures in respect of roosting bats would be the subject of an Natural Resources Wales (NRW) European Protected Species Licence (EPSL) (if necessary), which would be informed by pre-construction survey data. No significant residual effect is likely in the short term and mid to long term, on the local conservation status of bat populations following the implementation of the EPSL mitigation/compensation measures agreed

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			with NRW, based upon survey data to date and the commitment to mitigation/compensation for loss of Potential Roost Features (PRF) made in Section 6.3.2 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission).
2.76	The Applicant	**Onshore - Bat** Please can you confirm compensatory measures for bat populations along Onshore ECC including any bat boxes and quantity proposed (Table 5, section 13.3.5 [APP-074]).	Section 6.3.2 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) includes principles that will be applied in respect of compensatory measures for bat populations. The location and type of measures required will be informed by pre-construction survey and appropriate rights to install mitigation along the Onshore ECC are included within the dDCO. The relevant principles that have been committed to are: **Principle 1** "*No net loss of bat roosting habitat. Compensation roost features will be provided for every moderate or high potential roost feature prior to loss; to include bat boxes on retained trees or installed poles, re-use of whole felled trunks by setting vertically as monoliths and/ or veteranisation (cutting and carving into healthy trees to mimic nature, to speed the process of decay and rot holes) as appropriate.*" **Principle 2** "*Compensation features will be installed as close as possible to those lost, whilst also addressing other constraints, such as the requirement to be within an unlit area, ideally away from Public Rights of Way (PROW) and within or close to potential flight lines. In all cases the compensation measures for confirmed roost loss would be within the Core Sustenance Zone of the species concerned.*" Full details will be provided in the Final Landscape and Ecology Management Plan that will be secured by DCO R13 and prepared in light of pre-construction survey results and detailed design, in collaboration with key stakeholders.
2.77	The Applicant	**Onshore – GCN & Common toad** Please can you confirm the significance of residual effects short term and mid-term for GCN and common toad? (APP-066).	As stated in Table 21 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066):

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			No significant effect is likely on the local conservation status[i] of any of the metapopulations present following the implementation of mitigation measures. This applies over any timescale. For clarity - note that Table 21 also comments on the restoration of favourable conservation status, which is a separately defined term to local conservation status. The project would help toward restoring the favourable conservation status in the medium-long term, due to the provision of additional aquatic and terrestrial habitats managed for the benefit of the species for the lifetime of the project.
2.78	The Applicant	**Onshore – Hedgerow** Hedgerows north of the A525 were scoped out, due to lack of suitable structure, foodplants and/or connectivity. As the A525 is generally a north south route from Rhyl to St Asaph please can you provide further information as to the location of the hedgerows scoped out north of the A525 (APP-066).	The Applicant confirms that this reference to the A525 were made in error and the dormouse survey area actually relates to hedgerows located to the south of the A547. The Dormouse survey area is shown in Figures 1 and 2 of ES Volume 5, Annex 5.7: Dormouse Survey Report (APP-130). Hedgerows north of the A547 were scoped out, due to lack of suitable structure, foodplants and/or connectivity. The is also reflected in the Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
2.79	The Applicant, NRW, NWWT, Envirowatch.EU	**Onshore – Hedgerow** Please can you advise on the recovery time of a hedgerow to ecological function for use per species?	Table 12 of Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) under the section on Habitat Fragmentation states that it is anticipated that the hedgerows will have recovered ecological function for most species within five years. This is likely to be the case for species such as nesting birds or dormice. Species which use the base of hedgerows, such as newts, hedgehogs, etc may start using the base of the hedgerow sooner, once the ground flora has established. However, as per the Outline Landscape and Ecology

[i] conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2 of the EC Habitats Directive;

As defined in Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora Article 1(i) The conservation status will be taken as "favourable" when: - population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and - the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and - there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis;

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<tr><th>QUESTION NUMBER</th><th>QUESTION ADDRESSED TO</th><th>QUESTION</th><th>APPLICANT'S RESPONSE</th></tr>
<tr><td></td><td></td><td></td><td>Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), paragraph 62, it is expected the ground flora around the hedgerow plants may need to be treated with herbicide for up to three years, which would delay the ground flora being available for the terrestrial species (i.e.: newts, hedgehogs etc). Therefore, although the ground flora, base of the hedgerows maybe available for terrestrial species to use sooner than the hedgerow itself for the purposes of the assessment it is assumed it would also only be available after five years.</td></tr>
<tr><td>2.80</td><td>The Applicant</td><td>Onshore – Hedgerow
Please can you confirm the following referenced in Table 5, section 13.3.5) [APP-074]:
a) The temporary loss in metres of the parts of the 128 other hedgerows;
b) The length of hedgerow that is important under the Hedgerow Regulations that would be lost within the OnSS and would be lost Onshore ECC;
c) The significance of residual effect due to permanent loss of hedgerow.</td><td>The Applicant confirms the following:
(a) The following table provides a worst-case calculation of the length of hedgerow that would only be lost if the maximum extent of the onshore elements of AyM were fully realized. This is a worst-case calculation that assumes hedgerow loss from within all of the onshore ECC, TCCs, Access areas and visibility splays and has been used for the ecology assessment. In practice, RWE would seek to reduce hedgerow loss during detailed design.
<table>
<tr><th>INFRASTRUCTURE TYPE</th><th>LENGTH (M)</th></tr>
<tr><td>Access and Crossing Zones</td><td>815</td></tr>
<tr><td>Construction Access Area</td><td>818</td></tr>
<tr><td>HDD Compounds</td><td>58</td></tr>
<tr><td>Major Road Visibility Splay</td><td>762</td></tr>
<tr><td>Minor Road Visibility Splay</td><td>624</td></tr>
<tr><td>Onshore Export Cable Corridor</td><td>1,907</td></tr>
<tr><td>Substation Cable Corridor Zone</td><td>669</td></tr>
<tr><td>Substation Construction Access Zone</td><td>98</td></tr>
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<tr><th>QUESTION NUMBER</th><th>QUESTION ADDRESSED TO</th><th>QUESTION</th><th colspan="2">APPLICANT'S RESPONSE</th></tr>
<tr><td></td><td></td><td></td><td>Substation Construction Area</td><td>21</td></tr>
<tr><td></td><td></td><td></td><td>Substation Temporary Construction Access Zone</td><td>119</td></tr>
<tr><td></td><td></td><td></td><td>Substation Temporary Construction Compound</td><td>122</td></tr>
<tr><td></td><td></td><td></td><td>Substation Visibility Splay</td><td>175</td></tr>
<tr><td></td><td></td><td></td><td>Temporary Construction Compound</td><td>618</td></tr>
<tr><td></td><td></td><td></td><td>Total</td><td>6,806</td></tr>
<tr><td></td><td></td><td></td><td colspan="2">(a) The length of hedgerow that is important under the Hedgerow Regulations that would be lost within the OnSS and would be lost Onshore ECC is:
▪ Temporary loss - Onshore ECC (including associated infrastructure 2,530 m); and
▪ Temporary Loss (Onshore ECC Cable Corridor Only 1,810 m).
(b) The residual effect due to permanent loss of hedgerow is not considered to be significant as set out in Table 15 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). This was omitted in error from Table 21 of that chapter and also Table 5 of (APP-074) and has been corrected in the table of residual effects as identified within the ES in Document 1.47 of the Applicant's Deadline 1 submission</td></tr>
<tr><td>2.81</td><td>The Applicant</td><td>Onshore – Dormouse
Please can you check paragraph 178, reference to dormouse survey report Application reference 6.5.7 (should it be 6.5.5.7?) (APP-066).</td><td colspan="2">The Applicant confirms that paragraph 178 (APP-066) should indeed reference 6.5.5.7 (APP-130) and has included this in the Errata sheet (Document 1.4 of the Applicant's Deadline 1 submission).</td></tr>
</table>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
2.82	The Applicant	**Onshore – Trees** Please can you confirm how disturbed trees have been identified (APP-066).	Paragraph 70 of (APP-066) states that "Preliminary roost inspections and presence/absence surveys were conducted during late spring and summer 2021 at trees which may be removed or disturbed". Disturbed, in this context, is taken to mean any action other than felling that could directly impact the tree. Trees that may be affected by the project were identified by project ecologists and engineers and included all those which could not with certainty be excluded from direct impact and so are included within the assessment as a worst-case.
2.83	The Applicant	**Onshore – Ornithology** Please can you confirm the significance of residual effects on disturbance to wintering birds at the landfall and River Clwyd crossing as it appears that it has not been determined if further mitigation for visual and acoustic is needed.	Table 13 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) states: *"If required, depending on the final locations and timing of the works, HDD pits and other working areas at the landfall and River Clwyd crossing would be screened, where possible, to provide an element of visual and acoustic screening of active working areas. The need for screening and details of proposed screening, if required, will be determined during detailed design and will be agreed with DCC and NRW via approval of the final CoCP and CMS (post consent)."* The proposed mitigation measures would only be required if construction works in the relevant areas take place during the winter months (October to March inclusive). No mitigation would be required for works taking place outside the winter period. Similarly, the proposed mitigation measures would only be required if works take place in locations which are likely to cause disturbance to wintering waterbirds. The precise location of working areas will not be determined until the detailed design stage (post consent). If construction works take place at the landfall and/or River Clwyd during the winter period, and working areas are located in areas which could cause potentially significant disturbance to wintering waterbirds, the proposed mitigation measures would be implemented. An assessment of whether mitigation measures are required and details of proposed screening, if required, would be provided at the detailed design stage and would be agreed with DCC and NRW via approval of the final LEMP and CMS (secured under dDCO R13 and R10 respectively). Following the implementation of the proposed mitigation measures, if required, no significant residual effects on wintering birds are likely.

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2.84	The Applicant	**Onshore – Ornithology** Please can you confirm the temporary loss of habitat in ha for onshore breeding birds (Table 5, section 13.3.5 [APP-074]).	Table 12 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) sets out the maximum development footprint and indicates a maximum temporary habitat loss of 84.64 ha along the Onshore Export Cable Corridor (ECC) and 10.56 ha at the Onshore Substation (OnSS). All of the habitats which would be temporarily lost may be subject to some use by breeding birds, although the value of most of the habitats that would be temporarily lost for breeding birds is relatively low. A combined temporary habitat loss of 95.2 ha therefore represents very much a worst-case with the area affected that is of value to breeding birds likely to be substantially lower. The temporary loss of such relatively small areas is not likely to be significant.
2.85	The Applicant	**Onshore – Trees** Please can you clarify the 'including c.41 mature trees' statement (Table 5, section 13.3.5 [APP-074]). Is this in addition to the 8 mature trees lost at OnSS giving a total of 49? (With 41 mature trees being along the onshore ECC).	The Applicant confirms 49 trees is correct.
2.86	The Applicant	**Onshore – Baseline** Please can you explain how baseline conditions and important ecological features have been identified in areas where the draft order limit has changed? For example, Figure 1, page 5 of 13, habitat plan shows extents of habitat survey area near Aberkinsey curtailing rather than extending in an easterly/north easterly direction along the lane to its junction (ES Volume 5 – Annex 5.2 [APP-125]).	The Applicant has provided a revised version of Figure 1 from ES Volume 5 Annex 5.2 (APP-125) in Appendix I – Response to ExQ1.2.86 – Update to Habitat and Hedgerow Survey, which shows habitat survey information covering the full extent of the operational access to the east of Aberkinsey. The operational access is along an existing access track and the Applicant confirms no vegetation removal would be required for AyM (other than existing maintenance operations such as hedge trimming) In addition, an area of modified grassland has been added to the north of the OnSS to cover a small area of mitigation. The Applicant has undertaken a review and confirms that, with the updates in place, baseline conditions and important ecological features cover areas where the Draft Order Limits had changed. The updates do not alter the findings of ES Volume 3, Chapter 5: Biodiversity and nature conservation (APP-066).
2.87	The Applicant	**Onshore – Habitat and Species** Please can you confirm the extents of lowland fen area at the Flash that could be affected by the works, the assumed re-growth	As stated in Table 15 of ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066), 0.12 ha of lowland fen at the Flash would be temporarily lost. Topography including hydrological connection would be reinstated following construction works to ensure water retention and the

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		rates and time taken for the fen habitat to re-establish from the unaffected areas.	area allowed to revegetate naturally to minimise risk of introduction of aquatic invasive non-native species (INNS). Timescales for revegetation are considered to be swift given the large amount of fen directly adjacent; evidence shows that newly created wetland habitats are typically colonised within months (for example see Stehle *et al*. (2022)). This is considered not significant in the short term, i.e., less than 5 years in duration for the habitat to recover.
2.88	The Applicant	**Onshore – Habitat and Species** Please can you explain and describe the approach to impact assessment for NOx emissions and acid depositing from non-road mobile machinery ("NRMM") to Local Wildlife sites.	The Applicant has provided a Technical Note in Appendix J – Response to ExQ1.2.88 – that is summarised below. A qualitative assessment of NRMM emissions on nearby LWSs has been undertaken with reference to the Welsh Government's advice provided within LAQM.TG(22). Within ES Volume 3, Chapter 3.11 Air Quality (APP-072), consideration was given to NRMM emissions – with reference to relevant guidance, indicating NRMM emissions are unlikely to make a significant impact on local air quality. Furthermore, a series of construction phase control measures were included within the AQMP (APP-315 – as part of the overall CoCP to minimise NRMM emissions. Implementation of the CoCP is secured as a requirement of the DCO. In accordance with this, impacts on LWSs associated with construction phase generated NRMM emissions are not likely to be significant. Throughout the course of completing the EIA, consultation with statutory consultees was undertaken to agree upon the extent and scope of the air quality assessment. Consideration of NRMM emissions on LWSs for inclusion within the air quality assessment was not raised or requested by any relevant stakeholder during the pre-application consultation process. A review of LWSs in proximity (50m) of onshore construction activities was undertaken – consistent with approved methods applied for other NSIPs. Consequently, four LWSs were identified for further consideration. The spatial extent of worst-case affected areas for all LWSs are below 30% relative to the whole designation, and less than 15% for three. Sites of nature conservation importance are provided environmental protection with respect to air quality, through the application of standards known as Critical Levels for airborne concentrations and Critical Loads for deposition

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			to land from air. For the assessment of LWSs, the approach adopted by NRW is to initially assess emissions generated by proposed activities alone with reference to the applicable Critical Levels or Loads. Further assessment is not required where the short-term or long-term emission contributions from proposed activities are less than 100% of the Critical Level or Load alone. Emissions can consequentially be considered insignificant. A review of activities intended to be undertaken for each discrete onshore phase (construction, operational and decommissioning) has been undertaken. In relation to the construction phase, a review of construction activities and NRMM proposed within 50m of each LWS has been undertaken. Where there is uncertainty and/or optionality regarding the extent of specific construction activities within 50m of each LWS, all possible construction activities have been considered for completeness. This is considered worst-case, as it is possible that the full extent of construction activities and NRMM identified may not be relevant or occur within 50m of each LWS. However, this approach ensures all potential scenarios and associated impacts have been assessed for completeness. The outcomes of the qualitative construction phase NRMM assessment indicate that the likelihood of NRMM emissions resulting in a PC >100% of the Critical Levels and/or Loads alone is low. Emissions are therefore believed to be insignificant. Effects on this basis are believed to be not significant and so it is considered that the ES does not require any amendment or revision. Despite this, impacts arising from construction activities are considered temporary. 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. Based on the above, impacts on LWSs associated with NOx emissions from NRMM are considered not significant. No further assessment is considered to be required.
2.89	The Applicant	**Onshore – Habitat and Species** Please can you confirm the potential impacts, preliminary	As set out in Paragraph 82 of ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066), only ecological features of local

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		mitigation/compensation and significance of residual effects for the common frog (*Rana temporaria*), smooth newt (*Lissotriton vulgaris*) and palmate newt (*Lissotriton helveticus*).	importance or greater and/ or subject to legal protection are subject to detailed assessment (and are referred to as "important ecological features"). Effects on other ecological features of lower importance – such as the species listed in ExQ1.2.89 - are considered unlikely to be significant in legal or policy terms so are not subject to detailed assessment. Notwithstanding the above, measures to minimise impacts to great crested newt and common toad will also be of benefit to other amphibian species.
2.90	The Applicant	**Onshore – INNS** The spread of invasive non-native species (INNS) Table 12: MDS Key Parameters for EcIA (APP-066), column 'maximum adverse scenario assessed' lists the INNS known to be present within the OL. Please can you explain the reasons for the following (which seem to be within the vicinity of eastern survey area at Y Ffrith) not being included in the list Sea-buckthorn (*Hippophae rhamnoides*), Spanish Bluebell (*Hyacinthoides hispanica*), Pampas grass (*Cortaderia selloana)*, White stonecrop (*Sedum album*).	The list of invasive non-native species INNS included in Table 12 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) is not exhaustive and only lists species that are included on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended). As sea buckthorn, Spanish bluebell, pampas grass and white stonecrop are not included on Schedule 9 they were not listed in Table 12. These species are referred to within the Outline INNS Management Plan (oINNSMP) (APP-323; Document 1.39 of the Applicant's Deadline 1 submission) however and measures to avoid their spread will be included within the Final Code of Construction Practice (CoCP), secured under dDCO R10, if the detailed scheme design and pre-construction surveys indicate that they may be affected.
2.91	NRW, DCC, RSPB	**Onshore – Habitats and Species** Are you satisfied with: a) The designated sites listed in Table 5: Designated Sites Scoped out of the Assessment ES Volume 3, Chapter 5 (APP-066); b) The targeted scope of the wintering bird survey and that significant effects on other wintering bird species are unlikely and surveys for other species were not considered necessary (ES Volume 5 – Annex 5.3 [APP-126]); and c) That assessment of noise impact upon ecological receptors is not required for the cable route or OnSS (paragraph 105 of ES Volume 3, Chapter 10 [APP-071]). If not, please explain reasons and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. a) With regard to designated sites, Natural Resources Wales (NRW) provided an advice note provided 24 February 2021 – prepared after receipt of a preliminary ecological appraisal (PEA) report (included as ES Volume 5, Annex 5.1: Preliminary Ecological Appraisal Report (APP-120)), which confirmed specified statutory sites can be scoped out of the assessment [Liverpool Bay SPA, Dee Estuary SPA/SAC/Ramsar/SSSI, Llwyn SAC/SSSI, Elwy Valley Woods SAC/Coedwigoedd Elwy a Meirchion SSSI, Traeth Pensarn SSSI and Graig Fawr SSSI]. b) The Applicant has undertaken pre-application consultation with NRW, Denbighshire County Council (DCC), the RSPB and North Wales Wildlife Trust via Onshore Ecology Expert Topic Group 5 (ETG 5)

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			[APP-301], which has included discussion on the scope of the wintering bird survey (WBS). The proposed wintering bird survey areas and methodologies were presented at the 9 September 2020 ETG meeting and in a technical note, circulated to the ETG on 30 September 2020. The survey areas and methodologies presented were subsequently agreed with the ETG. The results of the WBS are provided in ES Volume 5, Annex 5.3: Wintering Bird Survey Report (APP-126). c) The Applicant would like to clarify that reference in Para 105 of ES Volume 3, Chapter 10: Noise and Vibration (APP-071), should make reference to ecological designations rather than ecological receptors. As confirmed in the Applicant's response to ExQ1.2.70, Table 16 of ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) identifies potential effects due to noise and vibration for wintering birds at the landfall and River Clwyd has and these have been included in the assessment. This is reflected in the Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
2.92	The Applicant	**Onshore – Habitat and Species** Please can you describe and explain how Habitats Regulations Annex 1 habitat H2130 dune grassland can successfully be re-established from turf salvaged from specific areas and created from native local provenance seed. Please confirm timeframe for both approaches for the habitat to be fully functional (Table 5, section 13.3.5 [APP-074]).	Outline proposals for reinstatement of the temporary construction compound (TCC) at Y Ffrith, including proposals for retention and replacement of turfs and/or re-seeding including proposals for aftercare periods and temporary protection to aid restoration are set out in Section 4.1 of the oLEMP (APP-305). The Applicant would like to highlight that the area of Annex 1 H2130 dune grassland that may be affected is located beside an existing access road (which may require widening for the project) and forms the southern boundary of an area of coastal grassland that is not currently considered to be "fully functional" as a result, i.e. dune processes cannot occur at the location due to existing infrastructure, management and use. It is anticipated that the area will recover to form coastal grassland of a type and quality to match the existing and undisturbed adjacent areas within 5 -10 years (i.e., not significant in the mid-term, as stated in Table 15 of the ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). This is based upon the current evidence of natural re-colonisation in the absence of management intervention (see below), and research by Denning, 2017, which indicates that recovery time of fixed dunes

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			supporting NVC type SD7 grassland (such as is the case here) can be decreased through planting to 5-10 years for the presence of key species. The TCC itself is proposed for a nearby area of coastal grassland that is not Annex 1 but does meet Priority Habitat status. The grassland at the TCC location has established on an area that has been previously developed (buildings are shown on the area in the OS 1:10.000 1949-1971 maps), with evidence of previous hard standing areas remaining (as shown on Figure 10 in ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066). This demonstrates that even in the absence of management, coastal grassland can develop at this location. Whilst it is not known when the buildings were demolished, based on publicly available aerial images on Google Earth, the area has been well vegetated since at least 2006. Full details of the salvage and translocation of coastal grassland, including any areas that meet the Annex 1 definition, will be provided in the Final LEMP that will be secured by DCO R13 and will be informed by pre-construction survey results, final scheme design and collaboration with key stakeholders. It is anticipated that retained turves will be kept within the working width, with turves and soils stored separately and watered as necessary. Additional, species-specific measures may be implemented if notable Re-instatement would follow standard practice of replacement of sub and topsoils (or sands), then turves. No material will be imported. Additional seeding will only occur if monitoring indicates that re-instatement is not progressing as expected.
2.93	The Applicant	**Onshore – Habitat and Species** Please can you: a) Define the term "heavy standard trees" which appears within different ES chapters as a proposed mitigation measure; b) Explain source of 3:1 planting ratio and how this ratio is secured in the dDCO (Table 5, section 13.3.5 [APP-074]); and c) Explain source/location of locally appropriate native mixture for replanting and timeframe in the MDS to reach sufficient maturity to be utilised as a hedgerow.	a) This is a term derived from standard tree sizes as set out in British Standard BS 3936-1, Nursery Stock Specification for Trees and Shrubs, and relates to trees with a girth of 12-14 cm at 1m above ground. b) The planting ratio is based on a requirement to reinstate what has been removed, allowing for a potential degree of failure in the long term or realising an enhancement where no failure occurs. It is not based upon any specific guidelines but is considered proportionate to the impacts in this case. This ratio is included in Section 4 of the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Full details will be provided in the Final LEMP that will be secured by

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			DCO R13, and prepared in light of pre-construction survey results, in collaboration with key stakeholders. c) The oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) commits to using locally appropriate species in all reinstatement and habitat creation proposals. The source of locally appropriate seed and other plant material will be determined closer to the time that reinstatement and habitat creation will take place. Full details will be provided in the final LEMP that will be secured by DCO R13, and prepared in light of pre-construction survey results, detailed design information and collaboration with key stakeholders. As stated in Table 12 of APP-066, a period of 5 years post construction is considered to be the approximate duration for recovery of a hedgerow to ecological function for use by most species. As previously noted at ExQ1.2.79, species which use the base of hedgerows, such as newts, hedgehogs, etc may start using the base of the hedgerow sooner, once the ground flora has established. However, as per the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305) paragraph 62, it is expected the ground flora around the hedgerow plants may need to be treated with herbicide for up to three years, which would delay the ground flora being available for the terrestrial species (i.e. newts, hedgehogs etc.). Therefore, although the ground flora, base of the hedgerows maybe available for terrestrial species to use sooner than the hedgerow itself for the purposes of the assessment it is assumed it would also only be available after five years.
2.94	The Applicant	**Onshore – Habitat and Species** For other S7 Mammal Species: hedgehog, brown hare, polecat please can you confirm permanent loss of habitat in hectares at the OnSS and explain and describe the habitat area earmarked for re-creation (Table 5, section 13.3.5 [APP-074]).	As stated in Table 12 of the ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066), there will be permanent loss of up to 5 ha of habitat at the Onshore Substation (OnSS). Although all of the habitats which would be lost may be subject to some use by S7 mammal species, the value of most of the habitats that would be lost for these species is relatively low. A loss of 5 ha therefore represents very much a worst-case with the area affected that is of value to S7 mammal species likely to be substantially lower.

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			The Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) describes the mitigation, compensation and enhancements that will be undertaken at the OnSS, much of which will benefit S7 mammal species. Figure 2 in the oLEMP shows the extent of proposed habitat re-creation and enhancement at the OnSS.
2.95	The Applicant	**Onshore – Invertebrates** Table 11 (APP-066) identifies invertebrates being a factor for importance of ecological features at coastal saltmarsh; coastal and floodplain grazing marsh, rivers; and ES Volume 5, Annex 7.4 [APP-140] identifies Bryn Cwnin Wetland LWS supporting a range of important invertebrates. Please can you confirm baseline invertebrate types identified at the habitats mentioned above and confirm significance of residual effects on invertebrates at the following habitats: Coastal saltmarsh; coastal and floodplain grazing marsh, rivers; and Bryn Cwnin Wetland LWS.	Table 11 of the ES Volume 3, Chapter 5: Biodiversity and Nature Conservation (APP-066) identifies the Important Ecological Features which have either been identified within the study area or are considered likely to be present within the study area. This identifies several sites or habitat types which are likely to support important invertebrate populations, including the sites and habitats listed in ExQ1.2.95, i.e. coastal saltmarsh, coastal and floodplain grazing marsh, rivers and Bryn Cwnin Wetland Local Wildlife Site (LWS), As set out in paragraph 198 of the ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066) there will be no direct impact on Bryn Cwnin Wetland LWS. Indirect impacts on Bryn Cwnin Wetland LWS have been assessed and deemed not significant (see paragraph 200 of the ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066)). As such any important invertebrate populations present within Bryn Cwnin Wetland LWS would not be significantly affected. Similarly, impacts on coastal saltmarsh and rivers will be avoided by the use of Horizontal Directional Drilling (HDD) (see also paragraph 198 of the ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066)). As such any important invertebrate populations within those habitats would not be affected. With respect to coastal and floodplain grazing marsh, impacts on the habitat type are assessed in Table 15 of the ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066). This notes that 11 ha of coastal and floodplain grazing marsh will be temporarily lost, although all of that area is subject to periodic agricultural disturbance via ploughing or reseeding as part of normal farming practice. Vegetation within several ditches will also be subject to temporary loss, however all ditches are likely to be subject to similar disturbance already during regular maintenance. Proposals for reinstatement of these habitats are provided in Section 4.3 of

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			the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Following the implementation of the proposed reinstatement no significant effects on the coastal and floodplain grazing marsh habitat are likely. This conclusion also applies to any important invertebrate populations that may be present within the coastal and floodplain grazing marsh habitat.
2.96	The Applicant	**Onshore – Invertebrates** Please describe and explain how the proposed mitigation for coastal sand dune in Table 15 (APP-066) assists with the mitigation of invertebrates at the following habitats: Coastal saltmarsh; coastal and floodplain grazing marsh, rivers; and Bryn Cwnin Wetland LWS.	The reference in Table 16 of the ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066) to the proposed mitigation for coastal sand dune habitat in Table 15 applies specifically to invertebrates using coastal dune habitat. As set out in the response to ExQ1.2.95, invertebrates in coastal saltmarsh, rivers and Bryn Cwnin Wetland Local Wildlife Site (LWS) will not be affected by the project and therefore no mitigation for invertebrates is required at these locations. The proposed mitigation for coastal and floodplain grazing marsh habitat summarised in Table 15 of the ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066) would apply to important invertebrate populations associated with coastal and floodplain grazing marsh. The Applicant confirms that Table 16 and Table 21 in the ES Volume 3 Chapter 5: Biodiversity and Nature Conservation (APP-066) should also include a row covering Invertebrates using coastal and floodplain grazing marsh and has included this in the Errata sheet (Document 1.4 of the Applicant's Deadline 1 submission).
2.97	NRW, JNCC, RSPB, NWWT	**RIAA** Are you satisfied with: a) Table 57 and no adverse effect on integrity alone and in-combination? (ES Report to Inform Appropriate Assessment [APP-027]); b) Table 6 – summary of the screening conclusions for all receptors (excluding ornithology) (ES RIAA Annex 1 [APP-028]); and c) The minimum air gap of 21.9m referenced in table 1 turbine and array parameters used to inform Collision Risk Models [APP-097].	It is acknowledged that this Question is not directed at the Applicant, but has provided the following response which may be useful context for the ExA. A) The Applicant has engaged with NRW, JNCC, RSPB and NWWT on HRA matters from an early stage via the Evidence Plan process (see the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303, respectively). SoCGs with these parties are currently in development to agree the conclusions of the RIAA with respect to AEoI. B) The Applicant has engaged with NRW, JNCC, RSPB and NWWT on HRA matters from an early stage via the Evidence Plan process (see the Evidence Plan Report and its supporting appendices (APP-301, APP-302

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		If no to any of the above points, please identify and explain your reasons and provide evidence justification.	and APP-303, respectively) and this has included agreement on the screening conclusions for all receptors. The Applicant expects this to be reflected within the SoCGs that are currently in development with these parties. C) As detailed in Volume 4, Annex 4.5: Offshore Scoping and Consultation Responses (APP-099), the Applicant consulted and agreed the approach for collision risk modelling through stakeholder engagement. The Applicant confirms that the value of 21.9 m referenced in Table 1 was a typographical error and should read 21.19. This correction is noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
2.98	NRW, JNCC, RSPB, NWWT	**RIAA** Are you satisfied with the potential impacts considered at designations within Table 1.1. If no, please identify the designation(s), explain your reasons, and provide evidence justification (ES Integrity Matrices [APP-034]).	N/A
2.99	The Applicant	**RIAA** Please can you respond to Janet Finch-Saunders MS [AS-036] and the statement that appears in [APP-032] the potential for offshore wind farms to have a negative effect on the integrity of Special Protection Areas within foraging range of the offshore wind farm site during the breeding season.	The Applicant agreed on the approach to the HRA screening ahead of the RIAA being undertaken through consultation with SNCBs. The outcome of the RIAA for offshore ornithology features of designated sites within foraging range of the project is agreed with NRW as being no AEoI for AyM alone and in-combination for other plans and projects. For clarification purposes for Janet Finch-Saunders MS, the Applicant can confirm that there will be no negative effect on the integrity of Special Protection Areas within foraging range of the offshore wind farm site during the breeding season. The Applicant has provided a full response to Janet Finch-Saunders Relevant Representation (AS-036) in Document 1.1 of the Applicant's Deadline 1 submission.
2.100	The Applicant	**RIAA** Table 5 of the Report to Inform Appropriate Assessment [APP-027] lists the features of the Special Protection Areas and Ramsar sites likely to experience significant effects from the Proposed Development. However, the features listed from some of the SPAs do not appear to match the features listed on the citations or conservation objectives for these features – for example the	The descriptions in Table 5 of Report 5.2: Report to Inform Appropriate Assessment (PINS ref: APP-027) relate to the periods where there is potential for LSE identified for features which may deviate from the citation. For example, common tern from the Liverpool Bay SPA is a breeding season qualifying feature of the SPA as denoted in the citation. However, the screening process for AyM identified that there is also potential for common terns feature of the Liverpool Bay SPA to have

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		common tern feature of Liverpool Bay SPA is described as being breeding and on passage while the SPA citation refers to the common tern breeding population. The Applicant is requested to provide clarification on the features considered in Table 5 (and if necessary, a revised version of Table 5), notably in relation to the following SPAs/proposed SPAs/Ramsar sites: • Bae Lerpwl/Liverpool Bay; • The Dee Estuary; • Morwenoliad Ynys Môn/Anglesey Terns; • Ribble and Alt Estuaries; • Bowland Fells; • Ailsa Craig; • Copeland Islands; • Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island; • Sgomer, Sgogwm a Moroedd Penfro /Skomer, Skokholm and the Seas off Pembrokeshire/; and • Morecambe Bay Ramsar site	connectivity whilst they migrate to and from the colony and therefore have been assessed during the migration period (passage) also.
2.101	NRW	**RIAA** The Applicant's assessment of LSE on European sites (Table 5 of [APP-027]) includes pintail, teal and ringed plover as features of the Severn Estuary Ramsar site. However, the ExA notes that these features are listed on the relevant Ramsar Information Site as identified for possible future consideration under criterion 6. Natural Resources Wales is requested to confirm if these features should be treated as listed Ramsar features. If so, what is the legal or policy basis for doing so?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant included these on a precautionary basis and treated potential updates to the RAMSAR site in the same manner as SPA extension citation features are treated, which is to include them as if they were already cited features.
2.102	NRW, NS, DAERANI, Isle of Man Government, JNCC	**RIAA** Please confirm if there are any additional European/Ramsar sites or qualifying features which have not been included in [APP-027].	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. As detailed in Table 1 of Report 5.2: Report to Inform Appropriate Assessment (APP-027), the Applicant undertook consultation with the Offshore Ornithology ETG through expert topic groups prior to drafting of the RIAA to ensure all designated sites and features were appropriately identified. Following consultation, an update was made to the screening

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			assessment in Report 5.2.2 Report to Inform Appropriate Assessment, Annex 2: Habitats Regulations Assessment (HRA) Screening Update (Ornithology) (APP-029) to capture any additional sites and features requested. The Applicant considers that extensive consultation has been had on this matter with multiple opportunities for further sites to be raised.
2.103	NRW, JNCC, DAERANI	**RIAA** Please confirm if the assessment in [APP-027] refers to the correct conservation objectives for the European/Ramsar sites under consideration.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. As detailed in Table 1 of Report 5.2: Report to Inform Appropriate Assessment (APP-027), the Applicant undertook consultation with SNCBs through expert topic groups prior to drafting of the RIAA to ensure the conservation objectives for all designated sites and features screened in for assessment were appropriately assessed against. Following consultation where applicable updates were made within Section 10.3 of Report 5.2: Report to Inform Appropriate Assessment (APP-027) and Report 5.2.2 Report to Inform Appropriate Assessment, Annex 2: Habitats Regulations Assessment (HRA) Screening Update (Ornithology)(APP-029).
2.104	NRW	**RIAA** In the assessment of potential adverse effects on the integrity of Liverpool Bay SPA, [APP-027] refers to the conservation objectives contained in the Regulation 35(3) Advice agreed by Natural Resources Wales (NRW) and Natural England (NE), despite the lack of reference in these objectives to several of the qualifying features (common tern, little tern and common scoter). Could NRW confirm if this approach is appropriate and how the Secretary of State can consider the implications for the conservation objectives of the SPA if the conservation objectives do not cover the full range of qualifying features?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. Since the publication of the Regulation 35(3) Advice, the additional features noted have been added to the Liverpool Bay SPA as detailed in a supplementary advice note in 2016 which contains a link to the main conservation objectives with an updated list all species. Therefore, the reference to the Regulation 35(3) advice remains valid and the Applicant can confirm that these additional qualifying features are considered in the RIAA.
2.105	The Applicant	**RIAA** Section 10.2 of [APP-027] states that the Isles of Scilly Complex Special Area of Conservation was included in the assessment of effects on grey seals. However, this SAC does not appear to have been identified in the LSE screening exercise reported in the RIAA	The Applicant confirms that the Isle of Scilly Complex SAC was included in the RIAA (APP-027). The conclusion was: There is expected to be no population level impact to the SAC as a result of this low-level disturbance (paragraph 294 in APP-027) and therefore no LSE. It is further noted that the Scilly Complex SAC is several hundred kilometers from AyM,

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		and supporting documents. The Applicant is requested to clarify whether it considers that LSE on this SAC could arise.	
2.106	The Applicant	**RIAA** Table 4 of [APP-027] identifies LSE on the Y Fenai a Bae Conwy/Menai Strait and Conwy Bay Special Area of Conservation from physical habitat loss/disturbance for all phases of the Proposed Development. However, this LSE is not addressed in the assessment of effects on the integrity of the SAC presented in section 10.1.1 of the RIAA. The Applicant is requested to provide an updated assessment which addresses effects from physical habitat loss/disturbance on the SAC.	The Applicant can confirm that this site was mistakenly screened-in to the RIAA based on incorrect distance data from the AyM site. The site is located 6.12 km from AyM at its closest point and should have been screened-out of further assessment at this distance. This error has been highlighted in Document 1.4 of the Applicant's Deadline 1 submission.
2.107	The Applicant, NRW	**RIAA** The Examining Authority notes that the Applicant has relied on mitigation measures to avoid harm to the integrity of European/Ramsar sites in the marine environment. However, these mitigation measures, including the Marine Mammal Mitigation Protocol and the Project Environmental Management Plan are not secured through the draft DCO but instead rely on suitable conditions being attached to the Marine Licences for the Proposed Development. The **Applicant** is requested to explain, with references to case law if appropriate, why the SoS should have confidence that such an approach would comply with the requirements of the Habitats Regulations. Do **NRW** agree with this approach to securing mitigation? If so, a justification should be provided, with reference to any relevant case law, as to why this approach is appropriate.	The Applicant draws the ExA's attention to paragraph 4.10.3 of NPS EN-1 which states: *"In considering an application for development consent, the IPC should focus on whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The IPC should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. It should act to complement but not seek to duplicate them."* The Applicant considers that securing offshore mitigation measures through the marine licences accords with this policy and will be in compliance with the requirements of the Habitats Regulations if the SoS grants the DCO without such mitigation measures being duplicated in the DCO. Advice Note Ten on Habitats Regulations Assessments states that an applicant must consider ways to mitigate any potential for adverse effects on the integrity of a European site and that the mitigation measures relied upon must be adequately secured *"through the DCO or other means"* (para 3.19). PINS policy therefore envisages that mitigation measures in relation to HRA could be secured through alternative means to the DCO. This is supported by the position taken for the Morlais Demonstration Zone applications for a Transport and Works Act Order (TWAO) and deemed planning permission. For this project the Welsh Government were the

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			competent authority for the TWAO and NRW were the competent authority for the marine licence. The Inspector's Report suggests that marine licence conditions were a relevant consideration for the Welsh Ministers in determining the TWAO application. Paragraph 798 of the Report states: *"My report does not offer a view on the potential appropriateness of the suggested Marine Licence conditions. However, the potential scope, nature and effectiveness of the mitigation either within the suggested conditions, or that would be provided by other Marine Licence conditions, is set out to inform the Welsh Ministers' consideration of this TWA application."* There is also case law in relation to Town and Country Planning Act 1990 where it was held that, in a multi-stage process, provided there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision-maker is able to conclude that a development will satisfy the requirements of the Habitats Regulations (*The Queen on the Application of Devon Wildlife Trust v Teignbridge District Council v Rocklands Development Partnership* [2015] EWHC 2159 (Admin) [85] applying *Feeney v Secretary of State for Transport* [2013] EWHC 1238 (Admin)). In *Devon Wildlife Trust*, an outline planning permission could be granted on the basis that the development could not begin until reserved matters applications were approved which would mean that there was no possibility of the objectives of the Habitats Directive being compromised by the outline decision. The Applicant considers that these cases support the position that the SoS can grant the DCO in compliance with the Habitats Regulations if he is satisfied that the mitigation can be achieved in practice by being secured as a condition of the marine licence. The SoS can be satisfied that the offshore aspects of the project cannot commence until marine licences are secured which would include necessary conditions relating to HRA mitigation measures.
2.108	The Applicant	**RIAA** Please can you explain and describe how the RIAA and ES	The Applicant has provided a clarification note (Document 1.20 of the Applicant's Deadline 1 submission) which addresses this query. In summary,

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		considers the impact of marine vessel emissions and the effect on designated sites?	based on the MDS, emissions from marine vessels are not expected to exceed Welsh Government air quality screening thresholds and therefore further assessment is not considered to be required.
2.109	The Applicant	**RIAA** Please can you provide an additional figure (in addition to Figure 4 - All sites screened into the assessment) to show the French sites screened in as stated in table 4. Please also update paragraph 93 and statement "*Figure 4 shows all screened in sites in relation to AyM*". RIAA [APP-027]. Please also advise if European Site Information [AS-022] needs to be updated to include relevant French sites, and their conservation objectives and qualifying features.	In response to the EXA's request, the applicant has produced an additional figure to show the French Sites screened in as stated in table 4 of the RIAA (APP-027). This figure is provided to the Examination as an Appendix A to this document. The Applicant can also confirm that European Site Information (AS-022) omitted these relevant French sites and their conservation objectives and qualifying features as stated in the Table 4 of the RIAA (APP-027). This is also highlighted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).

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

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The Book of Reference (BoR), Statement of Reasons (SoR), Land Plans, diligent enquiry and updates			
3.1	The Applicant	Please advise whether the BoR [AS-020a] is fully compliant with the Department of Communities and Local Government guidance 'Planning Act 2008: procedures for the compulsory acquisition of land' (September 2013) (DCLG guidance).	The Applicant confirms that AS-020a: Book of Reference is compliant with DCLG guidance.
3.2	The Applicant	a) Please provide further detail / justification of how you have identified Category 3 parties for the purposes of the [AS-020a]. b) Are there any other persons who might be entitled to make a relevant claim if the DCO were to be made and fully implemented and should therefore be added as Category 3 parties to [AS-020a]? This could include, but not be limited to, those that have provided representations on, or have interests in: - noise, vibration, smell, fumes, smoke or artificial lighting; - the effect of construction or operation of the Proposed Development on property values or rental incomes; - concerns about subsidence or settlement; - claims that someone would need to be temporarily or	a) The Applicant has applied a multidisciplinary approach to the initial identification of potential Category 3 parties. This involved input from specialist land agents Dalcour Maclaren, environmental consultants SLR Consulting Limited and the Awel y Môr project team. As part of the identification and refinement process, the respective subject matter experts combined to: ▲ confirm what could constitute a relevant claim; ▲ advise on matters arising from the construction or operation of the project which may give rise to a claim; ▲ undertake property due diligence exercise on properties where it was perceived a claim could possibly be made; and

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		permanently relocated; - impacts on a business; - loss of rights, e.g. to a parking space or access to a private property; - concerns about project financing; - claims that there are viable alternatives; or - blight.	➢ conclude the properties potentially impacted and the likelihood of success of any claims. The primary cause for any relevant claim during the construction period was determined to be noise emanating from construction activities at landfall along the cable corridor, the construction and use of temporary construction compounds and the construction activities at the onshore substation site (OnSS). A worst-case scenario for noise was used as a baseline for the assessment and therefore noise impact thresholds for night and weekend working were used as the basis for review. As there would be no operational impacts from the underground onshore export cables, the potential for relevant claims to arise in relation to the operation of the development is limited to properties in proximity to the OnSS. The predicted noise levels used for assessment of construction impacts were deemed sufficient in the area around the OnSS to also capture potential claimants resulting from the operation of the Project and therefore no specific buffer was applied to the substation site in order to provide a boundary within which claimants would be identified. b) The Applicant undertook adequate diligent inquiry to identify the parties in Part 2 of the Book of Reference (AS-020a; Document 1.26 of the Applicant's Deadline 1 submission) who would, or might be entitled to, make a relevant claim. The Applicant does not consider there are any further parties who need to be included.
3.3	The Applicant	The Onshore Land Plans [AS-005] indicate pink and blue land would be subject to TP as well as either CA of land or rights. Where is this provided for in the draft Development Consent Order (dDCO) [AS-014] and should this be reflected in the second column of the Part 1 table of [AS- 020a]?	As provided for in Article 27(1) of the dDCO (AS-014), all of the land subject to CA can be occupied under temporary possession (TP) before the CA powers are exercised. As explained in the 4.1 Statement of Reasons (APP-021) at 10.1.11, temporary possession powers apply to all of the Order land, and powers may be used before permanent rights are acquired. The second column in the 4.3 Book of Reference (AS-020a) concerns the powers of compulsory acquisition sought. TP is not compulsory acquisition but is intended to be used in order to reduce the land within which the Applicant requires to seek permanent rights and to minimise the interference with landowners' and occupiers' rights.

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3.4	The Applicant	Noting paragraph 149 of the SoR [APP-021] and paragraph 35 of the Funding Statement (FS) [AS-018], further justify the conclusion that there would be no blight?	For a blight compensation to be payable, the claim must be supported by evidence that the claimant has made reasonable endeavours to sell the land or property in question and that the claimant has been unable to do so or could do so only at a price substantially lower than that for which it might reasonably have been expected to sell. Throughout the course of consultations and negotiations with all landowners and occupiers along the route, the Applicant has not been made aware of any attempts to sell any of the affected land or property that has resulted in the land or property failing to sell or only being able to be disposed of at a significantly lower value or any parties intending to serve a Blight Notice.
3.5	Affected Persons, Interested Parties	Are any Affected Persons or Interested Parties aware of any inaccuracies in [AS-020a], [APP- 021] or [AS-005]? If so, please set out what these are and provide the correct details.	N/A
3.6	The Applicant	Please summarise where you have not yet been able to identify any persons having an interest in the land, including any rights over unregistered land? What further steps will you be taking to identify any unknown rights during the Examination?	The Applicant can confirm that there are no plots where they have not been able to identify some form of legal or beneficial interest in the land. There are a number of unregistered plots where the Applicant has identified the owner(s) or the reputed owner(s) through diligent inquiry. The Applicant conducted diligent inquiry as described in the Statement of Reasons (Document 1.45 of the Applicant's Deadline 1 submission) and for plots where unknown interests had been identified during Section 42 Consultation and at Section 56 Notification stage, site notices were erected and maintained. The Applicant will continue to undertake enquiries, including through contact with adjoining owners and their agents, and will continue to maintain the Book of Reference (Document 1.26 of the Applicant's Deadline 1 submission) through Examination should any parties make themselves known.
3.7	The Applicant	Please provide further detail as to how diligent enquiry has been carried out, noting that there are a large number of 'unknown' interests in [AS-020a], for example, in respect of Plots 96, 97 and 98?	The Applicant has submitted a Land Referencing Methodology (Doc Ref. setting out how it's appointed land agents Dalcour Maclaren have undertaken diligent inquiry into the land interests affected by the project. With specific reference to plots 96, 97 and 98 and the large number of 'unknown' occupiers within these plots, this has arisen as a result of the land use being a caravan park. It is important to note that the 'unknown'

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			occupiers are the same in plots 96, 97 and 98 and they represent the occupiers of caravan pitches within the park. Despite diligent inquiry including the hand delivery of land interest questionnaires and statutory notices to the park reception, and the erection of site notices at the entrance to the caravan park, the Applicant has been able to identify only a small number of caravan occupiers but have included an 'unknown' party against each caravan pitch on the basis that they are individually leased on short term licence agreements. The applicant is of the opinion that reasonable endeavours have been made to identify occupiers with a further detailed description and methodology setting out the diligent inquiry undertaken in respect of plots 96, 97 and 98 being provided in the Land Referencing Methodology (Appendix P of Document 1.7 of the Applicant's Deadline 1 submission).
3.8	The Applicant	There appear to be some inconsistencies between information provided in some relevant representations (RR) and information in [AS-020a]. For example, the words 'Discretionary Trust' in [RR-037] do not appear in the relevant entry in [AS-020a] and the company name associated with [RR-017] does not appear as such in [AS-020a]. Please explore these inconsistencies, and any others, and provide clarification.	In the case of RR-037, the parties listed as 'Owners or Reputed Owners' in the Book of Reference (AS-020a) are George Berwyn Lloyd Kerfoot, Iola Morris Kerfoot and Jeremy Charles Salisbury. These parties are the proprietors as listed in section B of the HM Land Registry title register for title number WA859967. The Applicant is aware that the respective parties listed above are trustees of the GBL and IM Kerfoot Discretionary Trust but would note that this trading entity is not referred to in the title register for WA859967. The GBL and IM Kerfoot Discretionary Trust is not a registered company and therefore the applicant would consider that the Book of Reference (AS-020a) does accurately reflect names of the legal owners. With regards to RR-017 submitted by Diamond Transmission Corporation, due diligence carried out by the Applicant's agents Dalcour Maclaren has confirmed that Diamond Transmission Partners BBE Limited is the holder of the rights cited within the Book of Reference (AS-20a). As part of Dalcour Maclaren's due diligence exercise, a utility search was undertaken with Atkins Utility Solutions and as part of the responses to this search, a letter was received confirming that Diamond Transmission Partners BBE Limited are the owners of apparatus within the Order Limits. The Applicant believes that Diamond Transmission Corporation is a parent company to Diamond Transmission Partners BBE Limited with the latter being the project specific OFTO for Dong Energy's Burbo Bank Extension Project.

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3.9	The Applicant	Please ensure that [AS-020a], [APP-021], [AS-005] and Special Category Land Plans [AS-006] are: a) Kept fully up to date with any changes and the latest versions submitted at the deadlines shown in the Examination timetable together with an explanation of the reasons for each change; b) Supplied in two versions (clean and track changed) at each deadline; c) Supplied with unique revision numbers that are updated consecutively from the application versions, clearly indicated within the body of each document and included within the electronic filename; and d) [AS-014], including relevant Schedules, is updated accordingly.	The Applicant notes these requests and will ensure that they are adhered to throughout the course of the examination.
3.10	The Applicant	What assurance and evidence can the Applicant provide of the accuracy of the land interests identified as submitted and can the Applicant indicate whether there are likely to be any changes to the land interests, including the identification of further owners / interests or monitoring and update of changes in interests?	The Applicant has submitted a land referencing methodology drafted by their appointed land agents Dalcour Maclaren which sets out the process by which land interests were identified. Dalcour Maclaren will continue to ensure that the Book of Reference is kept up to date through engagement with landowner's and their appointed agents as well as through the undertaking of regular refreshes to HM Land Registry and utilities searches. An updated Book of Reference (Document 1.26 of the Applicant's Deadline 1 submission) has been submitted at Deadline 1 which reflects changes to land interests which have been identified since the application was submitted on 20 April 2022. Given the length of the examination, the Applicant believes that it is likely that further new interests will be identified during the course of the examination period and therefore further updates to the Book of Reference are expected to be submitted in due course.
3.11	The Applicant	Do you envisage any changes to the application which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010?	The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 prescribe the process where a need for CA of additional land has been identified and any person with an interest in the additional land does not consent to its inclusion. The Applicant does not envisage the provision of the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 being engaged by this application during the Examination period as it is aware of no reason why new land for which compulsory powers are sought would require to be added.

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3.12	The Applicant	Schedule 1 of [APP-021] (Summary of status of negotiations with landowners) provides limited detail and it is unclear whether it relates to all landowners. Moreover, it provides no detail in respect of negotiations with other Category 1 parties, Category 2 parties or Category 3 parties. Please provide detailed information on the status of negotiations with all Affected Persons given that the ExA should be satisfied that the Applicant has engaged with all Affected Persons with a view to acquiring their land interests by agreement. Please also provide an update in respect of engagement with those affected parties as referred to in section 9 of [APP-021]. This information can be included in the Compulsory Acquisition Schedule and Statutory Undertakers Progress Schedule (see below).	The Applicant has prepared a schedule setting out the status of negotiations with all Category 1 parties (Document 1.12 of the Applicant's Deadline 1 submission). This includes all parties named in S.9 of the Statement of Reasons (Document 1.45 of the Applicant's Deadline 1 submission). Parties within Category 2 are those parties who hold rights over land within the Order Limits. The Applicant does not intend to acquire rights from any Category 2 parties and as such these parties are not included within Document 1.12 of the Applicant's Deadline 1 submission. A number of Category 2 parties are statutory undertakers and as such the Applicant is progressing negotiations in respect of protective provisions. A summary of progress in these negotiations is set out in Appendix C to Document 1.7 of the Applicant's Deadline 1 submission. Category 3 parties are those able to make a relevant claim under legislation including Part 1 of the Land Compensation Act 1971 and S.10 of the Compulsory Purchase Act 1965. The Applicant is not intending to acquire land or rights from any Category 3 parties and as such these parties do not appear in Document 1.45 of the Applicant's Deadline 1 submission.
3.13	The Applicant	Paragraph 7 of [AS-020a] sets out that the Applicant has taken a cautious approach to seeking CA / TP powers in respect of all plots of land even where it already holds an interest or presumes it holds an interest in land. Please list the plots the Applicant holds an interest or presumes it holds and interest in as it is not clear from [AS-020a] which these are.	The Applicant can confirm that it does not currently hold rights over any plots within the Order Limits.
How it is intended to use the land, whether reasonable alternatives have been explored and whether the rights sought are legitimate, proportionate and necessary			
3.14	The Applicant	To assist with the consideration of whether the extent of the land to be used temporarily is no more than is reasonably required for the purposes of the Proposed Development, please provide further details to justify the extent of the land sought to be used temporarily (including in respect of Rhyl Golf Club).	The Applicant has set out in Appendix B to this document the further detail requested for all of the plots for which only temporary possession is sought. The table presented in Appendix B to this document of this document is based on that set out in Schedule 6 of the dDCO with the additional detail added in response to this question in new column.
3.15	The Applicant	Article 27(8)(a) and (b) of [AS-014] appears to provide for the CA of rights over land / CA of subsoil in respect of plots identified for TP only (as set out in Schedule 6 of [AS-014] and as identified on	The article does provide an ability to acquire rights over land subject to temporary possession. That wording was used in the model provisions (article 28) and has appeared in precedent granted DCOs (*The Norfolk*

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		the onshore Land Plans in yellow). Please justify such powers, clarify to what extent persons affected are likely to be aware of this and confirm whether the powers sought are reflected in the [AS-020a] and [APP-021]?	*Boreas Offshore Wind Farm Order 2021 and The Norfolk Vanguard Offshore Wind Farm Order 2022 both as article 26 and The Hornsea Three Offshore Wind Farm Order 2020, article 26*). This is a fallback provision to ensure deliverability of the authorised development, including service diversions. Acquisition of rights is only anticipated in plots shown in blue on the Land Plans, primarily for the main cable route and mitigation land the locations of which have been identified. Flexibility to acquire other rights is necessary to ensure deliverability, should, for example, service diversions be required outside the main cable corridor. Although the Applicant has sought to identify all the services located within the Order Limits it cannot be ruled out that there are others that some are not mapped or incorrectly mapped or that some owners have not advised the Applicant of the location of their apparatus. This reserve power is therefore needed should a diversion be required in order to obtain the land rights to put that diversion in place and retain it on the new line. Any such acquisition would be compensatable in line with the Compensation Code. All affected land and rights holders have been consulted on the application as required by Section 42 of the Planning Act 2008 and notified of the acceptance of the application under section 56 of the Planning Act 2008. Both processes noted that the application would include seeking powers of compulsory acquisition. As with every DCO, all of the Order land would be subject to various powers if the DCO is granted and affected persons have been provided with an opportunity to make representations on the application.
3.16	The Applicant	Please justify the width of the onshore ECC where trenchless techniques are proposed and explain why this is greater than where trenching would occur.	The cable corridor construction swathe cross section for open trench installation for the six power cables required for AyM is 40m. This is shown in Figure 24 of (APP-062). It should be noted that this figure incorrectly identifies a corresponding easement width of 40m – this is not the case, and the final easement width will be less than this as it will be sized around the location of the installed cables. For crossings such as 5A-WX-12 (River Clwyd), the Applicant will use trenchless techniques to cross the river to ensure the feature (in this case the River Clwyd) is not adversely affected by the cable installation works. For trenchless crossings such as this, a cable corridor width of 60m is needed.

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			The cable corridor is wider for such trenchless crossings as cables installed via trenchless techniques are at a greater depth and require greater separation than cables installed near the surface using trenched techniques. Power cables emit heat which must be dissipated into the surrounding soil to prevent damage to the cable. The rate of heat dissipation depends on the depth of the cable and the thermal characteristics of the surrounding soil. Hence, to retain the current carrying capacity (power rating) of the cable, cables installed deep underground using trenchless methods need to be spaced further apart from each other, to prevent a derating of the cable and a reduction in the electricity that can be transmitted. Trenchless crossings such as the River Clwyd are complex, due to the expected ground conditions and their considerable length. For such complex crossings, an additional allowance needs to be made for the installation tolerances along the drill path, which increase when passing through difficult ground conditions. This tolerance is required to enable micrositing at the detailed design stage once the ground conditions are further understood. Additional space is also required for the working areas at the entry and exit pits. These working areas enable a drill rig to be positioned at each end of the 6 cable ducts and hence require the full 60m cable corridor width. The modelled HDD layout requires 8m between each cable (16m total per circuit). It allows up to 10m between the circuits, hence 42m in total. This leaves 9m installation tolerance for misalignment on each side of the anticipated corridor (including approximately 0.6m for the bore), ensuring that the full bore and duct can be safely installed within the 60m cable corridor width. This spacing is similar to that used in the final design of other cable schemes delivered by the Applicant, such as Triton Knoll. Post-consent detailed geotechnical surveys and detailed design will determine the trenchless crossing design at each location and the final cable spacing required for Awel y Môr. The final cable installation will remain within the corridor width of 60m, whilst maintaining sufficient separation to avoid affecting the rating of the cable.

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3.17	The Applicant	Given that the National Grid substation extension does not form part of the application, please justify the powers sought for CA of rights / TP of land associated with this and the inclusion of such land within the Order limits.	The compulsory acquisition (CA) and temporary possession (TP) powers sought are not required to build or facilitate the extension to the National Grid substation but to allow the Applicant to undertake the works necessary to connect to that substation, which would include works within the substation area, the location of which are be defined by National Grid within Work No.40. The Applicant has a connection agreement with National Grid and there is therefore certainty that a connection will be provided to the Applicant at this substation, however the precise connection point is not yet known. The degree of flexibility sought in the dDCO reflects the position that at this stage, the Applicant cannot be certain where in the substation or its proposed extension the connection point for the authorised development will be. Until National Grid issues a final design for the extension and confirms which connection bays the Applicant is to use, the Applicant requires the flexibility sought in this area to allow for routing of the cables and detailed design of works to ensure that the connection can be made. The land is accordingly included to access three sides of the substation. Land take will be the minimum necessary when exercising the powers (should that be required) as the National Grid design will have progressed and the location of the Awel y Môr connection point confirmed.
3.18	The Applicant	Section 5 of [APP-021], states that there is a compelling case in the public interest for CA. Please address the following: a) What assessment, if any, has been made of the effect upon individual Affected Persons and their private loss that would result from the exercise of CA powers in each case; b) How has it been demonstrated within the application that the public benefits of the scheme outweigh any residual adverse effects including private loss suffered by individual landowners and occupiers; and c) Demonstrate how such a conclusion has been reached and how the balancing exercise between public benefit and private loss has been carried out?	a) The 4.1 Statement of Reasons (APP-021) sets out that the Applicant is satisfied that the conditions in section 122 of the Planning Act 2008 (the Act) are met and that tests within the Compulsory Acquisition Guidance are satisfied, and there is a compelling case in the public interest for the Compulsory Acquisition identified as necessary to deliver the scheme. All of the land subject to compulsory acquisition and temporary possession is necessary to construct, operate, maintain and mitigate the scheme and the extent of land sought is proportionate and reasonable. Landowners whose land is compulsorily acquired are entitled to compensation under the Compensation Code. A first principle of the Compensation Code is the principle of equivalence - that landowners are, as far as possible, to be placed in a position equivalent to that which they would have been had the compulsory purchase of their land not occurred. The land cost estimate undertaken as part of the scheme development is undertaken

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			for each landowner / affected person and considers severance and injurious affection.
3.19	The Applicant	Section 12 of [APP-021] addresses human rights. Can the Applicant: a) Provide a more detailed demonstration that interference with human rights in this case would be proportionate and justified; and b) Explain how the proportionality test has been undertaken and how this approach has been undertaken in relation to individual plots?	A) The response to question (b) demonstrates that interference with human rights would be proportionate and justified. The need for and benefits of the scheme are set out within the 4.1 Statement of Reasons (APP-021; Document 1.45 of the Applicant's Deadline 1 submission) and in other submission documents including the 8.1 Planning Statement (APP-298). Together, they demonstrate that there is a very strong and compelling case in the public interest for the scheme to be delivered. The land identified as being required for the scheme has been based on environmental and engineering requirements and is the minimum necessary to construct, maintain and mitigate the scheme. The purpose for which each plot of land is required is set out within the Statement of Reasons. B) Proportionality cannot be looked at solely on individual plots because the compulsory rights sought are justified by the whole of the authorised development, not individual elements of it. The Planning Act 2008: procedures for the compulsory acquisition of land guidance at paragraph 14, provides that "In determining where the balance of public interest lies, the Secretary of State will weigh up the public benefits that a scheme will bring against any private loss to those affected by compulsory acquisition" (emphasis added). During scheme development, each plot has been reviewed individually in order to challenge the proposed land take and allow refinement where possible to reduce land required. This plot-by-plot review included consideration of: • The requirement for land take and extent to which the plot was required. This included design alterations in consultation with affected persons to ensure that only land necessary for the scheme was included within the Order limits, and wherever possible, the scheme allowed for the continued use of wider land holdings.

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			• The approach of accessing land and undertaking the majority of the works under temporary possession powers, ensuring that land is not acquired unnecessarily and that post-construction use of the land can continue subject to the restrictions necessary to protect the Awel y Môr cables. • Review of the land use and ownership of land in order to consider the impacts of including that land within the scheme, both in terms of ownership and any business impacts. • Review of areas and amendments to ensure, wherever possible, land take follows existing boundaries / ownerships. • Efforts to reduce severance and design changes to ensure no inaccessible or unworkable areas of land exist post construction of the scheme. As a result of the above proportionality tests and review / challenge process which balance the requirement for individual plots against the anticipated impacts, the Applicant is satisfied that the powers of compulsory acquisition and possession sought through the dDCO are necessary, proportionate, and justified. The powers sought are proportionate because of minimisation (see above), the site selection process which balanced multiple factors including environmental impacts and impact on landowners. CA is also proportionate because will be used as a last resort – the Applicant is and will continue to seek to agree voluntary agreements with landowners wherever possible.
3.20	The Applicant	For the avoidance of doubt, please set out all the factors that are regarded as constituting evidence for a compelling case in the public interest for the CA and TP powers sought and where, giving specific paragraph references, are these set out in the submitted documentation?	Please see details of the public need for Awel y Môr and benefits in 4.1 Statement of Reasons (APP-021; Document 1.45 of the Applicant's Deadline 1 submission) sections 5.4 and 12, in particular paragraphs 47, 48. 135 and 136. See also 8.1 Planning Statement (APP-298) sections 5 and 7, in particular paragraphs 884, 890, 891 and 892.
Individual objections, issues and voluntary agreements			
3.21	All Affected Persons	Does any Affected Person have any concerns that they have not yet raised about the legitimacy, proportionality or necessity of the compulsory acquisition or temporary possession powers sought by the Applicant that would affect their land or their rights in land?	N/A

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
3.22	The Applicant	Please complete the Compulsory Acquisition (CA) / Temporary Possession (TP) Objections Schedule (CA Schedule) (at Annex A of this document) and make any entries you believe would be appropriate, taking account of the positions expressed in RRs, and giving reasons for any additions. As the Examination progresses and at each successive deadline, please update the CA Schedule as necessary.	The Applicant has produced a Table of Compulsory Acquisition and Temporary Possession Objections (CA Schedule) with document reference Document 1.12 of the Applicant's Deadline 1 submission.
3.23	The Applicant	In the light of the DCLG guidance, in particular paragraph 8, please describe: a) How the ExA can be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored; and b) Set out in summary form, with document references where appropriate, what assessment / comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.	A) During the initial stages of the project, the Applicant explored and assessed alternative solutions and routes. These are the Environmental Statement (ES), 6.1.4 Chapter 4 (APP-044). The project which is the subject of the current application, has evolved through consultations, negotiation and discussion with a range of Interested Parties and Affected Persons. The 4.1 Statement of Reasons (APP-021; Document 1.45 of the Applicant's Deadline 1 submission), section 7 explains that following public consultation, the Applicant selected the most appropriate option for the landfall which drives one of the end points of the cable route. None of the alternatives or modifications considered during design iteration would obviate the need for the compulsory acquisition and temporary possession of land. The Applicant has been undertaking negotiations to acquire land and rights by agreement. The current situation in respect of those negotiations is detailed in the Applicant's schedule of negotiations which will be updated for deadline 1. The draft Development Consent Order (dDCO) (AS-014; Document 1.8 of the Applicant's Deadline 1 submission), A20 (Acquisition of subsoil only), facilitates the Applicant's ability to be flexible in order to minimise, so far as is possible, the extent of interests to be acquired, with less impact upon landowners. The Explanatory Memorandum (APP-019), in paragraph 91 explains that it is considered to be in the public interest to provide this flexibility. In addition, the dDCO, Article 20 (Compulsory acquisition of rights), allows for rights over land to be acquired instead of the land itself. This allows the Applicant, not to have to seek outright acquisition for the cable route and to rely on the creation and acquisition of new rights instead, as explained in

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			the Explanatory Memorandum (Document 1.17 of the Applicant's Deadline 1 submission), section 3.5.3. B) Please see the response to question 3.19(b) which addresses the consideration of individual plots. As set out in response to ExQ1.3.19 above, alternatives in the form of alternative design or site selection have been reported on in the Environmental Statement (ES), 6.1.4 Chapter 4 (APP-044). The only alternative to CA at this is voluntary negotiation which is being pursued. Design changes (which are not proposed) would simply move the CA sought from one landowner to another; given the careful consideration which was undertaken to lead to the current routing (as set out in the ES), the Applicant considers that the application as made represents a proportionate position.
Statutory Undertakers			
3.24	The Applicant, Statutory Undertakers (including SP Energy Networks on behalf of SP Manweb, National Grid Electricity Transmission Plc and Diamond Transmission Corporation)	[AS-020a] includes several Statutory Undertakers with interests in land and equipment that would be affected by CA / TP. The Applicant: a) Provide a progress report on negotiations with each of the Statutory Undertakers listed in [AS-020a], with an estimate of the timescale for securing agreement with them; b) Indicate whether there are any envisaged impediments to the securing of such agreements; and c) State whether any additional Statutory Undertakers have been identified since the submission of [AS-020a] with the application. Statutory Undertakers: Where Statutory Undertakers ([RR-013], [RR-014] and [RR-017]) have concerns regarding the current drafting of the Protective Provision within [AS-014], either provide copies of preferred wording or if you have provided it, signpost where it can be found and explain why you do not consider the wording as currently drafted to be appropriate.	SP Energy Networks (SPEN) a) negotiations are progressing well and both parties have verbally agreed that Protective Provisions are hopefully going to be agreed by Deadline 2. b) no impediments to the securing of Protective Provisions are envisaged at this time. National Grid a) negotiations are progressing well and agreement is anticipated, hopefully in early 2023. b) it is not anticipated that there are any impediments to securing the Protective Provisions. An update on negotiations with statutory undertakers with a land interest in the Book of Reference (including SPEN and National Grid) has been included in the Update on Negotiation with Landowners, Occupiers and Statutory Undertakers and Other Utilities (Appendix C to this document). c) There are no statutory undertakers identified that have not already been included.

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3.25	The Applicant	The Applicant is requested to review the RRs and subsequent Written Representations made by any Statutory Undertaker as the Examination progresses and at each successive deadline update, as necessary, a table identifying and responding to any representations made by Statutory Undertakers with land or rights to which PA2008 s127 and / or s138 of PA2008 applies (Statutory Undertakers Progress Schedule). Where such representations are identified, the Applicant is requested to identify: a) An up-to-date list of Statutory Undertakers; b) The nature of their undertakings; c) The Statutory Undertaker's land, rights or apparatus that would be affected and how it would be affected; d) The progress made in discussions with Statutory Undertakers since the last update in relation to the tests set out in s127(3)(a) or (b), s127(6)(a) or (b) and s138(4) of PA2008; and e) Any agreement or differences between the Applicant and the Statutory Undertaker about whether the tests have been met, the next steps to be taken, and the progress anticipated by the close of the Examination; f) In relation to these matters, whether any protective provisions and / or commercial agreement are anticipated, and if so: · whether these are already available to the ExA in draft or final form; · whether a new document describing them is attached to the response to this question or · whether further work is required before they can be documented; and g) In relation to a Statutory Undertaker named in an earlier version of the table but in respect of which a settlement has been reached: · whether the settlement has resulted in their representation(s) being withdrawn in whole or part; and · identifying any documents providing evidence or agreement and withdrawal. The above information will be published on the project page of	Noted. An update on negotiations with statutory undertakers with a land interest in the Book of Reference has been included in the Update on Negotiation with Landowners, Occupiers and Statutory Undertakers and Other Utilities (Appendix C to this document). An update on negotiations with offshore statutory undertakers are included in response to ExQ1.3.26.

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		the National Infrastructure website, so commercial and / or confidential details should not be given.	
3.26	The Applicant, Statutory Undertakers (including EirGrid, North Hoyle Wind Farm (NHWF) Limited and Rhyl Flats Wind Farm (RFWF) Limited)	Several Statutory Undertakers with offshore land and equipment interests (not included the BoR) have submitted a RR ([RR-018], [RR-019] and [RR-020]). The Applicant: a) Provide a progress report on negotiations with each of these Statutory Undertakers, with an estimate of the timescale for securing agreement with them; b) Indicate whether there are any envisaged impediments to the securing of such agreements; and c) State whether any additional Statutory Undertakers with offshore interests have been identified since the submission of the application. Statutory Undertakers: Where Statutory Undertakers [RR-018, RR-019 and RR-020] have concerns regarding the current drafting of the Protective Provision within [AS-014], either provide copies of preferred wording or if you have provided it, signpost where it can be found and explain why you do not consider the wording as currently drafted to be appropriate.	a) The Applicant is in discussions with Eirgrid, North Hoyle Wind Farm (NHWF) Limited and Rhyl Flats Wind Farm (RFWF) Limited with regards securing agreements to protect their land and equipment interests. In summary: - Eirgrid was provided with a draft cable crossing and proximity agreement in June 2022 and is yet to formally respond. However, correspondence indicates that agreement can be reached in good time before the close of Examination. Protective provisions are not required; - NHWF Limited was provided with a draft cable crossing agreement in August 2022 and is yet to respond. Protective provisions are not required. Further detail is provided in answer to ExQ1.3.27b, below; and - RFWF Limited was provided with draft protective provisions in September 2022 and is yet to respond. Further detail is provided in answer to ExQ1.3.27a, below. b) The Applicant expects to reach agreement on all matters relating to cable crossing/proximity agreements and protective provisions in good time before the close of Examination. c) No other Statutory Undertakers with offshore interests have been identified since submission of the application. However, the Applicant has been in discussion with Gwynt y Môr OFTO since inception in relation to a proposed offshore cable crossing. A draft cable crossing agreement was provided in June 2022 and correspondence indicates that agreement can be reached in good time before the close of Examination.
3.27	The Applicant	Please comment on the concerns raised by RFWF Limited [RR-020] regarding: a) Work No.2 and implications for the operation of RFWF and its lease agreements; b) Necessary consents from RFWF (similar matter also raised by NHWF Limited [RR-019]); and c) The positioning of the Proposed Development and potential for	a) Work No.2 overlaps the Rhyl Flats restriction zone (set by the Crown Estate (TCE) at 250m) but does not intrude into the area of the seabed which is leased by TCE to RFWF Limited for the operation of RFWF. A plan (Document 1.46 of the Applicant's Deadline 1 submission) has been provided to RFWF Limited showing this in greater detail than the scale of the Works Plans allows. Crossing of the restriction zone can be resolved by private agreement with RFWF Limited and, in order to facilitate this, draft protective provisions were sent to RFWF Limited on 5 September 2022 and

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		a reduction in the energy output of RFWF from changes to wind speed and direction.	have been inserted into the dDCO. No comments have yet been received from RFWF Limited. b) As noted above, crossing of the Rhyl Flats restriction zone is intended to be resolved by private agreement with RFWF Limited and the inclusion of suitable protective provisions within the dDCO. With regards NHWF, it has been agreed that, as the only interaction is where AyM's cables will cross NHWF's cables, a cable crossing agreement (examples of which are regularly agreed to cover this type of project interaction) is sufficient to protect NHWF's interests and there is no need for additional protective provisions in the dDCO. A draft crossing agreement was provided to NHWF Limited on 18 August 2022 but no comments have yet been received. c) AyM is more than 5 km (specifically 5.1 km) from RFWF, in accordance with TCE's 2017 siting criteria for OWF extensions (Offshore Wind Farm Project Extensions Guidance Document, version 3.3, November 2017). The Applicant's understanding is that this distance was set by TCE to provide a suitable stand-off from existing operational wind farms and therefore this was considered at the stage of TCE's extension site identification for AyM. The Applicant notes RFWF Limited's submissions at ISH1 in relation to NPS EN-3 (paragraph 2.6.184). The NPS paragraph states: *'The IPC should be satisfied that the site selection and site design of the proposed offshore wind farm has been made with a view to avoiding or minimising disruption or economic loss or any adverse effect on safety to other offshore industries. The IPC should not consent applications which pose unacceptable risks to safety after mitigation measures have been considered.'* The Applicant notes the reference in this paragraph to 'other offshore industries'. The heading of this section of EN-3 (Oil, gas and other offshore infrastructure and activities) wording in para 2.6.176 of EN-3 provides greater clarity on what is intended to be included, specifically it states: *'other offshore infrastructure, such as telecommunication cables or oil and gas pipelines, are located or other activities, including oil and gas exploration/drilling or marine aggregate dredging…'* It is notable that there is no reference in this section of EN-3 to the interaction between offshore wind farms and the Applicant considers that this section

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			only applies to interaction with other types of offshore infrastructure and industries. The Applicant considers that the above policy does not apply to other offshore wind farms, and that appropriate distances between projects are managed by TCE through its leasing process. However, AyM has ensured that the site design of AyM OWF minimises disruption or economic loss to other offshore industries, and in addition other offshore wind farms, including RFWF, as set out in the 'Site Selection and Alternatives' chapter of the Environmental Statement (APP-044) and in the 'Other Marine Users' chapter of the Environmental Statement (APP-058) in which Table 11 sets out the relevant embedded mitigation. The Applicant remains in discussion with RFWF Limited in response to its concerns.
3.28	The Applicant	NHWF Limited [RR-019] refers to an alternative offshore cable route which would avoid its infrastructure. Please comment on this.	NHWF asserts in RR-019 that "there are alternative routes which would avoid the need to cross the North Hoyle cable. The Promoter has not satisfactorily explained why the two shortlisted cable routes (out of three) were rejected since at least one of these does not affect North Hoyle, whilst not affecting Constable Bank". It is unclear which options NHWF is referring to. Of the three shortlisted options, one (West B) went west of RFWF, avoiding NHWF's cable, but was not progressed as it passes through Constable Bank (a sensitive sandbank feature); two (East A(i) and East B) went east of RFWF, avoiding Constable Bank, of which one (East A(i)) also avoided crossing NHWF's export cable. East A(i) was rejected in favour of East B due to the greater engineering risk of Landfall Option 4 (for East A(i)) relative to Landfall Option 5 (for East B) as set out in the 'Site Selection and Alternatives' chapter of the ES (doc ref 6.1.4, APP-044) and the 'SSA Shortlisting Outcomes Report' (doc ref 6.1.4.2, APP-046). In considering the cable routing, it should also be noted that the offshore routes were selected in combination with the onshore route and landfall choices; they cannot be considered separately as it is the effects of the totality of the transmission infrastructure that must be considered in determining the most suitable cable route and substation locations. In summary, AyM's shortlist considered three alternative cable routes and decided onwith the final route being identified after undertaking a

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			thorough and robust site selection process set out in the ES (as referenced above). In accordance with The Crown Estate's (TCE) Cable Route Protocol, (CRP) due consideration was given to the proximity of AyM to existing assets and minimising the number of cable crossings was a 'design principle' applied by the Applicant in undertaking its site selection and refinement. The final offshore cable route was informed by a number of technical and environmental factors (including cable crossings) as well as considering consultee feedback through the statutory and non-statutory processes.
3.29	The Applicant	Does Schedule 9 (Protective Provisions) Part 1 (Protection for electricity, gas, water and sewage undertakers) of [AS-014] apply both onshore and offshore?	The Applicant confirms that Schedule 9 (Part 1) applies onshore only (paragraph 3(b) of Schedule 9 (Part 1)).
Special Category Land			
3.30	The Applicant	Section 11.2 of [APP-021] addresses 'open space' and s132 of PA2008. However, please clarify the following: a) Whether s131 of PA2008 is relevant to the application; b) Whether there are any commons or fuel or field garden allotments relevant to the application; and c) Whether Rhyl Golf Club could be considered as open space, and if not, why it is referred to in section 11.2 of [APP-021]?	a) Section 131 is not relevant as no permanent acquisition of open space is sought. b) Due diligence undertaken on behalf of the Applicant has confirmed that there are no commons or fuel or field garden allotments within the Project's order limits. c) Open Space under the Planning Act 2008 has the meaning given in s19 of the Acquisition of Land Act 1981, being "open space" means any land laid out as a public garden, or used for the purposes of public recreation, or land being a disused burial ground". The Golf Course is not `open space within this meaning as it is not open to the public as of right, it is not a public garden and use of it for recreation is limited and controlled through the club and for payment. Use may be limited to classes of person (e.g. members) or denied to specific persons; there is no right for the general public to use it for recreation, in contrast for example to the beach. It is accordingly not an area in use for 'public' recreation.
3.31	DCC	Section 11.2 of [APP-021] sets out that any granting of development consent would not be subject to special parliamentary procedure given that 'open space' within the Order land, when burdened with the order right, will be no less advantageous than it was before to (a) the persons in whom it is vested, (b) other persons, if any, entitled to rights of common or	N/A

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		other rights, and (c) the public, in accordance with s132(3) of PA2008. Please confirm whether you are satisfied with this conclusion.	
Crown Land			
3.32	The Applicant	Consent is required for any provision in the DCO which would relate to Crown land or rights benefiting the Crown in accordance with s135(2) of the PA2008. Among other things this includes consent for any TP sought over Crown land. Part 4 of [AS-020a] lists numerous plots where the Crown is the owner of the land. The description of each of these plots includes the tailpiece '(excluding all interests of the Crown)'. a) Please provide a further explanation for the inclusion of this wording and what it implies for the purposes of s135 of the PA2008? b) [APP-021] advises that you are in discussions with the appropriate Crown authorities in order to obtain their consent to the inclusion of these provisions as required under s135 of the PA2008. Please provide an update on where these discussions are (listing all relevant authorities) and confirm whether agreement will be reached before the close of the Examination? c) Please confirm whether any land that would be subject to escheat is included within the Order limits?	a) The tailpieces reflect the provisions of section 135 which exclude Crown rights from compulsory acquisition (CA). No CA of any crown right is sought. CA powers are sought over other interests in same land; for example in plot 363, where the Crown has a right of access, cable rights are sought. As there is a Crown interest in that plot, then even though it is not sought to acquire it, Crown consent to the acquisition of other interests is required. It is clear from the drafting of s135 that the acquisition of interests "held otherwise than by or on behalf of the Crown" require Crown consent; this is reflected in article 37 of the dDCO. Therefore, in plot 363, the acquisition sought is of rights in land owned by E and I Williams (not the Crown). The tailpiece is included to note that difference so that the CA sought cannot be misunderstood to include the Crown interest. b) Discussions are ongoing between the Applicant and The Crown Estate (TCE) in respect of the acquisition of land rights over land at the foreshore and the crossing of the River Clwyd with the parties in regular contact to discuss matters as they arise and to agree the necessary next steps. These discussions have been ongoing since July 2021 with earlier discussions relating to land ownership being undertaken from January 2021. With regards to the crossing of the River Clwyd, the Applicant has been informed that TCE have completed the drafting of their standard documents and that they are currently undergoing final checks from TCE's appointed legal representatives. The Applicant hopes to be in receipt of these draft documents shortly and will continue to engage with TCE with regards to the timescales for the issuing of these documents. Discussions in respect of the temporary and permanent rights required over the foreshore are ongoing with the proposal for the required permanent rights to be incorporated into the Application for Lease. In addition to this, the parties are continuing to discuss the basis on which temporary possession would be taken. The Applicant understands that the TCE's appointed legal representatives are due to provide feedback shortly

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			on whether, given the presence of a regulating lease, a separate licence agreement would be required over these areas. Again, the Applicant will continue to engage with TCE to progress matters in a timely manner. TCE's representatives have expressed a willingness to move matters forward in a timely fashion, with the Applicant sharing and being grateful for this view. The Applicant is certainly hopeful that agreement will be reached prior to the end of the examination but until such a time as the Applicant is in receipt of the precedent documents for the River Clwyd crossing, it reserves the right to make any definitive assessments on timescales for completion of the necessary agreements.
3.33	The Applicant	Please clarify / identify the relevant Crown authority for 'The Queen's Most Excellent Majesty In Right Of Her Crown' as identified in [AS-020a].	The Applicant believes that the relevant Crown authority for The King's Most Excellent Majesty In Right Of His Crown (as the reference should now read) is The Crown Estate (TCE) and are actively engaging with representatives of TCE in respect of the land rights required for the project.
3.34	The Applicant	Paragraphs 16 and 110 of [APP-021] set out that an agreement for lease for the array area has already been finalised with the Crown Estate and a further agreement for lease for the cable area is being progressed. Please provide an update on this progress and confirm whether agreement will be reached before the close of the Examination, noting and addressing also that North Hoyle Wind Farm Limited [RR-019] and Rhyl Flats Wind Farm Limited [RR-020] indicate that their consent is also required.	The Applicant is progressing the Agreement for Lease (AfL) for the Transmission assets with The Crown Estate (TCE) and can confirm that agreement will be reached prior to the close of the Examination. The Applicant's understanding, following engagement with TCE, is that the consent of neither North Hoyle Wind Farm Limited or Rhyl Flats Wind Farm Limited is required in order for the Applicant to enter into the AfL. The AfL will provide the Applicant with an option to require TCE to grant a lease. The lease would only be entered into after a DCO is granted, and the consent referred to in RR-019 and RR-020 relates to the granting of the lease rather than the AfL.
Compensation provisions and adequacy of funds			
3.35	The Applicant	Paragraph 27 of [AS-018] sets out that the Applicant would ensure that the necessary funds relating to CA / TP / compensation (c.£11.2 million) would be available when they are due. How would this be achieved in practice, noting that the Applicant comprises a joint venture between three different companies?	The financial standing and creditworthiness of the joint venture partners is covered in 4.2 the Funding Statement (AS-018) and referenced at paragraphs 20, 21, 22. The compulsory acquisition / temporary possession compensation amounts would be included and made visible to the joint venture partners in the monthly budget forecast process and funds would be made available via regular quarterly cash calls. As such, these amounts would be no different to all other costs incurred and paid for by the project.

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3.36	The Applicant	Section 6 of [AS-018] sets out the estimated project cost and its components. Should this also include: a) TP costs; and b) Decommissioning costs? If not, why not? If so, would any increase in the project costs affect funding available for CA / TP / compensation?	a) An assessment of compensation arising from the temporary possession of land is made in Appendix 2 of the Funding Statement (AS-018) and as such this forms part of the £1.81bn figure cited in Section 6 of (AS-018). b) The cost of decommissioning the project is not a relevant consideration in the availability of funds for CA, TP and compensation. As such, whilst the estimated project cost in the Funding Statement (AS-018) doesn't include decommissioning costs, the inclusion of these costs would make no difference to the conclusion that the Secretary of State can be satisfied that sufficient funding will be available for any liability arising from the exercise of compulsory acquisition powers under the DCO.
3.37	The Applicant	Appendix 2 of [AS-018] sets out that the understanding of the likely impact on individual businesses is still incomplete due to minimal evidence being presented to date. Please confirm: a) Has any further evidence been presented since Appendix 2 was produced? b) If so, do any figures require updating?; and c) if not, how confident can the ExA be with regard to the accuracy of the figures?	a) The Applicant has not been presented with any further information since Appendix 2 of AS-018 was produced. b) N/A c) The Applicant's specialist land agents Dalcour Maclaren have u assessed potential losses to individual businesses from a desktop perspective using publicly available information including comparable valuations, extensive recent experience in the marketplace and on other projects, and professional judgement. These assessments are based on the design information available at the time and as such represent a perceived worst-case scenario given the requirement to undertake a detailed design exercise post consent. The Applicant believes that the ExA can be confident that the figures throughout Appendix 2 of AS-18 represent a reasonable worst-case based on the information available.
3.38	The Applicant	Appendix 2 of [AS-018] sets out that the valuation date is April 2022. Is the FS likely to need updating during the course of the examination given that it is due to run until March 2023?	The Applicant will continue to review Appendix 2 of the Funding Statement (AS-018) throughout the course of the examination and will update it in the event that further information is made available which impacts upon any of the assumptions or calculations used to formulate the statement.
Site Specific Questions			
3.39	The Applicant	[RR-030] and [RR-031] relate to the effect of the Proposed Development on the operation of the Denbighshire Memorial Park and Crematorium, including in respect of noise and visual	A detailed response is provided in Document 1.1 of the Applicant's Deadline 1 submission with regards to the issues of potential for noise and

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		disturbance / disruption. Please provide a response to the concerns raised.	visual disturbance for users of the Denbighshire Memorial Park and Garden.
3.40	The Applicant	Please address the points raised in [RR-037], including in respect of engagement and communication, alternatives and land rights provisions.	A detailed response is provided in Document 1.1 of the Applicant's Deadline 1 submission with regards to the matters raised in RR-037.
3.41	The Applicant	[RR-038] raises concerns around the acquisition of land and the viability of the affected agricultural enterprise. Please provide a response to this concern.	A detailed response is provided in Document 1.1 of the Applicant's Deadline 1 submission with regards to the matters raised in RR-038.
3.42	The Applicant	[RR-039] to [RR-041] cite concerns regarding impact on land and reinstatement standards. Please provide a response.	A detailed response is provided in Document 1.1 of the Applicant's Deadline 1 submission with regards to the matters raised in RR-039 to RR-041.
3.43	The Applicant	[RR-044] to [RR-051] raise concerns around noise, light and dust pollution from Cwybr Fawr compound, food security, effects on horse riding, highway safety and effects on local businesses. [RR-042] and [RR-043] also raise concerns around food security. Please respond to these concerns.	A detailed response is provided in Document 1.1 of the Applicant's Deadline 1 submission with regards to the matters raised in RR-044 to RR-051.
Other			
3.44	The Applicant	Please clarify how you have had regard to the Equality Act 2010 in relation to the powers sought? Have any Affected Persons been identified as having protected characteristics? If so, what regard has been given to them?	The Applicant will provide an Equalities Impact Assessment by Deadline 3 which will set out further details in response to this question.
3.45	The Applicant	Are any land or rights acquisitions required in addition to those sought through the dDCO before the Proposed Development could become operational?	No all land and rights required for delivering the development have been included in the DCO.

2.5 Construction

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4.1	The Applicant	**Indicative Construction Programme** Please provide a revised indicative construction programme (Figure 2 of ES Volume 3, Chapter 1 [APP-062]) to include additional detail in respect of the high-level activities currently listed.	The Applicant is unable to provide additional programme detail in respect of the high-level activities currently listed in APP-062 at this stage. The indicative construction programme has been developed for the purposes of EIA and further detail is unavailable until the detailed design phase post-consent. At this stage, the precise nature of the design and construction works. Including details about specific contractors are unknown, hence a Design Envelope approach has been adopted in the ES for the purposes of assessment and has considered a maximum duration.
4.2	The Applicant	**Cofferdam construction** Please can you confirm the amount of contingency delay associated with the 81 days for cofferdam construction?	Table 18 in (AS-026) reflects the Maximum Design Scenario for the cofferdam. It includes sufficient contingency for a robust assessment. This is derived from a combination of the following metrics: • Maximum quantity of exit pits requiring cofferdams: 3; • Nominal perimeter length of 140m per cofferdam; • Assuming a pile width of 750mm gives a total quantity of 560 piles; • Adding corners, end trims and further contingency rounds this up to 650piles for the MDS; and • Based on a maximum of 8 piles per day, this equates to 81days. Whilst the piling works alone could proceed faster than 8 piles/day, this value has been chosen to reflect the full construction of the cofferdam, including bracing and pinning as required. Existing contingency within each of the above inputs is combined such that this period is considered ample.
4.3	The Applicant	**Offshore construction period** Table 18 in ES Volume 2, Chapter 7 [AS-026] indicates the offshore construction dates as January 2028 to March 2030, whilst the indicative construction programme in Figure 2 of ES Volume 2, Chapter 1 [APP-047] shows offshore clearance works from Year 1 to Year 4 Q2, and foundation installation Year 2 to Year 4. Please can you clarify the offshore construction period undertaken for the impact assessment?	The indicative construction programme has been developed for the purposes of undertaking assessment, for which duration is the key component as a factor of impact magnitude. In relation to marine mammals, while the construction period for AyM covers a five-year period (Table 49), Year 1 (2026) is expected to be onshore construction activity only. Offshore construction work (excluding site preparation works) is not expected to commence until Year 2 (2027), and foundation installation activities (including UXO clearance and piling)

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			could occur any time between 2027 and 2029 inclusive, but only for a 12-month period within that three-year window (expected indicative date is 2028). Therefore, the underwater noise impact from UXO is considered for the purposes of assessment to take place in 2027, with piling 2028-2029 inclusive (Table 49 and Table 51) of the Marine mammals chapter of the ES (AS-026).
4.4	The Applicant	**Export cable** Please provide an explanatory note including an illustrative diagram (to include plan and section) showing trenchless installation works for the export cable beneath Rhyl Sea-defence.	Detail of the landfall parameters has been provided in (APP-062) the Onshore Project Description. This sets out the location and duration of the types of works being undertaken. The design envelope for the landfall (Table 4, Onshore Project Description (APP-062) sets out a maximum of two cables in up to three ducts (allowing for one spare) at an indicative maximum depth of 20m. The exact path of the trenchless installation works will be calculated at detailed design stage when all of the inputs required for this level of design have been collected. Figure 19 shows a typical HDD operation. Detailed plan and section drawings will be developed at detailed design stage. Trenchless installation techniques are commonly used beneath sea defence walls and this approach has been used for each of the offshore wind farm cable installations along this coastline. A typical methodology is described in paragraphs 77 to 86 of (APP-062). The cable for the Burbo Bank Extension offshore wind farm is adjacent to the proposed AyM trenchless installation location and was successfully installed using Horizontal Direction Drilling (HDD) under the railway, Lyons Robin Hood holiday park, Rhyl Golf Course and sea defence. The Applicant has reviewed records relating to the existing sheet piles embedded below the sea defence wall and will pass under them with sufficient clearance, such that the structure will not be affected by AyM's trenchless installation. The Burbo Bank Extension HDD passed under the sea defence wall at a depth of 16.7 metres below the promenade footway and it is likely that the AyM installation will be at a similar depth where it crosses. This will be confirmed at the detailed design stage. In addition, the applicant has also already undertaken preliminary intrusive ground investigation (onshore boreholes) in order to confirm the suitability of ground conditions and likely depth profile of the trenchless installation.

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			Boreholes were drilled on the Rhyl Golf Course, including adjacent to the sea defence wall. Available ground investigation data from the nearby Burbo Bank Extension offshore wind farm project was also reviewed. Further nearshore ground investigation for the proposed HDDs may be undertaken by the applicant at detailed design stage in the intertidal and/ or subtidal zone as required. The Applicant is also in contact with the developers of the Central Prestatyn Coastal Defence Scheme and has confirmed that AyM's proposed trenchless installation location will pass underneath this new infrastructure and hence will not impact their scheme.
4.5	The Applicant	**Jack-up Barges** Please provide an explanatory note and illustrative diagram of jack-up barges in the shallow sub-tidal zone.	The Applicant has provided an indicative image of how a jack-up barge (JUV) would be used in shallow subtidal zone taken from the adjacent Burbo Bank Extension construction in Appendix G of this document. The JUV would position and jack during high tide/ water levels to allow safe vessel access and then would remain in a jacked position until it is able to depart at a future high water.
4.6	The Applicant	**Construction Base** Please explain how the impact assessment for disturbance and displacement of vessel(s) navigating to/from an undefined construction base (port facility) location was undertaken?	Impacts from project vessels to third party vessels are managed via industry standard mitigations including marine coordination and compliance with flag state regulations (including the Convention on the International Regulations for Preventing Collisions at Sea (COLREGS)) which will apply regardless of ports used. The construction port has not been defined for the purposes of the Navigation Risk Assessment (NRA) (APP-111) however is fully compliant with the requirements of MGN-654.
4.7	The Applicant	**Piling Duration** Please can you provide further information how the 201 piling days were randomly spread throughout the 12 months construction period. For example, were any weightings given to seasons to differentiate between low and high densities?	The Applicant can confirm that the 201 piling days were randomly assigned using R code to randomly select 201 dates within the 12-month piling period. No weighting was given to seasons. In the absence of information from the engineers on a specific piling schedule, this approach is considered to be the most appropriate. Please note, this aligns and agrees with the approach used by NRW (A) who, in their technical response to the consultation on the Marine Licence Application stated that in their own in-house iPCoD modelling they created a piling schedule by *"randomising 201 piling days through a single year"*.

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4.8	The Applicant	**Onshore Substation (OnSS)** Please provide an explanatory note and earthworks phasing drawings for the construction of the OnSS. Please include: a) location of topsoil and subsoil mounds; and b) drainage features such as ponds.	Details about the construction of the OnSS has been provided in (APP-062) the Onshore Project Description. This sets out the parameters of the MDS, the sequence of construction and likely duration of works. The final location of construction elements such as soil stockpiles is a matter for the Principal Contractor and will not be established until detailed design stage once the type of substation under construction is known. The management of soils stockpiles will be controlled via the Soil Management Plan (APP-316; Document 1.37 of the Applicant's Deadline 1 submission) which is agreed under R10 of the DCO and will require the prior approval of Denbighshire County Council (DCC) as the relevant planning authority. The Outline Landscape Ecology Management Plan (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) sets out the proposed drainage at the OnSS in Figure 2. The figure outlines existing ponds, SuDS ponds to be created and ponds created for GCN habitat.
4.9	The Applicant	**Excavated Material** Please confirm if any of the excavated material for the OnSS is to be re-used as engineering material? If so, please provide the estimated quantity and type of material.	The Outline Site Waste Management Plan (APP-317) outlines the Applicant's approach to managing construction waste on site and forms part of the Code of Construction Practice (APP-312; Document 1.49 of the Applicant's Deadline 1 submission). The Outline Site Waste Management Plan requires the Applicant to appropriately manage construction waste on site and references the waste hierarchy to ensure waste is minimised. The quantum of excavated material to be reused will be established at detail design stage for the OnSS and the final Landscape and Environmental Management Plan is agreed with DCC. Any removal of excavated material will be agreed through the Site Waste Management Plan with DCC under R10 of the DCO.
4.10	The Applicant	**Waste Re-Use** Table 17 of [APP-062] estimates the types of waste and quantities to be generated from the construction of the OnSS. The waste management option column references to reuse on site where possible which infers reprocessing and certainty of use in terms of planning. Please explain and describe the approach to reuse on site including likely permits, licences and exceptions required.	The Outline Site Waste Management Plan (APP-317) outlines the Applicants approach to waste on site and forms part of the Code of Construction Practice. Under this plan contractors working on site are obligated to carry out their own assessments to ensure their activity minimises waste and they have considered opportunities for waste to be reused. Under this plan the Principal Contractor is responsible for ensuring waste transfer notes are produced correctly and that waste is stored and removed in accordance with UK legislation under the appropriate permit

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			or licence. The Site Waste Management Plan will be agreed with DCC under R10 of the DCO.
4.11	The Applicant	**Outline Code of Construction Practice (oCoCP)** Paragraph 9 of the oCoCP [APP-312] relates to the onshore elements of the Proposed Development only (i.e., landward of Mean High-Water Springs (MHWS)). Please provide a list of documents employed to manage the potential environmental impacts seaward of MHWS during preliminary works and construction works.	The Applicant confirms that the Outline CoCP (APP-312; Document 1.49 of the Applicant's Deadline 1 submission) relates to the intertidal and onshore aspects of the scheme. Documents employed to manage the potential environmental impacts seaward of MHWS are expected to be secured as conditions of any Marine Licence granted by NRW. A list of plans expected to be secured is provided in the updated Schedule of Mitigation (Document 1.18 of the Applicant's Deadline 1 submission) and a description of how the these are expected to be provided for in the Marine Licence is given in the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission).
4.12	The Applicant	**Trenchless Crossings** Please indicate likely construction duration for trenchless crossing works at the A55 and River Clwyd.	In APP-062 the Onshore Project Description the Applicant sets out the MDS duration for trenchless crossings as follows; HDD (or other trenchless crossing works) at the Landfall and other major crossing points will require works to take place 24 hours a day for a period of up to 3 months and this has been assessed in the airborne noise and vibration assessment (Volume 3, Chapter 10: Airborne Noise and Vibration (APP-071)). The likely construction duration of these crossings is significantly less. The likely (P50) construction duration for the trenchless crossing works at the A55 is 44 days, assuming 12 hour working. This has the potential to be reduced to 22 days if 24-hour working is used. The likely (P50) construction duration for the River Clwyd is also 44 days, assuming 12 hour working with the same potential to reduce to 22 days if works are carried out 24 hours a day. Note that the above likely durations are not used in the ES assessments and do not account for site establishment or reinstatement works.
4.13	The Applicant	**Cable Depths** Please confirm maximum depth of cable trench that do not cross obstacles (is it 1.7m or 2.0m?)	In the Onshore Project Description (APP-062) the Applicant sets out the indicative maximum depth of an open-cut trench not crossing an obstacle is 2m.
4.14	The Applicant	**Topsoil Stockpile** Please confirm the maximum height of topsoil stockpile.	The Outline Soil Management plan (APP-316; Document 1.37 of the Applicant's Deadline 1 submission) sets out a maximum height of 4m for topsoil stockpiles to avoid compaction.

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4.15	The Applicant	**Subsoil Stockpile** Please confirm the maximum height of subsoil stockpile.	No maximum height has been set out for subsoil stockpiles within the outline document, however, the height of stockpiles will depend on several factors, including the amount of space available, the nature and composition of the soil, the prevailing weather conditions at the time of stripping and will be agreed via the final SMP.
4.16	The Applicant	**Cable Installation and Drainage** Please explain and describe including a plan layout of "pumped via appropriate means to remove sediment before being discharged into local ditches or drains via temporary interceptor drains (paragraph 105 of [APP-062]".	A surface water drainage scheme for the onshore ECC works will be informed by detailed design and provided for approval by DCC prior to construction as set out in the Construction Method Statement (APP-313; Document 1.1.50 of the Applicant's Deadline 1 submission). The onshore ECC surface water drainage scheme will be prepared in line with the principles of surface water management that are provided in Volume 5, Annex 7.1 (APP-137). As noted in Paragraphs 74 and 75 of the outline Construction Method Statement (APP-313; Document 1.50 of the Applicant's Deadline 1 submission): Where required, drainage would be installed within either side of the onshore ECC to ensure existing land drainage flow is maintained. A Final Construction Drainage Scheme will be developed prior to works commencing in agreement with the appropriate stakeholders. Surface water flowing into the trenches during the construction period will be pumped via the appropriate means to remove sediment and potential contaminants, before being discharged into local ditches or drains via temporary interceptor drains. Where gradients on site are significant, where required, cable trenches will include a hydraulic brake (bentonite or natural clay seals) to reduce flow rates along trenches and hence reduce local erosion.
4.17	The Applicant	**Waste Sites** Please confirm name(s) and address(es) of conventional and hazardous waste sites including residual capacity to receive waste generated from the Proposed Development.	In terms of total tonnages generated, Construction of AyM is anticipated to mainly generate construction and demolition (C&D) wastes and more general industrial/ commercial/ household-like wastes (collectively referred to as 'Hhold/Ind/Com'). In addition there is potential to generate hazardous wastes. Appendix K – Response to ExQ1.4.7 – Waste Management Sites in North Wales provides a review of estimated available capacity of waste management sites in north Wale.

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4.18	The Applicant	**Demolition Activities** Paragraph 131 of ES Volume 3, Chapter 3.11 [AS-030] states "No demolition activities are proposed as part of the onshore construction works. As such, impacts associated with demolition activities have therefore not been considered further and are screened out". Please confirm if re-use of material won on site involves a demolition activity (such as stone being crushed and processed).	The Applicant does not intend to undertake demolition activities on site as per the statement in Paragraph 131 of ES Volume 3, Chapter 3.11 (AS-030).
4.19	The Applicant	**Array and Offshore Export Cables** Please provide explanation with evidence justification for parameter statement 50% of sediment is fluidized and 50% re-suspended in the water column for a V shaped trench, as detailed in tables 21 and 22 of [APP-047].	As described in the Physical Processes chapter of the ES (APP-048), the assumption that 50% of sediment is fluidized and 50% re-suspended into the water column is based on field studies of cabling techniques (such as the BERR (2008) Review of Cabling Techniques and Environmental Effects applicable to the Offshore Wind Farm Industry by the Department for Business Enterprise and Regulatory Reform in association with Defra, and (BOEM 2017) on Observing Cable Laying and Particle Settlement During the Construction of the Block Island Wind Farm by the US Department of the Interior Bureau of Ocean Energy Management Office of Renewable Energy Programs.
4.20	The Applicant	**Offshore Cable Burial** Please confirm the critical gradient slope to prevent the burying of a cable (paragraph 38 of [APP-047]).	The maximum gradient at which a cable cannot be installed without sandwave clearance or levelling will vary based on installation tooling and methodology selected. The typical maximum gradient may be 5-15 degrees, with a specific working limit defined by: • Final seabed survey data; • Cable design (including the angle of approach of the cable to the gradient of a seabed feature/slope); and • The tooling and contractor selected as appropriate for the seabed data and cabling design, which may include site specific operational limits applicable to site conditions. The Applicant expects a Cable Specification and Installation Plan (CSIP) to be secured as a condition in any Marine Licence granted by NRW, as outlined in Condition 20 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission).

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4.21	The Applicant	**Anchor Handling** Please explain and describe impact assessment approach for anchoring handling and deployment of anchors beyond the order limit from vessels.	As described within paragraph 52 of the Offshore Project Description chapter of the ES (APP-047), anchors may be deployed outside of the Order Limits. The Applicant has assessed in Section 5.11.1 of the Benthic Subtidal and Intertidal Ecology chapter of the ES (APP-051) that installation vessels may use anchors as an alternative to jack-up legs, and therefore they may be deployed outside of the Order Limits. However, in this instance, the anchors would still be deployed well within the study area for benthic, subtidal and intertidal ecology and are still considered within the MDS for seabed footprint of anchors. Anchor handling is assessed using a seabed area-based approach of the maximum number of deployments of the largest possible anchors (should they be required). Vessel anchoring is not a licensable activity and is considered necessary for the purposes of maritime and navigational safety. See also Applicant's response to ExQ1.6.52.
4.22	NRW	**Hazardous Waste and Emergency Incident Processes** Are you satisfied with the content of the outline Site Waste Management Plan (oSWMP) [APP- 317] and outline Pollution Prevention and Emergency Incident Response Plan (oPPEIRP) [APP- 317] with specific regard to the proposed hazardous waste and emergency incident processes? If not, please explain your reasons.	N/A
4.23	The Applicant	**Safety Zones** Please can you confirm the 500 metres safety zones during construction are within the OL?	As set out in the Offshore Project Description (APP-047), it is assumed for the purposes of assessment that the Applicant will apply for 500 m safety zones around infrastructure that is under construction or decommissioning. Temporary safety zones of 50 m will be sought for incomplete structures (such as installed monopiles without transition pieces, or where construction works are completed but commissioning has yet to be completed). These safety zones are subject to separate consent from the SoS (and further consultation) under the Energy Act 2004. No development will occur in the safety zones except that which is consented under the DCO and the precise location of safety zones can only be determined in relation to detailed design locations of WTGs. The works will take place within the Order Limits, however the Safety Zones may extend beyond the Order Limits. Further information is set out in doc ref 5.4 (APP-

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			037)(Consents and Licences Required Under Other Legislation) and in doc ref 7.2 (APP-297)(Safety Zone Statement).
4.24	The Applicant	**Safety Zones** Please confirm the safety zone approach to Work No. 3A Temporary working area including use for cable installation vessel anchoring as it does not seem to have been included within Section 4 of the Safety Zone Statement [APP-297].	There is no safety zone for Work No. 3A (*Temporary working area including use for cable installation vessel anchoring*) because it is in the near-shore area. Regulations relating to the approval of safety zones apply from the mean low water mark seawards and do not apply to subsea elements/ cables. To ensure the safety of stakeholders in the area, Notices to Mariners will promulgate safe passing distance from any installation vessel, noting that the installation vessel would either be at anchor or classed as RAM (restricted in its ability to manoeuvre) under COLREGs and will therefore have priority over all other vessels (bar those not under command).
4.25	The Applicant	**Onshore Trenching Plan** Please can you provide a plan drawing showing location and length of onshore open trenching incorporated within the MDS.	As detailed in (APP-062) Onshore Project Description, the primary method of installing the onshore cable will be through the use of open-cut trenching. This is a typical installation method for this type of linear project and is familiar to the area for the other offshore wind farms that have been constructed off the North Wales coast. The cables will be installed in one trench per circuit with each trench up to 5m wide at the top and up to 2m deep (although this could be deeper where required where cables cross obstacles). The Crossing Schedule (APP-121) sets out the obstacles that the cable will need to cross between the landfall and the OnSS. There are a range of obstacles that will need to be managed including utilities, highways, public rights of way, watercourses and other environmental obstacles such as woodlands. The Applicant has committed to cross some of the obstacles using trenchless techniques depending on practicality and sensitivity of the obstacle. However some obstacles the Applicant intends to consent both a trenchless or open-cut option for crossing the obstacle where the impacts can be managed appropriately for either option. The decision on whether to open-cut or use a trenchless technique will reside with the Principal Contractor at detailed design stage of the project. For this reason at this point in time it is impossible for the Applicant to provide a detailed breakdown of the length of open-cut trenching anticipated. As set out in the Construction Method Statement (APP-313; Document 1.50 of the Applicant's Deadline 1 submission) the final Crossing Schedule (APP-121) will be agreed through the Construction method Statement and

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			agreed with the Local Authority under R10 of the Development Consent Order.

2.6 Good Design

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5.1	The Applicant	**Substation sizes** Please provide details of the comparative sizes and design of the proposed OnSS and the existing Gwynt y Môr and Burbo Bank substations. If there is a significant difference (or likely difference), then why is this so?	The footprint of an onshore substation depends on many factors including the voltage, quantity of circuits, rating, technology, drainage design and environmental conditions. It is not linearly proportional to any single factor and often different manufacturers will require different areas for substation designs that are otherwise functionally identical. AyM substation has been designed for 2 circuits at 275kV or potentially 400kV. Higher voltage export cables can generally transmit more power than lower voltages. The selection of these higher voltages results in a reduction in quantity of circuits required (with a corresponding reduction in impacts offshore and onshore). However, higher voltages require larger safety clearances in the onshore substation. A safety clearance is the separation between a high voltage component and any adjacent component or the ground. Maintaining this space between all components in a 275kV substation requires a larger footprint than a lower voltage substation. Oil filled components such as transformers and reactors can also increase in size for higher voltages. This increases the corresponding fire safety zone around these components. Components such as air cored reactors similarly have a magnetic field exclusion zone which increases at higher voltage. Burbo Bank Extension substation uses GIS technology and contains 1 incoming circuit at 220kV, leading to 1 outgoing circuit at 400kV, with a total capacity of 258MW. The fenceline is approximately a rectangle of dimensions 116m x 70m, giving an area of approximately 8,120m^2 Gwynt y Môr substation uses GIS technology and contains 4 incoming circuits at 132kV, leading to 2 outgoing circuits at 400kV, with a total capacity of 576MW. It is 232m x 68m, giving an area of 15,776m^2. This area excludes the main roadway, carrier drain and SUDS pond which require additional space outside the fenceline. The Applicant notes that the

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			Environmental Statement in Gwynt y Môr's consent application contained the option of an AIS substation "estimated to require an area with footprint of circa 220m x 190m (41,800m^2). The proposed Awel y Môr substation will have an area of 50,000m^2 if using AIS technology and 30,000m^2 if using GIS technology. Paragraph 149 and 150 of (APP-047) describe the two substation technologies. Hence the proposed size of the AyM substation is larger than both existing local substations. However, the proposed size is commensurate with other schemes now being developed, such as EA1N, which has an area of 32,300m^2 (190x170m) for its GIS substation. The proposed size of the AyM AIS substation is similar to the final design of the existing Triton Knoll substation. Triton Knoll uses AIS technology and contains 2 circuits at 220kV from the offshore wind farm, leading to 2 outgoing circuits at 400kV heading to Bicker Fen National Grid substation. The fenceline is 251m x 182m, giving an area of 45,682m^2. In summary, the proposed size of the AyM onshore substation is larger than the two existing proximal substations, but its size matches other substations nationally (both proposed and existing). This increase in size is primarily driven by a trend towards higher voltages (amongst other factors), which create more efficient transmission networks.
5.2	The Applicant	**Good Design - Policy** EN-1 section 4.5 criteria for 'good design' for energy infrastructure states that applying good design to energy projects should produce infrastructure that is sustainable, sensitive to place, efficient in the use of natural resources and energy used in their construction and operation and be matched by an appearance that demonstrates good aesthetics as far as possible. Paragraph 4.5.3 of EN-1 requires applicants to take into account both functionality and aesthetics (including its contribution to the quality of the area in which it would be located) and encourages an applicant to take opportunities to demonstrate good design in terms of siting relative to existing landscape character, landform	As noted in section 6.4 of the Planning Statement (APP-298) the Applicant is constrained in its ability to apply a site selection process that would avoid all impacts, as a result of the 2017 Extensions round criteria. Notwithstanding this, the Applicant has sought, through consultation and iterative design, to minimise all environmental impacts as far as is practicable, whilst retaining an economically viable project. The Planning Statement provides a detailed breakdown of how the project has aligned with the requirements of section 4.5 of NPS EN-1, notably with regards the site selection process (paragraph 4.5.4 of EN-1), and paragraph 5.9.8 of NPS EN-1 with regards consideration of landscape effects, and how in the case of Awel y Môr the project is constrained in the offshore environment by virtue of the requirements of the 2017 Extensions round criteria. The 2017 Extension round criteria required inter alia proposed extension projects to

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		and vegetation. Paragraph 4.5.2 notes that good design is also a means by which many policy objectives in the NPS can be met, such as how the siting and use of appropriate technologies can help mitigate adverse impacts, for example noise. How would the Proposed Development: a) Achieve 'good design' in accordance with section 4.5 of NPS EN-1; and b) Accord with the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020)?	share boundaries with the project which is proposed to be extended. Specifically with regards paragraph 4.5.2 and 4,5.3 of EN-1 it is not possible to site the offshore elements of the proposed Awel y Môr project in such a way as to take advantage of existing landscape character, landform and vegetation. As noted in paragraph 175 et seq of the Planning Statement however the onshore substation and National Grid connection have been sited outside any areas of designation, such as AONB. The site selection process (see Site Selection and ES Chapter 4, Site Selection and Assessment of Alternatives (APP-044) indicated the onshore substation could be accommodated at the Bodelwyddan location without significant effects on the special qualities of any areas designated for visual amenity. The sensitivity of the landscape and visual receptors in the LVIA study area has been a key consideration in the siting and design of the onshore infrastructure. A detailed consideration and assessment of the capacity of the landscape to accommodate the onshore infrastructure in relation to the screening afforded by the existing landforms, trees and hedgerows between sensitive receptors and the project infrastructure has been undertaken in the Landscape and Visual Impact Chapter (AS-029). The same careful siting has been applied to the project consideration of planting and mitigation, with which it is anticipated to ameliorate visual, and noise, impacts over the medium term for the onshore substation. The proposed development accords with each of the four design principles for National Infrastructure identified in the National Infrastructure Commission's Design Group report in 2020. The design principles are: • Climate – mitigate greenhouse gas emissions and adapt to climate change; • People – reflect what society wants and share benefits widely; • Places – provide a sense of identify and improve our environment; and • Value – achieve multiple benefits and solve problems well. With regards climate the proposed development by its nature mitigates greenhouse gas emissions and facilitates adaptation to climate change through making a material and significant contribution to the targets set by the Welsh and wider UK governments. The proposed development has also been designed to ensure it is resilient to the impacts from climate

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			change (for example through the siting of the substation outside flood risk areas). With regards the 'people' design principle, the proposed development reflects the societal recognition of the need to address the climate emergency and place greater reliance on UK sources of energy and reduce exposure to global energy prices such as those experienced during 2022. Informal and formal consultation has been undertaken to engage with communities, and due regard has been had where practicable to ensure the project design reflects the views of the communities consulted (APP-024: Consultation Report). Examples of the feedback include the positive feedback received for the project during the PEIR phase from MoP_003 and MoP_004 which state support for the project. Similarly design requests to minimize interaction with the Rhyl Golf Club were received and actioned, with the option to undertake horizontal directional drilling brought forward in order to avoid any above ground working within the golf course. Further to this the proposed development has actively engaged with the communities potentially affected by the infrastructure. Feedback received through informal and formal consultation has been undertaken to engage with communities, and due regard has been had where practicable to ensure the project design reflects the views of the communities consulted (APP-024: Consultation Report). The Applicant has also provided an outline construction communications plan (APP-324) that sets out the communication measures which will be implemented by the Applicant, its contractors and subcontractors during the construction of the onshore works. A key aim of the outline plan is to communicate effectively and to inform the local community and other relevant parties that works will be taking place, when, where and for how long. In addition, and whilst not required as part of the proposed development, the Applicant has undertaken consultation on a proposed community benefits package. With regards places the Applicant has sought to work extensively with local stakeholders to identify opportunities to benefit the natural and built environment, through ecological and visual enhancement across the project infrastructure and proposed project boundary. Examples include

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			seeking to ensure the sense of identity within Wales is maintained through a positive contribution towards the Welsh language, as noted within APP-352 'Community Linguistic Statement', and seeking to improve the natural environment through a number of visual and ecological enhancement measures, as identified in the Outline Landscape and Ecology Management Plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) which notes, *inter alia* a number of biodiversity enhancements in Section 7 of the document. In so doing the proposed development actively delivers good design through supporting local ecology, and actively seeking to enrich the ecosystem in which the proposed development will be sited. Finally, with regards the 'value' design principle the Applicant has, as is evidenced through the socioeconomics chapter of the ES (AS-034) and enhancement measures identified within the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), actively sought to identify opportunities to secure economic, environmental and social benefits at a local and national scale, for example through promotion of the Welsh language where practicable, worked with local governmental and non-governmental organisations to identify appropriate enhancement measures (such as introducing enhanced grassland), and through the provision of between 20 and 40 full time equivalent jobs to North Wales (130-180 in Wales more broadly). The proposed development will contribute to local employment and the local economy during both the construction and operational periods (Table 25 of the socioeconomics chapter of the ES), whilst also introducing a number of biodiversity enhancement measures across the cable corridor and substation site that will support and strengthen biodiversity in the local area (Section 7 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission)).
5.3	The Applicant	**Good design - detail** Please provide scale drawings (which may be referred to as outline design and landscape plans) showing the preferred option layouts and three-dimensional design of the OnSS to the maximum parameters within the Rochdale envelope and the requirements for design and sustainability set out in the dDCO,	At this stage, in accordance with the Rochdale envelope approach, the Applicant has undertaken an assessment based on maximum parameters, including building, transmission, roadway and landscaping parameters. Scale drawings have been provided in the Onshore Project Description Chapter (APP-062) and oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), noting the possible layout scenarios alongside the

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		including, but not limited to, the proposed buildings, external electrical transmission equipment, roadways, storage areas, surface treatments, landscaping, attenuation ponds, sustainable drainage systems and fencing.	potential landscape and biodiversity enhancement and compensation opportunities, with maximum parameters also illustrated within the LVIA visualisations (APP-181 to APP-189). Specifically, Figure 2 of the oLEMP identifies the proposed landscaping, woodland, enhanced grassland, and lowland meadow habitat in a landscape and ecological mitigation plan which has been met with positive feedback from relevant stakeholders including NRW and DCC. With regards the possible layout scenarios Figure 15 of the Onshore Project Description chapter (APP-062) provides the likely zoning with regards the OnSS, the access zones, temporary construction compounds and transmission equipment zones. Figure 30 and Figure 31 of the onshore PD chapter provide indicative 3-dimensional designs of the OnSS, including all electrical transmission equipment, storage areas and fencing etc for both the AIS and GIS scenarios. Visualisations are presented within Annex 6.6.2.3, with viewpoint 3 (Glascoed Rd (APP-183)) notably presenting the visualisation of the 3-dimensional design options at pre-mitigation and post-mitigation/landscaping stages. The combined drawings provide the necessary detail to inform the impact assessment, but it is not considered possible to meaningfully collate the information into a single design/landscape drawing for each option.
5.4	The Applicant	**Design champion** Do you have a design champion within your organisation designated to the project? If so, what are their qualifications for such a role and what is their hierarchical position within the project?	The Applicant supports the concept of a Design Champion as an effective mechanism to achieve good design. Rather than appointing a single named individual, the Applicant is exploring options to spread this responsibility between key roles. Specifically, the following roles are under consideration: The Engineering Manager (EM), the Chief Engineer (CE) and a named Director on the Awel y Môr board. The board Director has direct experience on many UK infrastructure project and is at the appropriate level to shape the culture of the project. The CE is outside of the project structure and can provide a critical review function. They represent the highest technical authority for the related design activity. The EM has responsibility for coordinating and approving all aspects of the project design. They are accountable for delivering coherent good design across the project. The EM role is appointed from the early stages of the

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			project (before scoping) and continues until completion of commissioning. Hence the role ensures continuity of the design principles through each of the project stages. The EM role sits within the Senior Management Team of the windfarm and reports directly to the board at each board meeting. They liaise directly with all designers, both internally and externally. They set the governance structure for design and champion an effective iterative design process. The EM is a Chartered Engineer with experience across a range of infrastructure at various stages from feasibility through to operations. The EM role coordinates the actions of a broad team who have decades of experience designing and operating substations and other built infrastructure. The design process is much broader than just an Engineering function. It is inherently multidisciplinary, and the EM role ensures that the collective experience and vision from all of the team are embodied in the design choices. A simple example of this is demonstrated in Table 4 of (APP-044) where a diverse range of disciplines contributed to the site selection process. The Applicant will update the Design Principles Document (APP-308), to be submitted at a future deadline, to include details of the design champion and the peer review process in the evolution of the detailed design.
5.5	The Applicant, DCC	**Design review panel** Comment on the desirability of implementing a design review panel to provide an informed 'critical friend' comment on the developing proposals ensure that good quality sustainable design and integration of the proposed OnSS into the landscape is achieved in the detailed design, construction and operation of the project. How might they be secured?	The Applicant has significant experience designing, constructing and operating substation assets. The Project's design, including the OnSS, will be led by the Engineering Manager (EM). The EM role coordinates the actions of a broad team who have decades of experience designing and operating substations and other built infrastructure. The Applicant understands the importance of good design in developing infrastructure that is both functionally suitable and suitable for the place it is built. The design of the OnSS will, to a very large degree, be determined by performance, quality and electrical safety standards on equipment design and spacing, and therefore due to the functional nature of the OnSS there will be limited opportunity for design flexibility beyond the elements already set out in the Design Principles Document (APP-308) and

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			secured in Requirement 6 (e.g. 6(1)(e) the dimensions, colour and material used for buildings). The design process the Applicant has followed through the design to date and will continue to follow through the detailed design of the project, is to draw on expertise from outside the project team to provide peer reviews of the design at key points in the evolution of the project. The peer review panel is an internal body composed of experienced and senior members of the company, covering a variety of disciplines, and provides a sounding board for the project team in developing the project design. The Applicant considers this a suitable approach to ensuring the design standards are met whilst working within the functional constraints inherent in designing a substation. Through the engagement the Applicant will liaise with DCC in order to reach approval of the substation design under relevant aspects of R6 to R9 of the draft DCO (AS-014; Document 1.8 of the Applicant's Deadline 1 submission). DCC will be able to draw on their officers and advisors in order to assess, critique and influence the final design of the OnSS, within those functional constraints. That assessment is able to, amongst other criteria, look at good design. The Applicant will update the Design Principles Document (APP-308), to be submitted at a future deadline, to include details of the peer review process in the evolution of the detailed design, and in order to secure further elements of good design process.
5.6	The Applicant	**Design Guide** Should there be a Design Guide / Design Code (or similar) certified and secured in the DCO to provide the basis for ensuring good design standards would be met post-consent?	'The dDCO (AS-014; Document 1.8 of the Applicant's Deadline 1 submission) includes, at requirement 6(2), that the details of the onshore substation (OnSS) works defined in requirement 6(1) must be substantially in accordance with the outline Design Principles Document (APP-308). These details must be submitted to and approved by the relevant planning authority (DCC). The design principles document is focused on the OnSS, as the only permanent onshore above ground infrastructure, and sets out the principles of design that the Applicant proposes to apply to the OnSS when undertaking detailed design. This includes principles to be applied to the OnSS layout, ground levels, buildings and equipment, access and

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			construction areas, drainage, security and lighting, as well as the maximum parameters as defined in the ES. The design principles document also sets out the principles of landscape and ecological mitigation, to be secured through the Outline Landscape and Ecology Management Plan (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), as well as relevant dDCO requirements securing relevant mitigation. The design principles document therefore acts as a design guide for the OnSS, bringing together the design parameters, key design principles and relevant mitigation, into a document secured for DCC approval.
5.7	DCC	**Good design** Is DCC satisfied that it has sufficient design expertise to ensure good design of the OnSS when discharging Requirement 6 of the dDCO [AS-014]?	N/A
5.8	The Applicant	**Choice of substation insulation** ES Volume 8, Document 8, Design Principles Document [APP-308] makes it clear that the choice of Air insulated or Gas Insulated switchgear (AIS or GIS) for the proposed OnSS will be made at the detailed design stage, post consent (if consent is granted). However, the choice of AIS or GIS can make a significant difference to the appearance and the visibility of the OnSS, and many recent applications have stipulated during the application stage the proposed option chosen as part of their commitment to good design. This can also aid all interested parties in gaining a better sense of what the proposed OnSS is likely to look like. a) Provide further justification for your decision not to stipulate your choice of design for the OnSS. b) In design terms, assess the difference and comparative advantages and disadvantages of the OnSS being an AIS or GIS substation, both in terms of scale and mass but also the visual effect of a more open or enclosed layout.	a) The Applicant has set out the intention to consent both Air Insulated Switchgear (AIS) or Gas Insulated Switchgear (GIS) substation options. The Maximum Design Scenario (MDS) for each substation option is set out within ES chapters (where relevant), and assessment has been undertaken against the MDS for that particular discipline. As such, the ES has assessed the worst-case scenario for both technologies, and the maximum building heights and the area for both technologies are secured within R7. The use of the design envelope approach has been recognised in the Overarching National Policy Statement (NPS) for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3). This established approach has been used in other offshore wind applications such as Triton Knoll Electrical System, and as set out in the response to ExQ1.5.1 the Gwynt y Mor project took a similar approach to its OnSS, by consenting both AIS and GIS options. The recent DCO applications for Hornsea Project Four includes flexibility in transmission system technology, with HVAC and HVDC systems both included in the consent envelope. The decision to use GIS or AIS technology is not solely driven by good design, or component elements of good design, such as visual impact. The Applicant doesn't have a technology bias

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			towards either system and requires the flexibility in order to be able to engage with a wide range of suppliers, both to encourage competition which will drive cost savings (and subsequent CfD costs) but also ensure delivery of an economic and efficient system. It is also worth considering that where recently developed projects have selected a switchgear technology prior to consent it has often been for site specific reasons. The East Anglia ONE North and East Anglia TWO project substations, and a National Grid substation, are to be accommodated on one site- the project substation applications were for GIS whilst the National Grid substation was consented as either GIS or AIS. With the overall development covering a relatively large area due to the clustering of developments effects on the sensitive landscape and visual receptors within the local area are considered cumulatively. The available site to accommodate all of these substations, as well as the ancillary works and mitigation planting, is constrained by existing woodland and proximity to residential properties so that minimising the extent of the footprints of the project substations was desirable. Regarding AyM, consultees have not suggested that for the OnSS either technology would be more desirable than the other, and this may reflect that there are advantages and disadvantages associated with each of the options as set out in part b) of this response. There is sufficient area to accommodate either technology on this site, and to accommodate mitigation for impacts arising from either technology. The DCO facilitates the design and mitigation through the Design Principles document (APP-308) and the Outline Landscape and Ecology Management Plan (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). These documents set out the principles to be applied to the OnSS when undertaking detailed design and what mitigation is appropriate. These documents are secured under R6 and R8 of the DCO. b) As described in paragraph 144 of Chapter 2: LVIA (AS-029), the positions of the GIS and AIS infrastructure shown on visualisation Figures 2.18 to 2.22, (APP-181 to APP-185) only illustrate substation

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			options and not a detailed design option. The configuration of the 3D model and location of the AIS and GIS options within the OnSS platform was developed to best represent a worst-case arrangement for LVIA in that it positions the largest and tallest buildings to the south-east corner of the OnSS platform, an area which is most visible from the most sensitive receptors on Glascoed Road. For clarification Chapter 2: LVIA (AS-029) assesses the maximum parameters described in Volume 3, Chapter 1 - Onshore Project Description (APP-062), which in landscape and visual terms includes an envelope that could contain either AIS or GIS options. In relation to the differences between AIS and GIS from a landscape and visual perspective there are advantages and disadvantages for both options. For AIS there would be lower elevated buildings than for GIS, and so proposed planting mitigation could fulfil its mitigation potential faster than for taller buildings. However, AIS would have a larger overall footprint and so would require larger amounts of cut and fill to create the OnSS platform compared to GIS and would have more external equipment visible which can appear visually cluttered and more out of character with surrounding built form within St Asaph Business Park than the simpler buildings of a GIS option. Whilst the GIS option would result in taller buildings, the smaller footprint of the GIS option would allow greater flexibility in arranging the built elements within the OnSS footprint and with a smaller overall footprint the physical disruption to landscape elements and topography resulting from earthworks would also be smaller. In relation to the visual effect of a more open or enclosed layout, the AIS option, by fundamental design, is more likely to have a more open layout and the GIS option more likely to appear more enclosed. The visual effects, however, are also strongly influenced by the other differences described above which more readily affect the mitigation potential of the detailed planting in relation to the detailed design.
5.9	The Applicant	**Good design - requirement** Subsection (2) of Requirement 6 of the dDCO [AS-014] states that	There is judicial authority providing that "in accordance with" and "substantially in accordance with" mean "in agreement or harmony with;

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		details submitted under the requirement must be "substantially in accordance with the submitted design principles document" What does "substantially in accordance" mean in this context?	in conformity to", with "substantially" allowing less deviation; but neither requires strict accordance to plans which are diagrammatic rather than representing final or detailed designs (per R. (on the application of Swire) v Canterbury City Council 2022 EWHC 390 (Admin)). In this case substantially in accordance with means: • In relation to detailed plans: that the details submitted must contain what is required by the outline, subject to points of detail, eg not including matters not relevant to that phase; or • In relation to design, illustrative drawings may be departed from on the detail but parameters may not. There is a general rule that planning conditions (and therefore requirements) should be interpreted as plain language, 'in accordance with' is an established term within planning law (see Swire above). In DB Symmetry v Swindon BC [2020] EWCA Civ 1331 Court of Appeal adopted the approach that, like any other document, a planning permission must be interpreted in context, which includes the legal framework within which planning permissions are granted. This is a very common phrase in DCOs where matters of detail are frequently not finalised until post consent but are controlled by the requirement to be "in accordance with" specified documents.
5.10	The Applicant, DCC	**Good design - detail** The ExA welcomes the submission of [APP-308]. However, design guides for recently approved offshore wind farms, such as Norfolk Boreas, East Anglia One North, and East Anglia Two have seemingly contained more detailed design requirements and supporting documents than appears to be contained within the Design Principles Document. Such documents include details such as: · Indicative onshore project characteristics · Brief details on site selection, to demonstrate where good design has played a part in such a process · Detailed design principles and recommendations · Details of proposed link boxes · Landscaping details · Amount, scale, layout, appearance, access, and lighting of the	The Design Principles document (APP-308) sets out the design and landscaping parameters that the Applicant proposes to apply to the OnSS when undertaking detailed design. The document has been prepared in accordance with the design guidance contained in Overarching National Policy Statement (NPS) for Energy (NPS EN-1), the NPS for Renewable Energy Infrastructure (EN-3) and the NPS for Electricity Networks Infrastructure (EN-5). In addition to the current NPS, draft NPSs were consulted upon during September to November 2021. This document has also been prepared in accordance with the design guidance contained within the draft NPS EN-1, draft NPS EN-3 and draft NPS EN-5. The document sets out the site context for the OnSS, the new infrastructure proposed and the design principles and parameters that will be important in establishing the final design of the OnSS. Details including but not limited

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		proposed OnSS · Details of future consultation and engagement with the host authority · Example photographs of agricultural style buildings to be considered for use in GIS solutions or other site buildings · A preliminary design report providing details of approach to design, proposed materials, colour palettes, zoning plan and site layout. Please provide your view on whether such information should and can be provided within a revised Design Principles Document (and if so, by which deadline the document will be provided by)	to access, lighting, drainage and landscaping are covered within the document. Section 4 of the document sets out how DCC would be consulted post-consent to approve detailed OnSS design through the DCO Requirements. This document, in combination with the Outline Landscape and Ecological Management Plan (APP-305) secures the principles and parameters proposed to apply to the OnSS when undertaking detailed design. The Applicant welcomes engagement with DCC and other Stakeholders on the content of these documents during the examination to ensure they are satisfied with the approach being taken. The Applicant has engaged with DCC and Statutory Stakeholders throughout the development of AyM and has to date received limited feedback on the proposed approach.
5.11	The Applicant	**Good design and the National Grid substation** Should [APP-308] apply to the proposed National Grid substation extension? If not, why not?	The proposed National Grid substation extension does not form part of this application and therefore the design is not within the control of the Applicant.

2.7 Draft Development Consent Order (dDCO)

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General			
6.1	The Applicant	Please add page numbers to reflect the contents page.	Page numbers have been added to the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission).
6.2	The Applicant	Page two, second, third and fourth paragraphs – please amend to reflect that the ExA is a Panel.	The drafting of these paragraphs have been amended in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) to clarify that the examination was carried out by a panel.
6.3	The Applicant	Second page, fourth paragraph: a) The "special category land plans" (SGLP) are not defined in Part 1, Article 2 – please rectify; b) Should the "land plans" be referred to here given it is the SCLP which show special category land? c) The phrase "acquisition of permanent new rights" does not appear on the SCLP and a variation of it appears on the land plans – please ensure consistency of terms.	a) Special category land plan has been added as a new defined term in A2 and added as a document to be certified in A40 in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission). b) Location plan has been added as a new defined term in A2 and added as a document to be certified in A40 in the dDCO. c) The reference to "acquisition of permanent new rights" has been removed from the second page, fourth paragraph in the dDCO.
6.4	The Applicant	The 'street works access plan' is referred to throughout. However, the plan is titled the 'street works and access plan'. Please amend the dDCO to reflect this.	The naming of the street works and access plan has been changed throughout the dDCO submitted at deadline 1 (see Document 1.8 of the Applicant's Deadline 1 submission) to ensure it is consistent with the document name.
6.5	The Applicant	The assessments in the ES assume an operational period of 25 years for the Proposed Development before it is to be decommissioned. Therefore, should this period of time be specified and secured as a requirement of the dDCO? If not, might this allow for a longer operation period to occur and what implications might this have for the assessments of the ES?	See also the Applicant's Response to ExQ1.0.8. The Applicant does not consider it to be necessary or appropriate for the dDCO to specify an operational period for AyM or include a requirement to this effect. There is also no precedent in offshore wind DCOs for an operational time period to be included unless needed as specific environmental mitigation, as was required in the case of East Anglia ONE north. The assessment of the operational phase for AyM both on and offshore places no reliance on a set period of time of operation for any of its conclusions. No conclusion would change if operation continued beyond 25 years.

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			The 25 year life referred to is indicative for assessment purposes and a longer operational period would not affect any of the conclusions draw in the Environmental Statement (ES). The ES offshore project description, 6.2.1 Volume 2, Chapter 1: Offshore Project Description (APP-047), at paragraph 26 describes the development to be assessed as including turbines within "The key permanent offshore components of AyM…". At paragraph 154 it is stated that "the operational lifetime of the project is anticipated to be approximately 25 years". Some assessments reference annual impacts (for example the annual mortalities of birds in the Offshore Ornithology chapter of the ES (APP-050) but do not total the impact over 25 years and the magnitude definitions do not scale specifically with the length of the operational phase. Temporal extent is a component of impact magnitude, but for impacts associated with the presence of infrastructure (rather than maintenance activities), the impacts are described as 'long-term' or 'irreversible for the operation of the project', not given a specific length. For the purposes of assessment, the impact associated with the SLVIA consider that the long-term impacts are reversible after the wind farm is decommissioned. That remains true regardless of the length of the operational life. As the ES requires assessment of decommissioning, it had to assume an indicative lifespan; that is assumed at 25 years as representing a fairly standard design life assumption for turbines. In practice, and in common with other consented offshore windfarms, where at 25 years the windfarm was still operating safely and needed, operation would continue subject to the regime in place at the time, including importantly the Energy Act 2004 which regulates decommissioning of offshore generation. It would be artificial and counter-productive to cease operation simply because of a date where the windfarm was meeting demand for clean renewable electricity, and that cessation is not required for AyM to remain within the parameters that were assessed in the Environmental Statement.
6.6	The Applicant	Please can you address and correct any inconsistent document titles to be secured in the dDCO and/or Marine Licence if	The Applicant notes discrepancies between the naming of mitigations in the Schedule of Mitigation (APP-310) and the Marine Licence Principles

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		necessary. For example, the Marine Licence Principles [AS-023] references to a fisheries liaison and coexistence plan whilst the schedule of mitigation [APP- 310] references to fisheries liaison plan.	Document submitted at Application (AS-023) and has provided updated versions (Documents 1.18 and 1.24 of the Applicant's Deadline 1 submission, respectively). Document labels in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) have also been corrected.
6.7	The Applicant	Please clarify the status of the Schedule of Mitigation [APP-310] and the Schedule of Monitoring [APP-311]. Should these be secured in the dDCO or listed as documents to be certified?	The Schedule of Mitigation (APP-310) and the Schedule of Monitoring (APP-311) are not intended to be certified documents as they are trackers which have been created to assist with aligning the mitigation which is set out in Application within the Environmental Statement. The Environmental Statement is a certified document (see A40 and Sch 13 of the dDCO - Document 1.8 of the Applicant's Deadline 1 submission). The Applicant has submitted a revised document that incorporates the Schedule of Mitigation and Schedule of Monitoring into a single document for ease of reference (Document 1.18 of the Applicant's Deadline 1 submission).
Questions / comments relating to Articles (A):			
6.8	The Applicant	A2, Interpretation – is it necessary to refer to "Good Friday" and "Christmas Day" specifically under the term "business day" given that bank holidays are referred to?	The definition of "business day" in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) 1 has been changed to remove reference to Good Friday and Christmas Day.
6.9	The Applicant	A2 - Please explain the purposes of a 'temporary mitigation area' as referred to in Schedule 6 and should this be defined in A2?	The temporary mitigation areas in Schedule 6 of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) are referenced in column 3 – being the part of the authorised development for which only temporary possession may be taken. These are areas within the Order Limits which will be disturbed during construction but which will not be within the permanent cable corridor and are not required for permanent mitigation or access. For example a compound area near the foreshore will be restored to a dune habitat which will need to be managed (access managed or excluded) for three years after planting to allow the restoration planting to establish. Additionally, areas outside the permanent cable corridor will need to be managed to ensure that ecological mitigation is delivered. For example retention of areas of rough ground for great crested newt (GCN) and ensuring that connecting hedgerow planting is properly established may

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			be required in order to be able to get the necessary European Protected Species (EPS) licence (insert reference to example plots). The areas are shown on the 2.5 works plans (AS-007) and described in detail in the ES. The Onshore Biodiversity and Nature Conservation chapter of the ES (APP-066), sets out why and where this mitigation is required for: • GCN see paragraphs 122, 126, 127, and table 16; 8.4 the outline landscape and ecology management plan (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) (oLEMP) also details areas of enhancement, to include five new ponds and further areas of good quality terrestrial habitat suitable for foraging and shelter (APP-305); • Temporary reptile habitat and reinstatement of coastal sand dune habitat at Y Ffrith see tables 4, 11,13,15 and 16; • Reinstatement of habitats within Clwyd Estuary and Adjacent Fields LWS see table 4 and paragraph 153; and • Reinstatement of lowland fen at The Flash see table 13. Further details are included within the oLEMP. A definition of 'temporary mitigation area' has been added to A2 of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) to ensure that there is clarity over the activities that can be undertaken. In addition, the Applicant has updated Figures 3 to 7 of the oLEMP (see Document 1.33 of the Applicant's Deadline 1 submission) to show further detail on proposed temporary and permanent mitigation areas. A new definition of "temporary mitigation area" has been added to the DCO to provide clarity.
6.10	The Applicant	A2 – "commence" a) Please clarify what would be included in 'onshore site preparation works'. b) If 'onshore site preparation works' are excluded from the term 'commence', might this have implications for protected species or archaeology if this could occur prior to satisfying / discharging Requirements 12 and 14? c) The Infrastructure Planning (Miscellaneous Prescribed Provisions Regulations) 2010 defines operations of a prescribed description	a) The Onshore Project Description chapter of the ES (APP-062) at section 1.7.1 sets out what onshore site preparation would include, being: • Detailed pre-commencement surveys (such as geophysical, geotechnical, ecological or archaeological surveys); • preparatory works to existing infrastructure, utilities and services; • preparation and installation of temporary access roads, working areas and TCCs; and

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		which do not fall under the description of the term 'material operation. These regulations contain for Wales a much more extensive list of operations than that which applies to projects in England. Explain the implications and relevance (if any) of this.	▲ removal (or height reduction) of trees, hedgerows and ground vegetation will be kept to a minimum but where necessary will be completed in accordance with the prevailing best practice and controlled via the outline Code of Construct Practice (APP-213; Document 1.33 of the Applicant's Deadline 1 submission) (CoCP). Surveys for contaminated ground may also be required at the pre-commencement stage. The Applicant has amended the definition of commence in the dDCO revision F submitted at Deadline 1 (Document 1.8 of the Applicant's Deadline 1 submission) to define the works excluded, During any pre-commencement works, the requirements of the outline CoCP and landscape and ecology management plan (LEMP) will apply to those works. The dDCO requirements have been amended (see Document 1.8 of the Applicant's Deadline 1 submission) to clarify that. The OCoCP and outline landscape and ecology management plan (APP-305; Document 1.33 of the Applicant's Deadline 1 submission (oLEMP) are being updated to include specific pre-commencement sections to clarify the applicable controls and these updates will be submitted at the next deadline. b) The onshore WSI (APP-147) applies to pre-commencement works under requirement 12 to ensure that such works are carried out in accordance with archaeological protections. In respect of European Protected Species (EPS), R14 secures final pre-construction surveys to be undertaken in advance of any stage of the onshore works, including pre-commencement works. Whilst it would be illegal to interfere with an EPS without an appropriate licence, requirement 14(1) and (2) have been amended to cover 'onshore site investigation works' and ensure that the presence of EPS is identified in advance of such works taking place and appropriate measures, including an EPS licence if needed, are agreed and adhered to. c) The Infrastructure Planning (Miscellaneous Prescribed Provisions) Regulations 2010 were revoked by the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 and no longer have any effect. It has therefore been assumed that the question

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			intended to reference regulation 7 of the 2015 regulations which concerns the meaning of 'material operation'. Regulation 7 provides, in its entirety: "The measuring or marking out of a proposed road shall not be included within the meaning of "material operation" for the purposes of section 155 (when development begins) of the Act". This is identical to the wording which was in regulation 4 of the 2010 regulations. The Applicant does not consider that this exclusion addresses the substance of the query regarding what was intended to be covered by 'site preparation works' as this is not intended to cover the marking out of a proposed road. The Applicant cannot identify in either set of regulations a list of items which do not form material operations and which varies between England and Wales. The regulations do contain lists of consents which are prescribed and which may not be disapplied or which require consent to be disapplied, and which do vary between the jurisdictions. The Applicant does not consider that these list are relevant to the scope of the definition of commence.
6.11	The Applicant	A3(2) – would any works fall between "MHWS" and "MLWS" and if so, does this article need revising to reflect this?	Works will be undertaken between MHWS and MLWS. These are indicated in Schedule 1, Part 1 as being '[intertidal] and in the County of Denbighshire.' The Applicant has changed A3(2) of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) to clarify that "onshore works" will be undertaken landward of MLWS and "offshore works" will be undertaken seaward of MLWS. The definitions of these two terms have also been amended such that Work Nos. 3 and 3A now fall within the "onshore works". This change to clarify that the relevant planning authority will have control over the intertidal area, for example when signing off the code of construction practice under R10.
6.12	The Applicant	A7 – Please explain and justify the extent of the provisions of this Article.	A7 disapplies a series of provisions. Including a provision like this is within the ethos of the DCO process as a tool for streamlining the need for additional consents and avoiding unnecessary delay at the pre-construction stage. There is no objection from the relevant local authority in relation to the disapplication of water bylaws. Regarding A7 (c), in the knowledge that the Applicant will require flood risk activity permits, the Applicant has suggested to NRW that an

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			additional DCO Requirement be agreed that relates specifically to watercourse crossings. The proposed DCO Requirement would set out the post consent information that the Applicant would provide for each watercourse crossing, reflecting the information that would be included in a typical Flood Risk Activity Permit (FRAP) application. NRW is currently reviewing the principal of whether a dedicated watercourse crossing DCO Requirement would remove NRW's resistance to disapplication of FRAP via the DCO. A7 (e) has been included on a precautionary basis as the temporary possession sections of the Neighbourhood Planning Act 2017 have not been brought into force. Should the Neighbourhood Planning Act 2017 be commenced, A7 (e) disapplies it to prevent conflict with the provisions of the DCO. We have had regard to the Neighbourhood Planning Act 2017 in providing for the time period for taking of temporary possession for construction in A28 (2) as being 3 months and not 14 days as was commonly provided for in DCOs before that act. Please see Section 3.2.5 of 3.2 Explanatory Memorandum (APP-019; Document 1.17 of the Applicant's Deadline 1 submission) for further information.
6.13	The Applicant	A10 – Please explain and justify the extent of the provisions of subsection (4) of this Article.	Paragraph (4) provides that certain provisions of the New Roads and Street Works Act 1991 listed in that paragraph will not apply. The disapplication of these provisions (which are designed primarily to regulate the carrying out of street works by utility companies in respect of their apparatus) is appropriate given the scale of works proposed under the Order, the specific authorisation given for those works by the Order and the specific provisions in the Order which regulate the carrying out of the Order works.
6.14	DCC	Is the local highway authority content with the provisions of Part 3 of the dDCO?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. From discussions to date we understand the local highway authority's concerns are around the powers included within A11 of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) in respect of public rights of way diversions. We understand the local highway authority

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			have concerns regarding the reopening of public rights of way following a diversion to those ways during construction and the difficulties which can be faced with landowners when undertaking that process. The public rights of way diversions relating to Awel y Môr construction will be diversions which lie within the Order Limits so the Applicant does not anticipate there being issues with landowners when reinstating the public rights of way. Including A11 and giving the Applicant powers to divert public rights of way is aligned with the ethos of the DCO process as it avoids the need to obtain additional consents which could lead to delays to the project. As such the Applicant's position is that this power should be kept in the DCO. This appears to be the only point which the local highway authority has raised a concern over and as such the only point which the Applicant will address at this stage. The Applicant is, however, open to discussing any other concerns which the local highway authority has. Discussions regarding A11 are ongoing and the Applicant will provide an update in due course.
6.15	The Applicant	A16 - Please explain and justify the extent of the provisions of this Article.	The purpose of A16 is to allow the undertaker to carry out protective works to buildings affected by the authorised development (please see paragraph 65 of the Explanatory Memorandum (Document 1.17 of the Applicant's Deadline 1 submission)). A16 provides protection for landowners whose buildings will be impacted. There is no current need for protective works to buildings which has been identified but A16 offers a fall-back position in the event of the need arising. A16 largely follows the drafting of the model provision for protective works to buildings and the Hornsea Three Offshore Wind Farm Order 2020.
6.16	The Applicant	A24 – Should this provision apply to airspace as well?	The Applicant does not consider there to be a need to include airspace in A24 as no overhanging or oversailing is anticipated as part of the onshore works.
6.17	The Applicant	A27 – a) A27(8)(a) and (b) appear to provide for the CA of rights over land / CA of subsoil in respect of land identified for TP only (as set out in Schedule 6). Please justify such powers and clarify to what extent persons affected are likely to be aware of this?	a) Please see response to ExQ1.3.15 which addresses the same point. b) Article 27(1)(a)(ii) provides the Applicant with the ability to take temporary possession of land which is subject to outright CA and CA of rights. As explained in the Statement of Reasons (APP-021) Section 10.1.11,

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		b) The Land Plans indicate that land subject to outright CA and CA of rights would also be subject to TP. Where is this provided for in A27?	temporary possession powers apply to all of the Order land, and powers may be used before permanent rights are acquired.
6.18	The Applicant	A31 - a) Should subsection (2) also refer to Article 26, Rights under or over streets? b) Subsection (4) has a full stop missing.	a) This is not necessary. Streets are a special case because they are subject to control by the Street Authority and regimes such as street works. Works in streets by statutory undertakers can be authorised separately from obtaining land rights. Acquisition of rights from the underlying owners may not be liable to compensation where the works form street works and therefore it is not appropriate for the funding provisions in A31 to apply to A26. b) A full stop has been added to A31(4) of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission)
6.19	The Applicant, DCC	A34 – a) Are any trees subject to tree preservation orders (TPO) likely to be affected? b) Should this article make provision for some notification to be given to the relevant planning authority prior to any works to trees subject to TPOs? c) A34(2) omits a date for when TPOs were made after. Please also explain why such a date is necessary.	a) The Applicant has not identified any trees subject to TPOs that would be affected by the onshore works. A34 has been included as a reasonable fall-back position in the event an impact on a tree subject to a tree preservation order arises. b) Recently made offshore wind farm DCOs Norfolk Boreas Offshore Wind Farm Order 2021 and Norfolk Vanguard Offshore Wind Farm Order 2022 do not include a requirement to notify the relevant planning authority. The Applicant considers that including such a requirement would not align with the ethos of the DCO regime to streamline development processes. c) A34(2) has been amended in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) to include the date the Application was made. As this article is a fall-back position, it is only trees subject to a tree preservation order after the Application was made to be subject to the powers under A34.
6.20	The Applicant	A40 – a) Should this list be more extensive given that it does not specify all plans and documents submitted? b) Is reference to "(document number 6)" sufficient to describe the environmental statement? How does this reflect any amended ES documents? c) Please ensure this article is kept up to date with any revised documents. A separate Schedule within the draft Order may be	a) The Applicant does not consider it necessary to expand this list to include all plans and documents submitted. Only those documents which are necessary to understand the DCO and/or which control the development need to be certified. 2.5 The works plans [AS-007] are necessary to understand the extent and location of the works listed in Schedule 1, 2.3 the land plan (onshore) (AS-005) and 2.2 the land plan (offshore) (APP-007) directly relate to drafting of the compulsory acquisition schedules, the Environmental Statement provides detail

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		more appropriate. This would be simpler to update with dates of submission of revised, amended, and new documents submitted during the Examination. The Schedule could be referred to via the Article.	regarding the parameters of the assessment undertaken and the mitigation proposed and the various outline plans are referenced in the requirements so also need to be certified. Other plans and documents are submitted as necessary for examination but would not be required for the DCO if granted so do not need to be certified. b) The Applicant has created schedule 13 in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) which lists all of the documents to be certified, including all of the constituent parts of the ES. c) see ExQ1.16.6.
6.21	The Applicant	A43 - Please explain and justify the extent of the provisions of this Article	The purpose of this article is to provide a route of appeal for decisions under the DCO. The Planning Act 2008 does not prescribe a process for subsequent approvals including discharge of requirements and that is created by the DCO itself. This article provides a route of appeal, including where no decision is issued, as otherwise the project would have no such right. It is precedented in article 38 of the Hornsea Three Offshore Wind Farm Order 2020.
Questions / comments relating to Requirements:			
6.22	The Applicant	R1 – Please justify the need for seven years for commencement (as opposed to five)	A 7-year period for commencement is required due to the scale of the project, and the need to bid into Contract for Difference (CfD) rounds, the timing of which is currently unknown and is outside the control of the Applicant. The Applicant cannot bid into CfD rounds until consent for the project has been obtained. The dates for future CfD rounds have not yet been announced and the Applicant can only bid into these once they are opened. The Applicant accordingly requires time to bid into a round, receive the outcome and then procure the necessary works to progress the project before it can be commenced, and a 7-year period would allow for this to happen.
6.23	The Applicant	R2, Table 3 – this sets out the maximum parameters of Maximum Design Scenario (MDS) A and MDS B. Given this: a) Would it allow for the maximum parameters for each scenario to be constructed (e.g. 50 turbines at a height of 332 metres)? b) Should there instead be two tables with one setting out the maximum parameters of MDS A and the other setting out the maximum parameters of MDS B?	The Applicant does not consider that the use of the maximum parameters set out in Table 3 of the dDCO would allow for the maximum parameters of each scenario to be constructed, as this is controlled by the maximum total rotor swept area of 2,500,412 m^2. This parameter increases with the height and rotor diameter of the turbines, meaning that it would not be possible to adhere to this parameter with the greatest number of largest turbines. Table 1 within Appendix Q of this document shows the basis for

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			the EIA and demonstrates how the total rotor swept area operates to control the number of turbines that can be installed as their height and rotor diameter increase. To provide greater clarity the drafting of R2 (2) has now been amended to clarify that the offshore works must not exceed the parameters which have been assessed in the Environmental Statement and which are set out in Table 3. This will ensure the maximum design scenario is not exceeded. It should also be noted that the maximum design scenarios (MDS) A and B are not construction scenarios and the Offshore Project Description (APP-047) makes clear at paragraph 19 that the eventual built-out scenario may differ from these. MDS A and MDS B are scenarios which have been used solely for illustrative purposes to provide further information with regards to the Seascape Landscape and Visual Impact Assessment (AS-027) and the potential range of effects between the largest size of wind turbine generators and the largest number of wind turbine generators as requested by consultees during the pre-application Evidence Plan process (see Evidence plan report (APP-301)).
6.24	The Applicant, NATS	R3 – Given concerns over lighting provisions, could a separate subsection be added to this requirement stating that such lights will be operated at the lowest permissible lighting intensity level?	The Applicant has added a new subsection of R3 has been included in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) to specify that light will be operated at the lowest permissible lighting intensity level.
6.25	The Applicant	R5 – a) Please amend subsection (1) to read '…submitted to *and approved by*…'. b) Please can you confirm if this requirement applies to pre-commencement work and preliminary works?	a) Drafting 'submitted to and approved by' has been added to R5 (1) of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission). b) This requirement is not intended to apply to pre-commencement and preliminary works.
6.26	The Applicant, DCC	R6 – should provision for details of 'appearance' be added?	R6 (1)(e) requires details of 'the dimensions, colour and materials used for the buildings' to be approved. The Applicant considers this information would be enough for the relevant planning authority's approval to have due consideration of details of 'appearance'.
6.27	The Applicant	R7, Table 4 sets out some of the maximum parameters of the GIS / AIS OnSS options. Given this: a) Would it allow for the maximum parameters for a GIS / AIS to be constructed (e.g. building height of 49.975m AOD in a	a) The wording of R7 and Table 4 have been amended in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission). The drafting now includes parameters for the onshore works in the event an air insulated

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		50,000m² fenced compound)? b) Should there instead be two tables with one setting out the maximum parameters of a GIS and the other setting out the maximum parameters of an AIS? c) Should other maximum dimensions of buildings / elements be specified (e.g. 1 x GIS building 50m long x 15m wide x 15m high, as set out in ES Chapter 1: Onshore Project Description [APP-062])? d) Should 'AOD', 'm' and 'm2' be defined in A2?	switchgear (AIS) OnSS is built and a gas insulated switchgear (GIS) OnSS. This will allow for either to be constructed within the maximum parameters. b) As set out in ExQ1.6.27a. c) The Applicant does not think it is necessary for all the parameters set out in the ES Chapter 1: Onshore Project Description (APP-062) to be included in the DCO. Instead the drafting of R7 sub-paragraph (1) now includes reference to the "onshore works" being built in accordance with those assessed in the Environmental Statement. d) AOD is now written out in R7, Table 4 of the dDCO submitted at Deadline 1 so this acronym is no longer used. Further, new definitions for "m" and "m2" have been included in A2.
6.28	The Applicant	R7(2) – please remove erroneous comma at the end.	The erroneous comma in R7(2) has been removed from the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission).
6.29	The Applicant, DCC	R8 – a) Please change 'outline landscape and ecological management plan' to 'outline landscape and ecology management plan' to reflect the correct document name. b) Should this requirement make provision for a plan to be provided as well as written details? c) Should it make provision for a scheme of maintenance? d) The requirement only appears to relate to landscape works around the OnSS site. Should it also apply to the ECC? e) If it only relates to the OnSS, how would details of landscape works (e.g. new hedgerow planting) be secured for the wider ECC? f) If it only relates to the OnSS, should it make provision for details of proposed ponds also?	a) The outline landscape and ecology management plan has been correctly labelled in R8 of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) to ensure consistency with the document name and other references within the dDCO (AS-014). b) 8.4 The outline landscape and ecology management plan (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) (oLEMP) includes a plan showing the proposed landscaping and ecological works around Work No. 31A. As this is already provided for it is not considered to be necessary for this to be explicitly stated in R8. c) R9 applies to '[any] tree or shrub planted as part of an approved landscaping scheme'. That would include the landscaping scheme approved under R8. As such, the Applicant does not consider it necessary for R8 to specify maintenance provisions. d) / e) It is intended that R8 only applies to the onshore substation site as it relates to permanent landscaping for the purposes of screening. R13 is the requirement which relates to any landscaping for the remainder of the onshore works including the export cable corridor. f) Ponds are part of the surface water drainage strategy as well as the ecology strategy. As R8 concerns only permanent landscaping at the OnSS and other elements like the ponds are secured under R13 and R16.

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6.30	The Applicant, DCC	R9 – a) R9(1) – should this also refer to the 'associated work programme' specified in R8? b) R9(2) – is 5 years adequate time given that the ES assesses effects (including landscape and visual effects) at Year 15?	a) R9 intentionally broadly refers to 'approved landscaping scheme'. That would include the associated work programme approved under R8. As such, the Applicant does not consider it necessary for R9 to specifically include this. b) Five years is adequate because it is within a five-year period that all landscaping will either be established or will have failed and been replaced.
6.31	The Applicant	R10 – NRW has requested it is consulted on this requirement [RR-015]. Is the Applicant willing to make provision for this?	The drafting of R10 of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) has been changed to include NRW as a consultee.
6.32	The Applicant	R12 – a) should this make provision for the publishing of findings and data? b) should this refer to the "onshore written scheme of investigation"? c) is the submitted onshore written scheme of investigation (titled 'Onshore WSI') an outline doc?	a) The Applicant does not believe this would be appropriate as including a requirement to publish data as that is more usefully considered in the outline and detailed plans which can provide for appropriate measures depending on the significance of what is found. The Outline Offshore Archaeological Written Scheme of Investigation (APP-304) and the Onshore WSI (APP-147) and already provide for publication of findings as appropriate. A blanket obligation under requirement would risk a scenario in which data which reveals little or no information which would be of value would still have to published. In such a scenario it would not be proportionate for the Applicant to have to publish this data. Such a requirement is also not included in recently granted offshore wind farm DCOs: East Anglia ONE NORTH Offshore Wind Farm Order 2022 and the East Anglia TWO Offshore Wind Farm Order 2022. b) Reference to the Onshore WSI have been corrected in A2 and throughout in the dDCO submitted at Deadline 1 in order to match with the document name of 6.5.8.5 (APP-147). c) Yes, 6.5.8.5 the Onshore WSI (APP-147) is an outline document.
6.33	The Applicant	R13 – a) Please change 'outline landscape and ecological management plan' to 'outline landscape and ecology management plan' to reflect the correct document name. b) Does this requirement relate to management only or to details of planting (e.g. hedgerows, grassland, numbers, species, densities etc..) also?	a) There is no reference in R13 to an 'outline landscape and ecological management plan' but R13 has been changed from 'written landscape and ecological management plan' to 'written landscape and ecology management plan' in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission). b) R13 requires the final landscape and ecology management plan to be agreed in accordance with 8.4 the outline landscape and ecology management plan (APP-305; Document 1.33 of the Applicant's Deadline

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			1 submission) (oLEMP). The oLEMP sets out the proposed planting and planting principles, for example in Section 2.1.3. Precise details of species chosen for planting and planting densities would be agreed under R13(1).
6.34	The Applicant	R8, R9 and R13 – a) how does a 'written landscaping scheme and associated work programme' in accordance with the oLEMP in R8 differ from a 'written landscape and ecological management plan' in accordance with the oLEMP in R13. b) could R8, R9 and R13 be combined to form a single requirement?	R8 relates to landscaping associated with the onshore substation works (Work No. 31A) only and the written landscaping scheme and associated work programme relates specifically to permanent landscaping for the purposes of screening the onshore substation. R13 is the requirement which relates to landscaping for the wider onshore works and therefore covers a much wider range of landscaping and ecology works including, for example proposals for reinstatement of the temporary construction compounds. As such it would not be appropriate to combine R8, R9 and R13 as they operate to control different elements of the proposed development.
6.35	The Applicant	R14 – Should this also relate to nationally protected species under the Wildlife and Countryside Act 1981?	R14 has been amended to include species protected under the Wildlife and Countryside Act 1981 and a new definition of "nationally protected species" added.
6.36	The Applicant	R15 – a) This refers to "7 a.m. and 7 p.m." whereas Art 4 refers to "2300-0700". Please ensure consistency when showing times. b) Subsection (2)(d) refers to "other time critical elements of the onshore works". Please advise which 'other' works not listed would be time critical. c) Subsection (4) - Are 24-hour workings for trenchless installation techniques likely? If so, in which locations?	a) The references to times in R15 have been changed in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) to be consistent with the format in A4. b) As detailed in paragraph 184 of the Onshore Project Description chapter (APP-062) of the Environmental Statement, other time critical elements include trenchless cable crossing operations (including HDDs) and delivery and unloading of abnormal loads such as transformers, shunt reactors, electrical compensation equipment and large cable drums. The following other activities may also become time critical: • The testing or commissioning of electrical plant; • For internal fitting out works associated with the onshore substation; • Where interacting with other infrastructure (for example roads or utilities crossings) and continuous or overnight working is required to minimise disruption, in the interests of safety or to avoid damage; • Security monitoring; and • Activity necessary in the instance of an emergency where there is a risk to persons, the environment, delivery of electricity or property.

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			There may be other time critical activities, which would not be identified until the detailed design stage and will be agreed in advance with the relevant planning authority under R15(2). c) As discussed in Paragraph 40 and 185 of APP-062, 24-hour working will be required for trenchless installation at the Landfall, the A55 and River Clwyd. It also may be required at other trenchless crossings but these are less likely. The trenchless installation techniques and timings will be further refined as part of detailed design. 24-hour working will only be used where necessary.
6.37	The Applicant	R17 – a) Should this requirement require details to be submitted, specifying such details, and specify the timing of such submission of details (e.g. before works commence)? b) Should it also specify that land should be reinstated to the same quality / condition?	a) The Applicant does not consider that the requirements as described in the written question are needed in R17. The reason for that is details of restoration form part of 8.4 the outline landscape and ecology management plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). The oLEMP is a certified document and sets out all the details regarding restoration. R13 puts in place the mechanism for approval of the final landscape and ecology management plan on the basis of the oLEMP and the timeline for this. b) The oLEMP sets out the details of what restoration works would be undertaken on land affected by the authorised development. The final restoration works will be determined by what is most suitable for the affected land at the point it requires restoration. It would not necessarily be suitable for the land in question to be restored to the same quality / condition as before the authorised development commenced as taking a standard approach would not allow for restoration to be best suited to the particular requirements of that land. Further, having such a requirement may preclude the ability for the undertaker to offer biodiversity improvements when restoring the land in cases where the condition prior to the authorised development was poor.
6.38	The Applicant	R18(2)(a) – should the British Standard be in inverted commas as in R4?	Inverted commas have been added around the British Standard label in E18(2)(a) in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission).
6.39	DCC	R18 specifies noise levels during the operation of the OnSS. Are you content with the details of this requirement?	N/A

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6.40	The Applicant	R20 – a) should this specify for details to be approved by the SoS rather than just to be submitted to the SoS for approval? b) does it need an implementation clause? c) should it be more prescriptive in respect of details to be included within the written decommissioning programme?	a) R20 (now R21) refers to a written decommissioning programme pursuant to section 105(2) of the Energy Act 2004. As such, the provisions of Chapter 3 of the Energy Act 2004 are applied to the written decommissioning programme. There is no need to duplicate the details set out in Chapter 3 in R20 (now R21). b) / c) Section 105(8) of the Energy Act 2004 sets out what is to be included in the written decommissioning programme. Of particular relevance: the measures which will be undertaken to decommission the offshore wind assets and the times and periods within which those measures will be undertaken. Section 109 of the Energy Act 2004 includes an obligation to decommission in accordance with the written decommissioning programme and creates a criminal offence if that obligation is not satisfied. Further the undertaker will be bound by the provisions of the Energy Act 2004 to implement the written decommissioning programme.
6.41	The Applicant	R21 – Should this specify details to be included within the written scheme of decommissioning (e.g. buildings to be demolished, means of removal of material, land restorations works, timetable for implementation etc…)	The written scheme of decommissioning is to be drafted in accordance with the legislation which is applicable at the time and approved by the relevant planning authority. No further specific detail was included in the equivalent requirements in the Norfolk Vanguard Offshore Wind Farm Order 2022, the Norfolk Boreas Offshore Wind Farm Order 2021, the East Anglia ONE NORTH Offshore Wind Farm Order 2022, or the East Anglia TWO Offshore Wind Farm Order 2022.
6.42	The Applicant	**Decommissioning** R21 (1) refers to the onshore written scheme of decommissioning being submitted to and approve by the relevant planning authority at least six months prior to works commencing. In contrast, R20 remains silent in respect of a timescale. Please clarify why it isn't necessary for a timescale to be included within R20.	Requirement 20 (now R21) refers to a written decommissioning programme pursuant to section 105(2) of the Energy Act 2004. Chapter 3 of the Energy Act 2004 specifies the process for approving decommissioning programmes which will govern the approvals in this case. The offshore decommissioning guidance (Decommissioning offshore renewable energy installations, BEIS 2019) which the Applicant referred to in ISH1 can be found here: https://www.gov.uk/government/publications/decommissioning-offshore-renewable-energy-installations
6.43	NATS, The Applicant	Is a requirement necessary to ensure that no wind turbine generator operates prior to the agreed resolution of a scheme to protect Great Dun Fell and St Anne's Primary Surveillance Radars?	The Applicant is in active discussion with NATS and a legal agreement is being progressed (see answer to ExQ1.1.2). As NATS notes in its representation (RR-025) we are not aware of any in principle reason that agreement will not be concluded during the exam. That draft agreement

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			includes requirement wording which will be added to the dDCO in the terms agreed once that agreement is finalised.
Questions / comments relating to Schedules (Sch)			
6.44	The Applicant	Sch 1 – below "Work No. 3" and above Table 1 there is a reference to "co-ordinates shown on the works plan and listed in Table 1". However, the co-ordinates listed in Table 1 appear to be shown on the Location Plan rather than the Works Plan. Should this instead then refer to the Location Plan and should this plan be defined in A2?	Reference to the location plan has been included in the description of Work No. 3 of the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission). Further, a definition of location plan has been added to A2 and it has been included in the list of certified documents at A40.
6.45	The Applicant	Sch 3 – incorrect sheet numbers throughout – please amend	Sheet numbers have been corrected in Schedule 3.
6.46	The Applicant	Sch 4 – a) this is titled 'Streets and rights of way to be temporarily stopped up or restricted'. However, no streets are identified – should they be? b) Sheet numbers are incorrect throughout. Please amend. c) Point Ca regarding Footpath DE/206/44 does not appear on the Temporary stopping up of public rights of way plan (TSUPRoW) [AS-009]. d) There are no points Ba and Bb relating Footpath DE/206/23 on the TSUPRoW plan – should this instead refer to points Fx and Fy? e) Footpath DE/206/46 does not appear to be labelled on the TSUPRoW plan. f) Points Fx and Fy regarding Footpath DE/206/4 appears inconsistent with the TSUPRoW plan. g) There appear to be two footpaths DE/206/4 on the TSUPRoW plan – one on Sheet 4 and one on Sheet 7 – is this correct? h) Are Points Ix and Iy regarding Bridleway DE/201/9 correct – the TSUPRoW plan indicates otherwise (Kx and Ky). i) Is Bridleway DE/201/9 and Footpath DE/201/9 the same stretch? j) Footpath DE/105/7 is not labelled on the TSUPRoW plan. k) Clarify whether Point Ly is accurately shown on the TSUPRoW plan?	An updated data set relating to Public Rights of Way (PRoW) has been obtained from Denbighshire County Council (DCC) which differs slightly from the data set which was used to produce the Temporary Stopping Up of Public Rights of Way Plan (AS-009) (TSUPRoW). The Applicant has identified a number of anomalies updated data set with some minor spatial discrepancies (in the order of ~1m) between the updated and original data set. As such, there is no change to on the assessments carried out for the purposes of producing the Environmental Statement or Public Access Management Plan (PAMP) (APP-320). The discrepancies are, however, enough for the TSUPRoW to require updating and the Applicant is in discussion with DCC to fully understand the anomalies identified to most accurately update the TSUPRoW. The Applicant has not been able to do this for Deadline 1 but will endeavour to provide an updated TSUPRoW as soon as possible. Any updates to Schedule 4 will be undertaken following that and take into account points raised in ExQ1.6.46.
6.47	The Applicant	Sch 5 – incorrect sheet numbers throughout – please amend.	The sheet numbers in Schedule 5 have been corrected.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
6.48	The Applicant	Sch 10 – should this make reference to the Hedgerow and Protected Tree Plan, and should this plan be defined in A2?	Schedule 10 has been altered to refer to the hedgerow and protected tree plan and reference to this document has been added to A2 and A40 in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission).
6.49	The Applicant	Sch 11 – change 'specifed' in the title to 'specified'.	The title of Schedule 11 in the dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) has been corrected to refer to 'specified'.
6.50	The Applicant	Sch 12 2(1) – should this refer to "weekends and bank holidays"?	The wording at the end of Schedule 12 2(1) has been changed to "weekends and bank holidays".
Questions / comments relating to Explanatory Memorandum (EM)			
6.51	The Applicant	Section 3.5.10 (Article 27) – this refers to paragraph (1)(a)(iii) of A27. However, A27 does not appear to include such a paragraph. It also refers to paragraph (1)(d) of A27. However, the EM description does not appear to reflect A27(1)(d) of the dDCO. Please check and advise.	The dDCO (see Document 1.8 of the Applicant's Deadline 1 submission) and Explanatory Memorandum (see Document 1.17 of the Applicant's Deadline 1 submission) have been amended.
6.52	The Applicant	Please can you explain how the commitment to undertake a preconstruction survey beyond the OL will be fulfilled and secured? For example, all water courses within or immediately adjacent to the OL (250 m upstream/ downstream of OL) (Table 1: Pre-Construction Surveys, Outline Landscape and Ecology Management Plan [APP-305], [APP-047], Anchor handling and deployment of anchors may be required outside of the Order Limits).	R13 requires a landscape and ecology management plan (LEMP) to be approved by the relevant planning authority in line with 8.4 the outline landscape and ecology management plan (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) (oLEMP). As described in paragraph 2 of the oLEMP, its purpose is to '[set] out the key elements that will be included in the final Landscape and Ecology Mitigation Plan'. As such what is included in the oLEMP, including Table 1 which describes the pre-construction surveys, will form part of the LEMP. R13 also requires the LEMP to be implemented as approved so the undertaker will be bound to undertake the surveys which are set out in Table 1. A15 allows the undertaker to 'enter on any land shown within the Order limits or which may be affected by the authorised development' including in order to carry out ecological investigations (see A15(1)(c)) and as such allows the undertaker to enter into and carry out survey work outside of the Order Limits. A15 also includes rights for the undertaker to take equipment onto the land to be surveyed in order to carry out the surveys (see A15(3)(b)). If there is any requirement for surveys on areas below MLWS and outside the Order Limits, these would be agreed with the Crown Estate and any necessary licences secured for those works. With regards to anchor

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			handling and deployment these offshore activities are exempt marine licence activities under the Marine Licensing (Exempted Activities) Order 2011. They therefore do not need specific consent under the DCO or the marine licence and can take place outside of the Order Limits.
6.53	The Applicant	Please can you confirm the control measure in the dDCO to ensure that in the case of monopiles, piling will only occur at one location at a time with no simultaneous or concurrent piling, and in the case of pin-piled multi-leg jacket foundations, pin-piles may be installed concurrently, but only on adjacent legs of the same jacket foundation with no simultaneous or concurrent piling at two separate foundation locations. (Paragraph 71, Offshore Project Description [APP-047]).	The Environmental Statement (ES) has assessed a Maximum Design Scenario (MDS) based on there being no concurrent piling of monopiles, and in the case of pin-piled multi-leg jackets, the installation of two pin-piles concurrently on adjacent legs of the same jacket foundation. The ES has not assessed concurrent piling at two separate foundations in any case. The Applicant can confirm that this commitment will be controlled through the Construction Method Statement (CMS) (Condition 25 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission)), which it has proposed to Natural Resources Wales (NRW) is included within the Marine Licence. The CMS would typically cover the following: • Construction procedures in relation to foundations and substructures, wind turbines, OTMs and inter-array cables; • Good working practices to be employed during construction; • Identification of key contractors and vessels involved in construction; • The roles and responsibilities of key Project personnel and contractors during construction with respect to construction; and • Confirmation that the construction methods described within the CMS align with those considered in the original Environmental Statement. The CMS would need to be submitted to, and approved by, NRW prior to the commencement of offshore works. The Applicant can also confirm that these piling commitments also are repeated within the Marine Mammal Mitigation Protocol (MMMP) therefore, this provides a further layer of control on this matter. The Applicant is of the opinion that this is therefore the appropriate control mechanism to deal with the piling process associated with foundation installation.

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6.54	The Applicant	Please can you explain and describe the control measure in the DCO to prevent the MDS of 5,000kJ hammer energy for monopiles & 3,000kJ for pin piles being exceeded at the construction stage given that such measures are identified in ES Volume 4, Annex 7.2 [APP- 107]?	In the detailed design phase post-consent (once contractors are brought on board), the final piling strategy will be reviewed to ensure that the piling strategy does not result in environmental effects greater than those assessed in the Environmental Statement. The Applicant can confirm that the same two principal control documents within the Marine Licence as cited above, in response to ExQ1.6.53 (namely the CMS and MMMP) would apply here for maximum hammer energy.
6.55	The Applicant	Please can you explain and describe the control measure in the dDCO for vibro-piling technology at landfall during the winter period (October-March) given that such preliminary mitigation measure for non-breeding birds is identified in ES Volume 3, Chapter 13, Table 5 [APP-074].	Table 13 of 6.3.5 ES Volume 3, Chapter 5: Onshore Biodiversity and Nature Conservation (APP-066) states that the timing and type of piling (if required for the establishment of a temporary cofferdam at the landfall) would be agreed with Denbighshire County Council through provision of a Construction Method Statement (CMS) as part of the Code of Construction Practice approved under DCO Requirement 10. This would apply if the cofferdam piling were to take place landward of Mean Low-Water Springs (i.e. the intertidal area). If the piling were proposed seaward of Mean Low-Water Springs, the timing and type of piling would be agreed with Natural Resources Wales via the Marine Licence (see Condition 25 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission)).

2.8 Flood Risk and Water Quality

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
7.1	Envirowatch.EU	**Water Bodies** Please provide additional information regarding concerns in respect of the water bodies, as detailed in your relevant representation [RR-034]. Where relevant, please provide a plan identifying the location(s) of the water bodies.	N/A
7.2	NRW	**Western Wales River Basin Management Plan** Please provide a copy of the updated Western Wales River Basin Management Plan 2021-2027 as detailed in your relevant representation [RR-015].	N/A
7.3	NRW	**Inter-relationships** Further to your relevant representation [RR-015], please provide an explanation of which inter- relationships between marine water and sediment quality and other receptors you consider have been overlooked, in addition to elevated bacterial counts and human health.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has discussed the relevant representations with NRW and is awaiting an update on this point, and whether a response is required. Nevertheless, it was agreed with NRW that while added explanation of inter-relationships between marine water and sediment quality and other receptors could be presented, these are unlikely to result in a material change to the overall assessment.
7.4	The Applicant	**Marine Water and Sediment Quality** In their relevant representation [RR-015], NRW disagree with the conclusions made in relation to sediment bound contaminants, and further information is required to support the conclusion. Additionally, where data is available, NRW request that the Applicant reports all data in the context of Centre for the Environment, Fisheries and Aquaculture Sciences (Cefas) Action Levels. Once the above information has been updated and provided, NRW advise that the RIAA is updated to reflect this new information. Please provide a response in respect of these issues.	The Applicant has discussed and responded directly to NRW on this relevant representation (RR-015) and provided a clarification note to NRW which is Document 1.15 of the Applicant's Deadline 1 submission. Despite this technical query from NRW, there is no dispute on the conclusions of the assessment. The Cefas Action Levels provide context to sediment quality, but it has been agreed that contaminant concentrations were low in sediment samples analysed to support the assessment. It is not considered necessary, or proportionate to the risk, to update the RIAA as this does not materially influence or change the conclusions. It is understood that this matter is agreed and agreement is expected to come via the SoCG with NRW.
7.5	The Applicant	**Phytoplankton and Dissolved Oxygen Assessments** In their relevant representation [RR-015], NRW disagree with the approach to assessing impacts to phytoplankton and dissolved	The Applicant has discussed and responded directly to NRW on this relevant representation (RR-015) and provided a clarification note to NRW which is included in Document 1.15 of the Applicant's Deadline 1

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		oxygen and disagree with the conclusions. Please provide a response in respect of these issues.	submission. Despite this technical query from NRW, there is no dispute on the conclusions of the assessment. It is understood that this matter is now agreed and agreement is expected to come via the SoCG with NRW.
7.6	The Applicant	**Water Framework Directive Compliance Assessment – Water Clarity** In their relevant representation [RR-015], NRW disagree with the conclusions of the compliance assessment with respect to water clarity. Please provide a response in respect of this issue.	The Applicant has discussed and responded directly to NRW on this relevant representation (RR-015) and provided a clarification note to NRW which is included as Document 1.15 of the Applicant's Deadline 1 submission. Despite this technical query from NRW, there is no dispute on the conclusions of the assessment. It is understood that this matter is now agreed and agreement is expected to come via the SoCG with NRW.
7.7	The Applicant	**Trenchless Techniques and Outline Construction Method Statement (oCMS)** In their relevant representation [RR-015], NRW request that any trenchless techniques employed should be deep enough to avoid the saltmarsh and minimise cable exposure, and that appropriate entry and exit pits are identified. It is requested that this information should be included in the oCMS. Please provide a response in respect of these issues.	Please see The Applicant's response to NRW's Relevant Representation [RR015], specifically the response to RR-015-2.5.1 and RR-015-2.8.8, which summarises that the Applicant can confirm that trenchless crossing techniques (such as HDD), will be used for the installation of cables beneath the River Clwyd with above ground construction works located to the east and west of the existing flood defence embankments (and therefore outwith the area identified as saltmarsh within Annex 5.2: Habitat and Hedgerow Survey Report (APP-125). This is confirmed in Figure 11 of Volume 3, Chapter 1: Project description (AP-066) where the proposed entry and exit pit locations are shown. Although construction works within the saltmarsh area would be underground, there could be a requirement for personnel to access the saltmarsh area on foot in order to monitor and guide the HDD (or other underground equipment).
7.8	The Applicant	**Marine Water and Sediment Quality** The Canadian Marine Sediment Quality Guidelines have been used to establish threshold effect levels for polycyclic aromatic hydrocarbons (PAH) within the sediment in ES Volume 2, Chapter 3 [APP-049]. Four PAHs recorded in the baseline do not have thresholds defined under the Canadian Guidelines. Please explain what alternative threshold has been used to contextualise these contaminants or otherwise explain why a threshold is not required?	The Applicant has discussed this point with NRW and provided a clarification note to NRW which is included as Document 1.15 of the Applicant's Deadline 1 submission. The Cefas Action Levels provide context to sediment quality in England and Wales, although the threshold for PAHs is relatively crude. Therefore, reference was provided to Canadian Guidelines for PAHs, as suggested in NRW's Scoping Opinion, albeit recognising that reference to the respective Cefas Action Levels was not included as well (hence provided in the clarification note outlined above). Nevertheless, it has been agreed with NRW that contaminant concentrations were low in sediment samples analysed and there is no dispute on the conclusions of the assessment. It is understood that this matter is now agreed and agreement is anticipated to come via the SoCG with NRW.

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7.9	NRW	**Marine Water and Sediment Quality** Please clarify the comments made in your relevant representation [RR-015] regarding the need for further information and reporting against Cefas Action Levels. What additional information is required beyond the information presented [APP-049], Tables 10 and 12?	The Applicant has discussed this point with NRW and provided a clarification note to NRW (including revised tables comparing PAH concentrations in sediment samples against the respective Cefas Action Levels) which which is included as Document 1.15 of the Applicant's Deadline 1 submission. The Cefas Action Levels provide context to sediment quality in England and Wales, although the threshold for PAHs is relatively crude. Therefore, reference was provided to Canadian Guidelines for PAHs, as suggested in NRW's Scoping Opinion, albeit recognising that reference to the respective Cefas Action Levels was not included as well (hence provided in the clarification note outlined above). Nevertheless, it has been agreed with NRW that contaminant concentrations were low in sediment samples analysed and there is no dispute on the conclusions of the assessment. It is understood that this matter is now agreed and is expected to be resolved via the SoCG with NRW.
7.10	The Applicant	**Marine Water and Sediment Quality** [APP-049] includes an assessment of effects on marine water and sediment quality during decommissioning of the Proposed Development. Please clarify if there is potential for likely significant effects arising from deterioration of water quality due to release of sediment-bound contaminants and accidental spills of materials or chemicals during the decommissioning phase, in the maximum design scenario, i.e. with removal of all infrastructure. It is noted that these impact pathways were assessed for the construction phase.	The project infrastructure will be decommissioned in line with the decommissioning plan (expected to be secured via Condition 40 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission), and the prevailing best environmental practice/ option at the time, which may indicate infrastructure such as cables should be retained in situ. For the purposes of undertaking an assessment with regards to marine water and sediment quality, it was assumed as a worst-case that the decommissioning would essentially be a reversal of the construction process whereby infrastructure was removed. The potential impacts during decommissioning are considered to be similar or less than during construction for release of sediment-bound contaminants or accidental spills/releases. The Applicant is committed to the use of best practice and pollution prevention guidelines at all times. The Applicant undertook an assessment of the accidental releases or spills of materials or chemicals as part of the EIA on the basis that the provision of a Project Environmental Management Plan (PEMP) and Marine Pollution Contingency Plan (MPCP) would be secured through the Marine Licence and implemented accordingly. As part of NRW's relevant representations, it was noted that NRW did not agree that the impact magnitude could be described as 'temporary' and therefore 'negligible' without these measures. In the absence of mitigation, moderate adverse significance

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			(i.e., significant in terms of the EIA Regulations) could result for certain sensitive features (e.g., bathing waters) in the event of an accidental release/spill and thus it is necessary to implement mitigation measures to reduce the residual significance to minor at worst. While this does not change the overall conclusion of the assessment (given the implementation of appropriate measures), this position is acknowledged by the Applicant.
7.11	The Applicant	**Marine Water and Sediment Quality** Please clarify the differences between the description of the maximum design scenario (MDS) for assessment of marine water and sediment quality effects in [APP-049] relative to the MDS described in ES Volume 1, Chapter 2 [APP-048] and explain any implications for the assessment: a) The greatest volume of sediment disturbed and released from drill arisings from foundation installation for the wind turbine generators (WTGs), stated to be 270,161 m^3 (50 smaller WTGs with 60% of locations requiring drilling) in ES Volume 2, Chapter 3, Table 15 but showing as 276,862 m^3 (34 larger WTGs at 100% of locations requiring drilling) in ES Volume 2, Chapter 1, Table 9; and b) The approach to buried cables, scour and cable protection during decommissioning, and whether these components would be left in situ (as stated in [APP-049]) or removed (as stated in ES Volume 2, Chapter 1 [APP-047] and section 3.12.1 of [APP-049]). It is noted that in each instance, reference is made to further consultation at the point of decommissioning to determine the approach.	(a) The Applicant acknowledges the discrepancy in potential maximum volume of drill arisings between scenarios whereby 50 smaller WTGs or 34 larger WTGS were installed. However, the difference in volume is minor (6,701 m^3; which equates to an increase of approximately 2.5%) and would not result in any changes to the assessment conclusions due to increased uplift in suspended sediment concentrations or the remobilization/ redistribution of sediment-bound contaminants. It is also noted that the maximum volume of sediment released from WTG foundations as part of the Marine Geology, Oceanography and Physical Processes chapter (and numerical modelling for suspended sediments) was based on 34 of the larger WTGs (276,862 m^3; see Table 7 of (APP-048)) which informed the marine water and sediment quality assessment. Therefore, the worst-case has already been accounted for and there would be no change to the conclusion. (b) At this stage, it is not possible for the Applicant to determine whether components would be left in situ or removed from the seabed as part of decommissioning. This will be determined as part of the decommissioning plan which will be consulted and require approval from the regulator towards the end of the project lifetime. It is assumed that infrastructure left in situ would present a lesser impact in terms of potential changes to marine water and sediment quality (e.g., increased suspended sediment concentrations or remobilization/ redistribution of sediment-bound contaminants from cable removal). Therefore, with regards to assessing the worst-case impacts to marine water and sediment quality, it is assumed that the decommissioning would be a reversal of the construction process whereby infrastructure would be removed. Nevertheless, it is also assumed that such impacts during decommissioning would be of similar or lesser scale compared to the construction phase.

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7.12	The Applicant	**Marine Water and Sediment Quality** Table 17 of [APP-049] lists several projects as operational or active. These projects have been assigned 'Tier 1' status. Please explain why these projects have been included in the cumulative effects assessment and not the baseline for the assessment? It is noted that for example the operational offshore wind farms identified in Table 17 have been included in the baseline for the assessment of marine physical processes in [APP-048].	Projects that are listed as operational or active are considered unlikely to require further planned construction activities which contribute to the known baseline. However, it is recognised that operation and maintenance (O&M) works for these projects, including for example cable repairs and replacement, are often unplanned and reactionary. Therefore, these projects have only been included as part of the cumulative assessment in terms of potential impacts from O&M activities as opposed to forming part of the baseline.
7.13	The Applicant	**Marine Water and Sediment Quality** Please explain why ES Volume 1, Annex 3.1 [APP-094] screens out planned offshore wind farms from the assessment of cumulative marine water and sediment quality effects in [APP- 049], when a number of these are screened into the assessment of marine physical processes in [APP-048]. It is noted that scoping requests in respect of a number of these projects have been submitted during summer 2022. The Applicant is requested to comment on whether this affects the tier in which the project is categorised, in accordance with Table 4.4 in ES Volume 1, Annex 3.1 [APP-042] and provide commentary on the potential for cumulative effects.	The Applicant acknowledges that documentation relating to other projects, such as the Scoping Reports for the Morgan and Mona offshore wind farms, are in the public domain. However, these projects would be assigned a lower tier as there is not enough information available, or certainty over project programmes at this time to support a meaningful assessment in terms of cumulative effects to marine water and sediment quality. It is also noted that details relating to AyM are readily available and further progressed, and thus can be included in respective cumulative assessments for these projects as they progress through the EIA process. Furthermore, as the Morgan and Mona projects progress in the planning system, they will be required to undertake cumulative assessments that consider AyM. See also the Applicant's response to ExQ1.0.18.
7.14	The Applicant	**Marine Water and Sediment Quality** Paragraph 159 of [APP-049] states that the use of cofferdam(s) could reduce effects from release of drilling mud (bentonite) from minor adverse to negligible adverse. Please provide clarification as to whether it proposes to implement the measure as it does not appear to be referenced in the Schedule of Mitigation [APP-310].	From a marine water and sediment quality perspective, it was considered appropriate to assess the worst-case scenario whereby a cofferdam is not used during construction and thus potential dispersion of drilling mud in the wider area (minor adverse). The impact pathway was then assessed with mitigation to consider the residual effect (negligible). The assessment concluded that the use of a cofferdam would reduce the effects from the release of drilling mud, but even without mitigation, the effects would not be considered significant in terms of the EIA Regulations. Furthermore, it is important to recognise that while the use of a cofferdam would reduce the residual effect with regards to marine water and sediment quality, installation of a cofferdam would introduce other impact pathways such as underwater and airborne noise. It has been suggested that the requirement for a cofferdam would be a condition in the Marine Licence (see Document 1.24 of the Applicant's Deadline 1 submission), if deemed

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			necessary by NRW. The Applicant hopes to be in a position to understand from NRW whether a cofferdam is required and will provide an update on this matter at Deadline 2.
7.15	The Applicant	**Marine Water and Sediment Quality** Geophysical monitoring across the area of offshore construction works is proposed to determine the effectiveness of cable burial and protection, as identified in the Schedule of Monitoring [APP-311]. Could the Applicant explain whether any discussion has taken place with NRW about the expected monitoring locations, frequency and likely measurable thresholds for remedial action, and confirm how the monitoring and any remedial action would be secured through the DCO, bearing in mind that it is proposed as a condition to the proposed Marine Licence(s)?	There has been no discussion with NRW with regards to geophysical monitoring to determine the effectiveness of cable burial and protection. It is standard practice to agree the detail once the final scheme design is known as anything drafted at this stage could be redundant as a consequence. Discussions will take place on the monitoring locations, frequency, likely measurable thresholds and methods post-consent, prior to finalisation of the final monitoring plan as a condition of the Marine Licence. Monitoring is expected to be secured via conditions of any Marine Licence granted by NRW (see Document 1.24 of the Applicant's Deadline 1 submission).
7.16	The Applicant	**Flood Risk Activity Permit (FRAP)** In their relevant representation [RR-015], NRW states that they do not consent to the Applicant's request for the disapplication of the FRAP. NRW considers that a FRAP application should be made for each main river crossing (and associated flood defences) in accordance with the Environmental Permitting Regulations 2016 (EPR 2016). Please provide a response in respect of this issue.	Please see The Applicant's response to NRW's Relevant Representation (RR-015), specifically the response to RR-015-3.2.1and the Applicants response to ExAQ1.6.12 above.
7.17	The Applicant	**Flood Consequence Assessment (FCA)** In their relevant representation [RR-015], NRW states that the Flood Risk Assessment Wales maps should not be used for planning purposes. Instead, NRW advises the Flood Map for Planning (FMfP) represents more up-to-date information for assessing flood risk. Please confirm if the FMfP is to be utilised? If not, please provide reasoning.	The Applicant has provided an updated version of the FCAs for the Onshore ECC (APP-137) and OnSS (APP-138) within its Deadline 1 submission to include Flood Map for Planning (FMfP).
7.18	The Applicant	**Flood Consequence Assessment (FCA)** In their relevant representation [RR-015], NRW states that there are works in Flood Zone C2 which are not assessed in the Flood Consequence Assessment and that such works should be subject to a bespoke FRAP. Please confirm: a) Whether such works have omitted from the FCA?	The Applicant has provided an updated version of the FCA for the Onshore ECC (APP-137; Document 1.41 of the Applicant's Deadline 1 submission) to include consideration of works within C2. The areas of the DOL that are located within C2 comprise an operational access (which utilises an existing access track and field access points), and area of temporary mitigation for watervole and otter and part of an access point into a TCC from the A525.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		b) If works have been omitted, please give reasoning and confirm whether it is necessary to include such works; and c) Is a bespoke FRPA is to be submitted? If not, please provide reasoning.	
7.19	DCC	**Flood Consequence Assessment – Onshore Export Cable Corridor and Onshore Substation** Are you satisfied within the approach and conclusions as detailed in both FCAs ([APP-137] and [APP-138])? If not, please detail any matters of concern.	N/A
7.20	The Applicant	**Outline Pollution Prevention and Emergency Incident Response Plan (oPPEIRP)** In their relevant representation [RR-015], NRW requests that minor amendments are made to the oPPEIRP to strengthen the final version. Please confirm whether such amendments are to be made? If not, please provide reasoning.	Please see The Applicant's response to NRW's Relevant Representation [RR015], specifically the response to RR-015-3.6 which states that if NRW can provide further detail on the proposed amendments these can be reviewed and considered for inclusion in the document. NRW have been added to DCO R10 (the CoCP) as a consultee.
7.21	The Applicant	**Schedule of Mitigation** Please review row 12 on electronic page 8 of the [APP-310] and complete missing information. Please submit an updated version of [APP-310] at Deadline 1.	The Applicant has provided an updated version of the Schedule of Mitigation (Document 1.18 of the Applicant's Deadline 1 submission).
7.22	The Applicant	**Climate Change Allowances** Neither FCA uses the most recent climate change allowances to reflect UK Climate Projections 2018 (UKCP18) as recommended by the Welsh Government. Please confirm: a) Whether the updated climate change allowances are likely to affect the conclusions on the vulnerability of the substation to flooding; and b) Whether, considering the most up to date information, a revision to the sustainable drainage systems (SuDS) proposals is necessary? Additionally, there is also no reference to NRW guidance from 2021 (Adapting to Climate Change: Guidance for Flood and Coastal Erosion Risk Management Authorities in Wales) which	The Applicant has provided a revised version of the FCAs for the Onshore ECC (APP-137; Document 1.41 of the Applicant's Deadline 1 submission) and OnSS (APP-138; Document 1.43 of the Applicant's Deadline 1 submission) which have been revised using the most recent climate change allowances as set out in UK Climate Projections 2018 (UKCP18) and NRW guidance from 2021 (Adapting to Climate Change: Guidance for Flood and Coastal Erosion Risk Management Authorities in Wales). The Applicant confirms that there is no change to the proposed sustainable drainage systems (SuDS) for the OnSS.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		considers the most recent UKCIP climate predictions. Please explain why reference to this document is not necessary.	
	The Applicant	**Flood Risk Zones** [APP-137] only assesses the impacts on the sections of the onshore cable route within Flood Zone C1. However, Figure 2 and section 2.1 of [APP-137] also refer to sections of the cable route which cross Flood Zones B and C2. It is noted that the section of the Proposed Development within Flood Zone C2 is Work No. 41 (haul road) and that as a worst-case it may need to remain in place throughout the entire cable route construction period. As such, please expand on why [APP-137] does not assess works in Flood Zone C2.	The Applicant has provided a revised version of the FCAs for the Onshore ECC (APP-137; Document 1.41 of the Applicant's Deadline 1 submission) to include consideration of works in C2.
7.23	The Applicant	**East Rhyl Flood Defence Scheme** Paragraph 68 of Es Volume 3 Chapter 1[APP-062] states that there will be a temporary removal of a flood defence gate and section of embankment to enable access. This paragraph also states that this work will be carried out after the completion of the East Rhyl Flood Defence scheme by DCC and that this flood defence gate will no longer form part of the sea defences. Please clarify the progress of the East Rhyl Flood Defence works and whether it will be complete before the temporary works are required?	It is the Applicant's understanding that the East Rhyl Coastal defence scheme has completed ahead of schedule however the gate in question referred to in the Onshore Project Description [APP-062] is still required to contain overtopping flows within the flood storage lagoon during extreme events. DCC has confirmed that removal of the flood gate could be managed through deployment of temporary flood defences installed and managed by AyM. Paragraph 56 of APP-313; Document 1.33 of the Applicant's Deadline 1 submission (the Outline Code of Construction Practice Appendix 1 CMS) sets out the Applicants intention to submit and agree a flood response plan with DCC as part of the final CMS.
7.24	The Applicant	**Onshore Substation** Figure 1.1 of [APP-138] indicates that there is a waterbody to the west of the proposed substation location at Felyn Y Gors Mill, but this is not referred to in the FCA. Please clarify why this has been omitted from the assessment?	The Applicant has provided a revised version of the FCA for the OnSS [in Document 1.43 of the Applicant's Deadline 1 submission which makes reference to the waterbody at Felyn Y Gors Mill.
7.25	The Applicant	**Onshore Substation** Figure 1.1 of Appendix 1 in [APP-138] depicts a larger/different red line area than considered in the main substation FCA report. Please explain why the red line areas are different.	The Applicant has provided a revised version of the FCA for the OnSS (APP-138; Document 1.43 of the Applicant's Deadline 1 submission) with an amended red line area in Figure 1.1.

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7.26	The Applicant	**Onshore Substation** Section 1.2 of [APP-138] describes a 2.5-year construction programme and an estimated lifetime of 40 years for the substation. This differs from the timescales given in the ES which are three years from inception to operation and a 25-year operational life. Please clarify.	The Applicant has provided a revised version of the FCA for the OnSS (APP-138; Document 1.43 of the Applicant's Deadline 1 submission) to clarify the timescales.
7.27	The Applicant	**Cumulative Effects** Section 7.13 of [APP-068] discusses the cumulative effects assessment. However, Table 7 of [APP-074] makes no reference to cumulative effects. Please update and provide a revised version of [APP-074] at Deadline 1.	The Applicant has provided an updated summary of cumulative effects in the table of residual effects as identified within the ES in document 1.47 of the Applicant's Deadline 1 submission.
7.28	DCC	**Ordinary Watercourse Consent** In [APP-037] the Applicant has confirmed that they are seeking to disapply the Land Drainage Act 1991 as the dDCO provides for works to be undertaken on Ordinary Watercourses and the requisite information has been provided within the ES and associate documentation, such as the CoCP. Are you satisfied with this approach? If not, please expand on your reasoning.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant is in discussion with NRW regarding disapplication of FRAP (relating to Main Rivers) and as a result is proposing an additional Requirement within the DCO that relates specifically to watercourse crossings. The proposed DCO Requirement sets out the post consent information that The Applicant would provide for each watercourse crossing, reflecting the information that would be included in a typical FRAP/OWC application. NRW is currently reviewing the principal of whether a dedicated watercourse crossing DCO Requirement would remove NRW's resistance to disapplication of FRAP via the DCO and if favourable, The Applicant will confirm suitability for disapplication of OWC with DCC.
7.29	The Applicant	**Location of Watercourse Crossings on the Onshore ECC** Please provide a more detailed version of Figure 3 of [APP-094] to fully identify the location of individual watercourses and associated crossings.	The Applicant has provided a more detailed plan in Document 1.23 (Parts 1 and 2) of the Applicant's Deadline 1 submission.
7.30	The Applicant	**Environmental Permitting (England and Wales) Regulations (EPR) 2016** Section 100 of [APP-094] states that "Consent would be required for the works…affecting the sea defence structures, main rivers, non-main rivers and ordinary watercourses in accordance with	The Applicant confirms that Section 100 is not correct and reflects an earlier position regarding Flood Risk Activity Permits (FRAP) and Ordinary Watercourse Consent (OWC). Instead, the document should state that the draft DCO disapplies the Environmental Permitting (England and Wales) Regulations 2016 and Land

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		the Environmental Permitting (England and Wales) Regulations 2016". However, [APP- 310] (row 4, electronic page 8) confirms that the EPR is to be disapplied. Please clarify this discrepancy.	Drainage Act 1991 for FRAP and OWC. It is proposed that final details for watercourse crossings are approved by DCC, in consultation with NRW, and secured either by DCO R10, or by a new and DCO Requirement that is specific to watercourse crossings. This discrepancy has been noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
7.31	NRW, DCC	**Outline Code of Construction Practice** Are you satisfied that the measures contained within [APP-312] and associated outline environmental plans would be sufficient to effectively control the below during construction: a) Turbid run-off into rivers; b) Accidental spillages; and c) Run-off from HDD If not, please expand on your reasoning and detail additional required mitigation.	N/A
7.32	The Applicant	**Hydromorphological Designation Mitigation Measures** Paragraph 138 of [APP-094] states that the 2019 mitigation measures may have changed since the last update. Please confirm whether the measures have been updated? If so, does this affect the assessment?	Mitigation referred to under the Water Framework Directive (WFD) for heavily modified water bodies (separate from mitigation used as part of the EIA to reduce significant effects to acceptable levels) are identified as measures which are considered necessary for these water bodies to achieve Good Ecological Potential. In July 2022, NRW published updated mitigation measures as part of the Cycle 3 River Basin Management Plans, available to download via the Water Watch Wales website. With regards to the North Wales coastal water body, which is designated as heavily modified due to coastal protection use and within which the AyM export cable corridor is located, all measures are recorded as 'Not Applicable - Not Required in This Water Body'. Therefore, the proposed works within the North Wales coastal water body will not have any impact on mitigation measures associated with this water body or prevent this water body from achieving Good Ecological Potential in the future.
7.33	DCC	**Flood Defence Works** Paragraph 93 of [APP-068] states coastal defence improvement schemes at both Rhyl and Prestatyn are being investigated and implemented by DCC. Please confirm progress in terms of such schemes, including the Central Prestatyn Coastal Defence Scheme.	N/A

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7.34	The Applicant	**Draft Development Consent Order** Subsection (1) of R16 of the dDCO [AS-014] states that the surface and foul water drainage plan must be "*substantially in accordance with the principles set out in the outline drainage strategy*". Please confirm what "*substantially in accordance*" means in this context?	Please see the response to ExQ1.5.9.
7.35	The Applicant	**Assessment** The PPG on Flood Risk and Coastal Change was updated on 25 August 2022. The changes are a significant refresh to the guidance and brings the PPG up to date and in line with the latest policy position on flood risk introduced in the updates to the NPPF in 2018 and 2021. Please advise whether the update affects the assessment undertaken.	The Applicant's assessment has been undertaken in line with Technical Advice Note (TAN) 15 (Welsh Assembly Government, 2004) and Planning Policy Wales (PPW) (Welsh Government, 2021). The Applicant notes that the PPG on Flood Risk and Coastal Change relates to English Policy and as such does not consider the updates affect the assessment presented in the ES Volume 3, Chapter 7: Hydrology, Hydrogeology and Flood Risk (APP-068).

2.9 Historic Environment

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8.1	The Applicant	**Offshore Archaeology** Paragraph 45 of ES Volume 2 Chapter 11 Offshore Archaeology [APP-057] is blank. Please confirm is this is a typographical error or if there is a missing paragraph. If the latter, please supply the relevant text.	The Applicant can confirm that this is a typographical error and is included in the Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
8.2	The Applicant	**Survey data** Please elaborate on the approach taken when dealing with the partial lack of geophysical survey data for the proposed interlink area between AyM and GyM (paras 51 and 11.10.4 of [APP-057] consider).	The data gap in this area is acknowledged by the Applicant in paragraph 51 of the Offshore Archaeology and Cultural Heritage chapter (APP-057), however it should be noted that it is considered the existing data collected in the interlink area for the Gwynt y Mor (GyM) site is considered adequate for characterising the receiving environment for EIA purposes, as characterised by the Offshore Archaeology Desk Based Assessment (APP-117). Addressing this data gap is addressed within the mitigation section of the assessment chapter, specifically under Section 11.10.4, which recommends that in line with the draft Written Scheme of Investigation (WSI), archaeologists be involved during the post-consent phase of the interlink area to ensure a full assessment of the area is achieved pre-construction. It is anticipated that NRW will include a WSI as a condition in the Marine Licence. The Applicant has recognised this in the Marine Licence Principles document (Document 1.24 of the Applicant's Deadline 1 submission).
8.3	Cadw, Gwynedd Archaeological Planning Services, DCC	**Offshore Archaeology** Please confirm whether you are satisfied with the approach to offshore archaeology as outlined within [APP-057] and whether you have been consulted (or would expect to be) on the draft offshore Written Scheme of Investigation (WSI).	The Applicant notes that the Outline Offshore WSI (APP-304) has been consulted upon via statutory consultation under Section 42 as well as via the Archaeology and Cultural Heritage ETG (see the Evidence Plan and its supporting appendices (APP-301, APP-302 and APP-303, respectively).
8.4	The Applicant	**Archaeology – trial trenching** ES Volume 3 Chapter 8 [APP-069] states that targeted trial trenching to provide ground truthing was attempted between December 2021 and February 2022 but that these were not possible due to poor weather and ground conditions, and that agreement was made with Clwyd Powys Archaeological Trust (CPAT) that this could be undertaken post consent (if consent	Archaeological assessment follows a staged programme, as is standard archaeological practice for the assessment of development proposals, with the completion of the earlier stages informing the scope of subsequent stages. The first steps are to undertake desk-based assessment followed by geophysical survey.

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		were to be granted). Please explain why trenching was not attempted at alternative times of the year where weather conditions were likely to be more conducive to trenching.	Based on the consideration of the results presented in the desk-based assessment and the detailed geophysical survey, The Applicant considered that the risk that currently unknown significant archaeological sites (i.e., remains of schedulable or near schedulable quality which significantly add to our understanding of the past lives and environment of people within the area at all periods) might be encountered was low, and whilst it was clear from the geophysics survey that archaeological features do survive along the onshore ECC route, The Applicant considered that these would be most appropriately dealt with through the implementation of a programme of archaeological work, to be secured through approval of a WSI secured by DCO R12, and that further trial trenching was not required pre-determination. Despite this position, in response to feedback from CPAT, provided through DCC's S.42 response, the Applicant agreed to attempt limited trial trenching. The location for the trial trenches needs to be informed by the results of the geophysical surveys and as such this needed to be completed and interpreted as part of a report before the preparation and subsequent agreement of the WSI for the trial trenching could take place. The geophysical survey for AyM was undertaken in two main stages between April and May 2021 and September and October 2021 with a small follow up survey in November 2021 focused on the area around a potential Radar Station near Pengwern. The preparation of the WSI for the trial trenching began in October 2021 following the completion of much of the survey and was agreed with Clwyd Powys Archaeological Trust (CPAT) on 19 November 2021. It was only following the preparation and agreement of the WSI that the trenching could be carried out which happened to fall over the winter months between December and February. It was agreed with CPAT that efforts would be made to acquire as much data as feasibly possible within programme, such that it could be included within the consent application, but that if ground conditions proved too challenging due to the time of year and therefore it was not possible to complete all of the planned trenches, then this could be addressed post-consent without risk to the validity of the EIA on the condition that a robust

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			WSI was approved by CPAT. CPAT has approved the submitted WSI and is content with the approach being taken by the Applicant.
8.5	The Applicant	**Archaeology – trial trenching** [APP-069] acknowledges that one principal area of uncertainty within the Chapter relates to the nature of the archaeological baseline, being largely derived from desk-based studies. In conjunction with the lack of targeted trial trenching, quantify any risk which may arise from archaeological assets being discovered during construction works (if consent is granted). Is there an opportunity for micro siting to avoid any such assets within the proposed ECC (and OnSS)?	The archaeological baseline was formed of desk-based studies and non-intrusive geophysical surveys. The desk-based work has given The Applicant a good understanding of the archaeological background of the area, and the Geophysical survey has allowed a good appreciation of the densities of archaeological features within the onshore ECC. Notwithstanding the identified limits of the techniques applied, The Applicant is of the opinion that the staged approach (set out in the response to ExQ1.8.4) allows an informed consideration of the potential for unknown archaeological remains to survive with the onshore ECC (and so potentially be impacted by the proposals) as well as the likely significance of the type of remains that might be encountered. Based on the consideration of other results presented in the baseline, The Applicant considers that the risk that currently unknown significant archaeological sites (i.e., remains of schedulable or near schedulable quality which significantly add to our understanding of the past lives and environment of people within the area at all periods) might be encountered is low, and whilst it is clear from the geophysics survey that archaeological features do survive along the onshore ECC route, The Applicant considers that these can be dealt with through the implementation of an appropriate programme of archaeological work, to be secured through approval of a WSI secured by DCO R12, in accordance with normal archaeological practice. The risk of unforeseen significant finds cannot be discounted, nevertheless appropriate mitigation can be accommodated within the programme. The risk will be further reduced by the implementation of a programme of evaluation trenching (as indicated in the onshore Written Scheme of Investigation (APP-147) referred to in the ES Volume 3, Chapter 8 (APP-069), which will be carried out pre-construction, and the results of which will further inform any subsequent detailed mitigation measures that may be required, all of which will be agreed with DCC (in consultation with CPAT) in advance. Where possible, avoidance would normally be preferred, so as to preserve remains in situ. The desk-based study area and the geophysical survey undertaken to date has covered a wider corridor than that which will be

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			required for the construction works and as such there is some flexibility for small scale changes within the Draft Order Limits if significant archaeological remains are found within the areas required for the Onshore ECC works. Should there be areas where micro siting is not possible due to engineering or other constraints then standard archaeological practice through preservation by record will be applied, comprising strip, map and sample excavation and/or set-piece detailed investigation as appropriate.
8.6	The Applicant	**Archaeology – mitigation** [APP-069] notes that Denbighshire County Council state that archaeological investigation and recording would provide a partial mitigation of the loss of archaeological interest and would be less preferable to conservation of a historic asset in situ. Would pre-consent trial trenching provide an opportunity to achieve the latter which may not be possible post -consent? (should consent be granted)	Preservation in situ is preferable where harm can be reasonably avoided, and in particular where historic assets of high significance are identified. Pre-consent evaluation does provide a better opportunity to understand the significance of any potential assets, however, this ignores the staged and proportionate approach of the assessment of historic assets which policy and guidance advocates, and which has been carried out as part of the assessment presented in the ES, Volume 3, Chapter 8 (APP-069). The staged approach allows for a good understanding of historic assets through desk-based assessment and geophysical survey, to inform the need for and scope of trial trenching. The trial trenching can then be tailored to the density and predicted significance of the assets based upon the results of the survey. This allows for a considered approach, with the trial trenching focused on answering specific research questions, rather than a blanket percentage sample which could miss archaeological features through randomized placing of the trenches. Pre-consent trenching would not normally be considered as providing mitigation (partial or otherwise) and is normally understood to be an investigative technique to provide data to inform a baseline, and in particular inform assessments of significance of any remains, the likely impact of the proposals upon such remains and the requirement for and appropriateness of any mitigation measures which may be proposed. Whilst it is clearly better to have more data, there has to be due consideration to the proportionality of data-gathering. Focusing on trenching per se ignores or underplays the value of the desk-based assessment work, as well as the detailed and extensive geophysical coverage undertaken to support the assessment. Post-consent trenching is a widely used methodology as part of a staged approach to mitigation,

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			undertaken to inform detailed mitigation post-consent. In addition to this, preservation in situ needs to be balanced against the significance of the resource and it is not always appropriate for historic assets of low or medium significance assets to be preserved in situ as non-designated historic assets (when weighed in the balance against the benefits of the development proposals).
8.7	The Applicant, DCC	**Foreshore historic assets** Paragraph 142 of [APP-069] concerns foreshore historic assets and states that a major to moderate adverse effect prior to mitigation would arise. Following the proposed mitigation by 'preservation by record' this risk is stated to reduce to minor adverse. Denbighshire County Council (page 141) note that archaeological investigation and recording are a partial mitigation. To the Applicant: Provide further justification for this reduction of effect for the Disturbance or loss of historic and archaeological assets during construction – Foreshore assets. To DCC: Do you agree with the conclusions of the Applicant in this regard?	Mitigation through preservation by record is full mitigation, however, paragraph 142 (APP-069) recognises that archaeological remains are an irreplaceable resource, and that the asset will still have been lost or damaged but with an appropriate level of record provided to offset that. It is acknowledged that preservation by record is not a substitute for preservation in situ. However, this is a standard technique that is used elsewhere where impacts are unavoidable and/or the significance of the historic assets is low. The mitigation proposed does include specific investigation (in the form of a borehole survey proposed in the onshore WSI (APP-147)) to provide a geoarchaeological record, with the potential that additional work may be undertaken subsequently, depending on the results of that survey. The results of the borehole survey will also inform detailed scheme design and be considered when determining the location for the trenchless crossing exit pit and the placing of anchors (noting that seeking to avoid known assets on the foreshore is noted in the ES Chapter (APP-069)). The scope for an appropriate programme of archaeological work, leading to 'preservation by record' will be agreed with the DCC, in consultation with CPAT and CADW via a WSI and carried out in advance of construction.
8.8	The Applicant	**Survey data** [APP-069] states that 95.4% of the proposed cable route has been covered by a Geophysical Survey. Are there any plans to survey the remaining 4.6% during the examination period?	The Applicant considers that the Geophysical Survey has achieved a very high level of coverage, with only a small proportion of the cable route that is un-surveyed. Through this very high percentage of coverage, the Applicant has a very good understanding of the archaeological background of the area, and a robust appreciation of the densities of archaeological features within the onshore cable route. The small proportion of the route that was not surveyed were partially due to access constraints associated with landowners at the time of the

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			surveys and can also be accounted for by the presence of other physical constraints such as roads, hedgerows, trackways and water bodies. Should these very small areas be identified on further consideration as requiring investigation (such as after review of results of any proposed investigation carried out adjacent to them), then this can be undertaken as part of the phased approach to mitigation set out in the onshore WSI (APP-147) (and/or subsequent detailed revision to this) as part of post-consent archaeological programme. Having 95.4% coverage of the route for the geophysical survey is sufficient to enable a robust consideration of the archaeological potential of the onshore ECC and to inform the subsequent impact assessments. As such there is no need (or plans) to undertake the remaining survey during the examination period.
8.9	The Applicant	**Historic Heritage - Policy** [APP-069] contains a summary of the key provisions of NPS EN-1 (Overarching National Policy Statement for Energy) and of the draft EN-1 (September 2021). However, the reference to EN-1 (page 20) in relation to 'harm to designated heritage assets of less than substantial magnitude' does not appear to have come from EN-1. Furthermore, the precis of Draft EN-1 appears to repeat the same text (page 24) yet draft EN-1 appears to contain significantly more information on matters of less than substantial harm to heritage assets then EN-1 does. Please could you: a) Provide justification for the above, or provide an amended version of [APP-069] b) Provide an assessment of which heritage assets you consider the proposed development would cause less than substantial harm to, and why. For instance, would this cover all heritage assets identified as having some level of harm (from negligible to moderate adverse)?	The assessment has been undertaken in accordance with EN-1, as this is the current policy against which NSIPs should be determined (and there is not a definite timescale within which a revised EN-1 will be completed and adopted and the content of any revised NPS). A) The text quoted from page 20 relating to EN-1 is an error and should only have been included for Draft NPS-EN1 which has additional information which relates to less than substantial harm being weighed against the public benefits of a proposal. This amendment and clarification has been provided within the errata list (Document 1.4 of the Applicant's Deadline 1 submission). B) The ES provides an assessment in line with the requirements of the EIA regulations in that it seeks to identify any likely significant effects resulting from the proposed development. The identification of 'harm' is a policy test that should be considered separately from any EIA assessment and therefore the text with the ES does not explicitly draw any equivalence between the assessed level of significance of effect (in EIA terms) and any level of "harm". The following compare the levels of impact identified within the ES with the identification of 'harm': - Negligible – No Harm;

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			▲ Minor – Less than Substantial Harm (lower end of the scale); ▲ Moderate – Less than Substantial Harm (upper end of the scale); and ▲ Major – Substantial Harm. The use of a scale in consideration of "less than substantial harm" allows a more nuanced correlation with the levels of significance of effect afforded by the EIA methodology and terminology, and permits a greater degree of variance in how 'less substantial harm' can be expressed, which may of benefit when decision makers weigh the balance. By way of illustration, the Grade II* listed Llandudno Pier is assessed to receive an effect on its heritage significance of "moderate" level, which is considered significant for EIA purposes. This would equate to "less than substantial harm", but at the upper end of the scale. This conclusion is reached as the harm does not affect all of the values and interests from which the heritage significance of the Pier is derived but recognizes that the asset is highly important (as reflected in its designation) and that the effect as described clearly affects the ability to appreciate some of the value and interest in that asset (leading to an overall reduction of heritage significance).
8.10	The Applicant	**Historic Heritage - Policy** Table 3 of [APP-069] describes the importance of heritage receptors. Please provide further justification as to why designated special historic landscapes of special historic interest (including Grade II registered historic parks and gardens) fall within the category of 'Medium' Heritage Significance, as opposed to 'High'	No Special Historic Landscapes have been identified which would be subject to any likely significant effect from either offshore or onshore proposed works, and so have not been included within the heritage assessment in ES Volume 3, Chapter 8: Onshore archaeology and heritage (APP-069). All of the Historic Landscapes of Wales (HLWs) considered in the assessment fall into the Outstanding category (those listed in Part 2.1 of the Register of landscapes of historic interest in Wales.) and have been accorded High heritage significance in this assessment. On reflection, Special Historic Landscapes could be considered equal to the outstanding historic landscapes, as all are Historic Landscapes of Wales (HLW) and listed in Part 2 of the Register. Originally, the Applicant considered that the Outstanding Historic Landscape as listed in Part 2.1 of the Register (36 in number) were implicitly of higher value than "special historic landscapes" (as listed in Part 2.2 of the Register, 22 in number), by virtue of the nomenclature applied to them by Cadw. Effectively HLWs are

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			treated as one, with one set of guidance applying to them (and this is separate to guidance for the graded Registered Historic Parks and Gardens covered in Part 1 of the Register). With regard to the Registered Parks and Gardens, the use of a Grading system clearly suggests different level of implicit heritage significance for the various grades. This is reflected in the heritage significance accorded to the various grade for purposes of this assessment, albeit the guidance in '*Managing Change to Historic Parks and Gardens in Wales*' (Cadw 2017) does not assign a level of significance in relation to the grading. Whereas The Applicant has accorded listed buildings of all grades a uniform "high" level of heritage significance, The Applicant considers it justified in departing from this for registered historic parks and gardens, as these are not subject to the same levels of legal protection and lack an accompanying consenting regime. For purposes of the AyM heritage assessment, only one registered historic park and garden is considered, this being the grade II park at Bodelwyddan, which forms the setting of Bodelwyddan Castle (this building being listed at Grade I).
8.11	The Applicant	**Church of St Margaret, St Asaph** The ExA noted during their Unaccompanied Site Visit 2 (USI2) [EV-003, EV-004] the prominence in the local landscape of the Grade II* listed Church of St Margaret in St Asaph. This heritage asset appeared to be sited relatively closely to the proposed ECC and the OnSS and appeared in various views around such. Assessment of the Church and any effects upon it does not appear in [APP-069]. Please provide justification for the above, or an assessment of effects upon this designated heritage asset.	The Church of St Margaret, St Asaph lies at the edge of the 1 km boundary considered for the indirect effects arising from the proposed development and as such is at a distance of 1km from the Onshore ECC at its closest point and 1.1km from the OnSS construction zone and 858m from the nearest construction compound. St Margaret's Church was considered as part of ES volume 5, Annex 8.2: scoping exercise for indirect effects (APP-144) and was scoped out of further assessment within the ES chapter (APP-069). The request for the inclusion of a more detailed assessment of St Margaret's Church within the ES has not been raised during EIA Scoping or Section 42 consultation responses. Long distance views of the church spire from the Onshore ECC were noted within ES Volume 5, Annex 8.2: scoping exercise for indirect effects (APP-144) but the land upon which the Onshore ECC and OnSS are located was not found to contribute to the significance of the asset. There are not considered to be any indirect effects to the significance of St Margaret's Church due to the works associated with the buried Onshore ECC. The OnSS will be physically separated from the church by woodland and the A55, and in addition this

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			area of land has no functional or historical relationship with this piece of agricultural land. The presence of the OnSS within the wider surroundings of the church would not challenge the landmark status of the church and would not affect its historic or architectural interests which are inherent in the architectural detail of the fabric of the church.
8.12	The Applicant	**Bodelwyddan Castle** Paragraphs 192 and 193 of [APP-069] consider the effect of the constructed OnSS upon Bodelwyddan Castle. The ExA noticed during their USI1 [EV-001], [EV-002] the proximity of the proposed OnSS to the boundary walls of the Castle estate. However, the justification for the adverse effect found in paragraphs 192 and 193 appears very limited, and it is unclear whether assessment is made of the effect on the Grade II listed Registered Park and Garden of Bodelwyddan Castle during operation of the OnSS. Please provide your views on this observation and provide further assessment if necessary.	Bodelwyddan Castle has been considered in Sections 8.10.1 and 8.11.1 of ES, Volume 3, Chapter 8 (APP-069) alongside its Registered Historic Park and Garden and the listed assets which lie within its grounds. For the assessment of construction effects (Section 8.10.1 of the chapter) details on the setting and significance of the assets is provided in paragraphs 174 to 178 (APP-069). To avoid repetition within the document this has not been repeated at 192 and 193. Whilst the wording of paragraphs 192 and 193 could be more explicit, the assets assessed as part of the Bodelwyddan Castle assessment is the same as that provided for the construction effects in paragraph 177 and 178 and conclude no significant adverse effect. The corrected paragraphs have been provided in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
8.13	The Applicant	**Penrhyn Castle** Paragraphs 206 to 215 of [APP-069] consider the effect of the proposed array upon the Grade I listed Penrhyn Castle. The ExA noticed during their USI1 [EV-001], [EV-002] the extensive views from the terrace of the Castle (and from various points within the Grade II* listed Park and Garden) that such views encompass well framed and far-reaching views out to the sea. It is also noted that the listing for the Park describes the setting and relationship of the Castle with the park and surrounding landscape as outstanding and notes that the best views can be found at the entrance to the Castle and from the 'barbican' terrace on the east side of the property. The submitted visualisation [APP-246] shows how the proposed array would be perceived from this terrace. Such views are described in the ES as 'glimpsed'. Cadw [RR-028] and the National Trust [RR-029] also raise concerns over the effect of the proposal upon the Castle and it's Park and Garden.	Cadw's policy/guidance on setting is set out in 'Setting of Historic Assets in Wales' (May 2017). Policy states that 'the importance of setting lies in what it contributes to the significance of the historic asset' (Setting of Historic Assets in Wales, Cadw 2017; p2) and therefore simple intervisibility between an asset and a proposal is not necessarily harmful. The assessment in paragraphs 206-215 of ES Volume 3, Chapter 8: Onshore archaeology and heritage (APP-069) has detailed the significance of Penrhyn Castle and how the setting of the asset contributes to its significance. It is acknowledged within the assessment that views across the Menai Strait and to the surrounding landscape form part of the wider visual setting of the asset. However, it is also acknowledged that it is the *availability* of these long-distance sea views that is important (and not necessarily what is in them) that adds to the asset. Furthermore, seaward views are not the only or even major contributor to the castle's significance in this regard, with the arguably more important landward views providing the backdrop of the castle within the parkland itself.

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		Provide further justification for your view that the effect of the Proposed Development upon Penrhyn Castle and the registered park and garden would be negligible, given the above.	The visualisation (APP-246) shows that the WTGs will be visible within the view from the terrace in good conditions and at distance, however the presence of the WTGs in this view does not affect the availability of the view which is what is important for this asset. The WTGs will result in an addition to the current sea view but this doesn't affect the ways in which the interests of the assets are understood, experienced and appreciated and how the assets relate to the wider surroundings both in the past and present (including the relationship of the castle to the port at Penrhyn as a specific seaward expression of the economic underpinning of the wider estate, and to the slate economy which funded the estate).
8.14	The Applicant	**Puffin Island** Paragraphs 236 to 240 of [APP-069] consider the effect of the proposed array upon the scheduled monument of the Tower & Remains of Church and Monastic Settlement on Puffin Island and the Grade I listed Remains of monastic settlement including tower and walls. The text notes that "The selection of this location for the monastic settlement may well have been chosen deliberately for this sense of isolation and being physically cut off from the world, so the wider maritime setting and in particular the waters separating the Island from the coast at Penmon is a contributor to understanding the significance of the monument" (para 238), going on to consider that the current views from the island are not untouched by development, including the turbines of the Gwynt y Môr windfarm. However, the representative viewpoint [APP-278] shows the proposed array to be significantly more visible from the island and within the setting of the designated heritage assets upon Puffin Island than the existing wind farms, due to the location and scale of the proposed turbines. Please provide further justification for your findings of a negligible impact upon such heritage assets.	The proposed array will be visible from Puffin Island and this is acknowledged within paragraphs 236 and 238 of ES Volume 3, Chapter 8: Onshore archaeology and heritage (APP-069). However, simple intervisibility between the asset and the WTGs is not automatically harmful to the significance of the asset; as stated within the guidance prepared by Cadw, 'the importance of setting lies in what it contributes to the significance of the historic asset'. Despite the WTGs lying within the wider maritime setting of the asset (as acknowledged in paragraph 238), the presence of the WTGs at distance within views will not affect the ability to appreciate, experience or understand the built form, archaeological interest or isolated island location, which contribute to the significance of the asset. Furthermore, it is the separation of the island from the mainland which is important to the asset, in terms of understanding the location of the early Christian and monastic communities in respect of the desire for isolation from the temporal world as represented on the mainland (of Anglesey). The ability to appreciate this aspect, in term so the island location with its physical separation, are not diminished by the presence of the WTGs. Whilst the proposed array does bring modern infrastructure closer to the island this does not affect the ability to appreciate this as an island. The ability to appreciate the design, form and fabric of the standing remains are not affected, nor is the archaeological interest harmed. The Listed telegraph station on Puffin Island clearly has a wider setting in terms of the role it played in long-distance communications. Understanding this function is not compromised by the visibility of the

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			WTGs, nor is the ability to appreciate the physical remains (in terms of the design of the structure, and its form and fabric) of the asset in anyway diminished.
8.15	The Applicant	**Cumulative effects** Paragraph 319 of [APP-069] states that in no case are the proposed AyM turbines considered to cause additional or cumulative indirect harm to the specific heritage interest or value of any asset. The ExA noticed during their USI1 [EV-001], [EV-002] and USI2 [EV-003], [EV-004] that in some cases the effect of the proposed array may, in some instances, add to the effect of existing offshore windfarms and 'fill' more of existing vistas with offshore wind farms. Examples of this could be found for instance potentially in the setting of the Llandudno Conservation Area, Llandudno Pier and Pen y Dinas Hillfort. Please provide further justification for your views as outlined in Section 8.13.2 of [APP-069].	The assessment outlined in ES Volume 3, Chapter 8: Onshore archaeology and heritage (APP-069) Section 8.13.2 has considered the cumulative effects of AyM with regard to the 'fill' of more of the existing vistas and density of the proposed array in combination with the existing arrays as appropriate. It is acknowledged that the proposed array will add to the existing number of WTGs visible along the coast or from a given heritage asset, however the presence and visibility of more WTGs does not alter the assessment of the effects upon the significance of historic assets. This presence does not affect the ways in which the significance of the assets will be understood, appreciated and experienced. With regard to Llandudno Conservation Area, it is noted that whilst the WTGs will be a noticeable addition to views along the coast and out to sea, they are not an entirely new feature-type with Rhyl Flats being clear to the north east with the more distant turbines of Gwynt y Môr behind. Paragraphs 253 and 254 of the ES Chapter (APP-069) note that it will still be possible to appreciate the design and form of the planned architectural development along the eastern side of the Conservation Area. The additional WTGs associated with AyM will not detract from an appreciation of the historic development of the town, nor its historic recreational value in the past and today as a historic seaside resort. The assessment of Llandudno Pier highlights that although historic association of the pier with the town and its evolution as a leisure resort will not be affected, the architectural interest in the pier (particularly in relation to its focal position at the northern end of the promenade) will be affected adversely by WTGs visible in combination with the pier, rather than as a result of additional WTGs extending across the view. From Pen y Dinas hillfort, the proposed WTGs will be visible at distance to the north-east, but the bulk of the AyM array will be screened by the intervening mass of the Great Orme itself. The assessment notes that WTGs are already a feature of the seascape in views to the east, with Rhyl Flats being prominent, with the Gwynt y Môr WTGs at distance beyond. The significance of the hillfort resides primarily in its archaeological interest. The

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			ability to enjoy and understand this is not affected by the proposed WTGs, even where visible at distance from the monument.
8.16	The Applicant	**Assessment** Table 14 of [APP-069] has a heading title of 'Sensitivity of Receptor', whereas Tables 3, 4 and 5 appears to show the same category as 'Heritage Significance'. For consistency please confirm which wording should be used.	Heritage Significance should be used in Tables 3.5 and Table 14 within document (APP-069). Table 4 is correct as it discusses magnitude of impact, not heritage significance/sensitivity of receptor. This has been described within the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission.

2.10 Land Use

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
9.1	The Applicant	**Best and Most Versatile Land** NPS EN1 (paragraph 5.1.080) states "Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1,2 and 3a of the Agricultural Land Classification and preferably use land in areas of poorer quality (grades 3b, 4 and 5)." Please explain how the test in paragraph 5.10.8 of NPS EN-1 is satisfied in respect of the Proposed Development?	The Applicant has provided a plan, (see Appendix L – Response to ExQ1.9.1– Predictive Agricultural Land Classification), which shows the Predictive Agricultural Land Classification (ALC) alongside the onshore ECC and ONSS route sections and Order Limits to provide additional context for the Onshore ECC routing. Best and most versatile (BMV) agricultural land is defined in Planning Policy Wales as ALC Grades 1, 2 and 3a. The Applicant has also provided a further plan showing Post 1988 Agricultural Land Classification (Wales) Surveys that have been undertaken (see Appendix M – Response to ExQ1.9.1–Agricultural Land Classification (Wales) Surveys). Appendix M shows there have been extensive surveys undertaken to the south and east of Rhyl, to the north west of Bodelwyddan and around St Asaph Business Park. The ALC determined by these surveys is reflected in the Predictive ALC data (Appendix L). Impacts on best and most versatile land have been minimised where possible through site selection and the adherence to a soil management plan (APP-316; Document 1.37 of the Applicant's Deadline 1 submission) during both construction works and the reinstatement of the cable corridor following cable installation. The onshore cable corridor and associated works are not expected to have any significant impact on agricultural use given the pre-condition soil survey and soil management plan. The restoration to agricultural use of onshore cable connections for offshore windfarms within this area is demonstrated through the successful restoration of the Burbo Bank Extension and Gwynt y Môr cable corridors. The Applicant considered BMV though consideration of ALC grades within the appraisal of 'Land use' when undertaking its BRAG analysis of long-list and short-list options for the onshore ECC and OnSS (see section 4.11 of ES Volume 1, Chapter 4: Site Selection and Alternatives (APP-044). The BRAG Analysis included consideration of a number of other environmental and engineering constraints and noting that much of the land to the south east of Rhyl, and to the north and west of St Asaph Business Park is classed as BMV and therefore the ability to avoid use of BMV land is limited.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			The routing of the onshore ECC gave consideration to a number of environmental and engineering factors in deriving the route between landfall and substation. The predictive ALC map provided in Appendix L demonstrates, it is not feasible or practical that the route could be diverted to avoid BMV land in this area. The onshore ECC avoids all ALC Grade 1 land (albeit there is an operational access within Grade 1, however, this comprises use of an existing track within the Grade 1 area). The onshore ECC interacts with Grade 2 land around Bryn Cwnin Farm, where the ECC passes through the gap between Rhyl and Rhuddlan and also on the south western bank of the River Clwyd. At Bryn Cwnin the ALC grade 2 land extends eastwards to ALC Grade 1 land so avoiding interaction with ALC grade 2 is unavoidable. There are also areas of ancient woodland, residential properties, watercourses and ponds known to contain great crested newt in this area that a more southerly route would interact with. It is not possible to avoid the area of Grade 2 ALC located between Rhyl and Rhuddlan due to development to the north and south, and at the River Clwyd the onshore ECC cables will be installed using trenchless techniques and so pass beneath the area of ALC Grade 2 land. The Onshore ECC passes through ALC Grade 3a land as it approaches, and then runs southward from, Dyserth Road. This area of Grade 3a ALC extends from Rhyl to Prestatyn and so is unavoidable (noting the Burbo Bank Extension onshore cable runs through this area). To the south east of Rhyl, the Onshore ECC does not avoid Grade 3a land as it is constrained by ancient woodland to the east and candidate sites that are promoted in the emerging DCC Local Plan to the west. The next significnat area of Grade 3a occurs as the onshore ECC passes to the east of Fferm and then as the onshore ECC runs southwards from Etw'r area. In this area the routing is constrained by Nant y Faenol road and Grade 1 ALC land to the east, and greater interaction with Bodelwyddan Key Strategic Site to the west. To the south of the A55 the Grade 3a extends to the east and west of St Asaph Business Park and is unavoidable. The OnSS is located in this area of Grade 3a land, however, locating the OnSS to the south (and outside of the Grade 3a land), would bring it much nearer to residential

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			properties on Glascoed Road (with Nosie and visual impact considerations), as well as moving it away from the visual screening afforded by woodland at Coed y Gors when considering Bodelwyddan Castle and Historic Park and Garden. Measures to reduce the impact of construction works upon agricultural land are included in the Outline Code of Construction Practice (outline CoCP) (APP-312; Document 1.49 of the Applicant's Deadline 1 submission) which includes an outline Soil Management Plan (SMP) (APP-316; Document 1.37 of the Applicant's Deadline 1 submission). The outline SMP provides details of mitigation measures and best practice handling techniques to safeguard soil resources by ensuring their protection, conservation and appropriate reinstatement during the construction of the onshore works. The outline SMP includes a commitment to undertaken pre-construction soil condition surveys and intrusive soil survey trial pits to identify and describe the physical and nutrient characteristics of the existing soil profiles and the depths and properties of topsoil and subsoil horizons. The Final SMP will be developed based on the results of the pre-construction condition soil survey and include details of the methods of working, proposed site machinery and tillage equipment, materials and Health & Safety requirements. The SMP will also set out storage arrangements to minimise damage to disturbed soils and measures to avoid mixing of stored soils. The final SMP will set out the reinstatement measures to return the working area to pre-existing condition as far as reasonably practical in line with Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra 2009). Approval of a final COCP and the final SMP are secured via DCO Requirement 10 Whilst there is predicted to be a temporary impact upon agricultural land during the construction phase of the onshore cable works, the reinstatement of land above the buried cable will allow agricultural cultivation to re-commence once the cable has been installed. Field drainage will be reinstated and the indicative minimum burial depth (from ground surface to the top of the cable ducting), will allow cultivation of

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			land. Reinstatement in accordance with details approved by DCC is secured under DCO R17 The Applicant acknowledges that, based upon the predictive ALC mapping, there is potential for permanent loss of ALC Grade 3a land as a result of the OnSS which has a footprint of up to 5Ha (based on an AIS substation design). The predictive ALC data show that the OnSS access track, covering approximately 0.38 ha would be located within ALC Grade 3b. The potential impacts upon soil resource are considered within the ES for both the cable corridor and OnSS during construction and operation and are predicted to be not significant for both.
9.2	The Applicant	**Effect on Business Operations** What consideration has been given to the effect on the health and wellbeing of animals housed or grazing close to the Proposed Development i.e. effects due to noise and dust? What, if any, measures are necessary to mitigate effects and how will these be secured?	The Assessment presented in the ES Environmental Statement has not directly considered noise and dust effects upon animals housed or grazing close to the onshore elements of the scheme, although buildings housing animals are generally located near to the residential properties along the onshore export cable corridor that have been assessed. The 8.13 outline Code of Construction Practice (APP-312; Document 1.49 of the Applicant's Deadline 1 submission) proposes that the Applicant will employ a qualified land agent to liaise with landowners and farmers before and during construction. The Land Agent will undertake site inspections during construction to monitor working practices and ensure landowners' and farmers' reasonable requirements are fulfilled. The Land Agent will also retain a function with regards to agreeing reinstatement measures following completion of the works. Wherever possible, general disruption impacts will be mitigated early in the construction planning process by allowing a sufficient time period between the serving of notice for entry and the commencement of on-site activities; this will allow farmers and landowners time to adapt their working practices in anticipation of the works. Where required, crossing points will be used in suitable places in order that livestock and vehicles can cross the working width. The Applicant will also follow a Construction Communications Plan that would be approved by DCC, to provide landowners, farmers, tenants and

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			residents with advance communications that works will be taking place, when, where and for how long. It is also relevant that typical mechanised agricultural operations such as ground cultivation, harvesting (including silage), hedge-cutting, drilling and general movement of agricultural equipment will also give rise to similar noise and dust emissions that livestock and other animals are likely to have previously experienced.
9.3	DMPC	**Effect on Agricultural Enterprises** In respect of relevant representations made on behalf of your clients ([RR-038] to [RR-041]), please provide additional detail relating to the following concerns: a) Viability of the existing agricultural enterprise(s); and b) Proposed mitigation measures, including reinstatement methods Please annotate on a map area(s) of holding to be affected and percentage of the holding this represents.	N/A
9.4	Rostons	**Effect on Agricultural Enterprises** In respect of relevant representations made on behalf of your clients ([RR-042] to [RR-051]), please provide additional detail relating to the following concerns: a) Food production and security, and b) Proposed mitigation measures, including reinstatement methods. Please annotate on a map area(s) of holding to be affected and percentage of the holding this represents.	N/A
9.5	Sustainable Cymru	**Agricultural Land** Please provide further detail in respect of the concern raised in your relevant representation [RR-036] that "*The proposed site is currently on food producing agricultural green land*".	N/A
9.6	The Applicant	**Agricultural Land Classification (ALC)** Please provide a percentage breakdown of agricultural land quality for Route Section A as detailed within Table 7 of ES Volume 3, Chapter 6 [APP-067]. Additionally, Route Section G within Table 7 states "*limited grade 3b (good to moderate) (10%)*". Please	The Applicant has provided a revised version of Table 7 within the Errata list (Document 1.4 of the Applicant's Deadline 1 submission) which corrects errors present in the submitted version and provides a breakdown of Grade 3 land for route section G along with the percentage of Agricultural Land Classification within the draft order limits.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		confirm whether the ALC classification is referring to grade 3a or 3b land?	Although some percentage values have changed, the sensitivity of the soil resource remains Medium and so the assessment within Sections 6.10, 6.11 and 6.12 remain unchanged. The Applicant has also provided an additional plan showing the Draft Order limits overlaid onto the Agricultural Land Classification to provide additional context (see Appendix L – Response to ExQ1.9.1– Predictive Agricultural Land Classification).
9.7	The Applicant	**Agricultural Land Classification (ALC)** In respect of Table 7 of [APP-067], please provide the name of holding, size and ALC by route section.	The Applicant has provided a table in Appendix R to this document which shows a breakdown of the area in hectares of predicted ALC grade land that falls within the DOL for each Land Title Number (A plan of Land Title Numbers is provided in Appendix S to this document). The calculations within the table show all land within the DOL and do not account for areas of temporary mitigation, operational access, areas of trenchless crossings or other parts of the DOL where there would be no direct impact to soils. The table identifies the two land title numbers associated with Faenol Bropor within which permanent loss of agricultural land would occur. Faenol Bropor is a holding with an overall size of 61.29 ha, of which 38 ha is covered by the DOL. It is understood that the Faenol Bropor agricultural unit also farms approximately 30 ha of land located towards Bodelwyddan Castle that is not affected by AyM. It is within Faenol Bropor that there is potential for the permanent loss of up to 5 ha of Grade 3 agricultural land is proposed to accommodate the Onshore substation, as well as approximately 8 ha of Grade 3 Agricultural land that would be removed from agricultural use for mitigation and enhancement around the substation. The table also identifies the land title number area that contains the TJB which would be located in Grade 3B agricultural land.
9.8	The Applicant	**Grade 3a and 3b Soil Resources** In respect of the proposed OnSS, the permanent loss of Grade 3a soil resource is stated as 0.38ha (paragraph 137 of [APP-067]). In terms of landfall infrastructure, the loss of soil resource is stated to be 20 square metres (paragraph 140 of [APP-067]). In both instances, it is stated that the losses are small in comparison to the remaining available Grade 3a and Grade 3b soil resources.	The Applicant notes that the permanent loss of agricultural land from the OnSS footprint would be 5 ha (based on an AIS substation type). The predictive Agricultural Land Classification (ALC), dataset shows the OnSS to fall within Grade 3a and the proposed access to the OnSS falls within Grade B ALC land. The Applicant has calculated the area of ALC grade land within 1000 m of the two locations within the following 2 tables to provide a local context

<table>
<tr><th>QUESTION NUMBER</th><th>QUESTION ADDRESSED TO</th><th>QUESTION</th><th>APPLICANT'S RESPONSE</th></tr>
<tr><td></td><td></td><td>Please confirm the overall amount of Grade 3a and 3b soil resources within the region.</td><td>and also the area of ALC grade land within Denbighshire to provide a regional context.

This shows that at a local level, the OnSS footprint (up to 5 ha) represents loss 2.16% of the Grade 3a that is within 1000m of OnSS. At a regional level, the OnSS footprint represents a loss of and 0.038% of the Grade 3a land within in Denbighshire

The Applicant has also provided an additional plan showing the Draft Order limits overlaid onto the Agricultural Land Classification to provide additional context.

TJB – would be located within Grade 3b

<table>
<tr><th>ALC GRADE</th><th>HECTARES WITHIN 1000M</th><th>HECTARES WITHIN DENBIGHSHIRE</th></tr>
<tr><td>1</td><td></td><td>683</td></tr>
<tr><td>2</td><td></td><td>6,785</td></tr>
<tr><td>3a</td><td>70.859137</td><td>13,128</td></tr>
<tr><td>3b</td><td>132.499333</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>87.572893</td><td>2,385</td></tr>
<tr><td>Other</td><td>2</td><td>12,917</td></tr>
</table>

OnSS - 5 Ha of Grade 3a is 2.16% of Grade 3a within 1000m of OnSS and 0.038% of Grade 3a land in Denbighshire

<table>
<tr><th>ALC GRADE</th><th>HECTARES WITHIN 1000M</th><th>HECTARES WITHIN DENBIGHSHIRE</th></tr>
<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>231.61</td><td>13,128</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>QUESTION NUMBER</th><th>QUESTION ADDRESSED TO</th><th>QUESTION</th><th colspan="3">APPLICANT'S RESPONSE</th></tr>
<tr><td></td><td></td><td></td><td>3b</td><td>115.927</td><td>21,648</td></tr>
<tr><td></td><td></td><td></td><td>4</td><td></td><td>13,877</td></tr>
<tr><td></td><td></td><td></td><td>5</td><td></td><td>12,426</td></tr>
<tr><td></td><td></td><td></td><td>Urban</td><td>31.45894</td><td>2,385</td></tr>
<tr><td></td><td></td><td></td><td>Other</td><td>21.520193</td><td>12,917</td></tr>
<tr><td>9.9</td><td>CBBC, DCC, NRW</td><td>Outline Code of Construction Practice (oCoCP) and Soil Resources
Are you satisfied with the approach and content of the oCoCP [APP-312] and associated appendices (e.g. the outline Soil Management Plan (oSMP) [APP-316]) in respect of the management of potential effects on soil resources? If not, please detail additional methods and/or mitigation measures considered necessary within the oSMP. In addition, please confirm whether you are satisfied that soils would be suitable for the required end use and the appropriateness of the proposed soil restoration methods.</td><td colspan="3">It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA.

The Applicant provided draft versions of the oCoCP (APP-312; Document 1.49 of the Applicant's Deadline 1 submission) and oSMP (APP-316; Document 1.37 of the Applicant's Deadline 1 submission) alongside the PEIR when undertaking Statutory Consultation. In response, DCC and NRW provided feedback on the CoCP and associated plans that has been incorporated within the submitted documents, however, no feedback was provided on the oSMP. As no issues or disagreements were raised during this process, the Applicant considered that two Local Authorities and NRW to be content with the approach and content of the oSMP (Document 1.37 of the Applicant's Deadline 1 submission).</td></tr>
<tr><td>9.10</td><td>CBBC, DCC, NRW</td><td>Outline Code of Construction Practice (oCoCP) and Ground Conditions
Are you satisfied with the approach and content of the oCoCP [APP-312] and associated appendices (e.g. the Outline Pollution Prevention and Emergency Incident Response Plan (oPPEIRP) [APP-318]) in respect of the management of potential effects on ground conditions? If not, please detail additional methods and/or mitigation measures considered necessary within the oPPEIRP.</td><td colspan="3">It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA.

The Applicant provided draft versions of the oCoCP (APP-312) and oSMP (APP-316) alongside the PEIR when undertaking Statutory Consultation. In response, DCC and NRW provided feedback on the CoCP and some of the associated plans that has been incorporated within the submitted documents.

DCC and CCBC did not provide feedback on the oPPEIRP (APP-318). As no issues or disagreements were raised during this process, the Applicant considers two Local Authorities to be content with the approach and content.</td></tr>
</table>

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			NRW provided S.42 feedback on the oPPEIRP to confirm that the document detailed all the generic guidance for mitigation actions and pollution prevention measures associated with (ground) water issues. NRW therefore accepted its use for this development. NRW has provided additional feedback within its Relevant Representation that minor amendments to the Outline Pollution Prevention and Emergency Incident Response Plan (APP-318) be made in order to ensure that the final version of the plan is based on a more robust Outline version (e.g. confirmation that no discharge of contaminated water occurs (including contamination with sediments) without the relevant exemption or Permit, not refueling within 10m of a watercourse rather than the 5m stated). The Applicant has discussed this with NRW and is happy to review such feedback when it is provided (anticipated to be within NRW's Written Representation).
9.11	The Applicant	**Soil Storage** The oSMP confirms that soils shall be categorised based on their origin, and stockpiles/stored accordingly (paragraph 23 of [APP-316]). What documentation and physical control measures will be put in place to prevent accidental mixing? How will these be secured?	The Final SMP will be developed based on the results of a pre-construction condition survey. which will specify the detail of the existing soil characteristics and the depths and properties of topsoil and subsoil horizons. The final SMP will include details of the methods of working, proposed site machinery and tillage equipment, materials and Health & Safety requirements. As part of the SMP, soils will be segregated into stockpiles of no more than 5,000m^3 based on their origin and type (e.g., topsoil, subsoil and Made Ground). Each stockpile will be labelled with appropriate signage and a unique identifier. If export of excess topsoil and subsoil associated with the OnSS is proposed following detailed design, material will be tested in accordance with the appropriate British Standard guidance (e.g. BS 3882:2015 and BS8601:2013) to assess the quality of the soils and determine if the meet the required standards for re-use. Copies of any laboratory certificates, if obtained will also be held on record within the site file. Best practice measures will be set out and approved in the final SMP and implemented to prevent accidental mixing during all phases of soil handling, and this will include the following measures:

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			a) Use of a soil resource plan, informed by the condition survey showing soil units to be stripped with information provided to operatives to distinguish types and layers, and ranges of thickness b) Determination of stripping depths to allow segregation of topsoil and subsoil c) Use of clear signage to identify the content of stockpiles. The following measures will be used to protect stored soils: d) No trafficking of vehicles/plant or storage of materials to take place outside designated working areas. Heavy plant and vehicles to be restricted to specific routes; e) No trafficking of vehicles or plant on stockpiled or reinstated soils (topsoil or subsoil); f) Stripping areas are to be protected from in flow of water and ponding. Wet areas will be drained in advance of stripping; g) Where practicable, soils will only be moved when they are in a dry and friable condition, based on field assessment of the soils' wetness in relation to its lower plastic limit; h) No mixing of topsoil with subsoil, or of soil with other materials. i) Spraying and dust suppression measures will be used if required. Details of the soil management works will be recorded as part of the daily record/site diary, and these records will by checked on a weekly basis for compliance with the SMP, and these details recorded. The additional details above have been added to an updated version of the outline SMP (Document 1.37 of the Applicant's Deadline 1 submission) that has been provided at Deadline 1 and will be secured through approval of the final SMP under DCO R10.
9.12	The Applicant	**Soil Management** The oSMP confirms that where soil is to be stored for over 6 months it will be covered to minimise erosion or allowed to re-vegetate naturally to minimise soil run off (paragraph 4.6.2 of [APP-316]). For stockpiles stored under 6 months, will they be seeded to maintain slope stability and prevent erosion and/or dust generation?	The Applicant confirms that where it is not possible to re-vegetate stored soil, use of hessian, mulches or tackifiers to cover stored soil will considered, should this be required for dust management or stabilisation purposes. Consideration will also be given to re-vegetating, seeding, or covering soil

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
		Additionally, section 2.1.1 of the outline Air Quality Management Plan (oAQMP) [APP-315] states that the use of Hessian, mulches or trackifiers will be utilised where it is not possible to re-vegetate or cover stored soil. Please confirm if this mitigation measure is to be contained within the oSMP and if not, explain why? Please explain why this mitigation measure is considered a "*desirable*" measure rather than a "*highly recommended*" measure in the oAQMP?	that is being stored less than 6 months if this is required for dust management or stabilisation purposes. The following details have been added to a revised version of the outline SMP and will be secured through approval of the final SMP under DCO R10. With regard to why this measures is considered a "desirable" measure rather than a "highly recommended" measure in the oAQMP, a series of mitigation measures proportionate to the level of risk (considered worst-case), as identified by IAQM guidance (IAQM, 2016), were recommended to ensure that any potential impacts arising from any onshore construction works are minimised and, where possible, completely removed. These measures are grouped into those which are highly recommended and those which are desirable – based upon the level of risk. The full extent of recommended mitigation measures, relating to construction dust, are provided in the Outline Code of Construction Practice (oCoCP) - Appendix 3 - Outline Air Quality Management Plan (oAQMP) (APP-315). Where relevant, these measures have been included within the oCOCP - Appendix 4 - Outline Soil Management Plan (oSMP) (APP-316; Document 1.37 of the Applicant's Deadline 1 submission). The use of Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover stored soil has been categorised as a desirable measure with regards to earthwork activities within the oCoCP - Appendix 3 – oAQMP. This is based upon the maximum level of identified risk associated with the generation of dust on human health, public nuisances and harm to ecological receptors. As per Table 20 of Volume 3, Chapter 3.11 (AS-030), the dust emission magnitude potential of earthwork activities was considered to be large. The sensitivity of the area with respect to earthworks was considered medium in relation to dust soiling and harm to ecological receptors, and low in relation to human health (Table 21 of Volume 3, Chapter 3.11(AS-030)). The risk of impacts associated with earthworks are found to be at worst medium risk (Table 22 of Volume 3, Chapter 3.11 (AS-030)). As per the IAQM guidance (IAQM, 2016), where activities result in a medium risk in relation to earthwork activities, the use of Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover stored soil is considered a desirable measure.

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			The additional details above have been added to an updated version of the outline SMP (APP-316) that has been provided as Document 1.37 of the Applicant's Deadline 1 submission.
9.13	The Applicant	**Soil Management** Will stored soils be tested for plasticity? If so, please detail the proposed methodology. If no testing is proposed, please explain your reasons.	The plasticity of the stored soils will be assessed at regular intervals (at least on test per 1000m^3 of soil) in the field using a Soil Consistency Test comprising two stages: ▲ Step A - Attempt to roll a soil sample into a ball by hand; and ▲ Step B - Attempt to roll ball into a 3mm diameter thread by hand. If it is not possible to roll the soil into a ball or a 3mm diameter thread the soil will be determined to be below the plastic limit. The most appropriate methodology for handling and storage of the soils will then be determined and agreed via the final SMP based on the plasticity and the moisture content of the soils. Most inappropriate handling can be prevented by a detailed soils assessment combined with a set of construction rules which control timings of machinery handling in relation to winter wet (field capacity) periods and heavy rain at other times of year. The additional details above have been added to an updated version of the outline SMP (APP-316) that has been provided at Deadline 1 (Document 1.37 of the Applicant's Deadline 1 submission).
9.14	The Applicant	**Soil Management** How will the transmission of information contained within the final SMP be disseminated on site? Is the use of 'toolbox' talks envisaged? If so, how will this be secured?	All site operatives who will be involved in the excavation or movement of soils will be briefed on the final SMP as part of the initial site induction process, and each site operative will sign copies of the appropriate method statements held within the site register to confirm acknowledgement of this information. This information will be refreshed throughout the project as part of the daily toolbox talks, and key works relating the SMP will be recorded in the daily record/site diary maintained by the site manager (e.g. material movements/stockpiling, soil sampling/testing, etc.). Communication and understanding of the information relating to the SMP will be assessed as part of weekly review and regular site audits.

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			The additional details above have been added to an updated version of the outline SMP (APP-316) that has been provided at Deadline 1 that will be secured through approval of the final SMP under DCO R10.
9.15	The Applicant	**Soil Restoration Methods** How will the suitability of soil stockpiles for restoration be assessed? Please confirm whether the final SMP will include a restoration methodology?	The final SMP will include an appropriate restoration methodology based on the results of the site investigation and soil resource survey reports. The main objectives for the reinstatement of the land will be to restore it to its pre-development quality as far as is reasonably practicable, as determined by the information obtained during the pre-construction soils survey and to leave the topsoil of any agricultural land in a loose and friable and workable condition to its whole depth. Land will be reinstated as soon as reasonably practical after completion of the construction works. For works along the onshore ECC material will be re-used on site and replaced in its original location and correct depositional sequence in accordance with the SMP and the soil resource survey reports. For the OnSS, any material sent offsite for re-use or appropriate soil treatment/disposal will be minimised where possible. The additional details above have been added to an updated version of the outline SMP (APP-316) that has been provided at Deadline 1 (Document 1.37 of the Applicant's Deadline 1 submission).
9.16	The Applicant	**Internal Compliance** Please confirm whether the final SMP be subject to any internal compliance audits? If so, will be SMP be reviewed and updated as necessary? Please provide detail in respect of this process.	Details of the soil management works will be inspected and recorded as part of the daily record/site diary, and these records will by checked on a weekly basis for compliance with the SMP, and these details recorded. In addition, the SMP will be reviewed, periodically, with any required updates communicated to and approved by DCC. The additional details above have been added to a revised version of the outline SMP and will be secured through approval of the final SMP under DCO R10. The additional details above have been added to an updated version of the outline SMP (APP-316) that has been provided at Deadline 1 (Document 1.37 of the Applicant's Deadline 1 submission).

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9.17	The Applicant	**Decommissioning** The oSMP [APP-316] does not refer to the decommissioning phase. Please confirm why this isn't necessary and whether consideration of this phase this will be included in the final SMP? If not, please explain your reasons.	Details surrounding the decommissioning phase are yet to be fully clarified, such as whether onshore ducts to remain *in situ* with only the cable removed. In addition, it is also recognised that policy, legislation and local sensitivities will evolve. The scope for a decommissioning phase soil management plan would be determined through development of the written scheme of decommissioning that is required under DCO R22. A decommissioning phase soil management plan would be provided as part of the decommissioning phases CoCP (DCO R22 (2)). The additional details above have been added to an updated version of the outline SMP (APP-316) that has been provided at Deadline 1 (Document 1.37 of the Applicant's Deadline 1 submission).

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2.11 Landscape and Visual

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
10.1	DCC, NRW	**Assessment** Please confirm whether you are satisfied with: a) the ECC and OnSS study areas; and b) the OnSS viewpoint locations selected, as identified within ES Chapter 2: Landscape and Visual Impact Assessment (LVIA) [AS-029]. If not, please explain the reasons for this.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has engaged with NRW and DCC to discuss the scope of the LVIA throughout the pre-application phase through EIA Scoping, Statutory Consultation (via the PEIR), and through the Evidence Plan process via ETG 7. a) In accordance with the Methodology set out in ES Chapter 2: LVIA (AS-029), the study area is based on knowledge of similar projects, an understanding of the character of the local landscape and scale of the construction and development of the onshore components of AyM, including the proposed height of the substation infrastructure. The study area for the onshore ECC and landfall extends to a 1 km buffer around the onshore ECC (widening at landfall and trenchless crossings). The study area of the OnSS extends to a 5km radius around the OnSS. Together, these form the

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			onshore LVIA study area. The onshore LVIA study area is intended to define the area within which there is potential for significant landscape or visual effect which is considered very unlikely to occur towards the edges of the onshore LVIA study area. This correlates with the findings of the LVIA which found no potential for significant visual effects at distant visual receptors e.g. demonstrated at Viewpoint 8 – Rhuddlan and Viewpoint 9 – Y Foel. LUC were appointed to advise the North Wales Local Planning Authorities and the LUC review dated 21/09/21 states that *'The LVIA study area extends to a 1km buffer around the landfall and ECC, and a 5km radius around the OnSS Zone. The extent of this area is considered to be sufficient to capture all potentially significant effects.'* b) Eight LVIA viewpoints were agreed under the auspices of the EIA Evidence Plan and its Appendices (APP-301, 302, 303). However, an additional viewpoint, within the Clwydian Range and Dee Valley AONB was added in response to s42 feedback from NRW resulting in 9 viewpoints assessed in ES Chapter 2: LVIA (AS-029). No additional viewpoint locations were requested by DCC directly, however, LUC suggested that alternative viewpoint locations be included from St Asaph and Bodelwyddan Park as part of the S42 feedback. St Asaph – Viewpoint 7, was agreed as having the least restricted view from an elevated position within St Asaph that has theoretical visibility. It is acknowledged that there may be views from properties in close vicinity to viewpoint 7, however, the preliminary assessment in Table 12 of the LVIA considers that there is no potential for significant effects from St Asaph due to distance and intervening landscape elements (hedges, woodlands and trees), which combine to limit visibility from of the OnSS, see Figure 2.24, Viewpoint 7: St Asaph (APP-187). Bodelwyddan Park – Viewpoint 6, is located at the most elevated position within the publicly accessible area of the Bodelwyddan Park RHPG and therefore represents a worst-case view from this area in relation to representative visual effect, see Figure 2.23, Viewpoint 6: Bodelwyddan Castle (APP-186).

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10.2	DCC, NRW	**Assessment** Please confirm whether you are in agreement with: a) the Applicant's LVIA methodology; and b) its assessment of effects in respect of landscape features, landscape character and visual amenity. If not, please explain the reasons for this.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has engaged with NRW and DCC to discuss the scope of the LVIA throughout the pre-application phase through EIA Scoping, Statutory Consultation (via the PEIR), and through the Evidence Plan process via ETG 7. The LVIA Methodology was discussed at ETG meeting held on 10/12/19 including study area, baseline and viewpoints to be agreed. This is as set out in the Evidence Plan. And its Appendices (APP-301, APP-302 and APP-303). The appointment of an independent consultancy to advise the local authorities on LVIA and SLIVA matters was also discussed. LUC were subsequently appointed to advise the North Wales Local Planning Authorities. The LUC review dated 21/09/21 states that '*The SLVIA and LVIA have been carried out by experienced practitioners using a robust methodology based on established good practice. The scope of both assessments appears sufficient to capture all potentially significant effects. There is a clear record of consultation that indicates agreement with stakeholders on key points of the scope and approach.*'
10.3	DCC, NRW, The Applicant	**Assessment** The LVIA methodology provides for moderate adverse effects to be classified as either 'significant' or 'not significant' based on professional judgement. **DCC / NRW** – Please confirm you are satisfied with this approach? **The Applic–nt** - Please further justify the instances where moderate adverse effects are considered 'not significant' in Tables 8, 10, 13 and 14, as the precise reasons for this are not clear to the ExA.	In accordance with the Methodology set out in ES, Volume 3, Chapter 2: LVIA (AS-029) and the paragraphs set out on pages 21 and 22 of GLVIA 3 professional judgement is used in the assessment of whether effects are significant or not significant. Professional judgement has determined that Moderate effects can be found to be Significant or Not Significant. The following receptors with Moderate effects are listed below along with justification for the judgement of these being assessed as not significant effects. Construction Effects • Bodelwyddan Park RHPG (Moderate and Not Significant) – Whilst the sensitivity of this receptor is assessed as Medium-High the magnitude of change is considered to be Medium-Low due to existing screening from within the RHPG and other built development context in the view. Effects are localised to the south-east area of the RHPG. For these reasons it is considered a significant effect would not occur.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			• Chester to Holyhead Railway Line (Moderate and Not Significant) – Sensitivity is assessed as Medium for this receptor, the magnitude of change is also assessed as Medium and is not considered to be significant due to the localised nature of the effect, which would also only be experienced for a very short duration. • Bryn-y-wal Farm (Moderate and Not Significant) – This receptor is assessed as having a Medium-High sensitivity and Medium-Low magnitude of change. The magnitude of change is considered to be moderated by the landscape elements at the edges of the neighbouring and intervening field reducing potential visibility of the construction activity. For these reasons it is also considered that a significant effect would not occur. • Cwybr Fawr (Moderate and Not Significant) – Both sensitivity and magnitude of change are assessed as Medium for this receptor. Views of the construction activity would only be possible from the side of the house or garden area and the principal view from the property to the east would be unaffected. For these reasons it is considered that a significant effect would not occur. Operational Effects • Bodelwyddan Park RHPG (Moderate and Not Significant year 1) – Whilst the sensitivity of this receptor is assessed as Medium-High the magnitude of change is considered to remain Medium-Low in year 1 following completion of construction. The effect of the OnSS in year 1 would be moderated due to existing screening from within the RHPG and other built development context in the view. Effects are localised to the south-east area of the RHPG. For these reasons it is considered a significant effect would not occur.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			• A1. Eastern Lowlands, Cefn Meiriadog Vale Slopes (Moderate and Significant year 1, Moderate and Not Significant year 15) – The sensitivity of this receptor is considered to be Medium and the magnitude of change is assessed as Medium-High at year 1. Effects are localised to the areas immediately surrounding the OnSS and OnSS construction compound, given the direct nature of the character effect it is considered that the Moderate effect experienced in year 1 is significant. In year 15 it is considered that the reduction in magnitude of change to Medium, as a result of planting mitigation, would also result in a Not Significant Moderate effect. • Viewpoint 5, Minor Rd. Groesffordd (Moderate and Significant year 1, Moderate and Not Significant year 15, for residential receptors) – The sensitivity of residential receptors at this viewpoint is assessed as Medium-High and the magnitude of change is assessed as Medium at year 1. Whilst there is some intervening tree cover in the direction of the OnSS the built elements would be visible through these trees in a key view from this settled ridge. Whilst the cessation of construction activities would slightly reduce the magnitude of change, the landscape reinstatement would not have any visual mitigation potential in year 1. For these reasons it is considered that a significant effect would still be present in year 1 following completion of construction. In year 15 it is considered that the reduction in magnitude of change to Medium-Low, as a result of planting mitigation, would also result in a Not Significant Moderate effect. For completeness, The Applicant has also provided the following receptors with Moderate effects are listed below along with justification for the judgement of significant effects. Construction Effects • Taller hedgerows and hedgerow trees found along the onshore ECC (Moderate and Significant) – The magnitude of change is assessed as Medium for this element due to the degree of loss across several field boundaries as noted in the LVIA and it is considered that when combined with the Medium-High sensitivity that a significant effect would occur.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			• ProW to the south of Rhyl between the B5119 and A547, including the North Wales Path (Moderate and Significant) – The magnitude of change is assessed as Medium for this receptor due to the localised nature of construction activities within TCCs or HDD compounds in close proximity to ProWs noted in the LVIA and it is considered that when combined with the Medium-High sensitivity that a significant effect would occur. • Waen Meredydd (Moderate and Significant) – The sensitivity of this receptor is assessed as Medium however the magnitude of change is assessed as Medium-High due to the widening area of construction activity and large TCC which would span across 3 separate fields to the west of the National Grid Substation. For these reasons it is considered that a significant effect would occur. • Viewpoint 3 Glascoed Rd (Moderate and Significant, for road users) – The sensitivity of road users at this viewpoint is assessed as Medium-Low however the magnitude of change is assessed as High during construction due to the levels of construction activity visible along the road towards the onshore ECC and access and also the construction of the OnSS. For these reasons it is considered that a significant effect would occur. • Viewpoint 5 Minor Rd, Groesffordd (Moderate and Significant, for residential receptors) – The sensitivity of residential receptors at this viewpoint is assessed as Medium-High and the magnitude of change is assessed as Medium during construction. Whilst there is some intervening tree cover in the direction of the OnSS the construction activities would nevertheless be visible in key views from this settled ridge. For these reasons it is considered that a significant effect would occur. Operational Effects

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			▲ Viewpoint 1, Bridlepath nr Faenol Bropor (Moderate and Significant, year 15) – Sensitivity is assessed as Medium for this viewpoint. Whilst the magnitude of change is considered to change from High to Medium-High between year 1 and year 15 as a result of the proposed mitigation planting, the close proximity and higher elevation of the OnSS platform when seen in this view impinge on the potential screening effect of mitigation planting to be more fully realised. For these reasons it is considered that whilst dropping to a Moderate degree, that a significant effect would still be present in year 15. ▲ Viewpoint 3, Glascoed Rd (Moderate and Significant year 1, for road users) – The sensitivity of road users at this viewpoint is assessed as Medium-Low however the magnitude of change is assessed as Medium-High at year 1. Whilst the cessation of construction activities would slightly reduce the magnitude of change, the landscape reinstatement along the road would not have any visual mitigation potential in year 1. For these reasons it is considered that a significant effect would still be present in year 1 following completion of construction.
10.4	DCC	**Assessment** The photograph taken from Viewpoint (VP) 6 (Bodelwyddan Castle) [APP-186] shows summer views towards the OnSS site. Are you satisfied this is sufficient for the purposes of the assessment?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. As set out in ES Volume 3, Chapter 2: LVIA (AS-029), parts of the timeframe over which the LVIA has been undertaken has coincided with the restrictions put in place to reduce transmission of the COVID-19 virus. Access to the Bodelwyddan Park Registered Historic Park and Garden (RHPG) was not possible during this period as both the Castle Hotel and Bodelwyddan Castle were closed. The previously publicly accessible parts of Bodelwyddan Castle and terrace was for sale and access to these areas restricted. As a result, the photography site work undertaken when trees not in leaf was not possible from within Bodelwyddan Park. Access to Viewpoint 6 located on the grass terrace within the grounds of Bodelwyddan Castle was permitted through the Castle Hotel in May 2021, which is why the trees are in leaf in this photograph, see Figure 2.23, Viewpoint 6: Bodelwyddan Castle (APP-186). Given the density of the intervening woodlands in this view, it is considered that the visualisation still

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			represents the potential visual effect including the screening effect of intervening woodland from the publicly accessible part of the RHPG.
10.5	The Applicant	**Assessment** There is no public access in respect of VP 6 (Bodelwyddan Castle). Please explain the reason for including it within the assessment.	As set out in ES Volume 3, Chapter 2: LVIA (AS-029), access to Viewpoint 6 located on the grass terrace within the grounds of Bodelwyddan Castle is possible for visitors to the Castle Hotel. Before it closed in 2019 access to the parkland and woodland walks of the RHPG was also possible via Bodelwyddan Castle, including the location of Viewpoint 6, see Figure 2.23, Viewpoint 6: Bodelwyddan Castle (APP-186). Given the sensitivity of the RHPG in relation to its close proximity to the OnSS site area, a viewpoint at this location was considered important in representing elevated views close to the Castle where the majority of public interest for the RHPG has been focussed in the past and where visitors to the Castle Hotel continue to enjoy views of the landscape. Depending on the future ownership of the Castle it may be that the public will be permitted access to the RHPG again in the future (DCC has suggested it would undertake future management of areas of the castle grounds by the Council's Countryside Services for public access).
10.6	The Applicant	**Assessment** [AS-029] notes that photography was captured when trees and hedgerows were not in leaf and that this represents a worst-case scenario in relation to potential visual effects. Given this, please: a) justify the reason for the operational Year 15 photomontages showing proposed planting in leaf; and b) clarify whether and to what extent the assessment of visual effects takes into account seasonal variations.	a) The Applicant can confirm that the proposed planting is shown in leaf and illustrates this between spring and autumn in the most straightforward manner possible in order to illustrate the mitigation planting, given the level of information currently being assessed in terms of the project and presented in the mitigation proposals. This could have been more simply portrayed as a dashed line to indicate the potential height of planting at Year 15 as was shown in the visualisations included in the S42 consultation submission, and in a similar manner to the rest of the parameters shown in the LVIA. It is acknowledged that the proposed planting is therefore different in appearance to the existing planting in the photography. It is also considered that given the depth and density of woodland proposed for the OnSS, see Figure 2.16 Outline Landscape Mitigation Principles (APP-179) and shown in visualisation Figures 2.18 to 2.22, (APP-181 to APP-185) that the mitigation potential of the woodland planting would be very similar in winter months and therefore the visualisations are representative of the worst-case scenario.

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			b) The Applicant confirms that in accordance with GLVIA 3 (paragraph 6.28) seasonal variation has been taken into account within the assessment of landscape and visual effects set out in Chapter 2: LVIA (AS-029).
10.7	The Applicant	**Above Ground Installations** Other than features associated with the OnSS, would there be any other permanent above ground installations associated with the onshore elements of the Proposed Development?	Other than features associated with the OnSS, there will not be any significant permanent above ground installations associated with the onshore elements of the proposed development. The only other visible infrastructure will be small marker posts and link box lids. Marker posts are described in paragraph 192 of [APP-062] and typical examples can be seen on the Gwynt y Môr and Burbo Bank Extension cable routes. Link boxes will be installed along the onshore cable route including the transition joint bay (TJB) location. The lids of these boxes typically look like manhole covers and will be visible at ground level. These are defined in paragraph 119 and Table 8 of (APP-062). A photo of a typical manhole cover is shown in the right-hand image in Figure 18 of (APP-062). An example link box lid can be seen at the Burbo Bank Extension TJB location which is adjacent to the proposed AyM TJB location. The Applicant suggests that this location could be viewed during the accompanied site visit (Item 3 of Table 1 of PDA-02).
10.8	The Applicant	**Onshore Substation** Please explain: a) how the site for the OnSS (Work Nos. 31 and 31A), including its shape and orientation, has been determined; b) to what extent it reflects and is sensitive to surrounding landscape character, landform and field and hedgerow patterns; and c) why is it necessary for the OnSS to be on a level platform rather than following existing land profiles?	A) The shape and orientation has been determined through a review of the overall footprint required and the analysis of a number of engineering and environmental constraints. Engineering constraints include geotechnical and geo-environmental studies, flood consequences assessments, and a review of possible drainage strategies as well as proximity to existing utilities. With regards the environmental constraints, these included seeking to ensure the orientation minimised visual effects from the south, whilst also minimising as far as practicable the requirement to increase/decrease ground levels. The consideration of the need to increase/decrease ground levels focused on reducing as far as practicable the associated construction periods and traffic movements. The OnSS siting also avoids interaction with ponds at the site noting the metapopulation of great created newts in this area, including the

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			adjacent great crested newt population in Glascoed Nature Reserve. Consideration was also given to avoiding loss of mature trees and minimising hedgerow removal. Further to this the design process considered the ability to create a buffer between Glascoed Nature reserve and great crested newt mitigation area (mitigation for development of St Asaph business park) to the east, whilst also ensuring that any buffer could be meaningfully used as compensation and enhancement habitat. The proposed enhancement and compensation strategy, alongside the proposed approach to mitigation and landscaping is provided in the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). B) In relation to the embedded mitigation of effects through design, section 2.9 paragraph 161, of ES Volume 3, Chapter 2: LVIA (AS-029) states that: 'The site selection process considered constraints relating to physical landscape elements (such as woodlands, trees and hedgerows), landscape character and visual amenity, together with other environmental and technical constraints. The sensitivity of the surrounding landscape and of residents, road-users, workers and recreational users of the landscape was also a key consideration. The capacity of the landscape to accommodate the onshore elements of AyM is assessed in relation to the natural screening afforded by landform, woodlands and trees and the degree to which other surrounding infrastructure and buildings influence visual screening.' The Applicant confirms therefore that within the confines of the maximum parameter design presented in ES Volume 3, Chapter 1 – Onshore Project Description (APP-062), that landscape and visual mitigation of the effects on the landscape and visual resource has taken place throughout the design process. This has included the orientation of the site area in relation to sensitive landscape and visual receptors and in relation to potential physical disruption of the landscape elements and topography within the Draft Order Limits. Alongside this consideration has been given to existing ponds and the potential for impacts on the GCN population. The substation has been deliberately sited to minimize impacts to two ponds in

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			its locality and also to ponds in the wider area at Glascoed Nature Reserve. C)The proposed substation will use a combination of cut and fill earthworks to achieve a levelled platform. As described in paragraph 151 of (APP-062), the OnSS site topography falls from higher ground in the south (approximately 38 m above Ordnance Datum (AOD)) towards lower ground in the north (approximately 29.6 m AOD). It would be extremely unusual for a substation site to be sloped and very rare for a site to be terraced. It is highly preferable for substation sites to be level, to ensure a safe and economically efficient design for both construction and operation. As well as earthworks and drainage design, consideration must be given to electrical safety clearances, gradient of internal access roads for delivery of abnormal indivisible loads (large, heavy plant such as transformers), offloading and installation of heavy plant, lifetime operation and maintenance activities, etc. Under CDM (Construction, Design and Management) Regulations 2015, the Designer has a duty to design out any risks at an early stage of the project where possible. The selection of a level substation significantly reduces the risks involved in the activities listed above. Typically any decision to slope a site would be for sustainability/economic reasons, i.e. to achieve a cut and fill balance, minimise works, reduce import/export of material, etc. This does not apply to the Awel y Môr substation and hence a level design has been proposed.
10.9	The Applicant	**Mitigation** Section 2.9 of [AS-029] relates to mitigation. However, it does not appear to address to what extent the design of the OnSS and its elements might assist with reducing adverse landscape and visual effects. Requirement 6 of the dDCO [AS-014] relates to the detailed design of the OnSS. Please explain how the detailed design of the OnSS, having regard to the provisions of Requirement 6 (i.e. (1)(a) to €) of the dDCO, might assist with mitigating adverse landscape and visual effects?	For the LVIA assessment undertaken for the EIA, the design of the onshore elements of AyM includes some optionality in relation to the final size and locations of infrastructure being proposed. Volume 3, Chapter–1 - Onshore Project Description (APP-062), sets out the details of the project and which areas are and are not settled in precise detail. In relation to the embedded mitigation of effects through design, section 2.9 paragraph 161, of ES Volume 3, Chapter 2: LVIA (AS-029) states that: *'The site selection process considered constraints relating to physical landscape elements (such as woodlands, trees and hedgerows),*

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			landscape character and visual amenity, together with other environmental and technical constraints. The sensitivity of the surrounding landscape and of residents, road-users, workers and recreational users of the landscape was also a key consideration. The capacity of the landscape to accommodate the onshore elements of AyM is assessed in relation to the natural screening afforded by landform, woodlands and trees and the degree to which other surrounding infrastructure and buildings influence visual screening.' The Applicant confirms therefore that within the confines of the maximum parameter design presented in Volume 3, Chapter–1 - Onshore Project Description (APP-062), that landscape and visual mitigation of the effects on the landscape and visual resource has taken place throughout the design process. For clarification, and as described in paragraph 144 of ES Volume 3, Chapter 2: LVIA (AS-029), the positions of the GIS and AIS infrastructure shown on visualisation Figures 2.18 to 2.22, (APP-181 to APP-185) only represent substation options and not a detailed design option. The configuration of the 3D model and location within the OnSS platform was developed to best represent a worst-case arrangement for LVIA in that it positions the largest and tallest buildings to the southeast corner of the OnSS platform, an area which is most visible from the most sensitive receptors on Glascoed Road. It is therefore not possible to further refine the proposed mitigation for the OnSS until the design options are themselves also refined. However, the Applicant considers that the landscape and visual effects of the OnSS could be further reduced at the detailed design stages in the following ways: - Minimise tree and hedgerow loss as far as possible; - Further utilise the screening potential of existing woodland and tree cover within the surrounding landscape; - Ensure that the location of built elements within the OnSS maximum parameter takes sensitive landscape and visual receptors into account;

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			▲ Ensure that the detailed planting proposals are designed alongside the detailed design of the OnSS to ensure that the mitigation potential of proposed planting can be achieved; ▲ If possible and practical to do so, mitigation woodland could be planted during the early phases of the OnSS construction to ensure robust screening as quickly as possible; and ▲ If possible, the creation of suitably profiled landscape bunding would further limit views of the OnSS and provide further landscape and visual mitigation. Surplus soil and excavation material, if available, are subject to detailed design.
10.10	The Applicant	**Onshore Substation** The Year 15 photomontages from VP 1 [APP-181], where residual significant effects are predicted, illustrate that a large part of the OnSS would still be visible through a wide gap between new woodland planting. Please explain: a) whether there is scope to extend the woodland planting in this area to further minimise views of the OnSS from VP 1; and b) if there is scope, whether you would be willing to provide additional planting in this area.	For ES assessment the design of the onshore elements of AyM include some optionality in relation to the final size and locations of infrastructure being proposed. Volume 3, Chapter–1 - Onshore Project Description (APP-062), sets out the details of the project and which areas are and are not settled in precise detail. a) In relation to the gaps in woodland, this gap specifically relates to the route of the onshore ECC, see Figure 2.16 Outline Landscape Mitigation Principles [APP-179]. Due to the presence of underground cables entering the OnSS from the north, it would not be possible to extend woodland planting fully across the onshore ECC to close a gap as it is not possible to plant over the cables themselves. b) However, in relation to additional planting more generally, it may be possible to amend the design of the proposed planting to better fit with the confirmed design of the OnSS in the detailed planting design for the OnSS in order to further minimise views of the OnSS from both VP1 and VP2 where this effect is most evident.
10.11	The Applicant	**Access Impacts** Article 13 of [AS-014] makes provisions to allow the undertaker to form and lay out means of access, or improve existing means of access, including as part of Work No. 41. Might such works impact on any landscape features, such as trees and hedgerows, and if so, has this been considered as part of the assessment?	Works No. 41 represent existing access tracks and existing field access arrangements, currently used by agricultural vehicles, that would be utilised by AyM for operational access. These would typically be used infrequently (typically 1-2 times a year) to access link boxes along the cable corridor as set out in paragraph 190 of (APP-062). As such, no significant vegetation loss is anticipated for Works No. 41 (in addition to current management of these routes, such as hedge cutting, for access by agricultural machinery).

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			The Applicant confirms that the LVIA has considered the landscape and visual effect of all potential vegetation removal associated with the proposed development as described in ES Volume 3, Chapter 1: Onshore Project Description (APP-062). This includes any proposed means of access set out in ES Volume 3, Chapter 1: Onshore Project Description (APP-062). This is clarified in Para 212 (AS-014): *'Where unplanned replacement or maintenance of onshore ECC infrastructure is required this would result in only very localised and temporary effects of a much reduced scale to the effects assessed for construction. Taking this into account, operational effects of the onshore ECC and landfall are not considered further in the assessment of operational effects, this is also in line with SoS consultation in section 4.20.4 of the scoping opinion.'*
10.12	The Applicant	**Onshore Substation** How well does the site of the OnSS relate to existing development within the St Asaph Business Park and the Gwynt y Môr and Burbo Bank substations? Why could the OnSS not be located to the south of St Asaph Business Park in the vicinity of these substations e.g. to the immediate west of the Gwynt y Môr and National Grid substations?	As noted in response to ExQ1.16.8, the area to the south of St Asaph Business Park was considered during the initial identification of alternatives and short listing process (referred to as Zone 1), as recorded in application the Site Selection and Alternatives Shortlisting Outcomes Report (APP-046). The site of the onshore substation is considered to relate more positively to the surrounding environment than Zone 1, primarily as a result of its comparatively flat location and the intervening treelines which when combined with the available space surrounding the proposed substation location would offer a positive opportunity to mitigate and introduce landscape screening which would relate well to the existing treeline. A number of reasons meant that Zone 1 (Figure 6 of APP-046), was not carried forward beyond the long listing stage. These included likely visual and noise impacts on nearby residential receptors, and the visual impact on the setting of a number of designated assets, such as Bodelwyddan Registered Park and Gardens, and St Asaph Cathedral. As a result of the topography of the site, with a 20m fall across it, it was also noted that there may be an inability to adequately mitigate the effects. With regards the potential visual impacts to residential receptors, the project sought to ensure that residential receptors would be in excess of 250m from a proposed substation location. Of particular note during the review process of Zone 1 were 8 residential properties located along elevated Pentre-Mawr Road which had the potential to overlook

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			substation at a range of approximately 150-200m. There would be direct overlooking and relatively open, close range (c 150m) views through pylon lines of the substation and construction compound from rear elevations and gardens which may result in significant effects to the identified properties; a further number of residential receptors including bungalows and farmsteads were within or on the cusp of 250m. With regards noise impacts it was similarly noted that residential receptors <200m from the potential substation location may require challenging mitigation requirements such as acoustic screening which may result in further visual impacts. The decision not to progress Zone 1 preceded the understanding of the proposed extension to the NGET substation and did not directly influence the early shortlisting process and identification of possible substation zones.
10.13	The Applicant	**Onshore Substation** During an unaccompanied site inspection [EV-001], [EV-002], the ExA observed views towards the OnSS site from within the publicly accessible Glascoed Nature Reserve. Please comment on the likely use of this nature reserve by the public, including workers associated with St Asaph Business Park, and provide an assessment of visual effects for its users.	The Nature reserve is managed primarily for great crested newts having been established in 2000 as mitigation for the development of the business park. As such the current level of usage is not known. The Applicant notes the ExA comments and will provide an assessment of visual effects for users of the nature reserve at Deadline 2.
10.14	The Applicant	**Assessment** Noting paragraph 5.10.8 of draft NPS EN-1 as referred to in [AS-029], has the assessment considered how noise from construction and operational activities on residential amenity, sensitive locations, receptors and views, would be minimised? If not, please explain how this would be achieved.	The Applicant notes that paragraph 5.10.8 of the Draft NPS EN-1 would be an addition to the NPS (if adopted) and does not occur in the extant NPS EN-1, and that the timescale for adoption of the draft NPS (or likely amendments to is), are not currently known. The Applicant has considered the impacts of noise upon residential properties, and other receptors, during construction and operation within ES Volume 3, Chapter 10: Noise and Vibration (APP-071), and proposed measures to minimise noise impacts through mitigation summarised in the chapter and also the outline Noise and Vibration Management Plan (APP-314).
10.15	The Applicant	**Onshore Substation** [AS-029] notes that, depending on levels of surplus soil and excavation material associated with the OnSS site, there is potential for the creation of landscape bunding in areas of	a) The Applicant confirms that the potential for landscape bunding described in ES Volume 3, Chapter 2: LVIA (AS-029), is not secured as part of the mitigation. As described in section 2.9.3 of ES Volume 3, Chapter 2: LVIA (AS-029), the creation of landscape bunding is subject

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		proposed woodland which would further limit views of the OnSS and which would provide further landscape and visual mitigation. Please identify: a) where this is secured; and b) whether this has been assessed in terms of effects on landscape character?	to detailed design and the availability of surplus soil and excavation material. b) The Applicant confirms that landscape bunding has not been assessed in Chapter 2: LVIA (AS-029) and as such the assessment presented in the ES is worst-case. It is considered bunding has the potential to further limit views of the OnSS, potentially reducing the time needed for woodland to provide screening and therefore provide further landscape and visual mitigation. However, this would also need to consider how this would interact with existing hedgerows and trees as well as existing ponds and other ecological and hydrological factors. In relation to landscape character an appropriately graded landscape bund would blend into the existing contours around the OnSS site to ensure best fit with immediately surrounding character. Ultimately, it is considered that the view of such a bund, which would likely be planted, would be preferrable to the views of built structures of the OnSS in relation to character change. The use of surplus soil and excavation material, if available, would be dependent on the final design of the substation, need to give due consideration to other factors (ecology, hydrology) and agreed via approval of the Landscape and Ecology management Plan (LEMP), secured by DCO R13.
10.16	DCC, NRW	**Clwydian Range and Dee Valley Area of Outstanding Natural Beauty** VP 9 [APP-189] is located within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). Are you satisfied that: a) the OnSS would give rise to no significant effects from this viewpoint (and the AONB as a whole); and b) that this would also be the case should the AONB change to National Park status (albeit boundaries might differ)?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. a) As described within Table 12 of Chapter 2: LVIA (AS-029), it is considered that there is no potential for significant effects from the AONB or viewpoint 9 due to distance and intervening landscape elements such as woodlands, trees and St Asaph Business Park, which combine to limit visibility of the Onshore ECC and OnSS. This viewpoint was selected by NRW to best represent the effects on the AONB and it is considered that similar limited visibility would occur along the length of the elevated Clwydian Range. NRW intimated in RR-015-3.1.8 that it considers effects on the AONB are unlikely to be significant but adverse. LUC has undertaken a review (LUC March 2022) of the LVIA (provided within the PEIR) and

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			confirmed that the reasons provided within the PEIR for scoping out further consideration of the Clwydian Range and Dee AONB are considered appropriate. b) In relation to the status of the AONB the assessment at this viewpoint, and within Table 12 of Chapter 2: LVIA (AS-029), is based on the current baseline. A new National Park, including the boundary of such an area, for the Clwydian Range and Dee Valley Area is not a designation and therefore does not form part of the baseline of the LVIA. Notwithstanding the uncertainty of a National Park status, both the AONB and the National Park are nationally significant landscape designations that would be considered to be of high value and would have similar susceptibility and therefore sensitivity judgements when considering the onshore ECC and OnSS. Taking this into account, it is considered that a similar conclusion would be reached in relation to no potential for significant effects from a National Park as was concluded in the LVIA for the AONB. See also Figure 2.26, Viewpoint 9: Y Foel (AA-189).
10.17	The Applicant	**Onshore Substation** [AS-029] identifies potential for some woodland planting during the early phases of the OnSS construction to ensure robust screening as quickly as possible. Please define 'as quickly as possible'. In addition, please confirm where is this secured and how would this be approved?	To clarify, the construction phase is stated as 27 months for the OnSS in ES Volume 3, Chapter 1: Onshore Project Description (APP-062). Should it be possible to plant proposed woodland in the planting season following the start of the construction phase (avoiding construction activities and permanent infrastructure), then the woodland planting in these areas could reach a similar height to that shown in the visualisations by year 13 rather than year 15. However, this has not been included within the assessment as the use of advance planting would be dependent on the final design of the substation and having appropriate landowner agreements in place. As such, advance planting is not assessed within the LVIA, which presents a worst-case assessment, and is not secured. If advance planting were to be incorporated it would be done via the final LEMP and approved by DCC.
10.18	The Applicant	**Assessment** No tree survey or arboricultural impact assessment (AIA) has been submitted with the application. However, it is indicated in [AS-029] and the Outline Landscape and Ecology Management Plan (oLEMP) [APP-305] that around 20-26 trees associated with the	The Applicant considers that through the ecological and landscape assessments that are provided within the application, the effects of tree loss as a result of AyM have been considered by the EIA. The assessments are based on a worst-case assumption that all trees within the identified onshore ECC, TCCs, access zones and construction working areas would

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		OnSS site and around area 33 trees associated with the ECC would need to be removed. Without a tree survey or AIA, how can the ExA be certain: a) Whether any other trees might be affected; b) The value of the affected trees; c) Whether any affected trees display characteristic which might categorise them as either ancient or veteran; and d) Whether works, for example, Work No. 30A, lie outside the root protection area of trees, including those associated with areas of woodland, including ancient woodland.	be lost, however, when undertaking detailed design, the Applicant will seek to reduce the amount of hedgerow and tree loss than that assessed within the ecology and LVIA assessments. The Applicant would undertake a tree survey and AIA to inform the detailed design of onshore aspects of AyM when the final location of cable trenching, TCC boundaries, access points are being determined. The outline Construction Method Statement [APP-313] proposes that a pre-construction walkover survey of the working area will be undertaken by an appropriately experienced arboriculturist and the guidance set out in BS5837:2012 Trees in Relation to Construction will be adhered to where applicable. The survey will define specific mitigation measures required for all trees situated in or adjacent to the working width, including where practical, measures such as the erection of protective fencing in order to minimise the impacts on trees and their roots. Those measures will be identified in the final CMS for each stage of the works and be approved by DCC under DCO Requirement 10. A) The onshore works would require the loss of at least 41 mature trees, and other smaller trees, associated with the onshore cable corridor, and 8 mature trees associated with the substation. Other hedgerow trees typically smaller may also be lost but have not been specifically counted. B) As set out in the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission), it is proposed that heavy standard trees are planted at a 3:1 ratio to compensate for tree loss along the onshore ECC (noting that trees will not be planted above cable routes). Additional compensation for the loss of trees will be provided by the proposed screen planting at the OnSS (see Section 2 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission)). All additional planting would involve native species appropriate to the site. C) The ecological and landscape impacts arising from tree loss have been assessed within ES Volume 3, Chapters 2 and 5 (AS-029 and APP-065).

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			Veteran trees that were identified during the habitat and hedgerow survey are identified in the Habitat and Hedgerow survey report (APP-125). a veteran oak tree is present in woodland in the south of the habitat survey area, within Bodelwyddan Estate. The tree comprises a five stemmed oak with a diameter of over 2 m. A review of the Woodland Trust, Ancient Tree Inventory confirms there are no veteran or ancient trees recorded on the Inventory within the DOL, the nearest is a Wild black poplar located on the edge of St Asaph Business Park (ID Ref:231068). D) Arboricultural advice was sought by the Applicant in determining an offset from the areas of Ancient Woodland around the OnSS TCC (Works No.30). A site visit was undertaken by Treeworks Environmental Practice in March 2021, who undertook a survey accordance with BS5837:2012 Trees in Relation to Design, Demolition and Construction to advise on the extent of the TCC. The survey recommended an offset of 4m from the stone wall bounding the woodland on the west, and from the hedgerow on the east, be used to define the works area. The survey results have not been provided with the application as the survey provides Phase 1 information and does not represent a full Arboricultural Impact Assessment and Tree Protection Plan (which would be undertaken as part of the CMS as stated above).
10.19	The Applicant	**Tree Protection** The oLEMP [APP-305] refers to the need for tree protection in accordance with BS 5837:2012 – Trees in relation to design, demolition and construction. Where is this secured? Should it be specified in the Schedules of Mitigation [APP-310] and Monitoring [APP-311] or secured as a requirement of the dDCO?	The outline Construction Method Statement (CMS) (APP-313), secured by DCO R10, specifies that a pre-construction walkover survey of the working area will be undertaken by an appropriately experienced arboriculturist and the guidance set out in BS5837:2012 Trees in Relation to Construction will be adhered to where applicable. The survey will define specific mitigation measures required for all trees situated in or adjacent to the working width, including where practical, measures such as the erection of protective fencing in order to minimise the impacts on trees and their roots. Those measures will be identified in the final CMS for each stage of the works.
10.20	DCC	**Woodland Planting** Are you satisfied with the suggested growth rates of woodland planting (7-10m over 15 years) as set out in [AS-029] and the 8.5	The Applicant considers the proposed woodland planting would result in effective screening for the OnSS site. Whilst the specific growth rates will depend on site conditions and species specified in the detailed planting

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		metres height (as an average) of woodland planting shown on the Year 15 photomontages?	proposals, it is considered that woodland planting would be sufficiently fast growing to provide the 7-10m growth from planted heights in 15 years as described in Chapter 2: LVIA (AS-029). LUC has undertaken a review (LUC March 2022) of the LVIA (that was provided within the PEIR) and concluded that *'It is recognised that the design of the OnSS is at a relatively early stage and that this limits the extent to which mitigation proposals can be developed. Some clarification of this section will be required for the ES, but the planting principles set out are sound and appear capable of being developed into an effective mitigation scheme.'* The screening potential of the woodland planting in relation to the OnSS structures will also depend on the detailed design and layout of the OnSS in relation to the areas of proposed planting and the detailed planting proposals for the OnSS site.
10.21	The Applicant	**Temporary Mitigation Areas** What would be the purposes of the 'Temporary Mitigation Areas' as shown on the Works Plans and in the oLEMP [APP-305]? Where are these defined?	The Temporary Mitigation Areas are proposed in order to compensate for potential impacts on the following protected and notable species: - Great Crested Newts; - Bats; - Water Vole; and - Reptiles. An updated version of the oLEMP (Document 1.33 of the Applicant's Deadline 1 submission) has been provided at Deadline 1 which includes an update to Figures 3 to 7 to clarify the intended purpose of the mitigation areas and to show temporary and permanent mitigation (in response to ExQ1.2.48) See also the Applicant's response to ExQ1.3.14 in relation to the defintion of Temporary Mitigation Areas.
10.22	The Applicant, DCC	**Onshore Substation** Table 6 of [AS-029] identifies maximum dimensions for buildings associated with the OnSS. Should all these dimensions be reflected in Table 4 of R7 of [AS-014] and if not, how would it be ensured that the dimensions of buildings did not exceed that considered in the assessment?	The parameters of the Onshore Substation (or Work No. 31A in the dDCO (AS-014)) are restricted by the details approved under R6 and R7. Together these would effectively restrict the Onshore Substation to dimensions which would not exceed that which has been assessed in 6.3.2 Landscape and Visual Impact Assessment (AS-029). Wording has now been included in R7 of the dDCO submitted at Deadline 1 to clarify that

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			the parameters are those which have been assessed in the Environmental Statement and which are set out in Table 4.
10.23	The Applicant	**Assessment** [AS-029] considers 'Individual properties' as a visual receptor. Is this specifically relating to the occupiers / residents of these properties? Please explain how including an assessment of the private views of these receptors as part of the LVIA accords with paragraphs 6.16 and 6.17 of the Guidelines for Landscape and Visual Impact Assessment Third Edition?	Paragraphs 6.16 and 6.17 of GLVIA 3 are more specifically related to the assessment from viewpoints. In relation to visual receptors, paragraph 21 of ES Volume 3, Chapter 2: LVIA (AS-029), states that '*Visual effects potentially arise from the introduction of onshore elements in views and the resultant effects on visual amenity experienced by people from principal visual receptors (for example groups of people, such as within settlements, using transport routes or recreational trails) and representative viewpoints.*' GLVIA 3, in a section titled 'Receptors of Visual Effects', states in paragraph 6.13 that the LVIA baseline must '*identify the people within the area who will be affected by the changes in views and visual amenity – usually referred to as 'visual receptors'. They may include people living in the area, people who work there, people passing through on road, rail or other forms of transport, people visiting promoted landscapes or attractions, and people engaged in recreation of different types.*' This paragraph in GLVIA 3 supports the approach taken in the ES Volume 3, Chapter 2: LVIA (AS-029), and in particular the inclusion of residential receptors within the assessment of visual effects. Section 4.20.6 of the scoping opinion (APP-295) states '*The Inspectorate does not consider that sufficient evidence has been provided to support scoping out residential visual amenity during operation.*' This also supports the inclusion of residential receptors including properties and settlements within the visual assessment of Chapter 2: LVIA (AS-029).
10.24	The Applicant	**Onshore Export Cable Corridor** [AS-029] concludes that "…the LVIA has assessed that there would be no residual significant effects to the landscape and visual resource as a result of the onshore ECC". Please clarify whether this would be the case for all relevant receptors (shown in Table 17), including "taller hedgerows and hedgerow trees".	The Applicant confirms this concluding statement to be correct. Table 17 of ES Volume 3, Chapter 2: LVIA (AS-029), summarises the significance or not of the construction effects. The effects described in Table 17 are therefore not considered to be residual effects. As described in paragraph 195 of Chapter 2: LVIA (AS-029), the significant effect on taller hedgerows and hedgerow trees would remain significant until the replacement or reinstatement planting has matured. Table 8 of Chapter 2: LVIA (AS-029), describes the mitigation of effects of taller hedgerows to take approximately 5-10 years. Trees removed over the onshore ECC cables would be unable to be replanted within the 25-year project lifespan.

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			However, at the detailed design stage the Applicant will seek to avoid the removal of high value hedgerow trees where possible and mitigate tree removals by replanting elsewhere within the ECC.
10.25	The Applicant	**Onshore Substation** Visual effects for the residents of the Faenol Bropor have been assessed during construction of the ECC. Please clarify whether visual effects have also been assessed for this receptor with regard to the construction and operation of the OnSS (e.g. does VP1 represent effects from this property as well as for footpath / bridleway users?). If not, please provide such an assessment or justify why this is not required, noting the contents of [RR-038].	GLVIA 3 notes at paragraph 6.17 that where private viewpoints from residential properties are to be considered the scope of this should be agreed with the competent authority, noting that 'it is impractical to visit all properties that might be affected.' The viewpoints were agreed through the Evidence Plan process and no viewpoint was requested to represent the view from Faenol Bropor and no residential visual amenity assessment was requested by consultees. LUC noted in the response on behalf of the NWLPAs that an assessment of Faenol Bropor should be provided with reference to Viewpoint 1. The Applicant confirms that visual effects of the OnSS at Viewpoint 1 are not representative of views from the Faenol Bropor residential property. Following extensive field work carried out during the course of the LVIA, work in the Applicant's view, the effect on Faenol Bropor would be lower than for Viewpoint 1. Faenol Bropor was considered as a visual receptor in relation to the construction of the ECC where no viewpoint assessment has been included.
10.26	DCC	**Woodland Species Selection** Please confirm you are satisfied with the suggested woodland species selection as set out in paragraph 168 of [AS-029]? If not, please provide reasoning.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The proposed woodland species selection has been shared with DCC via the Landscape and Ecological Design Principles Plan (LEDPP), which was a precursor to the outline LEMP, and provided within the PEIR. The LEDPP proposed: *'a mix of faster growing 'nurse' species and slower growing 'core' species. Nurse species, such as alder, birch, and pine would grow quicker so that after 15 years they would be approximately 7-10m in height. They would provide shelter to bring on core species, such as oak, beech and horse chestnut.'*

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			Feedback was received from NRW in its response to S.42 consultation that suggested horse chestnut, beech and pine were omitted and black poplar is included. This change has been incorporated in (APP-305) and (AS-029). DCC did not provide any feedback on the proposed woodland species selection.
10.27	The Applicant	**Onshore Substation** Table 8 of [AS-029] provides an assessment of physical landscape effects during construction. With regard to the OnSS site, such effects appear to have been considered in respect of trees only. Please clarify: a) whether mitigation for effects on these trees includes the proposed woodland planting or if it relies on new tree planting after decommissioning, or both; and b) whether agricultural land, hedgerows and taller hedgerows should form part of the assessment of physical landscape effects for the OnSS site as they do for the ECC?	a) The Applicant confirms that the mitigation of effects on trees includes the proposed woodland planting. As described in Table 8 of Chapter 2: LVIA (AS-029), mitigation of trees removed over the onshore ECC would not be possible until after decommissioning. Proposed mitigation has not included proposed tree planting following decommissioning. b) The Applicant confirms that the assessment of physical landscape effects includes consideration of the potential physical effect along the entire route of the Onshore ECC which includes the area where this interacts with the OnSS site. It is accepted that this is not explicit in the assessment of the agricultural land within the LVIA (AS-029), which should also include reference to the OnSS site area in the baseline, however, the Applicant confirms that the physical effects of the agricultural land within the OnSS site area have been considered as part of this assessment and that the conclusions of significance would be unchanged. Table 8 includes specific reference to the OnSS site within the assessment of taller hedgerows and hedgerow trees found along the onshore ECC including those hedgerows found within the OnSS site and OnSS construction compounds. At the detailed design stage the Applicant will seek to avoid the removal of high value hedgerow trees where possible and mitigate tree removals by replacing lost hedgerows with a locally appropriate mixture of at least seven species, including standard trees (except directly over the Onshore ECC) at a 3:1 ratio for any lost hedgerows
10.28	The Applicant	**Planting** Page 22 of the Schedule of Mitigation [APP-310] states "All habitats will be reinstated as soon as possible after construction. Hedgerows along the onshore cable ECC will be reinstated using a species rich, locally appropriate native mixture including heavy	a) Paragraph 68 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) also notes that heavy standard trees would not be planted above the installed cables. At the detailed design stage the Applicant will seek to avoid the removal of high value hedgerow trees where possible and mitigate tree

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		standard trees at a 3:1 ratio for any lost." Paragraph 68 of the oLEMP [APP-305] also suggests heavy standard trees would be planted in hedgerows. Please clarify: a) whether heavy standard trees would be included in replacement hedgerow planting given elsewhere in the application documents (including [AS-209] and [APP-305]) it suggests trees cannot be planted along the onshore ECC; and b) whether all hedgerows would be replaced, given the second bullet point of paragraph 172 of [AS-029] uses the term 'where practical'.	removals by planting heavy standard trees elsewhere within the ECC (i.e. not over cables). b) To clarify, it is the intention of the Applicant in the first instance to propose the reinstatement of removed sections of hedgerows. Reinstatement of hedgerows may not always be practical, particularly where the hedgerow removals result in displaced or severed sections of hedgerows, in which case suitable replacement hedgerows will be provided that also consider ecological requirements (such as bat flight lines or sheltering, hibernating and foraging by GCN, as well as providing routes between ponds and foraging areas). Agreement with landowners as to the practicality of reinstatement or replacement of hedgerows will also be required.
10.29	The Applicant	**Trees** Noting the width of cable trenches when compared to the total width of the onshore ECC in combination with the depth that cables would be buried (as shown on Figure 24 of ES Chapter 1: Onshore Project Description [APP-062]), please clarify: a) any operational restrictions regarding tree planting along the onshore ECC; and b) any risk to cables from the roots of trees over a 25-year period.	Paragraph 61 of (APP-062) notes that trees cannot be planted within 3m (horizontally) of any sections of underground cable that has been installed. 3m is typically used as a standoff distance from buried infrastructure. 90% of trees roots, including virtually all larger structural roots are typically found in the upper 0.6m of soil. The lateral roots taper rapidly until at 2-3m distance they are usually only 2-5cm in diameter, by which stage they have lost much of their rigidity and physical strength, it is here that they tend to break when root plate failure occurs, e.g. in a storm. Root plate failure within this area could risk damage to cables and the ground covering the cables. Beyond the 'zone of taper' lateral roots extend outwards in a broad zone for many meters without appreciable further decrease in size - typically maintaining a diameter of l-2cm. Table 7 of (APP-062) notes an indicative minimum depth of burial of 0.6m and an indicative maximum depth of burial of 1.64m (excluding crossing points). Hence interaction between the deeper roots and cables is possible if planting occurred. This interaction could cause damage in several ways:

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			• Roots breaking up the CBS (cement bound sand) and hence reducing its ability to transfer heat away from the cable. This would create a localised hotspot; • Physically deforming or stressing the cable as an adjacent root grows over time; • Small roots are known to grow through cracks. The joints between sections of cable duct are typically push fit and hence a small root could grow through this join, causing later damage as the root grows; • The joints between cable sections are not ducted and are more exposed to physical damage from a root system, which deform or damage the insulation around the joints; • Where tree roots become entangled with cables, e.g. if the tree falls then cables can be disturbed; • Tree roots alter the moisture content of the soil surrounding the cable. A cable's rating relies heavily on the cable environment, especially the thermal resistivity (TR) value of the soil. This TR value in turn is usually, but not always, dependent on the moisture content of the soil. The higher the moisture content the better the TR value. If trees or bushes take up some of the soils natural moisture this will make the TR value worse and reduce the rating of the cable; and • When maintaining and replacing high voltage underground cables the ground above the cables must be excavated and this can be extremely difficult if tree roots surround the cable. As such, a tree planting restriction is placed across the permanent easement to ensure that: • Roots do not interfere with the cables in operation; • Sufficient space is retained for emergency repairs to the cable in the event of a fault; and • Vehicular access along the easement can be retained for routine maintenance and emergency repairs.
10.30	The Applicant	**Final Landscape and Ecological Management Plan** Paragraph 8 of [APP-035] says the final LEMP would be a working document subject to regular review and updates. How would this	Applicant has amended Paragraph 6 of the outline landscape and ecology management plan (oLEMP) as follows within an updated version of the oLEMP that is being submitted at Deadline 1 (see Document 1.33 of the Applicant's Deadline 1 submission)

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		work in practice and would R13 of [AS-014] make provision for this?	Following its approval, the Final LEMP would be implemented as approved for the relevant stage of construction. Where ongoing review of construction works necessitates an amendment to the Final LEMP, this would be approved by DCC in consultation with NRW before the amendment is implemented.
10.31	The Applicant	**Planting** Given that landscape and visual effects are considered at Year 15 as part of the LVIA please confirm: a) is 3 years aftercare as set out in [APP-035] sufficient and how would it be identified and secured if this needed extending; b) is a five-year period as specified in R9 of [AS-014] for replacement planting sufficient; and c) how would any necessary maintenance and replacement planting be ensured once land is handed back to landowners?	The proposals for 3 years aftercare referenced in Paras 131 and 135 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) relate to Biodiversity enhancements within the OnSS site. The biodiversity enhancements will be subject to an initial aftercare period of up to three years following creation, to be extended (if required) if deemed not to have been successful. The methods of aftercare will be agreed in the Final LEMP and subject to the results of monitoring and EPSL requirements. The Applicant would have ownership and be responsible for the maintenance and management of the land around the OnSS and its existing and proposed landuses as indicated by the coloured areas shown on Figure 2 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) throughout the lifetime of the project. In relation to ongoing maintenance of the proposed woodland planting mitigation shown on Figure 2 of the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) and shown in visualisation Figures 2.18 to 2.22, (APP-181 to APP-185) the Applicant considers that the following broad maintenance principles will help to clarify what may be required within the 25-year lifetime of the project. • The most intensive woodland maintenance would occur within the first 5 years which would typically include biannual pruning, weeding, checking stakes, mulching and watering etc.; • In years 6-10 the required management would be less intensive and typically be driven by an annual inspection, the key objective of which would be assessing the establishment of the woodland areas potentially resulting in selective thinning or replanting where required; • Beyond 10 years the proposed woodland would likely only require annual site inspections to ensure continued establishment and thinning out of nurse species; and

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			▲ Hedgerows would require to be maintained throughout establishment (approximately year 5) and beyond this would typically only require annual maintenance and cutting.
10.32	The Applicant	**Ancient Woodland** The area for Work No. 35 includes an area of ancient woodland. What are the implications for this woodland given the description of Work No. 35 in Schedule 1 of [AS-014]?	The Applicant confirms there are no proposals for works within the area of Ancient Woodland located approximately 200m to the South West of Faenol Bropor that is encompassed within Works Area 35. To clarify this position, the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission) has been updated to confirm the retention of, and no significant adverse impact to this area of woodland.
10.33	The Applicant	**Assessment** [AS-029] refers to 'Year 1' whereas the photomontages refer to 'Year 0'. What is the reason for this, and does it have any bearing on the assessment?	The Applicant confirms that this has no bearing on the conclusions of the assessment set out in Chapter 2: LVIA (AS-029). The LVIA has considered the effect in the first year of operation following the completion of the main substation construction activity but without the benefit of any planting mitigation, which would have to wait until the next suitable planting season. The visualisations in Figures 2.18 to 2.22, (APP-181 to APP-185) represent this situation in the 'year 0' set of images. This has been added to the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
10.34	The Applicant	**Assessment** Please confirm whether the direction of photography shown for VP 9 (in Figure 2.26a of [APP- 189]) is correct?	The Applicant confirms that the view direction shown on Figure 2.26a (APP-189) and then again stated on Figures 2.26b&c (APP-189) for viewpoint 9 is incorrect. The view direction for all the images presented at this viewpoint location should be 233o. This has been added to the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
10.35	The Applicant	**Assessment** Please confirm whether the maximum parameter extent line in the visualisations for VP 5 [APP- 185] is correct?	The Applicant confirms that the maximum parameter extent line shown on Figure 2.22, Viewpoint 5, Minor Rd Groesffordd (APP-185) as an identification umbrella (solid line) above the maximum parameter box (dashed line) is incorrect. The maximum parameter extent should only extend to the edges of the maximum parameter box which the Applicant confirms is correctly shown on the images presented. This has been added to the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).

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10.36	DCC, NRW	**Cumulative Assessment** Are you satisfied with the list of developments for cumulative assessment purposes as shown in Table 15 of ES Chapter 2 [AS-029] and with the conclusions that no significant cumulative landscape and visual effects would arise?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. With regard to the list of development considered for cumulative effects assessment (CEA) methodology, the CEA is the subject of detailed discussion between the Applicant, NRW, DCC and various statutory and non-statutory authorities and stakeholders. This consultation has been captured under the auspices of the Evidence Plan process, via focused Expert Topic Groups (ETGs), as well as technical consultation working groups. The CEA methodology and draft list of sites was provided within the PEIR and feedback was received from DCC. DCC provided a comprehensive list of potential cumulative sites in Oct 21 that have been considered along with an updated search of DCC's planning website to collate cumulative list considered by the ES (See Section 3 of ES Volume 1, Annex 3.1: Cumulative Effects Assessment Methodology (APP-042)). A draft of the LVIA was also provided within the PEIR, with subsequent feedback provided by DCC and NRW. DCC provide an LUC report presenting the findings of a review LUC undertook of the LVIA that was presented in the PEIR. Regarding cumulative assessment, LUC confirmed that there are no future cumulative development scenarios that require detailed assessment in a Cumulative Landscape and Visual Assessment (CLVIA) within the PEIR. The ES has undertaken the assessment on the same basis as the PEIR and so it is anticipated this position would not change. NRW did not comment on the CEA methodology or cumulative assessment in the LVIA chapter in its S42 feedback.
10.37	DCC, NRW, The Applicant	**Cumulative Assessment** **DCC / NRW** - [AS-029] sets out that the cumulative assessment excludes the consideration of the necessary extension to the National Grid substation on the basis of insufficient detail known of it at the time of the assessment. However, it goes on to suggest that the effects of the extension would be localised and would therefore be unlikely to lead to a significant cumulative effect. Are you in agreement with this? **The Applicant** - Has there been any progression in respect of the	The Applicant continues to engage with National Grid Electricity Transmission to understand any progress they are making with the design of the extension to the National Grid Substation. The Applicant understands that a planning application is due to be made by National Grid to Denbighshire County Council by the end of Q1 2023. The Applicant therefore has insufficient information on which to provide a more detailed consideration of cumulative effects. The Applicant also understands that National Grid intend to undertake a cumulative assessment as part of their planning application for the National Grid substation extension.

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		National Grid substation extension which might assist with a more detailed consideration of cumulative effects?	
10.38	The Applicant	**Cumulative Assessment** Please explain the reason for the numerous blank boxes under the relevant topic areas, including 'Landscape and Visual Impact', in the onshore cumulative effects assessment matrix in the Cumulative Effects Assessment Methodology [APP-042] (e.g. planning ref 40/2018/1036 – power plant, ref 44/2018/0855 / 44/2015/1075 – 99 dwellings, etc.)	The Applicant confirms that the CEA Matrix presented in APP-042 contains a complete list of the projects considered in the onshore cumulative assessment. The matrix was used as a tool to assist screening of projects into the cumulative effects assessments within each individual ES chapter based on being within a screening range for a particular topic, or having temporal overlap with AyM. The tool was not used as the basis for assessment itself but was presented to illustrate the methodology for assessment. The Applicant has undertaken a review of the projects considered within the cumulative assessment sections of those ES chapters where cells were marked blank in the CEA matrix and confirms that no onshore projects were missed.

2.12 Marine and Coastal Physical Processes

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11.1	The Applicant	**Impact on Coastal Processes** In light of paragraphs 5.5.7 and 5.5.10 of NPS EN-1, please demonstrate how the decision- maker can be satisfied: a) That any potential impacts would be minimised; and b) The Proposed Development would be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and any decommissioning period.	The Applicant has assessed all potential impacts in relation to Coastal Processes to be Not Significant in EIA terms (APP-048). The assessments are based on the maximum design scenario for all relevant factors, which include various project specific embedded mitigation measures. The magnitude of potential impacts due to sediment disturbance (e.g. through cable burial, drilling and dredging activities) are inherently minimized by the engineering design of the tools and the industry standard operating protocols that have been developed in conjunction with environmental protection aims and objectives. The Applicant has developed the design envelope of the Proposed Development to accommodate future patterns of coastal erosion and deposition, also taking account of climate change, during the project operational life and any decommissioning period. This resilience will be implemented through the more detailed engineering design process, in conjunction with suitable information about local metocean conditions, coastline morphology and evolution, and the predicted effects of climate change in the lifetime of the project. The Applicant also refers the ExA to its response to ExQ1.0.15
11.2	The Applicant	**Secondary Scour** NRW [RR-105] notes that the local dimensions of secondary scour are highly dependent upon the specific shape, design and placement of the scour protection. Additionally, NRW further state that the parameters are highly variable and so there is no clear quantitative method or evidence base for accurately predicting the dimensions of secondary scour. NRW advise that given the uncertainty regarding the spatial extent and volume of secondary scour, post- construction monitoring should be considered. Please respond to these specific matters and confirm how such monitoring would be secured?	The Applicant will undertake monitoring of the installed wind farm infrastructure for the occurrence of scour, including: buried cables; cable protection; wind turbine and substation foundations. Such asset integrity surveys are normally undertaken by all wind farm operators at suitable intervals throughout the lifetime of the project to mitigate the risk of damage to infrastructure exposed or otherwise affected by scour. The spatial coverage and time interval between surveys may vary depending initially on the theoretical likelihood of scour based on known local seabed conditions, and latterly based on the actual historical occurrence or absence of scour. It is also reasonably common practice for subsets of these asset integrity surveys to be provided in a bespoke report to the Regulatory Authority to report on scour and the need for any scour protection. The Applicant would therefore, expect NRW to condition this within the Marine Licence as they deem necessary.

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			See condition 36 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission).
11.3	The Applicant	**Cable Burial Risk Assessment** Please confirm when the Cable Burial Risk Assessment is to be completed and provide a high- level overview in respect of content.	The CBRA is a risk assessment process that forms a component of the information that feeds into the final design for the cable burial depth and routing. The CBRA takes into consideration a number of factors including, ground conditions, marine processes & bathymetry, risks to and from anthropogenic activity relating to other marine users. The objective of the CBRA is to define a target burial depth which is practically and economically achievable whilst providing adequate protection to the assets. The methodology for CBRA has been standardised for the industry by The Carbon Trust (2015) (see reference list). As identified within Figure 3.1 of the guidance a summary of the methodology for the CBRA is as follows: • Cable Routing; • Collection and Review of Data; • Assessment of Seabed Conditions; • Risk Register / Threat (Hazard) Assessment; • Probability Risk Assessment; and • Quantification of Recommended Burial Depth. The Schedule of Mitigation and Marine Licence Principles Document (Documents 1.18 and 1.24 of the Applicant's Deadline 1 submission, respectively) confirm that the Cable Burial Risk Assessment (CBRA) will sit within and inform, the Cable Specification & Installation Plan (CSIP) which is a certified plan that will be conditioned within the Marine Licence, and approved by NRW prior to the commencement of offshore construction. The Applicant would fully expect NRW to set out their required timescale for submission of the CSIP within their Marine Licence for this project (the Marine Licence Principles document (AS-023) provides that this will be submitted for approval by NRW at least four months prior to the commencement of offshore works). The CBRA will therefore, be undertaken following completion of detailed site investigation works (post consent) and in time to inform the drafting of the CSIP.

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11.4	The Applicant	**Cable Specification and Installation Plan and Cable Route Burial Protocol** Noting that this plan and protocol are to be produced post consent, please confirm how they are to be secured and provide a high-level overview in respect of content.	As detailed in the Applicants response to ExQ1.11.4, the Applicant fully expects the CSIP to be a requirement of the Marine Licences (for Generation, Transmission and interlink assets). Whilst there is no specific guidance relating to the content of the CSIP, it is a standard plan within the offshore wind sector and typically comprises the following: • Introduction; • Project Context; • Scope and Objectives of the CSIP; • Statements of Compliance; • Updates and Amendments to the CSIP; • Technical Specifications of Cables; • Cable Burial Risk Assessment (CBRA); • Sandwave Clearance Plan (if relevant); • Cable Laying Plan and Installation Methodology; and • Cable Protection Plan. The Applicant would seek to agree the precise content of the plan with NRW prior to the development of the plan, post consent. The Applicant assumes the ExA means Cable Burial Risk Assessment rather than Cable Route Burial Protocol. The context and context of the CBRA is as set out above in the Applicants response to ExQ1.11.3. The Applicant recognises that a Cable Route Burial Protocol was referred to within the Physical Processes chapter (APP-048) but can confirm this was inconsistency in terminology and it should have referred to the CBRA instead.
11.5	The Applicant, NRW	**Assessment of Change to Pathways** Paragraph 43 of ES Volume 2, Chapter 2 [APP-048] confirms that the assessment of potential change to pathways will not, at this stage, be accompanied by a conclusion regarding the significance of effects. Applicant – Please confirm why it isn't necessary to include significance of effect conclusions in respect of this matter? Are	The Applicant clarifies that a 'potential change to pathways' relates to quantifiable changes to relevant environmental parameters (e.g. an increase in suspended sediment concentration or a modification to the wave regime), but which is not itself a sensitive coastal process receptor. An assessment of the significance of effect to these pathways is not possible in these cases as there is no meaningful way in which each pathway can be assigned a sensitivity rating.

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		they to be provided at a later date? NRW – Do you consider such conclusions necessary?	However, the impact of such changes to other sensitive receptors if and where identified is considered in other Chapters (as listed and cross-referenced in the Assessment of significance for each 'pathway' type assessment). Since the assessment of change description is still relevant to other Chapters, it is included in the Marine Geology, Oceanography and Physical Processes chapter of the ES (APP-048) for completeness.
11.6	The Applicant	**Settlement Thickness** Please provide further detail as to why an overview of the likely shape and thickness of the seabed deposit resulting from the release of material from the dredger at the water surface cannot be estimated (paragraph 61 of [APP-048])? Does the MDS take into consideration that such deposits are likely to vary?	The Applicant confirms that it is not possible to accurately predict or describe the final shape or local thickness of seabed deposits that result from gradual disturbance or sudden release of sediment and subsequent settlement under gravity. This is due to inevitable variability in most of the relevant parameters, for example: the exact mixture of sediment grain sizes, the depth of water to settle through, the current speed during the period of settlement, the duration of settlement, the seabed slope and shape in the footprint of the effect, the nature of any subsequent flow under gravity after initial impact with the seabed, etc. The MDS conservatively considers the maximum total volume of sediment in the deposit. Although there may be uncertainty in the final shape, the maximum dimensions of the deposit are inherently limited by the total volume. The results of the assessment (in Table 9 of APP-077) accounts for a range of possible shapes and thicknesses, including greater average thickness with a correspondingly smaller footprint, and smaller average thickness with a correspondingly larger footprint.
11.7	The Applicant	**HDD Exit Pits** Please confirm whether the excavated material for the HDD exit pits is to be stored in the intertidal zone? If so, will this be directly adjacent to the exit pits?	The Applicant can confirm that any excavated material from HDD exit pits located in the inter-tidal will be stored 'nearby' (Paragraph 112 of APP-048). The material could therefore be located 'directly adjacent' to the HDD exit pit. For exit pits on other similar schemes, the pit is only open for a relatively brief duration and the excavated material is stored directly adjacent to the pit.
11.8	The Applicant	**HDD Exit Pits** Paragraph 114 of [APP-048] states that any morphological response due to the spoil mounds located in the intertidal zone would be highly localised and any onward propagation would be limited by the presence of the groynes. Does this statement	The Applicant can confirm that the assessment does take into consideration the possibility that for a 10-month period there may be a gap in the groynes. Whilst the removal of the groynes could result in short-term and localised morphology change, the Applicant confirms that

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		consider the possible 10-month period when gaps of up to 5 metres in the groynes would occur? If not, please explain why.	potential impacts in relation to Coastal Processes at the landfall will be Not Significant in EIA terms.
11.9	The Applicant	**Nearshore Cable Protection** A commitment has been made to the utilisation of cable mattressing in the nearshore areas, if required (paragraph 131 of [APP-048]). How is such a commitment to be secured?	The Applicant fully expects NRW to ensure this commitment was captured within the Marine Licence. The detail of the mattressing and confirmation of compliance would then be set out within the CSIP (see Applicant's response to ExQ1.11.4).

2.13 Marine – Commercial Fisheries, Shipping and Navigation

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12.1	The Applicant	**Commercial Fisheries – Mitigation** With reference to the Fishing Liaison and Co-existence Plan (FLCEP) [APP-306] please can you: a) Confirm the wind farm/project operation period. The FLCEP states the "wind farm is due to operate for a period of 20 years", whilst the ES Volume 2 Chapter 1 [APP-047] states "operational lifetime of the project is anticipated to be approximately 25 years"; b) confirm the criteria to identify specialists able to undertake cooperation payment assessment; c) outline timeframe for each key step in the cooperation payment process in paragraph 3.2; d) describe and confirm the dispute resolution method for cooperation payment; e) confirm how the cooperation payment is secured in the dDCO [AS-014].	a) The FLCEP reference to a period of operation of 20 years is an error. The correct lifetime is 25 years, as stated in the ES Volume 2 Chapter 1 (APP-047). The FLCEP (APP-306) has been corrected and resubmitted to exam (document 1.32 of the Applicant's Deadline 1 submission) and will be redistributed to fishers. b) Brown & May Marine Ltd have been appointed to carry out the assessment. The fisheries cooperation strategy specialists have been selected on the basis of their experience of working on comparable projects and in accordance with the Fisheries Liaison Plan (FLP). The FLP has been submitted to exam as part of the amended FLCEP (Document 1.32 of the Applicant's Deadline 1 submission). c) An outline process and timeframe has been added to the Fisheries Co-operation Strategy (FCS) and submitted to exam as part of the amended FLCEP (document 1.32 of the Applicant's Deadline 1 submission). d) A dispute resolution method has been added to the FCS and submitted as part of the amended FLCEP [document 1.32 of the Applicant's Deadline 1 submission]. Where agreement cannot be reached, mediation will be employed whereby a mutually-agreed third party will facilitate discussions between both parties to reach a final agreement. e) The FLCEP is referenced in the Marine Licence Principles document (doc ref 4.5.1, (AS-023)) for securing via the Marine Licences.
12.2	The Applicant	**Commercial Fisheries – General** Please can you confirm how fishing métiers (such as tangle or gill netting) compatibility in the presence of wind turbines would be assessed?	The assessment presented in Volume 2, Chapter 8 (APP-054) considers potential impacts on fishing fleets known to be active within and/or adjacent to AyM. The assessment of potential impacts on vessel access to AyM considered the operating parameters of vessels/gear in that fleet (as described in Section 3.3 of Annex 8.1: Commercial Fisheries Technical Report (APP-109)) and the AyM maximum design scenario (as described in Table 9 of Volume 2, Chapter 8 (APP-054)). APP-054 confirms that the minimum wind turbine spacing in AyM will be 830m and that cable burial is the preferred means of cable protection.

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			The type of fishing gear and method of use influences the potential opportunities within the array area. For example, trawl gears typically require a greater distance for safe operation and these gears are unlikely to target grounds in the vicinity of infrastructure, whilst it is expected that potting activity will resume within the operational AyM array area. The impact assessment presented in Chapter 8 assumes that some fishing will be possible within the AyM array area where turbine spacing and layout allow productive grounds to be targeted. The individual decisions made by the skippers of fishing vessels with their own perception of risk will determine the likelihood of whether their fishing will resume within the AyM array area. Inclement weather will be a significant contributor to this risk perception. These assumptions were supported by the outcomes of informal fisheries consultation, as summarised in Table 2-3 of Annex 8.1: Commercial Fisheries Technical Report (APP-109), where it was noted that potting can continue within a wind farm array if the skipper is comfortable.
12.3	The Applicant	**Commercial Fisheries – Mitigation** Please can you confirm if arbitration would be the process to resolve adverse impacts on other commercial offshore activities and if it is secured in the dDCO. If not, please explain your reasons and provide evidence justification.	The Applicant is committed to promoting co-existence between AyM and other marine users. Applicant-proposed measures to encourage co-existence with the fishing industry are presented in full in APP-054, in Section 8.9. Measures include commitment to the FLCEP (APP-306; Document 1.32 of the Applicant's Deadline 1 submission) comprising a Fisheries Liaison Plan (FLP, submitted at Deadline 1 as part of the amended FLCP) and the Fisheries Cooperation Strategy (FCS). Together these documents present co-existence measures and approaches to further mitigate any significant impacts (relevant to the potting fleet during the construction phase), including procedures for cooperation agreements and associated payments. As noted in the answer to ExQ1.12.1d, the FLCEP includes mediation as a dispute resolution method. It is anticipated that the FLCEP will be secured within Marine Licence conditions as set out in the Marine Licence Principles document (AS-023; Document 1.24 of the Applicant's Deadline 1 submission).

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12.4	The Applicant	**Commercial Fisheries – Baseline** Please can you confirm the potential reduction or increase in fish stocks that would result from the presence of the proposed development.	The assessment presented in the Fish and Shellfish Ecology chapter of the ES (APP-052) confirms that there are no significant adverse effects predicted on fish and shellfish receptors. The commercial fisheries assessment presented in Volume 2, Chapter 8 (APP-054) considers the potential for disturbance of commercially important fish and shellfish resources leading to displacement or disruption of fishing activity. This assessment relies upon the findings of the assessment presented in Volume 2, Chapter 6: Fish and Shellfish Ecology (APP-052), as summarised above. No significant effects on commercial fishing activity are expected to result from impacts to fish and shellfish species.
12.5	Isle of Man Government (Territorial Sea Committee), Captain Haddock's Seafood, Manx Fish Producers Organisation	**Commercial Fisheries – General** Are you satisfied with ES volume 2, chapter 8 [APP-054] and: a) potting fleet, netting fleet and dredging fleet being the three receptors requiring assessment for commercial fisheries; b) data sources in table 5 to inform the commercial fisheries environmental statement assessment; c) applicant's pro-rata annual landings value approach to define magnitude of impact - paragraphs 73-78; d) that all relevant projects and associated tiers considered within the commercial fisheries cumulative effect assessment in table 13. If no to any of the above points, please explain your reasons and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. Isle of Man (IoM) commercial fishing interests have been considered in the Application. As confirmed in Volume 4, Annex 8.2 Commercial Fisheries Consultation Record (APP-110), Isle of Man fleet activity is described in Volume 2, Chapter 8 (APP-054), Section 8.7 and Annex 8.1: Commercial Fisheries Technical Report (APP-109). As stated within the aforementioned documents, Vessel Monitoring System (VMS) (capturing activity by vessels 15m length and over) and landings (capturing landings by fishing vessels of all lengths) data sourced from the Marine Management Organisation (MMO) and presented in the ES include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey. Isle of Man data has been incorporated into MMO UK databases since 2011. Commercial fishing vessels that are registered to the IoM are required to hold both IoM and UK fishing licences. The MMO data presented in the ES therefore provides commercial landing statistics for all vessels registered to UK administrations and crown dependencies. To confirm, the most recently available VMS and landings datasets have been accessed and used to inform the Environmental Impact Assessment (EIA). The extent of IoM-registered vessel activity in and around the study area is noted. Across all of ICES Division 7a (Irish Sea), the annual average (2016-

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			2020) landed value of scallops landed by IoM vessels was £3.8 million, based on MMO landings statistics. Landings from the AyM regional study area over the same period were £420,000 and from the AyM study area were £1,700. The potential for displacement of fishing activity is assessed in Volume 2, Chapter 8 (PINS ref: APP-054), Sections 8.10 to 8.12. Potential displacement of UK (including IoM) scallop dredge activity is assessed in the context of the wider Irish Sea, noting that scallop grounds extend across much of the Irish Sea and that vessels typically have large operating ranges. AyM has not been assessed as causing significant displacement of the scallop dredge fishery given key grounds are outside of the AyM area. The potential for cumulative effects on the scallop dredge fisheries is assessed in Volume 2, Chapter 8 (APP-054), Sections 8.13. As stated above, the scallop dredging fleet target scallop across a relatively wide area offshore and vessels typically have large operating ranges. Scallop grounds extend far beyond the extent of AyM and the other projects relevant to the cumulative effects assessment. Cumulative effects on the scallop dredge fleet have been assessed as not significant in EIA terms. See also the Applicant's response to Relevant Representations (Document 1.1 of the Applicant's Deadlne 1 submission).
12.6	Isle of Man Government (Territorial Sea Committee)	**Commercial Fisheries – General** Are you satisfied issues raised during consultation have been captured in table 2-3 in the Commercial Fisheries Baseline Report [APP-109]? If not, please explain your reasons and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. (Engagement with Isle of Man fishing interests has been pursued by AyM. The Applicant held meetings with the Isle of Man Government on 16/12/2020 and 8/12/2021; in both meetings commercial fisheries impact assessment and stakeholder engagement were discussed. Comprehensive engagement in the form of fisheries group meetings and individual interviews (see Annex 8.1: Commercial Fisheries Technical Report (APP-109) and the commercial fisheries consultation record (APP-110)) with fishermen has been undertaken to understand fishing activity within the AyM study area. The Manx Fish Producers' Organisation is included on the AyM fisheries stakeholder distribution list, with contact details confirmed as correct by the IoM Government and has been invited to attend both group meetings and individual interviews).

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12.7	The Applicant	**Commercial Fisheries – General** Please can you check the reference chapter and application reference for the following statement in ES Volume 2, Chapter 14 page 13 [APP-060] and statement "… drawing on the assessment in Volume 2, Chapter 6: Commercial Fisheries; application ref: 6.2.6".	The Applicant can confirm this is an erroneous reference and has provided the corrected text in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
12.8	The Applicant	**Commercial Fisheries – Baseline** Please can you explain and describe if any important fishing grounds have been identified a) within the OL, b) adjacent and beyond the OL.	As described in Volume 2, Chapter 8 (APP-054), in Section 8.7, and in Annex 8.1: Commercial Fisheries Technical Report (APP-109), data gathered and analysed via desk-based assessment and the findings of stakeholder engagement indicate the following: • Within AyM Order Limits, fishing vessels deploying pots and dredges to target shellfish species, and nets to target mixed demersal fish species are expected to be active. • Fleets targeting grounds within the AyM boundaries are active across grounds throughout and beyond the study area (as defined in Section 8.4 of Volume 2, Chapter 8 (APP-054)), and data indicates that the most actively targeted and valuable grounds are located outside of AyM boundaries. • Vessels using pots to target shellfish species (primarily whelk, some lobster and crab) are likely to be active within the AyM boundaries. Potting activity by larger vessels over 15 m length is focused on grounds located to the north and northeast of AyM. Potting takes place throughout the wider regional study area. • Vessels using nets to target mixed fish species including flounder, thornback ray and bass are likely to be active within the AyM boundaries. Netting activity is understood to be relatively greater in inshore waters. Netting takes place throughout the wider regional study area. • Vessels using dredges to target scallop may occasionally be active within the northern portion of the AyM array area. Markedly higher levels of dredge activity are noted to the northeast of the AyM array area. Dredging takes place throughout the wider regional study area.

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			Data indicates that across the study area, there are low levels of beam trawling, demersal otter trawling and use of hooked gears. Data does not indicate the presence of these activities within AyM boundaries.
12.9	The Applicant	**Commercial Fisheries – Mitigation** Reference is made within [APP-054] of localised loss of access to fishing grounds fleets over a short-term (less than 5 years). The impact is predicted to be intermittent with localised exclusion surrounding construction activities and would be mitigated through sufficient notice of planned construction activity supported by a fisheries liaison officer where appropriate. Please can you explain and describe the planning and scheduling construction approach to identify these intermittent and localised exclusion zones, and the timeframe given to fishing receptor groups to be deemed sufficient notice of planned construction activity?	Measures to communicate planned construction activity are presented in Volume 2, Chapter 8 (APP-054), in Section 8.9, Table 10. As per the Chapter text, the Applicant is committed to ongoing liaison with fishermen, in line with FLOWW guidance. The Applicant is committed to the appointment of a company Fisheries Liaison Officer (with this role already active) and to timely issue of notifications to the fishing community and other marine users, including Notice to Mariners (NtMs), Kingfisher Bulletin notifications and other navigational warnings that provide advance warning of project activities and associated Safety Zones and advisory safety distances. The Applicant is not aware of any stipulated timeframe in relation to issue of notifications but proposes that timely issue would involve a two-week notice period where possible. If for any reason an adequate notice period could not be achieved, information on planned activity would be directly disseminated to local fishermen via the Fisheries Liaison Officer. Regarding construction scheduling, a schedule will be developed post-consent. The schedule will inform issue of the notifications described immediately above (see also the FLCEP (Document 1.32 of the Applicant's Deadline 1 submission)).
12.10	The Applicant	**Commercial Fisheries – Mitigation** Please can you describe the options being considered to encourage co-existence with the fishing industry.	The Applicant has sought to reduce the project design to minimise potential impacts as far as practicable. Since EIA scoping stage, this has included a reduction in overall project area by over 25% and a reduction in number of turbines by more than 50%. Measures to promote co-existence between AyM and the fishing industry are presented in full in Volume 2, Chapter 8 (APP-054), in Section 8.9. Measures include commitments to fisheries liaison, infrastructure marking and lighting, dropped objects procedures and cable burial planning. As confirmed in Section 8.9, it is anticipated that these commitments will be secured within Marine Licence conditions as set out in the Marine Licence Principles document (AS-023).

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			In relation specifically to liaison commitments, the Applicant has prepared a draft Fishing Liaison and Co-existence Plan (FLCEP) (APP-306), which has been developed following consultation with the fishing industry and will be finalised post-consent. The FLCEP comprises a Fisheries Liaison Plan (FLP) and Fisheries Cooperation Strategy (FCS) and an updated version has been submitted at Deadline 1 (document 1.32 of the Applicant's Deadline 1 submission). The final FLCEP will present co-existence measures and explore approaches to further mitigate significant impacts, including cooperation agreements and associated payments.
12.11	The Applicant	**Commercial Fisheries – Relevant Representation** Please can you respond to the issue of 12m and under vessels and possible missing vessel location and data set, and vessel monitoring system data available to the applicant does not include vessels <15m length by Janet Finch-Saunders MS [AS-036] point 8.	The data used to inform the description of baseline activity is fully listed in Volume 2, Chapter 8 (APP-054), in Section 8.4.5, and in Annex 8.1: Commercial Fisheries Technical Report (APP-109). Limitations associated with data sources are described. The Applicant has provided a full response to the Relevant Representation from Janet Finch-Saunders in Document 1.1 of the Applicant's Deadline 1 submission. Regarding the Vessel Monitoring System (VMS) data referred to here, it is confirmed that data is not missing, but is not available. British vessels ≥12 m in length have had VMS on board since 2012, however, to date, the Marine Management Organisation (MMO) provide publicly available amalgamated VMS datasets for ≥15 m vessels only, which has been accessed and presented in the Application. The effect of this limitation and approach to addressing it is described in Volume 2, Chapter 8 (APP-054), in paragraph 30.
12.12	MCA, Trinity House, UK Chamber of Shipping	**Shipping and Navigation – General** Are you satisfied with the ES volume 2, chapter 9 [APP-055] and: a) that the maximum design scenario for safety zones of 500 metres around structures during construction, 50 metres around structures which are installed but awaiting further works or commissioning, and 500 metres from structures undergoing major maintenance works are not significant to impede your activities; b) that the maximum design scenario minimum spacing of 830 metres between structures is not significant to not impede your activities; c) that all main routes (17 in number) have been identified and are as shown on Figure 6;	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. a) The Applicant notes that the safety zones listed are industry standard. b) The Applicant notes that this spacing was discussed at the Hazard Workshop (see consultation section of the Shipping and Navigation Chapter (APP-055), with the indication being it was suitable to facilitate internal transit, with no concerns raised. c) Noted that these routes were presented at the Hazard Workshop and attendees indicated they reflected traffic in the area.

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		d) that the proposed development does not interfere with the use of recognised sea lanes essential to international navigation; and e) that any negative impacts on non-international navigation sea lanes are as low as reasonably practicable; If you have any issues on the above, please explain your reasons and provide evidence justification.	d) Setback from the TSS that aligns with GyM has been maintained. Deviations of routes were assessed within the NRA and were observed to be minor, noting that the site was amended post PEIR to the benefit of shipping and navigation (i.e., deviations decreased). e) Deviations of routes were assessed within the NRA (APP-111) and were observed to be minor, noting that the site was amended post PEIR to the benefit of shipping and navigation (i.e., deviations decreased).
12.13	The Applicant	**Shipping and Navigation – General** Marine Licence Principles [AS-023] refers to depth reductions from cable protection stating that this must not compromise safe navigation and must not result in a x% reduction in surrounding depth, unless otherwise agreed with NRW. Please can you explain and describe: a) your consultation and engagement approach to depth reductions with MCA, Trinity House and UK Chamber of Shipping; b) the x% reduction in surrounding depth criteria within the MDS.	a) The Project will comply with MGN 654 which requires that any reductions of depth of greater than 5% will be discussed with the MCA, noting Trinity House will also be consulted, and Chamber of Shipping where appropriate. Where required based on this consultation, additional mitigation will be implemented. b) The Applicant notes that MGN 654 states that the MCA would be willing to accept up to 5% reduction in surrounding charted depths referenced to Chart Datum, unless developers are able to demonstrate that any identified risks to any vessel type are satisfactorily mitigated. The Applicant will complete a CBRA during the detailed design phase to confirm the need for cable protection in agreement with NRW and liaison with MCA.
12.14	The Applicant	**Shipping and Navigation – Mitigation** Please can you confirm: a) how the Search and Rescue Response Assessment (prior to commencement of construction) is secured in the dDCO [AS-014]; b) if there are any public right of navigation being extinguished and if so, what provisions are made in the dDCO [AS-014] c) safety zones secured in the dDCO and safety zone distances implemented and monitored on site [APP-055].	a) The 5.4.1 Marine Licence Principles document (AS-023) includes a condition requiring an Emergency Response Co-operation Plan (ERCoP) to be approved by NRW at least 4 months prior to commencement of offshore works. The detailed completion of the plan will be in cooperation with the Maritime Rescue Coordination Centre. The Applicant does not consider it appropriate or necessary to duplicate this condition in the draft DCO. b) No private rights of navigation will be extinguished through the dDCO. A separate safety zone application will be submitted to the SoS once the final layout of the offshore infrastructure is decided. Further details is set out in 7.2 Safety Zone Statement (APP-297). c) As mentioned in 7.2 Safety Zone Statement (APP-297), the Applicant intends to apply to the SoS for safety zones once the final number and

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			precise location of the offshore infrastructure is decided. The Applicant's application would be for safety zones of 500 m around structures during construction, 50 m around structures which are installed but awaiting further works or commmissioning, and 500 m from structures undergoing major maintenance works. This is separate to the DCO process and no safety zones are secured through the dDCO.

2.14 Marine – Natural

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13.1	The Applicant	**Benthic Ecology – Noise** Table 4 of ES Volume 2 Chapter 5 [APP-051] notes that noise impacts on benthic ecology have been scoped out and are not assessed in the Chapter. However, the summary of 'Consultation and Key Issues raised' states "noise pollution on benthic ecology during foundation installation during construction" with no mention of scoping out. The Inspectorate notes that the Scoping Opinion requested at ID 4.3.1 in Table 4.3 states that 'The ES should include information to explain the extent of the likely impact and assess any likely significant effects. The ES should also assess impacts on benthic subtidal and intertidal ecology from noise produced during other construction activities, including installation of the offshore ECR.' Can the Applicant provide this information or justify its omission?	The Applicant has not included an assessment for "noise pollution on benthic ecology during foundation installation during construction", because it is recognized by industry that there is no likely significant effect to benthic ecology resources associated with the impact of noise from construction related activities. There is a scarcity of studies carried out with benthic receptors which constrains an assessment for noise pollution, however it is understood that marine invertebrates are likely to suffer injurious and possibly lethal effects from anthropogenic high intensity noise (for instance piling). It is possible that noise from piling may have similar effects on the eggs/larvae of benthic invertebrates, however the area of ensonification for which this happens is likely to be in the order of meters from the piling location and consequently, the magnitude of this impact is likely to be discernible. ES Volume 2 Chapter 6 (APP-051) recognizes the potential likely significant effect on fish and shellfish species, where the assessment has applied project specific modelling on sensitive fish ecology receptors.
13.2	The Applicant	**Scour protection** The MDS makes no reference to the volume of scour protection assumed in the assessment. The Applicant is requested to provide this information and explain how this has informed the benthic ecology assessment.	The Applicant can confirm that scour protection has been assessed in in the Benthic Ecology chapter of the ES (APP-051) in relation to the area and therefore the footprint of long-term habitat loss that it is likely to incur on benthic habitat features, rather than the volume of scour protection used.
13.3	The Applicant	**Mitigation** Table 12 of [APP-051] states that pre-commencement "A geophysical survey will be undertaken to facilitate the micrositing	The Applicant can confirm that this mitigation will be delivered through the Schedule of Monitoring (APP-311) and is sectured in Condition 36 of the Marine Licence Principles Document (Document 1.24 of the

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		around sensitive habitats such as Sabellaria". The Schedule of Mitigation [APP-310] does not reference geophysical surveys. Can the Applicant confirm how delivery of this mitigation measure would be secured?	Applicant's Deadline 1 submission). Geophysical monitoring will be undertaken across the Project area in which construction is going to take place, with a suitable buffer to be determined in agreement with NRW and the post-consent phase of the Project. The Applicant expects NRW to secure this process through a Marine Licence condition as part of the suite of pre-construction monitoring commitments that would inform micrositing of infrastructure.
13.4	JNCC	**Benthic Ecology** Please confirm or otherwise if you are content with the content and conclusions of [APP-051].	N/A
13.5	The Applicant	**Non-native species** Natural Resources Wales [RR-015] state that they consider that the magnitude of impact from the potential introduction of marine invasive non-native species should be presented as low and not negligible. Please respond to this view and adjust [APP-051] if necessary.	The Applicant can confirm that the magnitude of the impact from the potential introduction of Marine Invasive Non-Native Species (MINNS) is negligible. The Marine Biosecurity Plan which details mitigation applied through the Schedule of Mitigation [APP-310] will ensure that the risk of potential introduction and spread of MINNS is greatly reduced. This is expected to be secured in the Marine Licence (Condition 16 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission)). If the magnitude was changed to Low this would not materially alter the conclusions of the assessment for this impact. Therefore, the Applicant is not proposing to update the application document (APP-051).
13.6	The Applicant	**Biosecurity risk assessment** Natural Resources Wales [RR-015] note the commitment of the Applicant to produce a biosecurity risk assessment to be conditioned within the Marine Licence but recommend that a marine biosecurity plan is kept free standing and separate. Provide your views on this proposal and on the most appropriate regulatory mechanism needed to secure it.	The Schedule of Mitigation (APP-310) stipulates that the Applicant will produce a Project Environmental Management Plan (PEMP) which is to include a Marine Biosecurity Plan. An updated version of the Schedule of Mitigation has been provided as Document 1.18 of the Applicant's Deadline 1 submission). This is expected to be secured in the Marine Licence (Condition 16 of the Marine Licence Principles Document (Document 1.24 of the Applicant's Deadline 1 submission)). The PEMP is expected to be secured as a condition within the Marine Licence. The Marine Biosecurity Plan will be separate to the onshore Outline Invasive Non-Native Species Management Plan that is secured by a requirement in the DCO.
13.7	JNCC	**Fish and Shellfish Ecology** Please confirm or otherwise if you are content with the content	N/A

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		and conclusions of ES Volume 2 Chapter 6, Fish and Shellfish Ecology [APP-052].	
13.8	The Applicant	**Fish Ecology** Natural Resources Wales [RR-015] highlight discrepancies within Table 18 of [APP-052] and also consider that the swim speed for spawning fish fleeing receptors is overstated, leading to unrealistic scenarios for sole, plaice, cod, and whiting. Please comment on these observations and provide an updated Chapter if necessary.	The Applicant has responded directly to NRW on this point in response to Relevant Representation (RR-015) in Document 1.1 of the Applicant's deadline 1 submission and provided a clarification note to NRW which is included within the Applicant's Deadline 1 submission (Document 1.3). Despite this technical query, there is no dispute on the conclusions of the assessment.
13.9	The Applicant	**Fish Ecology** Natural Resources Wales [RR-015] would wish to see further information on how the cumulative impacts to fish populations over multiple spawning seasons from underwater noise arising from consecutive construction activity from several offshore windfarm projects in Liverpool Bay has been considered. Please respond to this request.	The Applicant notes that NRW have requested further information to inform the CEA for the Fish and Shellfish Ecology Chapter (APP-052). The Applicant notes that at the time of writing there was limited information on the proposed offshore windfarm projects within Liverpool Bay. In accordance with the CEA methodology detailed in Cumulative Effects Assessment Methodology (APP-042) the projects were assigned Tiers, based on project details published in the public domain. On the basis on the Tier allocation of the projects considered within the CEA and considering the lack of project information available at the time of writing, it was not possible to undertake a quantitative CEA on fish and shellfish receptors, and instead a qualitative assessment was provided. The Applicant notes, that the onus should therefore be on the forthcoming projects to appropriately consider the cumulative effects on fish and shellfish receptors in line with the Awel y Môr development. See also the Applicant's response to ExQ1.0.19.
13.10	North Wales Wildlife Trust	**Fish and Shellfish Ecology** Table 4 of [APP-052] summarises comments from yourselves and provides comments from the Applicant (pages 63-65) on the following matters: a) Noise impacts on herring; b) Precautionary principle for herring for work in potential herring spawning grounds; and c) Fishing activities within the baseline. Please provide your comments on the Applicant's responses contained within column 3 of Table 4.	N/A

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13.11	The Applicant	**Fish and Shellfish Ecology - Noise** Please confirm the reasoning for the choice of the noise modelling locations for underwater noise (fleeing and stationery) as shown in Figures 8 and 9 of [APP-052].	The Applicant confirms that the noise modelling locations were agreed as appropriate within ETGs for marine mammals and for fish receptors (see the Evidence Plan Report and its supporting appendices (APP-301, APP-302 and APP-303). The locations are deemed appropriate as they consider the range of worst-case effects across the array.
13.12	NRW, JNCC, RSPB, NWWT	**Offshore – General** Are you satisfied that there is no disturbance assessment available to assess other construction activities such as drilling, dredging, vessel activity? If no, please explain your reasons and provide evidence justification.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant notes that ES Chapter 7: Marine Mammals (AS-026) provides an assessment of the impact of disturbance from other construction activities on marine mammals. It is highlighted in (AS-026) para 51 that: *"There is currently no guidance on the thresholds to be used to assess disturbance of marine mammals from drilling, dredging or vessel activity. Therefore, this impact assessment provides a qualitative assessment for these impacts. The assessment is based on the limited evidence that is available in the existing literature for that impact pathway and species combination, where available."* Likewise, ES Chapter 7: Marine Mammals (AS-026) provides an assessment of the impact of disturbance from vessels on marine mammals (1.10.8 Disturbance from construction vessels).

2.15 Public Health and Nuisance

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14.1	The Applicant	**Noise and Soundscape Action Plan and Well-Being of Future Generations (Wales) Act** How have you taken into account the Noise and Soundscape Action Plan Wales 2018 to 2023 and the Well-Being of Future Generations (Wales) Act 2015?	The production of the Soundscape Action Plans is required by the Environmental Noise Regulations, which aims to define a common approach intended to avoid, prevent or reduce the harmful effects of environmental noise. It has a broader focus than simply a reduction in decibels, recognising that the Welsh Government also need to create appropriate soundscapes, meaning the right acoustic environment in the right time and place. Whilst the Well-Being of Future Generations (Wales) Act is clear that its duties only apply to public bodies in Wales in the carrying out of their functions and therefore are not directly applicable to AyM or the Applicant, consideration with regard to AyM is provided below: Section 8.2 of the Noise and Soundscape Action Plan Wales 2018 to 2023, *Integrated pollution prevention and control*, states: *The commonly used methodology for assessing the adverse impacts of industrial noise, BS 4142, was updated in 2014. This standard now requires a broader consideration of the adverse impacts of noise and the context within which emissions occur, in particular:* - *The absolute level;* - *The character of the noise, in particular whether it is tonal or impulsive, which can be as much a feature in any adverse impact as the level; and* - *The nature of the receptor, for example whether there are particular vulnerabilities, and whether the exposure is time-limited.* With regards to the Awel y Môr Offshore Wind Farm (AyM) the OnSS is considered a source of industrial or commercial noise and has been assessed in accordance with BS4142:2014+A1:2019 (which supersedes the 2014 version) within Section 10.12 of the ES. Section 4 of the Noise and Soundscape Action Plan Wales 2018 to 2023, relates to planning for a new development and Section 4.4 refers to *Acoustic Design*, with regards to construction noise Section 4.4.5 States: BS 5228:2009+A1:2014 refers to the need for the protection against noise and vibration of persons living and working in the vicinity of, and working on, construction and open sites. Noise and vibration can cause serious

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			disturbance and inconvenience to anyone exposed to them and to processes and activities in neighbouring buildings. In extreme circumstances vibration can cause or contribute to building damage. BS 5228 recommends procedures for noise and vibration control in respect of construction operations and aims to assist architects, contractors, site operatives, designers, developers, engineers, environmental health officers and planners With regards to the AYM the potential noise and vibration impacts of the construction of the Array, the Landfall, the ECC and the OnSS have been assessed in accordance with BS5228:2009+A1:2014 within Section 10.11 of the ES. With reference to the above it is considered that the Applicant has taken into account the relevant aspects of the Noise and Soundscape Action Plan Wales 2018 to 2023. The Well-being of Future Generations (Wales) Act 2015 (WFG Act) is summarised within Section 2.1 of the Noise and Soundscape Action Plan Wales 2018 to 2023 and States: 'Noise policy in Wales now sits, not in a vacuum, but within the cross-cutting policy framework set by the WFG Act. This requires public bodies such as local authorities, local health boards, Natural Resources Wales (NRW), Public Health Wales (PHW) and the Welsh Government to carry out sustainable development. This is the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the seven well-being goals.' The sustainable development principle defined in the WFG Act is a fundamental part of how public bodies and Public Service Boards must now operate. They must act in a manner that seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. It is considered that by taking into account the relevant aspects of the Noise and Soundscape Action Plan Wales 2018 to 2023, the Applicant has also adhered to the requirements of the WFG Act.

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14.2	DCC, CCBC	**Assessment** Are you satisfied with the assessment of operational noise from the turbines and its conclusion in Section 10.5.2 of ES Volume 3 Chapter 10: Noise and Vibration [APP-071]?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant presented the methodology for the operational noise assessment of the turbines to DCC and CCBC at an ETG meeting on the 31 March 2021 (APP-302). In addition, a draft version of the noise and vibration assessment was provided within the PEIR as part of Statutory Consultation with no feedback specific to operation noise from turbines provided by consultees. As no issues or disagreements were raised during this process, the Applicant considered that DCC and CCBC to be content with the approach used. The Applicant has undertaken the assessment in conjunction with the Danish regulations, as the noise predictions for operational offshore wind turbines falls outside the scope of the IoA GPG due to the large separation distances across reflective surfaces resulting in cylindrical spreading. The operational noise assessment is based upon the noise specification of the GE Haliade-X wind turbine as the exact model of turbine to be used at the site will be the result of a future tendering process and therefore an indicative candidate turbine was used. The results of the assessment have shown that the predicted noise emission levels from both the smaller and larger turbines would be below the absolute lower fixed limits set by ETSU-R-97 of 35 dB L_{A90} at the closest receptor to the development.
14.3	DCC	**Assessment** Are you satisfied with the Applicant's decision not to undertake an operational vibration assessment of the OnSS, based on the evidence provided in Section 10.12.5 of [APP-071]?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant provided evidence of why there was not a requirement for an operational vibration assessment of the substation in Section 10.12.5 of the ES chapter (APP-314). No comments were received regarding the requirement for an operational vibration assessment of the substation. As no issues or disagreements were raised during this process, the Applicant considered that DCC are content with the approach used.

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14.4	DCC	**Assessment** Are you satisfied that baseline noise monitoring Location CR1, the location of which is provided by Table 56 and Figure 5 of [APP-071], is representative of the residential buildings both in Rhydwen Farm Mews and the New Pines Holiday Home Park?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant presented the methodology for the baseline noise monitoring to DCC at an ETG meeting on the 31 March 2021 (APP-302). In response DCC requested that Location C1 should be representative of the residential buildings (Rhydwen Farm Mews) of the south of the New Pines Holiday Home Park. Table 30 of the ES shows the general soundscape experienced at Location C1 which consisted of birdsong, distant train noise, local activity and high-altitude aircraft. The Applicant considers that a very similar soundscape to this would be experienced at Rhydwen Farm Mews. This information was included within the PEIR that was provided at Statutory Consultation and no feedback was provided from DCC on the monitoring locations used for the assessment. It should also be considered that the construction noise threshold limits have been based on the results of the baseline survey. The calculated daytime threshold limit at receptors representative of Location C1 equates to the lowest limit (65dB(A)) contained in the relevant guidance (BS5228:2009+A1:2014), and therefore represents a worst-case scenario.
14.5	DCC	**Assessment** Are you content with the use of a tonal penalty approach in the assessment of operational noise levels from the OnSS in lieu of 1/3 octave band data and the defined noise rating level limits arising from the OnSS, specified in Requirement 18 of the draft Development Consent Order (dDCO) [AS-014]?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant presented the methodology for the operational noise assessment for the substation at an ETG meeting on the 31 March 2021 (APP-302). During the discussion DCC requested that 1/3 octave band data should be utilised for the operational noise assessment of the OnSS. The Applicant confirmed with its design consultants that 1/3 octave band data would not be available until detailed design (post-consent), consequently tonal penalties have been applied to the predicted specific noise levels from the OnSS within the assessment.

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			The Applicant applied the maximum tonal penalty correction of +6dB (as stated within Section 9.2 of BS4142:2014+A1:2019) to the predicted specific noise levels. This methodology was presented within the PEIR at Statutory Consultation and no feedback was received from DCC on 1/3 octave band data. With regards to noise rating limits contained in the dDCO, the Applicant based these on a level of + 5dB above the prevailing night-time background sound. The Applicant considered that due to the measured background sound levels being relatively low, specifying limits of 5dB above the prevailing night-time background sound levels is unlikely to cause a change in the baseline ambient noise levels at the nearest NSR's and would be below the WHO Night Noise Guidelines L_{night}, outside level of 40 dB(A) where adverse effects start to occur. This methodology was presented within the PEIR at Statutory Consultation and no feedback was received from DCC on noise rating limits.
14.6	DCC	**Outline Noise and Vibration Management Plan** Are you satisfied that the outline Noise and Vibration Management Plan [APP-314], will adequately control noise and vibration during onshore construction? If not, what amendments would you like to see?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant submitted a draft copy of the outline Noise and Vibration Management Plan (NVMP) DCC alongside the PEIR during Statutory Consultation for comment and, although a request for noise abatement plans was provided, no comments were received on the content of the plan. The outline NVMP has been written in conjunction with relevant policy and guidance to comply with the requirements of the DCO and describes suitable measures and management procedures to control and limit noise and vibration levels, and to minimise disturbance to residents and sensitive receptors as far as reasonably practicable.
14.7	DCC	**Draft Development Consent Order** Are you satisfied with the proposed working hours in Requirement 15 of the dDCO [AS-014] and the proposed process for agreeing	N/A

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		location specific variations? If not, what amendments would you like to see?	
14.8	DCC	**Outline Construction Communication Plan** Are you satisfied with the outline Construction Communication Plan [APP-324]?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. Within its response to Statutory Consultation in October 2022, DCC requested that a Construction Communications Plan be included within the CoCP. In response, the Applicant has provided an outline communications plan within the application (APP-324).
14.9	CCBC, DCC	**Assessment and Controls** Are you satisfied with the assessment of noise from offshore construction provided in [APP- 071] and the provisions to monitor and control it in Requirement 4 of the dDCO [AS-014]?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant considered the noise from worst-case pin piling operations when they are being undertaken at their closest approach to the nearest Noise Sensitive Receptors (NSR's) to the seafront and inland. The Applicant then compared predicted noise levels from the piling operations against the construction noise threshold limits, which were determined during periods of inclement weather and when weather conditions were suitable/neutral. The results of the assessment showed that there was a moderate level of effect at the NSR's located inland when piling operations were being undertaken at night during periods of neutral weather. The Applicant then provided a number of mitigation measures and recommendations which included reference to a suitable DCO requirement which would specify noise limits at the nearest NSR's during neutral weather conditions. The Applicant provided draft copies of the assessment within the PIER provided at Statutory Consultation, in response to which CCBC requested that additional noise monitoring be undertaken. This was discussed with CCBC and carried out in January 2022. With regards to requirement 4 contained in the DCO this provides a noise limit of 50dB(A) $L_{eq,T}$ for offshore construction works during onshore weather conditions at a specified location. The DCO requirements also stated that

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			to determine compliance with this limit associated noise monitoring needs to be undertaken. The noise limit within DCO Requirement 4 has been derived by Applicant in conjunction with the measured baseline ambient sound levels (during neutral weather conditions) and the relevant guidance contained in BS5228:2009+A1:2014. The Applicant has continued discussion with CCBC to clarify the full results of the Jan 2022 noise monitoring and calculation of the proposed threshold presented in the dDCO. The Applicant will continue to discuss this issue with CCBC environmental health department and hopes that agreement can be reached on appropriate measures to put in place during any night time piling activity.
14.10	Sustainable Cymru	**Asbestos Pipe** In your Relevant Representation [RR-036], you make reference to an asbestos pipe. Please provide further information on its exact location and how the effect of the project on it may raise concerns for public health.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has responded to RR-036 (see Document 1.1 of the Applicant's Deadline 1 submission) regarding the water pipe. The Applicant is in discussions with Dwr Cymru regarding the proximity if its assets to AyM proposed infrastructure.
14.11	Glyndwr University (on behalf of Glyndwr Innovations Limited)	**Vibration** a) Please provide the details of the duration, nature/ type and magnitude of vibration that would adversely affect Glyndwr Innovations Limited's operations. b) On their site visit [EV-001], [EV-002] the EXA noted the proximity of the A55 dual carriageway to Glyndwr Innovations Limited. Does this create any issues in terms of vibration to your operations?	N/A
14.12	DCC, NRW	**Assessment** Are you satisfied: a) That a project specific air quality monitoring survey has not been carried out? b) With the approach adopted for the consideration of cumulative construction dust impacts in Section 11.13 of ES	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. Throughout the course of completing the EIA, consultation with statutory consultees was undertaken by the Applicant at a number of stages to

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		Volume 3 Chapter 11: Air Quality [AS -030]? c) That all relevant receptors have been identified? d) With the Applicant's assessment of road traffic effects and that there is no proposal to use dispersion modelling to quantify the resultant impact on critical loads and/ or critical levels? e) With the assessment of construction dust impacts on ecological sites? f) That the screening of traffic trips is in accordance with current guidelines and legal judgements? And g) With the assessment of the potential health impacts from PM10 of NRMM in Section 11.10.1 of ES Volume 3 Chapter 11: Air Quality [AS-030]?	agree upon the extent and scope of the air quality assessment. This comprised: ▲ Submission of a Scoping Report to seek a Scoping Opinion; ▲ AyM Evidence Plan (Human Environment Expert Topic Group (ETG-5)) process, comprising discussions with NRW and DCC; and ▲ Statutory Consultation (Section 42) that was accompanied by a PEIR that included a draft air quality chapter setting out the methodology, baseline data and assessment conclusions. As part of the Human Environment ETG, a PEIR Method Statement (SLR, 2021) was issued to NRW and DCC on 23rd June 2021 to provide an update on the proposed approach and assessment methodology for the PEIR Air Quality chapter. Specific questions were provided by the Applicant within the PEIR Method Statement (SLR, 2021) in order to seek agreement on assessment matters. NRW provided a formal response to the questions raised and agreed with the proposed methodology (NRW, 2021). Consultation comments provided by DCC and NRW throughout the course of the pre-application stage are summarised within the ES Volume 3, Chapter 3.11: Air Quality (AS-030). Table 4 of Volume 3, Chapter 3.11 provides a summary of consultation comments received to date relating to Air Quality, and associated responses. The approach to the air quality is in line with established best practice for appraising the onshore elements of offshore wind farms across the UK and is consistent with approaches adopted for assessment submitted and approved by DCC in support of other development.
14.13	DCC	**Ancient Woodland** Are you satisfied that the proposed works will not have a detrimental effect on Ancient Woodland?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. Throughout the course of completing the EIA, consultation with statutory consultees was undertaken by the Applicant at a number of stages to agree upon the extent and scope of the air quality assessment. This comprised: ▲ Submission of a Scoping Report to seek a Scoping Opinion;

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			▲ AyM Evidence Plan (Human Environment Expert Topic Group (ETG-5)) process, comprising discussions with NRW and DCC; and ▲ Statutory Consultation (Section 42) that was accompanied by a PEIR that included a draft air quality chapter setting out the methodology, baseline data and assessment conclusions. The extent of air quality impacts associated with AyM on Ancient Woodlands (and supporting methodologies) considered within ES Volume 3, Chapter 3.11 (APP-072), as agreed with DCC and NRW, comprised the following: ▲ Temporary ecological impacts associated with the generation of dust from proposed construction/ decommissioning activities; and ▲ Temporary ecological impacts associated with the generation of road traffic volumes on the local road network from proposed construction/ decommissioning activities. No further impacts were considered, as agreed with DCC and NRW. A qualitative assessment of the potential dust impacts associated with worst-case construction activities was undertaken in accordance with guidance provided by the Institute of Air Quality Management (IAQM, 2016). The extent of construction activities (and their associated dust emission magnitude potential) and sensitivity of the surrounding area (human and ecological receptors) are taken into account into inform the risk of potential impacts. The risk of impact is then used to determine proportionate mitigation requirements, whereby through effective application, residual effects are considered to be not significant. Areas of AW were found to be within 20 m and/ or 50 m of potential dust generating activities. Onshore construction activities were found to be at worst medium risk in relation to ecological designations. A series of mitigation measures proportionate to the level of risk, as identified by IAQM guidance (IAQM, 2016), were recommended to ensure that any potential impacts arising from any onshore construction works are minimised and, where possible, completely removed. These measures are included in the Outline Air Quality Management Plan (oAQMP) (APP-315). A screening assessment of potential impacts associated with construction generated vehicle flows on sensitive ecological receptors has been

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			undertaken in accordance with guidance provided by IAQM (IAQM, 2020). Three AWs are located within 200 m of the proposed main routing arrangements for all potential construction scenarios assessed. Road traffic flows for all potential scenarios are observed to be below the IAQM prescribed screening criteria (IAQM, 2020). Whilst assessing impacts on local ecological designations, it is appropriate to assess developmental trips in isolation. This approach has been agreed formally with NRW via the ETG process, as well as on other projects within the development locale such as the Elwy Solar Energy Farm (Air Quality Consultants, 2020). As such, impacts on ecological receptors can therefore be screened out and effects are not considered to be significant. No further assessment is required. In relation to potential impacts associated with decommissioning activities, these are not anticipated to exceed the construction phase worst-case criteria assessed, and impacts are likely to be lesser in comparison.
14.14	DCC	**Mitigation and Requirements** Are you satisfied with the draft dust management plan, which is part of the outline Air Quality Management Plan [APP-315] and that the draft requirements in the dDCO [AS-014] on this matter are sufficient?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. Throughout the course of completing the EIA, consultation with statutory consultees was undertaken by the Applicant at a number of stages to agree upon the extent and scope of the air quality assessment. This comprised: • Submission of a Scoping Report to seek a Scoping Opinion; • AyM Evidence Plan (Human Environment Expert Topic Group (ETG-5)) process, comprising discussions with NRW and DCC; and • Statutory Consultation (Section 42) that was accompanied by a PEIR. that included a draft air quality chapter setting out the methodology, baseline data and assessment conclusion. An outline Air Quality Management Plan was also provided alongside the PEIR. Mitigation measures included within the draft dust management plan are based on the outcomes of the IAQM construction dust assessment (IAQM, 2016), applied as part of Volume 3, Chapter 11 (AS-030). These measures are proportionate to the scale and extent of potential unmitigated impacts from anticipated construction activities relating to human health,

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			nuisances and harm to ecological receptors. Following implementation, residual effects are considered to be not significant. DCC in its response to Statutory Consultation, agreed that a dust assessment is necessary. Following application,
14.15	The Applicant	**Onshore Substation** The ExA note the potential for the OnSS to be gas insulated (GIS). Are there any proposals to use sulphur hexafluoride (SF6) gas? If so, how will it be controlled to avoid a risk to public health or damaging the environment?	SF6 is commonly found in onshore substations, offshore substations and in the switchgear located on certain wind turbines. It will not be used in any other locations or equipment at Awel y Môr. Detailed design decisions will be made after consent, based on the best technologies available at the time. Switchgear technology is evolving. SF6 is commonly used in GIS (gas insulated switchgear) technologies, and these are one of the options that Awel y Môr is considering. Alternatively, we may use AIS (air insulated switchgear), or we may use GIS with a different gas. SF6 gas has many advantages but also several disadvantages. For this reason, the use of SF6 is very tightly controlled and regulated. The control of SF6 gas will be in line with the following regulations and standards: • EU Regulation No.517/2014 (Retained) and the UK Fluorinated Greenhouse Gases Regulations 2015 working with fluorinated gases; • BS EN 62271-4:2013 High-voltage switchgear and control gear. Handling procedures of sulphur hexafluoride (SF6) gas and its mixtures; • Energy Networks Association 2013 ER G69 Guidance on working with sulphur hexafluoride; • BS EN 60376:2005 Specification of technical grade sulphur hexafluoride (SF6) for use in electrical equipment; • BS EN IC 60480:2004 Guidelines for the checking and treatment of sulphur hexafluoride (SF6) taken from electrical equipment and specification for its re-use; • The Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR); and • HSE guidance document HSG230 - keeping electrical switchgear safe. **Equipment Operation and Maintenance**.

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			To prevent leaks (and hence minimise risk of damaging the environment), all equipment will be maintained in line with original equipment manufacturer's instructions. Only personnel trained and competent under EU Regulation No.517/2014 (Retained) and the UK Fluorinated Greenhouse Gases Regulations 2015, will be allowed to operate and maintain equipment containing SF6. In the rare event of a leak occurring, automatic monitoring systems will be used to identify the leak. Any leaks will be repaired as soon as reasonably practicable after discovery. Appropriate safe systems of work will be used to ensure employees are protected from the hazards associated with this type of work. To avoid a risk to public health, only trained and competent persons will be permitted to access areas where equipment containing SF6 is located. These areas will be secured in such a way as to prevent unauthorised access in compliance with the ESQCR regulations 2002. **Records an Auditing** Locations that have equipment containing SF6 will hold a register, recording the equipment containing and the quantity of SF6 used. The location will produce a decommissioning plan to deal with this equipment at the end of life. The location SF6 register will also keep records of any leaks and repairs including the amount of SF6 used during the operational life. Any repairs or leaks will be managed to ensure equipment leakage rates remain under the maximum rates per year, in accordance with relevant regulations. Leakage rates per year will be linked to the gas volume contained in equipment as stated by the original equipment manufacturer. **Disposal and End of Life Plan** Where possible SF6 will be re-used in accordance with the relevant standards. Where it is not re-useable, it will be recovered and then transported and recycled or destroyed by licensed companies. During decommissioning, gas will be recovered from equipment by trained and competent personnel.
14.16	The Applicant	**Onshore Substation Lighting** What lighting is proposed for the OnSS during its operation? Which areas would be permanently lit and which only when required?	Within the Onshore Project Description (APP-062) the Applicant sets out operational lighting requirements. The OnSS will not be manned, and lighting will only be required during O&M activities (paragraph 189). Table

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		Please provide the reasons for each. What assessment has been made of the impact of the proposed lighting regime on receptors?	19 sets out the MDS for the O&M phase of AyM, that being approximately one visit per week, rising to a daily visit for a two-week period during planned annual maintenance. Directional lighting for safety and security and task specific external lighting may be required on a very infrequent basis, for example should a visit occur at dusk over winter months, but the liklihood is a more appropriate time of day would be used. On this basis operational lighting has not been assessed.
14.17	PHW, DCC	**Assessment** Are you content with the assessment of the potential impacts of the project on health due to electromagnetic radiation during operation set out in Section 12.10 of ES Volume 3 Chapter 12: Public Health [APP-073]?	N/A

2.16 Project Description and Site Selection

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16.1	The Applicant	**Project Description** The project overview indicates construction surveys and works in 2024 and 2025, and the indicative construction programme shows offshore preconstruction works (survey/clearance etc) commencing at Year 1 Q1. Please can you confirm the year(s) for the preconstruction works impact assessment and define the scope of "etc" statement.	Surveys to inform the finalisation of the detailed design are expected to be completed before the indicative construction start date of Q1 2026 as part of the iterative design process to inform the final scheme design post-consent, however some pre-construction surveys may continue into the construction phase in respect of the various elements of the project which may commence at different times during the construction phase and therefore may overlap with one another. For example, pre-construction surveys for foundations may be completed before pre-construction surveys for the export cable corridor. For the purposes of assessment, an indicative construction start date of Q1 2026 has been assumed, when pre-construction works including seabed preparation, sandwave clearance, boulder clearance, UXO clearance and debris removal. This is further explained in Section 1.6 of the Offshore Project Description chapter of the ES (AP-047).
16.2	The Applicant	**Project Description** For the indicative construction programme (Onshore) works please confirm activity and duration at i) land fall, ii) onshore ECC and iii) OnSS for: a) Pre-commencement work b) Preliminary works c) Reinstatement	The Applicant is unable to provide additional programme detail in respect of the high-level activities at this stage. The indicative construction programme has been developed for the purposes of EIA and further detail is unavailable until the detailed design phase post-consent.
16.3	The Applicant	**Project Description** Please provide indicative temporary construction compound annotated plan layout with dimensions for areas of: a) 10,000m2; b) 22,500m2; and c) 37,500m2.	The Applicant has provided indicative temporary construction compound annotated plan layouts in Appendix E of this document.
16.4	The Applicant	**Project Description** For the Onshore Sub Station construction area please provide annotated indicative drawings of: a) cross sections along northern and southern points of platform (in a generally east-west direction) showing existing and proposed features, levels and tie-ins;	Detailed design drawings such as these will not be available until post-consent when the Principal Contractor is appointed. Indicative layouts can be found in the Onshore Project Description (APP-062) and visualisations can be found in the Landscape and visual Chapter Appendix (APP-181 to APP-189).

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		b) longitudinal section (in a generally north -south direction) showing existing and proposed features, levels and tie-ins.	
16.5	The Applicant	**Project Description** Please confirm or define the proposed electrical output of the project	Paragraphs 14-16 of the Offshore Project Description (APP-047) set out the Applicant's position on the electrical capacity of the Project. The electrical capacity for the project is not considered a material factor in determining the MDS for environmental assessments, as it is the physical dimensions of the infrastructure that have meaningful implications for EIA. In line with other recently issued DCOs (e.g. East Anglia ONE North Offshore Wind Farm), the dDCO (AS-014; Document 1.8 of the Applicant's Deadline 1 submission) sets out the minimum gross electrical capacity of the project (defined in the description of Work no. 1). For Awel y Môr this is a gross electrical output capacity of over 350 megawatts and therefore constitutes a Nationally Significant Infrastructure Project under section 15(3B) of the Planning Act 2008.
16.6	The Applicant	**Project Description** Please supplement Figure 30: Indicative AIS Substation Layout and Figure 31: Indicative GIS Substation Layout Onshore [APP-062] with an annotated draft plan drawing of each substation layout with buildings and structures labelled and key dimensions noted.	The Applicant has supplemented Figure 30 and Figure 31 with annotations showing labels for building and structures, with key dimensions. This is in Appendix F, Annotated Draft Substation Layout Plan.
16.7	The Applicant	**Site Selection** Table 2 of ES Vol 1 Chapter 4, Site Selection and Alternatives [APP-044] notes in a summary of Crown Estate extensions criteria that "Other than the existing wind farm, the proposed extension must not encroach within a radius of 5km of any other wind farm unless the tenant of any such wind farm confirms its agreement in writing to The Crown Estate". The proposed development compliance states in response that "the nearest wind farm to the…project is the Rhyl Flats offshore wind farm, which is greater than 5km away and is also operated by RWE" [RR-020] from DLA Piper on behalf of Rhyl Flats Wind Farm Limited effectively objects to the proposed development. Please confirm: a) the distance between the proposed development and Rhyl	A) As described in Table 9 of the Other Marine Users and Activities chapter of the ES (APP-058), the Rhyl Flats array is located 5.1 km from the proposed AyM array at its closest point and therefore in compliance with the TCE extensions criteria. B) Rhyl Flats operational and maintenance activities are undertaken by RWE Renewables UK Swindon Limited, under a Management Services Deed with Rhyl Flats Wind Farm Limited. Such activities consist of regular planned maintenance, servicing, plant condition monitoring and unplanned repairs.

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		Flats b) whether Rhyl Flats is operated by RWE.	
16.8	The Applicant	**Site Selection** Figure 10 of [APP-044] show the area of search for the proposed OnSS. This figure shows as a block the proposed extension to the existing National Grid substation on the west side of the existing substation. Did the location of this extension have an impact on the proposed location of the OnSS?	The land parcel to the west of the existing substation was considered as a potential location and was termed Zone 1 (APP-046). Zone 1 was not taken forward primarily due to the potential impact on nearby residential receptors in terms of visual amenity, and critically the likelihood that mitigation would not be achievable given the local topography constraints. Although the existing NGET substation influenced the available space, the anticipated extension to the NGET substation did not directly influence the early shortlisting process and identification of possible substation zones. Further detailed information with regards the other environmental and engineering constraints identified for Zone 1 is available in APP-046.
16.9	The Applicant	**Site Selection** Table 10 of [APP-044] details the long list of proposed cable corridor options. Cable corridor option 5c is noted but this option does not seem to appear on the associated Figure 19 of the same document. Please provide further details and an updated Figure 19 if necessary.	Option 5c is more clearly illustrated in Figure 4 of Site Selection and Alternatives (SSA) Shortlisting Outcomes Report (APP-046). As can be seen Option 5c aligns with route 6c and as such was not illustrated clearly in Figure 19 of APP-044. The Applicant does not consider it necessary to further revise Figure 19 of APP-044 for this reason.
16.10	The Applicant	**Site Selection** Table 10 of [APP-044] details the long list of proposed cable corridor options. The summary of analysis for Cable corridor proposal 5b states that "option not progressed following parallel analysis screening this route from further consideration" Please expand on this reasoning/analysis.	Route 5b, as illustrated in Figure 19 of APP-044, initially occupied the same geographic location as 5a before branching to join route 6a, progressing south and across the Clwyd. The parallel analysis referred to is the analysis of Landfall 6 and associated routes, which were discounted for the reasons presented in APP-044 and associated annexes, of which Site Selection and Alternatives (SSA) Shortlisting Outcomes Report, notes Landfall 6 was not progressed for reasons associated with HDD at landfall.
16.11	The Applicant	**Site Selection** Table 11 of [APP-044] details stakeholder feedback on various proposed cable routes, including options 5a and 5c. Subsequent paragraphs contain the reasoning for the selection of route 5a for the purposes of the PEIR. However, route 5c does not appear to be mentioned at all within such reasoning.	Section 5.3.1 of the Site Selection and Alternatives (SSA) Shortlisting Outcomes Report (APP-046) provides further detail with regards the rationale for why other routes, including Option 5c, were not progressed. In summary Option 5c was not taken forward due to carrying more engineering and environmental constraints than any other option, including significant engineering risks associated with the River Elwy HDD. Environmental risks include, but were not limited to noise sensitive

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		Please explain and expand if necessary on why route 5c was not progressed.	properties, and interactions with UK Habitats of Principal Importance including broadleaved woodland and a range of protected species, issues which are not present at the River Clwyd crossing.

2.17 Seascape, Landscape and Visual

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17.1	DCC, IoACC, CCBC, GC, FCC, SNP, NRW	**Assessment** Please confirm whether you are satisfied with: a) the study area; b) the Zone of Theoretical Visibility; c) the viewpoint locations selected; and d) the extent of assessment of these viewpoints, as identified within ES Chapter 10: Seascape, Landscape and Visual Impact Assessment (SLVIA) [AS-027]. If not, please explain the reasons for this.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. a) The 50km radius study area was agreed through the scoping process at ID 4.10.2 of the Scoping Opinion (APP-295). b) The Zone of Theoretical Visibility (ZTV) has been prepared for the agreed study area. c) The viewpoint locations were agreed through Expert Topic Group (ETG) meetings in advance of the Section 42 consultation. Following the receipt of consultation responses further viewpoints were added and submitted in the ES. This process is set out in the Evidence Plan and its Appendices (APP-301, 302, 303). d) The extent of the assessment of the viewpoints was agreed through expert topic group meetings in advance of the Section 42 consultation. Following the receipt of consultation responses further assessment was included in the ES. This process is set out in the Evidence Plan and its Appendices (APP-301, 302, 303).
17.2	DCC, IoACC, CCBC GC, FCC, SNP, NRW	**Assessment** Please confirm whether you are satisfied with: a) the Applicant's SLVIA methodology; and b) its assessment of effects on seascape character, landscape character and visual amenity. If not, please explain the reasons for this.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Scoping Opinion (APP-295) includes information on the degree to which the methodology was agreed at that stage in the process. Further agreement of aspects of the methodology is set out the Evidence Plan and its Appendices (APP-301, 302, 303), which records the consultation process. Land Use Consultants carried out a review of the SLVIA (and LVIA) on behalf of the North Wales Local Planning Authorities. They note at paragraph 2.3 that 'Offshore SLVIA. 'The methodology for the offshore SLVIA is set out in Volume 4, Annex 10.1 of the PEIR. The approach is clearly set out, and grounded in the principles of

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			GLVIA3, the industry standard guidance on the topic. The components that inform each stage of the assessment, leading to judgements of sensitivity, magnitude and impact significance, are appropriately explained. Definitions are provided for the levels of magnitude of change. Table 4 presents a significance matrix, though it is noted this is used as a guide only. Section 1.2.9 notes that duration and reversibility of the development do not inform magnitude of change, as GLVIA3 recommends, but rather provide context to the findings of significance. While this diverges from GLVIA3 guidance, in practice this approach is quite common, and is unlikely to affect the findings of the SLVIA.'
17.3	DCC, IoACC, CCBC, GC FCC, SNP, NRW	**Assessment** The SLVIA methodology provides for moderate adverse effects to be classified as either 'significant' or 'not significant' based on professional judgement. **DCC/IoACC/CCBC/GC/FCC/SNP/NRW** - Please confirm you are satisfied with this approach? **The Applicant** - Please further justify the instances where moderate adverse effects are considered 'not significant' as the precise reasons for this are not clear to the ExA.	In accordance with the Methodology set out in Annex 10.1: SLVIA Methodology (APP-112) Professional judgement has determined that the Moderate effects on VP 22, 36, 44, 66 and 67, the settlement of Llanddona, a section of the WCP Section H – Lavan Sands, SNP LCA 01 – Northern Uplands, LCA C9 and SNP Special Quality Diverse Landscapes are non-significant. This assessment finding generally relates to the fact that the Development would be seen within a context that includes development characteristics as part of the intervening and surrounding seascape, landscape and views. The assessments of these receptors and viewpoints all lie on the lower levels of Moderate effects that result from Medium-High sensitivity combined with a Medium-Low magnitude or Medium-Low sensitivity combined with a Medium-High magnitude.
17.4	The Applicant	**Assessment** [AS-027] notes on numerous occasions that the susceptibility to change of receptors is moderated by distance from the array area. Please further justify this noting that 'distance' does not appear to be a factor for 'susceptibility to change' in Annex 10.1: SLVIA Methodology [APP-112].	Annex 10.1: SLVIA Methodology (APP-112) notes the following at para. 17 which relates to Seascape/ landscape susceptibility to change: "In GLVIA3 it is made clear in paragraph 5.41 that in Landscape and Visual Impact Assessment (LVIA) the assessment of susceptibility must be '*the individual assessment of the susceptibility of the receptors in relation to the change arising from the specific development proposal.*' Susceptibility of a receptor to the development proposed must therefore be influenced by the

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			relationship of the receptor to the development proposed – will it directly alter the features and elements that define its seascape/ landscape character or will the changes occur as part of a wider visual influence that may also include many other features as part of the context of the seascape/ landscape character receptor in question? The location of the development proposed relative to the receptor being considered is therefore of relevance to susceptibility of seascape/ landscape character." Annex 10.1: SLVIA Methodology (APP-112) notes the following at para. 49 which relates to visual susceptibility to change: "In LVIA the need to consider susceptibility to the specific proposal rather than susceptibility in general is emphasised in paragraph 3.24 of GLVIA3. Therefore, the visual relationship of the Development to the viewer is also of relevance in determining the susceptibility of the visual receptor." The Applicant considers that distance is relevant when considering the relationship between the receptor and the Development and the susceptibility of the receptors to it.
17.5	SNP, NRW	**Assessment** SNP [RR-006] and NRW [RR-015] raise concerns around under-reporting of significant effects. Please identify specifically where your concerns lie, with supporting reasons for this.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has engaged with NRW through post DCO application consultation in order to review and understand aspects of NRW (RR-015). It is understood that NRW will provide further feedback at Deadline 1.
17.6	SNP	**Assessment** SNP's RR [RR-006] makes reference to visual impacts from specific points within the National Park, such as from Carnedd Llywelyn and the Carneddau as a whole. Noting that VP 10 [APP- 239] is from Carnedd Llywelyn and VP 38 [APP-267] is from Foel Fras: a) is SNP satisfied that these viewpoints are representative of this part of the National Park (ie the Carneddau); b) does SNP agree with the Applicant's assessment that residual effects from these	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. SNP was party to the agreement of the viewpoints during the expert topic group meetings. Foel Fras was suggested by NRW as being representative of the area in addition to Carnedd Llywelyn. This process is set out in the Evidence Plan and its Appendices (APP-301, 302, 303).

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		viewpoints would be moderate adverse and significant; and c) does SNP agree with the Applicant's assessment that residual effects on the SNP Landscape Character Area (LCA) 02: Carneddau Range would be minor-moderate adverse and not significant?	
17.7	SNP, NRW, GC (if relevant), CCBC (if relevant)	**Assessment** Please confirm: a) whether you agree that the relevant special qualities of the National Park are limited to 'Diverse landscapes' and 'Tranquillity and solitude – Peaceful areas' as defined in the Cynllun Eryri The Snowdonia National Park Partnership Plan 2020 (SNPPP); b) the status of the SNPPP, noting [AS-027] indicates it is currently draft and under consultation; and c) whether you agree with the Applicant's assessment of effects in respect of these special qualities (Table 10) and its overall conclusion that any harm would not be to such a degree as to affect the integrity and inherent natural beauty of the National Park (paragraph 806).	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. a) In their responses to the Section 42 consultation set out in the Evidence Plan and its Appendices (APP-301, 302, 303) NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities agreed that the Special Qualities requiring detailed assessment were: Diverse Landscapes and Tranquility & Solitude – Peaceful Areas. b) Reference is wrongly made in the ES (AS-027) to the SNPPP being at consultation draft stage. Cynllun Eryri (The Snowdonia National Park Partnership Plan, 2020) was adopted in 2020. Reference is made to the adopted version in the assessments contained in the ES at (AS-027). c) In its response to the Section 42 consultation set out in the Evidence Plan and its Appendices (APP-301, 302, 303) NRW agreed that the likely effects on the Special Qualities Diverse Landscapes and Tranquility & Solitude – Peaceful Areas would be non-significant.
17.8	NRW	**Assessment** [AS-027] reports no significant effects on landscape character areas within the National Park, including for SNP LCA 01: Northern Uplands and SNP LCA 02: Carneddau Range. It also reports no significant effects on the identified special qualities of the National Park. NRW [RR-015] (paragraphs 3.1.2 and 3.1.5) appears to suggest otherwise. Please explain your reasons for this.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. In its response to the Section 42 consultation set out in the Evidence Plan and its Appendices (APP-301, 302, 303) NRW agreed that the likely effects on the Diverse Landscapes and Tranquility & Solitude – Peaceful Areas. Special Qualities of SNP would be non-significant. The Applicant notes that the Development assessed in the ES has reduced in scale from that assessed in the PEIR.

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17.9	NRW, National Trust, The Applicant	**Assessment** **NRW and National Trust** - NRW [RR-015] and National Trust [RR-029] suggest that enhancement of designated landscapes should be considered. Please explain what is meant by this and how you envisage this might be achieved? **The Applicant** - Is this something that you have considered or are willing to consider?	The Applicant is considering the potential for enhancement of designated landscapes and initiated discussions through ETG consultation process prior to the DCO Application being submitted. This is as set out in the Evidence Plan and its Appendices (APP-301, 302, 303). The Applicant is undertaking further engagement with NRW and relevant Local Authorities post-application to understand their positions on this issue.
17.10	The Applicant	**Assessment** [AS-027] identifies 'Diverse landscapes' and 'Tranquillity and solitude – Peaceful areas' as special qualities of the National Park, including in Table 10. However, paragraphs 798 and 806 suggested that 'Diverse Views' are special qualities. Please clarify.	It has been clarified in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission that 'Diverse Views' is not an identified Special Quality in the SNPPP 2020. The Special Qualities that may be affected by the Development are 'Diverse landscapes' and 'Tranquillity and solitude – Peaceful areas'.
17.11	NRW, IoACC	**Assessment** Do you agree that the relevant special qualities of the Ynys Môn (Anglesey) Area of Outstanding Natural Beauty (AONB) include 'Expansive views'; 'Peace and tranquillity'; and 'Islands around Anglesey' as reported in [AS-027]? Following on from this, do you agree with the conclusions in Table 7 relating to these and the overall conclusion in paragraph 562 that harm would not occur to such a degree that it would affect the overall integrity of the Ynys Môn (Anglesey) AONB or its inherent natural beauty? Please provide reasons if there is any disagreement.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. In its response to the Section 42 consultation set out in the Evidence Plan and its Appendices (APP-301, 302, 303) NRW agreed that the Special Qualities requiring detailed assessment were: Expansive views, Peace & Tranquility, Islands around Anglesey.
17.12	DCC, FCC, NRW	**Assessment** Do you agree that the relevant special qualities of the Clwydian Range and Dee Valley AONB include 'Tranquillity'; and 'Remoteness and Wildness' as reported in [AS-027]? Following on from this, do you agree with the conclusions in Table 13 relating to these? Please provide reasons if there is any disagreement.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. In their responses to the Section 42 consultation set out in the Evidence Plan and its Appendices (APP-301, 302, 303) NRW and September 2021 SLVIA LUC Review (Draft) on behalf of North Wales Local Planning Authorities agreed that the Special Qualities requiring detailed assessment were: Landscape Character and Quality – Tranquility and Landscape Character and Quality – Remoteness & Wildness.

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17.13	The Applicant	**Assessment** Please confirm whether viewpoint numbers 46, 47, 48 and 51 are omitted purposefully.	Yes, these viewpoints were omitted purposefully. These viewpoints were included during early consultation on viewpoint locations. It was agreed that they should be excluded as other nearby locations were considered and agreed with Stakeholders to be representative. This process is set out in the Evidence Plan and its Appendices (APP-301, 302, 303). Therefore, to avoid confusion potentially arising from the re-numbering of viewpoints, the decision was taken to retain numbering of other viewpoint locations and not re-number.
17.14	The Applicant	**Assessment** [AS-027] uses the terms 'minor-moderate' / 'moderate-minor' and 'moderate-major' / 'major- moderate' interchangeably. Please clarify whether these terms mean the same effect.	Yes - these terms mean the same effect.
17.15	The Applicant	**Assessment** [AS-027] reports some significant and non-significant effects on parts of Seascape Character Area (SCA) 28: Northeast of Anglesey. What would be the effect on SCA 28 as a whole?	The Applicant's methodology (APP-112) does not provide for such an assessment. In accordance with GLVIA3 the SLVIA (AS-027) sets out the geographic extents of the likely significant effect on SCA 28.
17.16	The Applicant	**Assessment** Please explain why no photographs have been provided for some viewpoints (including VP 3 (Puffin Island), VP 26 (Bryn-llwyn), VP 30 (Hilbre Point), VP 31 (Crosby), VP 32 (Formby Point), VP 33 (Southport Pier), VP 35 (Blackpool Tower), VP 39 (North Wales Path), VP 54 (Y Foel), VP 55 (footpath above Cilgwyn Mawr), VP 56 (Pen-y-corddyn-mawr) and VP 57 (Moelfre Isaf)).	The extent of the visualisation materials prepared for each of the viewpoints was agreed through expert topic group meetings in advance of the Section 42 consultation. This process is set out in the Evidence Plan and its Appendices (APP-301, 302, 303). The rationale for this is explained further from paragraph 118 of the SLVIA (APP-027).
17.17	The Applicant	**Assessment** Paragraph 2.35.9 of draft NPS EN-3 states that "… *the layout of the turbines should be designed appropriately to minimise harm*...". [AS-027] states that a north-south grid formation layout reflects the worst-case in seascape, landscape and visual terms. To what degree would alternative layouts reduce / minimise harmful effects and have these been considered?	It is anticipated that the application will be considered against the policies included in the current NPS EN-3 (paragraph 2.6.210) and not the draft EN-3. A variety a possible layouts were reviewed by the Applicant and stakeholders as part of the consultation process as set out in the Evidence Plan and its Appendices (APP-301, 302, 303) in order to ascertain the Maximum Design Scenario to be used to inform the assessment. Whilst alternative orientations may appear differently within views from different points along the coast it is considered that no

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			alternative orientation or layout of the turbines within the array area would fundamentally change the overall findings of the assessment.
17.18	DCC, IoACC, CCBC, GC FCC, SNP, NRW	**Assessment** Do you agree that MDS A and MDS B would have similar effects in seascape, landscape and visual terms, as indicated in paragraph 138 of [AS-027]?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. NRW noted in its Relevant Representation (RR-015) that 'These concerns relate to all Maximum Design Scenarios (MDS) i.e. those relating to MDS of the smaller number of Wind Turbine Generators (WTGs) and the MDS relating to the larger number of WTGs as detailed in the offshore project descriptions (APP-047).
17.19	The Applicant	**Siting** Having regard to Figures 2a [APP-191] and 2b [APP-192], would there be any scope for relocating some or all of the westernmost turbines into other parts of the array area? If not, please explain the reasons for this.	Figures 2a (APP-191) and 2b (APP-192) show the wind turbine generator (WTG) layouts used for Maximum Design Scenario A (MDS A) and MDS B respectively. As set out in para 45 of (AS-027) the final locations of the offshore elements of the Project within the identified Order Limits have not been fixed at this stage, in line with the Rochdale Envelope approach detailed in 2.6.43 of NPS-EN3. The principle that the precise location and configuration of turbines is not known at the time of application is set out in 2.6.42 of NPS EN-3. As set out in (APP-055) the final layout for the Project will be agreed with the MCA and Trinity House post-consent (it is anticipated that the agreement of the layout with the MCA and Trinity House will form a Marine Licence condition as set out in (AS-023)). The final layout will be in accordance with the framework layout commitments presented in (APP-111), which places constraints on how the final array may be laid out to ensure navigational safety. The WTG locations shown in (APP-191) and (APP-192) represent indicative locations for the respective MDSs (i.e. the largest turbines (MDS A) and the largest number of turbines (MDS B)), and not fixed positions of turbines in the final Offshore wind farm to be built. As set out in the Applicant's response to ExQ1.17.25, the scale of the Proposed Development, including, and in particular, the array area, cannot be further reduced to mitigate seascape, landscape

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			and visual effects without a significant reduction in the Project's output. The array boundary has progressively and iteratively been reduced in response to feedback received during EIA Scoping, through the Evidence Plan Process, and PEIR consultation, from an overall area of 107 km^2 during Scoping to 88 km^2 in the PEIR, and 78 km^2 for the final application design; a total reduction of 27%. 'Relocating some or all of the westernmost turbines into other parts of the array area' would simply reduce the size (and therefore the energy output of the scheme) without materially reducing seascape, landscape and visual effects. As set out in (APP-044) the Applicant considers that there is not an alternative layout which would meaningfully minimise harm whilst also delivering the significant benefits of the scheme.
17.20	The Applicant	**Colour Finish** Clarify what colour the wind turbines would be and provide justification for this.	As stated in paragraph 136 of (APP-047), the colour scheme for the blades, nacelles and towers is generally light grey. Specifically, all recent offshore turbines in the UK are painted RAL7035 (light grey). The towers have a semi-gloss 25-45% finish (ISO2813) and the blades have a >30% ISO2813 finish. Wind turbines are mass produced in this colour for an international market which has now become the standardised colour scheme. This colour will match the existing turbines at Gwynt y Môr, North Hoyle and Rhyl Flats. The blades are likely to have red tips and circles painted in RAL 2009 (traffic orange) or RAL 3020 (traffic red) as required by the Civil Aviation Authority (MGN543) to ensure correct visibility to aircraft. This will match the scheme at Gwynt y Môr. The Applicant notes that these red circles on the Gwynt y Môr turbines are sufficiently small that they cannot be seen from shore. As stated in paragraph 62 of [APP-047], the Transition Piece (TP) is typically painted yellow and marked according to the relevant regulatory guidance. Specifically, all recent TPs have been painted in RAL1023 (traffic yellow) as required by Trinity House to ensure visibility to vessels. This will match the scheme at Gwynt y Môr, North Hoyle and Rhyl Flats.

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17.21	The Applicant	**Landscaping** Having regard to paragraph 5.9.23 of NPS EN-1, has the Applicant had regard to potential for off-site landscaping to mitigate adverse effects from more distant vistas?	The Applicant is willing to consider landscape enhancement, which may provide opportunities to offset adverse effects. This may involve off-site landscape proposals being initiated. Otherwise the Applicant considers it likely to be impractical and potentially detrimental to the landscape and visual resource to attempt to mitigate adverse effects on more distant vistas through off-site landscape proposals.
17.22	The Applicant	**Turbine Visibility** Please explain why existing turbines associated with other wind farms are not visible in some of the baseline visualisations but appear in the photomontages (e.g. VP 17 (Penrhyn Castle Terrace) [APP-246])?	As noted in ES Annex 10.1: Methodology (APP-027) at paragraph 132 a small number of photographs were taken in less than favourable weather conditions, including VP17. As noted in paragraph 150 'In some cases, the visibility of the operational offshore wind farms has been enhanced using photomontage techniques. This is in accordance with NatureScot Guidance and is noted on the visualisations.
17.23	The Applicant	**Viewpoint Numbering** Viewpoint numbering on Figure 11 [APP-204] is not clear and is on occasion hidden by other viewpoint numbers, especially around the Llandudno area. Also, the underlying map is not particularly clear. Can these matters be resolved in the interests of clarity?	Due to the small size of Figure 11and the information presented it is recognised that the precise locations of the viewpoints and their numbering is unclear in places. However, several figures including 17.1 and 17.2 provide further clarity on viewpoint locations at a large scale with these shown on Ordnance Survey 1:50,000 mapping.
17.24	The Applicant	**Assessment** Table 2 of [AS-027] identifies that VP 43 (Mynydd y Garn) is a representative viewpoint but no further assessment appears to have been made in respect of it and it is not included in Table 20. Please provide a reason for this or provide an assessment of effects from this viewpoint.	The inclusion of VP 43 in Table 2 as a representative viewpoint was in error. It should have been noted in the Table 2 as an illustrative viewpoint due to its distance from the Development, the character of the intervening landscape, the wide and diverse panoramic views so that the Development is a relatively small component of these. These factors ensure that the effect of the Development on this viewpoint would be non-significant.
17.25	The Applicant	**Mitigation** The ExA recognises that the scale of the Proposed Development has been reduced since pre- application consultations. [AS-027] reports that this is a form of mitigation. As the ExA is considering the Proposed Development as applied for, please: a) justify how and to what extent pre-application changes can represent	a) The pre-application changes are a form of primary measures of mitigation, developed through the iterative design process and embedded into the project design in order to reduce the effects. This forms part of the 'mitigation hierarchy' set out in the Guidelines for Landscape and Visual Impact Assessment Version 3 (GLVIA3).

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		mitigation for the current scheme being assessed; and b) having regard to paragraph 5.9.2.1 of NPS EN-1, what scope is there to reduce the scale of the Proposed Development to mitigate seascape, landscape and visual effects (with very significant benefits in this regard) with only a small reduction in function (e.g. electricity generation output)?	b) The Applicant has considered both the scale of individual WTGs and the project area when considering the scale of the proposed development. With respect to individual WTG sizes, the Applicant has set out the rationale for the size of individual turbines in the WTG Size Technical Note (APP-299). The size of individual turbines has increased over time, and smaller models, such as those used for Gwynt y Mor, Rhyl Flats and North Hoyle, are no longer available on the market. The WTG sizes (in terms of rotor diameter and maximum tip height) that are described in MDS A and MDS B represent the Applicant's view on the anticipated range of size of WTGs that will be available in the timeframe that AyM will be delivered. This principle is captured in 2.6.43 of NPS-EN3, which states that 'In accordance with Section 4.2 of EN-1, the IPC should accept that wind farm operators are unlikely to know precisely which turbines will be procured for the site until some time after any consent has been granted.' The Applicant is therefore unable to reduce the size of the individual WTGs representing the WTG envelope as it would create a significant risk that the Applicant is unable to procure turbines and/or make the project economically unviable. This principle is captured within 2.6.210 of NPS EN-3, where it is noted that 'Neither the design nor scale of individual wind turbines can be changed without significantly affecting the electricity generating output of the wind turbines. Therefore, the IPC should expect it to be unlikely that mitigation in the form of reduction in scale will be feasible.' The Applicant is familiar with NRW's evidence base report prepared by White, Michaels, King for NRW (2019) Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance, Stages 1-3. This is a strategic study developed to inform consultees and developers and to assist in the planning stages for offshore windfarm development. It was published in 2019 after the AyM Area for Lease had been established and agreed with the Crown Estates as part of their Offshore Windfarms Extensions Round. It is hereafter referred to as NRW (2019).

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			In the NRW (2019) Stage 3 report Figure 8 shows the Designated landscapes, their seascape settings and their sensitivity to offshore windfarms off North Wales at Page 34. The identified sensitivity areas are shown on Figure 2c of the SLVIA Figures (APP-193) along with the boundary of the array area. These figures indicate that the array area lies largely within Zone 1, an area defined as being of medium sensitivity to offshore wind farms, and partially within Zone 2, an area defined as being of medium/low sensitivity. Pages 36-39 of the Stage 3 report set out that for sites located within 22.6km of the coast (i.e. all of Zone 1) all turbine sizes being considered in the report (145m – 350m to tip) would be likely to exceed the low sensitivity threshold which would be required in order to ensure that a significant effect would not arise on the AONBs and National Park. However, it is noted that 'existing wind farms may modify the likely impacts'. At a range of less than 14km from the shore it is noted that even turbines below 145m to tip would exceed the threshold of medium magnitude likely to be required to avoid significant effects on the AONBs and National Park whilst at a range of 18.8km turbines of 145-175m would exceed a medium magnitude. Again, it is noted that 'existing wind farms may modify the likely impacts' and this is an important factor when considering actual likely effects against theoretical effects based on distance thresholds. Of relevance to this is that the array area boundary is located at a distance of 10.5 km from the shore at its closest point on Little Orme. The array area extends to the north-east to a range of 22.9km from this point, however the majority of the array area lies within 18.8km of the coast. The Stage 3 report therefore suggests that even turbines of less than 175m would be likely to exceed a medium magnitude based on the analysis undertaken by the NRW (2029) authors. It follows that according to the Stage 3 report the turbines proposed, which range from 282-332m to tip, would be likely to exceed the threshold of a medium magnitude. For Zone 2, which extends out to a range of 44 km from the shore the Stage 3 report notes that turbines of 225-300m would be likely to

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			exceed the low magnitude threshold at a range of 41.6km and that at heights of 300-350m the low magnitude threshold would be exceeded anywhere within 44 km of the coast. There are some recognised limitations with an approach based largely on distances and thresholds drawn from the previous assessments reviewed as part of the NRW (2019) report. The report is not intended to negate the need for SLVIA of individual projects as has been carried out. The SLVIA has identified that significant effects would arise on the nationally designated Isle of Anglesey AONB and Snowdonia National Park, which are located at distances of 17km and 16.6km from the array area respectively. The Applicant's SLVIA assessors concur that a substantial reduction in the WTG dimensions would be required, in combination with a substantial reduction in the horizontal extents, in order for there to be a reduction in the geographical extents of the significant effects on seascape, landscape and visual receptors identified. With respect to the array area the array boundary has progressively and iteratively been reduced in response to feedback received during the EIA Scoping, through the Evidence Plan Process, and PEIR consultation, from an overall area of 107 km^2 during Scoping to 88 km^2 in the PEIR, and 78 km^2 for the final application design; a total reduction of 27%. The useable array area is already less than that of Gwynt y Mor, which is considered to be a densely packed array (at 8.5 MW/km2) when compared with more recently built and designed projects the Applicant has involvement in (Triton Knoll at 5.93 MW/km2 and Sofia at 2.54 MW/km2). In addition, in order to compete successfully in a Contract for Difference auction rounds (CfD ARs), and therefore be deliverable, a project must strive to keep the Levelised Cost of Energy (LCoE) down in order be competitive with other projects. A low LCoE is based on a number of different factors, but the scale of the project is a critical variable as it drives economies of scale, and the density of a project is a key variable as it drives energy yield. Awel y Môr is already at the lower end of project size and upper end of site density

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			than many competing projects (based on the Applicant's predictions of other projects that may compete in the same CfD ARs Awel y Môr) so a large reduction in area would drive significant changes in both project size or array density (or both) and therefore in LCoE, likely making the project economically unviable. The Applicant's SLVIA assessors consider that there would require to be a further substantial reduction in the horizontal extents of the array area, potentially combined with a reduction in WTG height, in order to reduce the geographical extent of the significant seascape, landscape and visual effects and therefore the extent of the receptors that would be affected in this way. NRW advised the following in its Relevant Representation (RR-015): 'In terms of mitigation, a further substantial reduction in array area and/or scale or number of turbines would be required to minimise adverse effects on the Isle of Anglesey AONB and Snowdonia NP. Further consideration of NRW's evidence base "Seascape & visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance" would assist in informing an appropriate reduction.' The large scale of reduction to individual WTG and/or the array area that would be required to have 'a very significant benefit', as stated in 5.9.21 of NPS EN1, would significantly curtail the size of the project and the amount of electricity generated. It is simply not possible to reduce SLVIA impacts with only a corresponding small reduction in function.
17.26	The Applicant	**Lighting** [AS-027] identifies that mitigation for night-time effects would include reducing aviation lights to 200 candela when visibility is greater than 5km. How would this be secured?	The lighting mitigation would be secured via the lighting and marking plan as set out in the Marine Licence Principles document (AS-023 and Document 1.24 of the Applicant's Deadline 1 submission) and the Schedule of Mitigation (APP-310 and Document 1.18 of the Applicant's Deadline 1 submission). In addition, a requirement has been added to Requirement 3 of the draft DCO (see Document 1.8 of the Applicant's Deadline 1 submission) which means that aviation lighting will be operated at the lowest permissible lighting intensity level.

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17.27	The Applicant	**Lighting** Table 16 of [AS-027] sets out further options for mitigation of night-time visual effect. Please provide an update on the feasibility of such mitigation, noting that night-time lighting has been raised as a concern in some RRs (including [RR-015] and [RR-029]).	Table 16 (AS-027) sets out two potential mitigation options that would reduce the aviation lighting from that assessed in the SLVIA. The first is around 'Directional intensity'. The Applicant has established that the reduced intensity above and below the horizontal, which was suggested as mitigation, is a requirement of Air Navigation Order Para 223 para 5 as set out below: '(5) When displayed— (a) the angle of the plane of the beam of peak intensity emitted by the light must be elevated to between three and four degrees above the horizontal plane; (b) not more than 45% or less than 20% of the minimum peak intensity specified for a light of this type is to be visible at the horizontal plane; (c) not more than 10% of the minimum peak intensity specified for a light of this type is to be visible at a depression of 1.5 degrees or more below the horizontal plane.' This would be applicable to both the flashing 2,000cd and 200cd lighting. The MOD 2020. MOD Obstruction Lighting Guidance sets out that 'The MOD minimum standard for offshore developments is a 200cd flashing red light on wind turbines and, because MOD aircraft operate to lower altitudes over-sea (using altimeters) without night vision devices/systems, offshore developments therefore require both visible and IR lighting. In the majority of cases though, this MOD requirement is exceeded by the CAA, Maritime and Coastguard Agency and Trinity House statutory requirements' The MOD does not suggest that there is any conflict with the CAA's requirement for reduced intensity above and below the horizontal. The actual light emitted at different angles above and below the horizontal will not be determined until the lighting is procured from the manufacturer. However, it is clear that there would be a reduced intensity of light emitted and seen from the parts of the

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			land where the light extends out from the WTG hubs at an angle of less than three degrees above the horizontal plane. The assessed hub height for MDS A is 179m above MHWS and for MDS B this is 159m above MHWS so that, as required the light emitted at a horizontal angle from the lit WTGs would be less than 45% and greater than 20% of 2,000cd or 200cd, depending on the visibility conditions. At an angle of 1.5 degrees below the horizontal the light emitted is to be no more than 10% of 2,000 or 200cd. Figure 3 (APP-194) illustrates the landform within the SLVIA study area. This shows that the majority of the area within the Hub Height Aviation Lighting Zone of Theoretical Visibility (ZTV) for MDS A and B Figures 21a-c (APP-223) and 22a-c (APP-224) respectively are located at levels below 150m AOD. Importantly this includes the majority of the Isle of Anglesey AONB. There are, however, some notable high points in the Isle of Anglesey AONB, many of which are represented by viewpoints in the SLVIA. However, with reference to Ordnance Survey mapping, all of these high points have elevations below the 179m above MHWS hub height of the MDS A WTGs whilst many of them are also at elevations below the 159m hub height of the MDS B WTGs so that from all parts of the Isle of Anglesey AONB the light visible would be of lower intensity (by between 45-20%) than was assessed in the SLVIA. Within Snowdonia National Park more complex analysis would be required to ascertain the degree to which the light intensity would be reduced above and below the horizontal within the areas shown in Figures 21a-c (APP-223) and 22a-c (APP-224). In terms of the second potential mitigation option presented in Table 16 [AS-027] further consultation with the CAA and MOD on this matter would take place following DCO consent and during the detailed design stage of the wind farm layout development.
17.28	The Applicant	**Lighting** Paragraph 1407 of [AS-027] states that "The night-time photomontages shown in these figures have been produced to show 2,00cd lighting, to inform the assessment of worst-case effects	This is an error and should read as 200cd lighting. This has been noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).

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		assessed […]". Given the presence of the comma, is this figure 200 or should it be 2000?	
17.29	The Applicant	**Night-time Effects** Paragraph 1559, section 10.17.6 of [AS-027], relates to a summary of night-time effects and refers to significant effects in this regard in respect of Anglesey AONB. However, such effects do not appear to be reported elsewhere in the chapter. Please clarify.	The summary of the night-time effects in section 10.17.6 (AS-027) at paragraph 1559 is not correct. The effects on the Anglesey AONB are correctly reported from paragraph 1445 of (AS-027) as non-significant. This has been noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
17.30	DCC, IoACC, CCBC, GC FCC, SNP, NRW	**Cumulative and Inter-Relationship Assessments** Are you satisfied with the assessment of cumulative and inter-relationship effects in sections 10.13 and 10.14 of [AS-027]?	N/A
17.31	The Applicant	**Cumulative Assessment** Has there been any progression of the Mona, Morgan or Morecambe wind farm projects which might affect the cumulative assessment set out in section 10.13 of [AS-027]?	The scoping reports have been submitted for the Mona, Morgan and Morecambe offshore wind farm projects. Whilst this is the case Developments that are at this stage in the planning process are considered to have Tier 3 level of certainty within the Planning Inspectorate Advice Note Seventeen and as such, the level of certainty is considered insufficient to inform the cumulative assessment. The SLVIAs for these OWF projects would have to include AyM within their cumulative SLVIAs.
17.32	The Applicant	**Assessment** Table 20 of [AS-027] cites "*VP 30: Snowdon Summit*". Please confirm that this should read "*VP 34: Snowdon Summit*"?	We confirm that Table 20 should list VP 34 as Snowdon Summit. This has been noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
17.33	The Applicant	**Assessment** Paragraph 678 of [AS-027] refers to Penrhyn Castle in respect of Wales Coast Path Section I. Is this correct?	This is not correct and paragraph 678 should be deleted from this section. This has been noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
17.34	The Applicant	**Assessment** [AS-027] refers to "*Figure 18.1 (Annex 10.5)*" at paragraphs 598, 613, 1055, 1074, 1268, 1273 and 1351, "*Figure 10.1*" in paragraph 1271 and "*Annex 10.6*" throughout. Are these references correct? Please check and correct these as necessary and as well as any other inaccuracies.	Figure 18.1 should read Figure 17.1 at paragraphs 598, 613, 1055, 1074, 1268, 1273 and 1351. Figure 10.1 should read Figure 17.1 in paragraph 1271. Where visualisations are noted as being included in Annex 10.6 this should read Volume 6, Annex 10.5. This has been noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).

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17.35	The Applicant	**Assessment** Please correct the subheading for 'Denbighshire' between paragraphs 1232 and 1233 of [AS- 027].	The word 'Denbighshire' located between paragraphs 1232 and 1233 of (AS- 027) should be shown as a sub-heading. This has been noted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).

2.18 Socio-Economic

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18.1	The Applicant	**The Well-being of Future Generations (Wales) Act (WBFGW) 2015** In line with the objectives of WBFGW Act 2015, please detail how the Proposed Development seeks to improve the social, economic, environmental, and cultural well-being of both the North Wales regional level and the Wales national level. Please provide a response in line with the seven well-being goals as detailed within the Act.	The Well-being of Future Generations (Wales) Act 2015 (WBFGW, Act 2015) seeks to improve the social, economic, environmental and cultural well-being of Wales through seven well-being goals. Whilst the Act is clear that its duties only apply to public bodies in Wales in the carrying out of their functions and therefore are not directly applicable to AyM or the Applicant, the seven well-being goals are considered with regard to AyM below: **A Prosperous Wales** - ***'an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.'*** As noted in the ES, Volume 3, Chapter 3: Socio Economic Assessment, (APP-064), the construction, operation and decommissioning of AyM has potential to support supply chain businesses located in North Wales and wider Wales. It is estimated that construction activity will contribute to between £8.8 to £11.8 million GVA per annum to the Wales economy, totalling between £44.2 and £59.2 million over the Proposed Development's assumed five-year development and construction phase. Of this, an estimated £8.7 to £15.7 million GVA (or up to £3.1 million per annum) are anticipated to be generated by businesses in North Wales that are engaged in AyM's supply chain. It is estimated that the operational phase of AyM has potential to generate annual GVA impact of between £32 and £38 million to the Wales national economy, totalling to between £793 million and £962 million over the course of its anticipated 25-year operational lifetime. At the North Wales level, the direct and wider supply chain employment supported has potential to generate an annual impact of between £14

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			and £17 million, adding up to between £347 and £424 million over AyM's lifetime. AyM will make a significant contribution to the further development of a *low carbon society within Wales by* providing clean energy for 500,000 homes. *In overall terms AyM will provide approximately 6% of the Wales' electricity consumption, and making a significant contribution towards Wales' target of 70% renewables by 2030, and the ambitious UK's deployment target of 40 GW by 2030 (a figure which was revised upward to 50 GW by 2030 in the April 2022 UK Government Energy Security Statement);* The Applicant has a long history of offering skills and investment within the region, notably through the Grŵp Llandrillo Menai (GyM) community benefit fund. RWE has a commitment to local training and has sought to upskill the future generation through the creation of its Wind Turbine Apprenticeship programme in partnership with GyM. The course has trained 30 new apprentices producing high-quality technicians who are primarily deployed on offshore and onshore wind farms, both locally (North Wales) and across the United Kingdom (UK). ES, Volume 3, Chapter 3: Socio Economic Assessment, (APP-064) sets out the employment generation of AyM, creating an estimated peak employment of over 300 staff per day during onshore construction and between 100 to 300 Full Time Equivalent (FTE) jobs for offshore construction within north Wales. As a result of the war in Ukraine and its impact on global energy markets, sharp focus has been placed on the U.K.'s dependence on imports to heat homes, fuel cars and generate electricity. Energy security is considered to be a primary policy driver, with the need for offshore wind considered to form a critical part of the security of the UK's energy supply. **A Resilient Wales** – ***'A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change.'*** AyM has sought to minimise effects of the scheme through avoidance of ecological impacts through siting and routing, with mitigation and

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			compensation measures proposed where impacts are predicted to occur. In addition, AyM will provide new benefits for biodiversity, through proposed enhancement measures, that are additional to those provided as part of mitigation or compensation measures, although they can be complementary. Proposals to provide biodiversity enhancement have been discussed with NRW and DCC and proposed within the Outline Landscape and Ecology Mitigation plan (oLEMP) (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). Proposals for biodiversity enhancements include: ▲ Creation of five additional ponds/ pools located to the south-east of the OnSS and ongoing management of the new ponds plus two existing ponds; ▲ Creation of five reptile/amphibian hibernacula each measuring at least 1m3 and constructed from on-site materials including soil, logs, brash and stone; ▲ Creation of twenty reptile/amphibian refugia, each comprising brash piles or log stacks, at least 0.25m^3; ▲ Erection of ten bat boxes (additional to those required as compensation for PRFs to be lost) and ten bird boxes, including two pole mounted barn owl boxes; ▲ Scrub management to promote structurally diverse grassland habitat and benefit reptiles and amphibians; ▲ Creation of 9.8ha of species-rich, lowland meadow Priority Habitat and 6.05ha of diverse neutral grassland, plus management thereafter to ensure its nature conservation interest is maintained; and ▲ Creation of 2.96ha of locally native broadleaved woodland (refer to Section 2), including locally sourced black poplar Populus nigra. NRW has confirmed (RR-0.15) that it agrees with the proposed principles for mitigation in the oLEMP (APP-305; Document 1.33 of the Applicant's Deadline 1 submission). A More Equal Wales – 'A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic circumstances)'

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			In addition to the employment and training opportunities outlined above, the AyM project is undertaking community consultation with a view to providing a community benefit fund that, whilst likely to be different in nature and not associated with the planning process, will offer the opportunity for the community to continue to benefit. Opportunities to maximise local socio-economic benefits will be presented in more detail post-consent. The Supply Chain Plan (required under the CfD supply chain process that must be approved by the SoS) will consider the skills and training requirements of AyM, supporting the Act's goal of a more equal Wales which enables people to fulfil their potential, through a legacy of skills and training benefits. **A Healthier Wales – *'A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood'*** The Appraisal of Sustainability undertaken for NPS EN-1 acknowledges that projects, such as AyM, will contribute positively towards health and well-being in the medium to longer term through helping to secure affordable supplies of energy and minimising fuel poverty (para 3.4.2). In addition, the production of renewable energy, in contrast to use of fossil fuel generation, will improve health by reducing concentrations of harmful air pollutants, including fine particulate matter and nitrogen oxides. As noted above, AyM will make a significant contribution to carbon reduction objectives *within Wales by* providing clean energy for 500,000 homes, and so reduce the effects of climate change, which in turn will help to mitigate the adverse effects of climate change (such as heatwaves, flooding and effects of extreme weather). ES Volume 3, Chapter 12: Public Health [APP-073] describes the approach taken in the assessment on potential impacts to public health. Public health is an inherent part of a number of technical areas assessed within the ES, including flood risk, air quality, noise and vibration and traffic and transport. Chapter 12 (APP-073) also provides a further assessment of the potential effects arising from electromagnetic fields (EMF), as these effects are not considered in the wider ES in the context of Public Health. The

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			environmental information and assessment carried out for AyM concludes that there are no significant effects with regard to public health. Maintaining access to recreational resources is considered a contributor to healthier and more fulfilled life. The impacts of AyM upon recreational resources is considered in ES, Volume 3, Chapter 4; Tourism and Recreation (APP-065), which concludes the construction and operation of AyM will not give rise to significant impacts upon onshore or offshore recreation. Walking and other active recreation is a recognised tool for improving health and well-being with AyM interacting with a number of Public Rights of Way (PRoW)and Active travel Routes (ATRs). The potential impact of AyM on health walks has been assessed in ES, Volume 3, Chapter 4; Tourism and Recreation (APP-065). An outline Public Access Management Plan (APP-320) which establishes the principles for management of PRoW and ATRs, to minimise disruption to users, is provided as part of the Outline Code of Construction Practice (outline COCP (APP-312; Document 1.49 of the Applicant's Deadline 1 submission). **A Wales of Cohesive Communities** – ***'Attractive, safe, viable and well-connected.'*** The AyM socio-economic assessment considers the proposed development's impact on local communities along the North Wales coast. In addition, the assessment seeks to measure and quantify the impacts created at the North Wales level and identifies how the AyM project will support local and regional communities by providing jobs and investment training and maximising new investment to support the wider (i.e. North Wales) region and Wales at a national level. The assessment also considers impacts upon community facilities and health services and concludes that any adverse effect would not be significant. With regard to well-connected communities, ES Volume 3, Chapter 9: Traffic and Transport (APP-070) considers the potential for community severance to arise from traffic generated by AyM during the construction phase. This assessment concludes that any effect on community severance would not be significant.

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			A Wales of Vibrant Culture and Thriving Welsh - ***'a society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.'*** The Act seeks to protect Welsh heritage and culture, with this topic being assessed in Volume 3, Chapter 8 (Onshore archaeology and Cultural Heritage) of the ES (application ref: 6.3.8). The assessment has considered potential effects on the heritage significance of heritage assets, including those of the highest designations (such as the Castles and Towns of King Edward I in Gwynedd World Heritage Site). No cases have been identified where substantial harm to the heritage significance of a designated heritage asset would arise, following mitigation, ensuring AyM will not give rise to significant adverse effects upon the rich culture and heritage associated with the North Wales coastline. In further support of Goal 6, the Welsh language has been promoted throughout the consultation process and through the provision of reports also written in the Welsh language. The Applicant has provided a Community linguistics Statement (APP-325) which provides a commitment to promote the use of the Welsh language as part of the proposed development through proposing that all non-technical public-facing signage within the development site during construction and operation will be bilingual. The community engagement undertaken by the Applicant is recorded in the Consultation Report and EIA Evidence Plan Report (APP-024 and APP-301). The Consultation Report includes a Welsh language translation of the executive summary, as is the case with other key documents such as the bilingual non-technical summary and the executive summary to the Planning Statement (APP-298). All key communications materials used to promote the consultation, including digital platforms and materials such as AyM's website and extensive online exhibition, were bilingual also. (The AyM website, a key interface with the public and stakeholders, was set up as a bilingual platform and remains that way.) The measures proposed by the Applicant to maximise the use of Welsh in the text-based visual elements of the AyM project are:

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			▲ To ensure that all non-technical visual elements are either in Welsh or alternatively bilingually in Welsh and English. These should include but not be limited to: ▪ public image texts (e.g. permanent and temporary visual signs, corporate brand, stationery, business cards); ▪ websites and digital services including social media; ▪ advertising and marketing (e.g. broadcast advertising, print-based advertising, recruitment advertising, outdoor advertising on billboards and vehicles, printed publications, exhibition and marketing materials); ▪ communication on request (e.g. paper and electronic correspondence, forms and account documents can be provided in Welsh on request); ▲ To ensure that AyM complies fully with AyM's Welsh Language Policy; and ▲ To ensure that contractors and all supply chain companies also comply with the Awel y Môr Welsh Language Policy. **A Globally Responsible Wales** – ***'A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being'*** AyM provides an opportunity for Wales to make a positive contribution to global well-being with the provision of clean energy generation for 500,000 homes and the contribution to meeting global, European and national targets on carbon dioxide (CO_2) reduction in line with the Climate Change Act 2008 (2050 Target Amendment) Order 2019. Achieving this target is key to the UK's Paris 2015 Commitments, which pledged to achieve at least a 40% domestic reduction in greenhouse gases by 2030 compared to 1990 levels (European Commission 2017b). The proposed AyM project would contribute significantly towards these targets; hence a key benefit of the project is its delivery against targets regarding CO_2 reductions.

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18.2	CCBC, DCC, FCC, GC, IoACC, SNP	**Future Wales – The National Plan (FWNP)2040** Are you satisfied that the design of the Proposed Development contributes to the objectives of FWNP in respect of sustaining and developing a vibrant economy and improving the health and well-being of communities? If not, please explain your reasons.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has summarised in the response to ExQ1.18.1 how it considers AyM will contribute to the social, economic, environmental, and cultural well-being goals of WBFGW Act 2015 which are also applicable to the same objectives from FWNP 2040.
18.3	CCBC, DCC, FCC, GC, IoACC, SNP	**Planning Policy Wales 11 (PPW-11)** Are you satisfied that the design of the Proposed Development contributes to the objectives of PPW-11 in respect of improving the social, economic, and cultural wellbeing of North Wales? If not, please explain your reasons.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has summarised in the response to ExQ1.18.1 how it considers AyM will contribute to the social, economic, environmental, and cultural well-being goals of WBFGW Act 2015 which are also applicable to the same objectives from PPW-11.
18.4	CCBC, DCC, FCC, GC, IoACC, SNP	**Technical Advice Note (TAN) 23: Economic Development** Are you satisfied that the design of the Proposed Development contributes to the objectives of TAN 23 in respect of the generation of wealth, jobs, and income? If not, please explain your reasons.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has summarised in the response to ExQ1.18.1 relating to 'A Prosperous Wales' how it considers AyM will contribute to the objectives of TAN 23 in respect of the generation of wealth, jobs, and income.
18.5	Betws yn Rhos and Llanelian yn Rhos Community Council	**Compensatory Grant** In your relevant representation [RR-008], reference is made to the provision of a compensatory grant to the Community Council area. Please expand on the purpose and need for such a grant.	N/A
18.6	Rostons	**Commercial Operations** In respect of relevant representations made on behalf of your clients ([RR-045] to [RR-051]), please provide additional detail in respect of their concerns on the diversified commercial operations at Cwybr Fawr.	N/A

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18.7	Captain Haddock's Seafood	**Commercial Operations** Please provide more detail in respect of your concern raised in your relevant representation [RR-032] on the effect that the Proposed Development would have on your commercial operations.	N/A
18.8	Carl Davies	**Commercial Operations** Please provide more detail in respect of your concern raised in your relevant representation [RR-060] on the effect that the Proposed Development would have on your commercial operations.	N/A
18.9	The Applicant	**Effects on Local Businesses** Several relevant representations make refence to the potential for adverse effects on their businesses: a) [RR-030] and [RR-031] – harm to operations; b) [RR-044] to [RR-051] – effect on wider economy; and c) [RR-035] – effects due to noise Please respond to these concerns and set out how, if justified, mitigation could be provided for each of the businesses.	Please see The Applicant's response to Relevant Representations (RR-030, RR-031, RR-044 to RR-051 and RR-035) in Document 1.1 of the Applicant's Deadline 1 submission.
18.10	The Applicant	**Manx Vessel Data** [RR-027] and [RR-033] both raise queries as to whether Manx vessel data has not been fully included in the presented datasets. Please confirm whether Manx vessel data has been taken into consideration and if not, explain your position in this regard.	The Applicant confirms that Manx vessels have been considered and refers the ExA to the Applicant's responses to those Relevant Representations (Document 1.1 of the Applicant's Deadline 1 submission). Vessel Monitoring System (VMS) (capturing activity by vessels 15m length and over) and landings (capturing landings by fishing vessels of all lengths) data sourced from the Marine Management Organisation (MMO) and presented in the ES include vessels registered to the following UK administrations and British crown dependencies: England, Wales, Scotland, Northern Ireland, Isle of Man, Guernsey and Jersey. Isle of Man data has been incorporated into MMO UK databases since 2011. Commercial fishing vessels that are registered to the IoM are required to hold both IoM and UK fishing licences. The MMO data presented in the ES therefore provides commercial landing statistics for all vessels registered to UK administrations and crown dependencies. To confirm, the most recently available VMS and landings datasets have been accessed and used to inform the EIA.

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18.11	The Applicant	**Skills and Employment Strategy** [RR-004] suggests that the dDCO is lacking a suitably worded requirement in respect of the approval of a 'Skills and Employment Strategy' and that it is best practice to prepare and submit an outline of such a plan. Please explain your position in this respect.	As noted in Issue Specific Hearing 1 on the dDCO (Document 1.6 of the Applicant's Deadline 1 submission) the Applicant will include a Requirement in the dDCO securing a Skills and Employment Strategy. The updated dDCO submitted at Deadline 1 (Document 1.8 of the Applicant's Deadline 1 submission (Draft DCO (Clean)) includes a new Requirement securing a Skills and Employment Strategy, to be approved by the relevant LPA (DCC) in accordance with the outline Skills and Employment Strategy. The Applicant is currently engaging with relevant IPs and other bodies on the content of the outline Skills and Employment Strategy and will submit the outline strategy into the DCO examination once suitably advanced.
18.12	CCBC, DCC, FCC, GC, IoACC, SNP	**Community Linguistic Statement** Are you satisfied with the content of the Community Linguistic Statement [APP-325] and the conclusion that the Proposed Development would not result in negative impacts on the linguistic, social character and locality? Additionally, are you content that the Proposed Development would not impede the ability to achieve the relevant national and local Welsh language policy objectives? If not, please explain your position in this respect.	N/A
18.13	The Applicant	**Community Linguistic Statement** Paragraph 57 of [APP-325] confirms that all non-technical visual elements of the Proposed Development will be produced in either Welsh or bilingually in Welsh and English. Please confirm how this will be secured? Additionally, contractors and all supply chain companies will need to comply with RWE's Welsh Language Policy. Please provide a copy of this policy.	The Awel y Môr Welsh Language Policy is available from the Awel y Môr project website.
18.14	The Applicant	**Assessment** Please provide a revised plan of 'Figure 1: Study areas used in the socio-economic assessment' and 'Figure 4: Overall deprivation along the North Wales coast' at a scale of 1:50,000 (ES Volume 3, Chapter 3 [AS-034]).	The Applicant has provided an additional plan of 'Figure 1: Study areas used in the socio-economic assessment' and 'Figure 4: Overall deprivation along the North Wales coast' at a scale of 1:50,000 within Appendix N.
18.15	The Applicant	**Maximum Design Scenario** Please provide further justification for the maximum adverse	Disruption to community facilities during the construction phase could be caused by a range of effects on the local environment, particularly visual

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		scenario assessed in relation to disruption to community facilities as the justification provided in Table 23 of [AS-034] is unclear.	impacts on the local landscape, noise and disturbance from traffic related to the project. Therefore, the assessment of these effects draws upon the findings of other ES chapters, including: • Volume 3, Chapter 2: Landscape and Visual Impact Assessment (AS-029); • Volume 3, Chapter 9: Traffic and Transport (APP-070); • Volume 3, Chapter 10: Noise and Vibration (APP-071); • Volume 3, Chapter 11: Air Quality (APP-072); and • Volume 3, Chapter 12: Public Health (APP-073). The justification for the maximum adverse scenario for disruption to community facilities is based on the justification for maximum adverse scenario, and associated methodology used for these other chapters.
18.16	The Applicant	**Construction Employment** Paragraph 219 of [AS-034] states that the Proposed Development has the potential to support 150 FTE jobs per annum, which relates to the 'No Local Port Scenario'. It is further confirmed that the figure of 150 FTE jobs is likely to consist of 30 jobs relating to onshore installation and commissioning, with the remaining 120 involved in offshore construction. Please provide a similar breakdown of job types for the 'Local Port Scenario' FTE figures.	Table 25 of (AS-034) shows the total number of jobs supported by the development and construction of the onshore and offshore infrastructure in North Wales and Wales in each of the port location scenarios. This includes all of the jobs associated with each stage of the development of the wind farm, including design, manufacturing, installation and commissioning. It relates only to jobs accessed by people from Wales and North Wales and does not include jobs accessed by people from the rest of the UK and other parts of the world. Paragraph 219 is concerned with the potential impact of development on healthcare services. In order to do this the assessment needs to estimate: 1. The total number of jobs where activities will be physically located in North Wales (influenced by the selection of the construction port), and 2. The share of these jobs which are accessed by people from outside North Wales (including the rest of Wales, the rest of the UK and the rest of the world) who would need to move to the area, albeit temporarily. It therefore should not be confused with Table 25 which relates only to employment in North Wales and Wales. To address the first point, the assessment focuses only on the jobs associated with onshore and offshore installation and commissioning and excludes other activities which do not need to take place close to the construction port or offshore and onshore infrastructure (e.g., design,

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			development and manufacture). It is estimated that this stage of construction will support 360 FTE jobs in total. Of these, 30 jobs are related to onshore installation and commissioning and 330 jobs are related to offshore construction. This is the same in the local port scenario and the non-local port scenario. The only difference between these scenarios relates to where these jobs are physically located and who accesses them. In the local port scenario there would be more activity physically located in North Wales, which would result in a higher influx of construction workers in to the area and therefore greater demand for healthcare services. In the 'No Local Port Scenario', most activities would take place outside North Wales and there would be a minimal influx of workers into the area. The main activity that would take place in North Wales in this scenario would be installation and commissioning of onshore infrastructure (30 jobs). The opening sentence in paragraph 219 can be clarified as it currently states that installation and commissioning activity will support 150 FTE jobs per annum in the local port scenario. These only relate to jobs which are expected to be taken by UK residents. If those jobs taken by non-UK workers are also included, the total number of jobs is 360. Based on the modelling assumptions for the local port scenario, around 15 of these jobs are expected to be taken by North Wales residents, c. 30 would be taken by residents from other parts of Wales, 105 by residents from the rest of the UK (outside Wales), and the remaining 210 by people from outside the UK. Paragraph 224 of AS-034 states that the assessment considers the impact of 360 workers on healthcare provision. This was an error as 15 of these workers are expected to already live in North Wales and would not generate additional demand for healthcare. Therefore the assessment should consider the impact of 345 workers. This does not alter the findings as this would still result in a non-significant effect. Additional demand for healthcare services could come from any of those workers who are not currently living in North Wales. However it is expected that most workers from other parts of Wales and the UK would be unlikely to require GP services unless they moved to North Wales for a long period of time. Most are only likely to stay in the area for a short period of time

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			and would continue to be registered with their GP at their home address. Similarly, not all of the non-UK based workers would wish to, or need to, register with a GP on a temporary basis. Many will not be based in the local area long enough to merit registering with a North Wales GP, while others will simply choose not to even if they are based here for longer spells. These corrections have been highlighted in the Application Errata List (Document 1.4 of the Applicant's Deadline 1 submission).
18.17	The Applicant	**Construction Employment** Paragraph 291 of [AS-034] refers to an additional 210 FTE jobs which are likely to be required to support offshore construction. It is stated that these roles are likely to be held by non-UK based workers, although they will reside in the UK during construction. Have these additional 210 FTE roles been included in the assessment of the effect of construction on community facilities, the economy and employment? If not, please explain your position in this respect.	The assessment of the impact on community facilities (other than healthcare services) is focused on direct effects as a result of severance of access routes, noise and vibration, and visual impact. This did not include the indirect effects arising from additional demand from non-local workers (i.e. from outside North Wales). This approach was presented to consultees at a Human Environment Expert topic Group (ETG 5), meeting on the 5th May 2021 and was used for the socioeconomic assessment presented in the PEIR as part of Statutory Consultation with no issues or disagreements raised. Furthermore, there is very limited information available on the capacity of these other community facilities (e.g. churches) and these do not face capacity constraints in the same way GP surgeries do. In line with other assessments undertaken for other offshore windfarms (including Hornsea 3[ii], Hornsea 4[iii] and Sheringham Shoal & Dudgeon Extension Project[iv]s), these jobs are associated with contractors and workers that are from outside the UK and so are not included in the assessment of effects on the economy and employment of North Wales. Whilst these non-local workers will spend locally, these types of induced personal expenditure effects have not been modelled as part of the assessment. This is because these types of effects would be small scale and very difficult to estimate with any certainty at a local level This would depend on a wide range of factors which are unknown, including their length of stay in North Wales, their salary levels and expenditure patterns.

[ii] Orsted, 2018, Hornsea Project Three Offshore Wind Farm, Environmental Statement: Volume 3, Chapter 10 – Socio-economics.
[iii] Orsted, 2021, Hornsea Project Four: Environmental Statement (ES) Volume A3, Chapter 10: Socio-economics.
[iv] Equinor, 2022, Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Environmental Statement Volume 2 Chapter 27 - Socio-Economics and Tourism.

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18.18	The Applicant	**Construction Employment** Are the employment sectors listed at paragraph 192 of [AS-034] for the Wales national level, the same for the North Wales level? If not, please list the relevant sectors.	Given the types of economic sectors within North Wales and the track record of developing other offshore wind farms off the North Wales coast, the employment that is expected to be supported in North Wales will be spread across the same range of sectors to the rest of Wales.
18.19	The Applicant	**Apprenticeships** Will the Proposed Development provide additional apprenticeship opportunities and training partnerships with Coleg Llandrillo? If so, how will these be secured?	As set out in the Applicant's response to ExQ1.18.11, the Applicant has committed to securing a Skills and Employment Strategy within the dDCO. The Applicant is currently engaging with relevant IPs and other bodies on the content of the outline Skills and Employment Strategy and will submit the outline strategy into the DCO examination once suitably advanced. The Applicant will give consideration to the suitability of inclusion of apprenticeships in the strategy- however the Applicant doesn't consider it appropriate to include reference to any specific training provider(s) in an outline plan, even where used by RWE for training apprentices for currently operating projects, as the detail of training providers may change prior to drafting of the final plan.
18.20	The Applicant	**Healthcare Services** Paragraph 224 of [AS-034] states that the Applicant will provide healthcare services. Please confirm: a) What healthcare services are to be provided by the Applicant? b) Will the services only be available to non-UK-based workers? c) How will such services be secured?	The reference in Paragraph 224 highlights that 'it is anticipated that any non-UK-based workers required to support offshore installation works will have access to healthcare services provided by the Applicant'. As such, the provision of healthcare services is not secured by the planning process and the provision of healthcare by the Applicant is not relied upon by the assessment (i.e. the predicted effect would remain not significant whether healthcare is provided or not). The types of healthcare referenced by the chapter include First Aid, Health and Safety Officer, Occupational Health Services and welfare support that represent legislative and voluntary workplace requirements.
18.21	The Applicant	**Healthcare Services** Paragraph 223 of [AS-034] refers to the possibility of the capacity of the Proposed Development being greater than 576MW. One implication of an increase in capacity may be that if the workforce increases, the level of additional patients for GP services could result in the number of registered patients exceeding the recommended benchmark of 1,800 patients per GP. Please explain what other effects an increase in capacity above 576MW would have on the outcome of the socio-economic assessments.	For the purposes of the assessment the assumption is that AyM will have an overall indicative generation capacity of 576 MW, in order to enable the estimation of the number of non-UK workers that may move into the area on a temporary basis and hence may generate potential additional demand for health services. The PEIR assessment was based on a higher capacity assumption of 1,100 MW. This estimated that 690 additional (i.e. non-North Wales) employees would be required during the onshore and offshore installation and commissioning works and would therefore temporarily move to North Wales. If all of these workers registered with a GP (which is highly unlikely

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			for the reasons given in the response to 18.16), this would generate demand for around 0.4 additional FTE GPs. Therefore, even with a considerably higher capacity than 576 MW, the magnitude of effect was assessed as negligible and not significant. The other aspect of the socio-economic assessment suggests that a higher capacity may affect wealth creation and employment. Generally, the higher the capacity, the greater retained expenditure and hence more GVA and jobs retained within North Wales and the rest of Wales.
18.22	The Applicant	**Healthcare Services** Paragraph 98 of [AS-034] states that the in respect of the demand for healthcare services the assessment is based on the wider North Wales area but that the impact has the potential to be concentrated locally, around areas of construction or port activity. As a decision hasn't yet been reached in respect of the port, how does the assessment reflect the possible geographical variation in the labour catchment area?	As stated in paragraph 222 of APP-064, workers from outside North Wales that move to the area during the construction stage could choose to live within a large area defined by a travel to work area of up to 60 minutes, and this will ultimately depend on the availability of suitable accommodation. There may be concentrations around the construction port which means demand for healthcare services could be higher in some parts of North Wales than others. Although it should be noted again that many will not register with a GP or require healthcare services during their stay. It is not possible to assess how capacity in GP practices (as measured by the number of patients per FTE GP) varies in different parts of North Wales. There is data available on the number of patients per GP practice. However, the lowest level of geographical disaggregation for publicly available data on FTE GPs by GP practice for Wales is for Local Health Boards which for AyM is Betsi Cadwaladr University Health Board (BCUHB). This covers the whole North Wales region including the Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham Council areas. The approach taken in the socio-economics chapter is therefore the best available given the availability of relevant data.
18.23	The Applicant	**Housing** Given the operational lifespan of the Proposed Development, are those workers who relocate to the area for the operational phase classified as 'temporarily' moving to the area or permanently relocating to the area?	The socio-economic assessment (APP-064) concluded that during the operational phase around 40-50 direct operational FTE jobs could be supported and a further 30 FTE jobs through indirect supply chains effects in the North Wales study area. The vast majority of these operational jobs can be considered to be permanent in their nature, which is reinforced by AyM operator's requirement for a skilled and stable local workforce.

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			Whilst many of these employees will be recruited from the local workforce, others will move into the area to take up these jobs (and these would be considered permanent relocations). It is difficult to say exactly what this balance between local and non-local recruited staff will be in practice, the scale of non-local workers is unlikely to lead to a significant amount of extra demand for housing locally (which would be assessed as not significant in EIA terms). There will be a need for maintenance work from time to time, involving workers from outside of North Wales. However, the number of workers is not likely to be greater than the numbers working locally during the construction phase. The effects on housing and community facilities was assessed as not significant during this phase. Hence, we would expect the effects to be not significant for the maintenance workers as well.
18.24	The Applicant	**UK Lifetime Expenditure** Paragraph 119 of [AS-034] states that the Applicant intends to work with local, regional and national stakeholders to achieve higher UK content than the base case assumed. Please confirm: a) What measures will be employed to achieve a higher content? b) How will such measures be secured?	A Supply Chain Plan will be agreed with the National Government through the Contracts for Difference (CfD) process (see response to ExQ1.18.26). In addition. The Supply Chain Plan will give details of measures taken to achieve higher UK supply chain content.
18.25	The Applicant	**Operations Base** Please provide any update in respect of the selection of an operations base for the Proposed Development.	The Applicant continues to engage with port operators in undertaking a review of available ports and to understand the suitability of ports to support the Project's operations base. Those discussions are commercially confidential in nature. A decision on which port, or ports, are used to support the operations base will likely be taken after consent for the Project is granted.
18.26	The Applicant	**Supply Chain Strategy** Is there a commitment to a proportion of contracts to be provided through local suppliers? If so, how would this be secured, monitored and delivered?	A proportion of contracts to be provided through local suppliers is not a mitigation within the Socioeconomics assessment (AS-034), or elsewhere in the ES, and therefore does not need to be secured in the DCO. However, since an early stage of the project, the Applicant has already been proactively undertaking activities to include and maximise the use of local suppliers wherever possible and is fully aware and supportive of the benefits of local content. In addition, the Applicant is an active founding member of The Offshore Energy Alliance (OEA) - a supply chain cluster organisation set up as part of the Offshore Wind Sector Deal that acts as a

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			champion for local business development in North Wales and the North West of England. The cluster facilitates engagement between offshore wind developers and suppliers, highlighting opportunities in a timely way and therefore helping to maximise local benefits. Following receipt of a DCO and Marine Licence (requirements for entering a Contract for Difference (CfD) Allocation Round (AR)), the Applicant intends to apply for a CfD. Whilst all the rules governing ARs after AR4 (2022) are yet to be published, it is anticipated that the Project will be required to submit a Supply Chain Plan (SCP) in order to be eligible to apply for a CfD (this has been the case for previous ARs and is the case for AR5 in 2023). The range and quality of commitments within the SCP across the categories of Green (Business) Growth, Innovation, Skills & Infrastructure will be assessed and approved by the UK Government via the Secretary of State and will include requirements for monitoring and reporting on progress regarding implementing commitments. Amongst a number of other criteria, within the category of 'Green Growth', it is expected the Applicant will be incentivised to maximise local content. The Applicant would have significant concern about a proportion of local content being secured through the DCO. It would likely duplicate requirements under the SCP and would pre-empt the work currently underway to assess the ability of the local supply chain to assist in delivery of the Project. The Applicant is currently engaged in discussions with the offshore wind supply chain, but those discussions, and therefore the Applicant's understanding of the local supply chain's role, will evolve as the Project's detailed design progresses and as the supply chain itself evolves.
18.27	CCBC, DCC, FCC, GC, IoACC, SNP	**Mitigation Measures** Are you satisfied with the proposed embedded and applied mitigation measures in respect of socio-economic effects of the Proposed Development?	N/A
18.28	The Applicant	**Inter-relationship Effects** Have any inter-related effects between offshore and onshore parts of the Proposed Development been identified in terms of socio-economics?	The socio-economic assessment has assessed the effects of offshore and onshore infrastructure, where appropriate assessing the effects on receptors in combination and separately (e.g. the employment supported by the construction of each type of infrastructure). This allows for the consideration of inter-related effects in an appropriate way, depending

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			on the nature of the development activity and the potential effects on receptors.

2.19 Tourism and Recreation

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19.1	The Applicant	**Green Infrastructure** Please confirm how the Proposed Development complies with paragraph 5.10.20 of NPS EN-1 in respect of the connectivity of green infrastructure?	Paragraph 5.10.20 states that "*Where green infrastructure is affected, the IPC should consider imposing requirements to ensure the connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to new coastal access routes.*" The Applicant has primarily sought to avoid adverse effects on green infrastructure through consideration of routing, siting and scheme design (such as the decision to avoid interaction with Rhyl Golf Club). Where there remains interaction with green infrastructure, this is predominantly via works that could potentially disrupt the PRoW network or public use of the beach area. To reduce the impact of landfall construction, trenchless installation techniques will be used to install ducts that will house the cables under Ffrith Beach. Whilst details plans are still being developed, it is anticipated that drilling will start from the landfall construction compound and extend to a trenchless installation exit pit located in the intertidal or shallow subtidal, between MHWS and 1,000 m seaward of MHWS. During construction, the trenchless installation exit pit works areas (two 150 m x w100 m works areas) will be cordoned off. The location of the trenchless installation exit point, and therefore the length of the trenchless installation itself, is yet to be determined, however, if an exit pit is required in the beach area any adverse effect would be limited to the immediate area around the cordoned area. Potential impacts during the construction phase will be temporary in nature and will be minimized through the use of trenchless installation

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			techniques which avoid disturbance to the surface above the cable and local ecosystems (such as beneath the River Clwyd and the PROW either side of the river). This will ensure that green infrastructure connectivity is maintained in the vicinity of the development. These techniques will also ensure that disruption to PRoW or coastal access routes is minimised. If it is necessary to temporarily disrupt PRoW, alternative routes will be provided wherever possible. This is described in the Outline Public Access Management Plan (APP-320; Document 1.35 of the Applicant's Deadline 1 submission).
19.2	CCBC, DCC, FCC, GC, IoACC, SNP	**Planning Policy Wales 11 (PPW-11)** Are you satisfied that the design of the Proposed Development contributes to the objectives of PPW-11 in respect of improving the cultural wellbeing of North Wales? If not, please explain your reasons.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has summarised in the response to ExQ1.18.1 relating to '**A Wales of Vibrant Culture and Thriving Welsh**' how it considers AyM will contribute to the objectives of PPW 11 in respect of the cultural wellbeing of North Wales.
19.3	DCC	**Denbighshire Adopted Local Development Plan** Both Garford Road and Ferguson Avenue are located within Coastal Tourism Protection Zones as detailed in Policy PSE 11 of the Adopted Local Development Plan. Due to the proposed Temporary Construction Compound and access arrangements in both locations, temporary adverse effects are anticipated. However, the Applicant states that these will be managed to ensure such effects are minimised (paragraph 34 of ES Volume 3, Chapter 4 [APP-065]). Please confirm whether you are satisfied with the management of such effects and are content that this would not result in any permanent loss of tourism facilities? If not, please explain your reasons.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has engaged with DCC in discussion of both TCC options during the pre-application stage. Proposals for the management of potential impacts associated with construction traffic and noise arising from use of the TCCs will be agreed with DCC through approval of the CoCP (APP-312; Document 1.49 of the Applicant's Deadline 1 submission) and associated management plans. A Construction Traffic Management Plan (CTMP), Public Access Management Plan (PAMP) and Noise and Vibration Management Plan (NVMP) are all proposed to be developed with, and approved by, DCC in advance of works commencing. Draft copies of outline documents were included within S42 consultation and are provided with the DCO application (APP-314, APP-319 and APP-320). The Applicant highlights that the Garford Road TCC has previously been used as a construction compound as part of the East Rhyl Flood Defence Works and so there is existing hardstanding and access arrangements that would be used by AyM. Consequently, much of the plant associated with

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			site preparation works may not be required for this TCC, which would reduce the impacts identified in the ES. The Applicant does not consider that any effects would result in the loss of any permanent tourism facilities.
19.4	The Applicant	**St Asaph Bridleway** In response to [RR-036], please confirm whether the access to St Asaph bridleway will be blocked during any phase of the Proposed Development? If access is to be restricted, please detail reasons and anticipated duration.	St Asaph Bridleway (Public Right of Way (PRoW) DE/201/9), would be crossed by the Onshore Export Cable Corridor (onshore ECC), approximately 425m to the northwest of the bridleway entry point from Ffordd William Morgan. The bridleway would remain open during all phases of the Proposed Development and would be managed with a gated crossing, as identified in Table 1 of the Outline Code of Construction Practice (CoCP) Appendix 8, Outline Public Access Management Plan (APP-320; Document 1/35 of the Applicant's Deadline 1 submission). A minor diversion to the route of the bridleway may need to be in place when the cable trenching works are being undertaken at the crossing point. The diversion around the works area would result in only adding a negligible increase in journey time for users of the bridleway. Although a duration of up to four months is stated in ES, Volume 3, Chapter 4: Tourism and Recreation (APP-065), this is a worst-case assumption used for the MDS and it is anticipated the actual duration would be less than this (duration will be confirmed with DCC via approval of the final PAMP under DCO R10).
19.5	Jodi Cook	**Tourism Effects** Please provide additional detail in respect of your concern raised in relevant representation [RR-057] regarding the effect that the Proposed Development would have on tourism in Llandudno.	N/A
19.6	Rostons	**Recreation Effects** In respect of relevant representations made on behalf of your clients ([RR-044] to [RR-051]), please provide additional detail regarding concerns relating to the Proposed Development and horse riding during the construction phase.	N/A
19.7	The Applicant	**Tourism Sector Benefits** Please respond to the concern raised by the National Trust in respect of the potential effect on tourism [RR-029]. Specifically, please provide a response to the statement that "*No specific*	As noted in ES Volume 3, Chapter 4 (APP-065), there are opportunities for AyM to potentially deliver a positive benefit to the tourism sector within Llandudno and Great Orme area. The Applicant is engaged in ongoing discussion with stakeholders, alongside ongoing discussion on a potential

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		implementation mechanisms appear to be brought forward within the submission, nor the extension of this commitment to operational impacts, nor detailed exploration of this potential benefit".	package of contributions to support the tourism industry (that would site outside of the planning process), and a potential package of landscape contributions. Potential measures could include the provision of information and interpretation (e.g. providing signage) and undertaking promotional activities which would explain the construction and operation of AyM and its role in the renewable energy transition and addressing climate change. The provision of a tourism liaison officer would aid in the delivery of benefits to the tourism sector. The Applicant anticipates being in a position to update the ExA on these discussions at a later point in the Examination.
19.8	The Applicant	**Assessment** Table 4 of ES Volume 3, Chapter 13 [APP-074] identifies a significant residual effect on Rhyl Golf Club during decommissioning. However, such an effect does not appear to be reported in [APP-065]. Please clarify this discrepancy.	The Applicant confirms that Chapter 13 (APP-074) is incorrect and retains an earlier conclusion that is no longer relevant following The Applicant's decision not to locate TJBs within the golf course. A revised version of the Table has been provided in Document 1.47 of the Applicant's Deadline 1 submission. It is assumed that the residual effect for all tourism and recreation receptors will minor (but are likely to be lower in magnitude) to the project's construction phase.
19.9	The Applicant	**Assessment** Please provide an additional plan of 'Study Areas Used in the Tourism and Recreation Assessment' [APP-065] at a scale of 1;50,000 which clearly depicts the Local Area of Influence.	The Applicant has provided an additional plan of 'Study Areas Used in the Tourism and Recreation Assessment' (APP-065) at a scale of 1;50,000 which clearly depicts the Local Area of Influence within Appendix O.
19.10	CCBC, DCC	**Outline Public Access Management Plan (oPAMP)** Are you satisfied with the approach and content of the oPAMP [APP-320]? If not, please details what additional measures are required to supplement the oPAMP.	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant provided draft versions of the oCoCP (APP-312; Document 1.49 of the Applicant's Deadline 1 submission) and oPAMP (APP-320) alongside the PEIR when undertaking Statutory Consultation. In response, DCC provided feedback on the oCoCP that has been incorporated within the submitted documents, however, no feedback was provided specifically on the oPAMP. In addition, the Applicant has discussed the proposals within the PAMP with DCC who have provided feedback relating to specific PROW that the Applicant is currently reviewing and

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			hopes to provide an updated copy of the PAMP at Document 1.35 of the Applicant's Deadline 1 submission.
19.11	The Applicant	**Outline Public Access Management Plan (oPAMP)** Section 2.2.3 of the oPAMP [APP-320] discusses the need for temporary closures without a diversion. The title of this section relates to Public Rights of Way (PRoW) only. However, text in paragraph 21 of [APP-320] also refers to Active Travel Routes (ATR). Please provide clarification as to which of the routes listed in Table 1 of the oPAMP are PRoW, ATR or both?	The Applicant confirms that the first two rows in the table relate to ATRs namely: ▲ Wales Coastal Path/ National Cycle Network (NCN) 5; and ▲ Shared user path on the A548. The remainder are PRoWs. An updated version of the oPAMP has been provided by the Applicant at Deadline 1 (Document 1.35).
19.12	The Applicant	**Outline Public Access Management Plan (oPAMP)** Please review Table 1 of the oPAMP [APP-320] and confirm all PRoWs are detailed within Schedule 4 of the dDCO [AS-014].	The Applicant has reviewed both documents and has revised Schedule 4 of the dDCO accordingly and provided an updated version at Deadline 1 (Documents 1.35 and 1.8, respectively).
19.13	The Applicant	**Scottish Power Renewables Tourism Study** Please provide a copy of the study by Scottish Power Renewables (2020), as detailed at paragraph 247 of [APP-065].	The study by Scottish Power Renewables (2020) was provided in support of the East Anglia ONE North and East Anglia TWO DCO applications within the first round ExA questions for those applications. A copy of the document can be found on the planning inspectorate website here: Appendix 13 Tourism Impact Review (planninginspectorate.gov.uk).
19.14	The Applicant	**Replacement Effects** It is stated that where there is the risk of some holiday and day visitors from being discouraged from visiting, there is the potential for discouraged visitors to be replaced by other visitors as the local tourism sector and market adapts (paragraph 299 and Table 33 of [APP- 065]). What evidence exists to support this statement and who are the 'other' visitors considered to be?	The review of wind farm tourism impact evidence presented in Volume 3, Chapter 4: Tourism and Recreation (APP-065) concludes that there is limited evidence pointing to wind farm developments having a negative impact on the local tourism economy. Professor Aitchison in her evidence to the Scottish Government Renewables Inquiry notes that, '*Although a very small number of current visitors might choose not to repeat their visit because of the presence of a wind farm this number is likely to be off-set by additional tourists who visit irrespective of the presence of a wind farm, return because of the wind farm or visit for the first time because of the wind farm' (Aitchison, 2012)*. Aitchison's conclusion is based on a meta review of the relevant literature. The analysis of the change in tourism employment before, during and after construction of offshore wind farms (Volume 5, Annex 4.2: Seaside Tourism Economics Employment Evidence, APP-124) in close proximity to established coastal visitor destinations (i.e. within 20 KMs of the wind farms) supports this conclusion, concluding that there has not been a decline in tourism employment during construction and following completion. In

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			most instances, there has actually been growth in tourism employment and this is broadly in line or above regional and national growth trends. The Applicant's assessment concluded that there is the potential for limited discouragement of visitors in the short term as a consequence of AyM in the Llandudno and Great Orme area. However, there is the potential for these discouraged visitors to be offset by additional visits and visitors (i.e. a replacement effect), helping to minimize the longer-term consequences of these losses. Specially, the replacement effects are expected to arise in a number of ways: Existing visitors visiting more frequently as a consequence of AyM (Aitchison points to the surveys which identify the potential for an increased frequency of repeat visits amongst some visitors as a consequence of the wind farms (pg 15 para 2.5.21). New visitors who are attracted as a consequence of the wind farm development. Again, Aitchinson notes this potential effect and states that '*this is most likely to be the case where renewable energy projects are developed in tandem with the development of visitor attractions*' (pg 15 para 2.5.21). New visitors taking advantage of the freed-up capacity in particular at busier times of the year when accommodation occupancy rates are much higher in North Wales. The 2021 Visit Wales Accommodation Occupancy Survey (Visit Wales, 2022) notes that hotel and B&B occupancy in North Wales was around 79% and 81% respectively in 2021).
19.15	The Applicant	**Tourism Sector Benefits** Paragraphs 257 and 301 of [APP-065] states that there are opportunities during both the construction and operational phases for AyM to support and engage with local stakeholders to promote and realise potential positive benefits to the tourism sector within Llandudno and Great Orme. Please confirm: a) What benefits are predicted to the tourism sector from such measures? b) How they would be secured? And c) Are such measures considered mitigation or enhancement?	Please see that Applicant's response to ExQ1.19.7.

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19.16	The Applicant	**Recreational Fishing** Further to the 2020/2021 vessel type survey data detailed in Figures 3, 4 and 5 of ES Volume 2, Chapter 9 [APP-055], please provide isolated survey data for the winter and summer periods which illustrates fishing and recreational vessels only.	These figures are provided in the Navigation Risk Assessment (NRA) (Figures 13.9 and 13.2) (APP-111).
19.17	The Applicant	**Recreational Fishing** Paragraph 112 of ES Volume 2, Chapter 12 [APP-058] confirms that any disturbed fish species will return immediately following the construction phase so recoverability will be high. Please confirm: a) Whether this statement relates to all the main species of importance listed; and b) On what evidence is the statement based on?	The recoverability of a receptor typically relates to the ability of a receptor to return/recolonise an area after an impact, or for normal behaviours to resume. Further information on how the vulnerability, recoverability and importance of receptors are considered is provided within Section 6.5.2 of Chapter 6: Fish and Shellfish Ecology (APP-052). When assessing the recoverability of a receptor, several factors are taken into consideration, including the vulnerability of the receptor, its mobility, site fidelity, substrate dependency and spawning behaviours. Chapter 6: Fish and Shellfish Ecology (APP-052) assesses the recoverability of recreationally important species to disturbance impacts from the development. All main species of recreational importance, as detailed in Volume 2, Chapter 12: Other Marine Users and Activities (APP-058) are assessed as having high recoverability, on account of their mobile nature, pelagic spawning behaviours, and low vulnerability to disturbance. The recoverability of key species of recreational importance is informed by scientific literature, which is detailed within Chapter 6: Fish and Shellfish Ecology (APP-052), and Marine Evidence Based Sensitivity Assessments (MarESA) undertaken by the Marine Life Information Network (MarLIN).
19.18	Isle of Man Government (Territorial Sea Committee), Carl Davies	**Charter Angling** Are you satisfied the issues raised during consultation have been captured in table 2-2 in the Charter Angling Baseline Report [APP-118]? If not, please explain reasons and provide evidence justification.	N/A
19.19	The Applicant	**Inter-relationship Effects** Have any inter-related effects between offshore and onshore parts of the Proposed Development been identified in terms of tourism and recreation? If so, please detail.	As described in Table 2 of the Inter-relationships chapter of the ES (APP-060), the consideration of inter-related effects associated with socio-economics, tourism and recreation are provided throughout those relevant chapters of the ES (AS-034 and APP-065, respectively). Inter-related effects are considered to be an inherent part of the socio-

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			economic, tourism and recreational assessments since they consider the wider knock-on effects of the AyM scheme in its entirety.

2.20 Traffic and Transport

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20.1	The Applicant	**Wales Transport Strategy 2021** Please set out how the project aligns with the Welsh Government's priorities and objectives for transport contained in Llwybr Newydd: the Wales Transport Strategy 2021. In particular, how will the project promote the use of sustainable forms of transport and maintain and enhance provision for active travel?	Priority 3 of the Wales Transport Strategy is the most relevant to the Proposed Development, which is to encourage people to make the change to more sustainable transport. The Outline Travel Plan (APP-321), which was submitted with the DCO application, will be updated to a full Travel Plan prior to any construction activity being undertaken, and which will be required to be approved by Denbighshire County Council. The outline Travel Plan sets out how the following will be promoted to construction personnel: • Walking and cycling; • Use of public transport including taxis; and • A car sharing scheme The Applicant will also consider the use of a minibus service to minimise the number of construction personnel vehicles on the highway network. The final Travel Plan to be prepared post consent, will provide firm details of the sustainable travel measures to be implemented during construction and how the effects of the Travel Plan will be monitored throughout the construction programme. In addition, The Applicant will agree measures to minimise disruption to users of Public Rights of Way and Active Travel routes through approval of the Public Access Management Plan (PAMP) by DCC. An outline version of the PAMP (APP-320; Document 1.35 of the applicant's Deadline 1 submission) is provided with the application.
20.2	The Applicant	**Construction Port** Would you please provide an update on the port of origin for delivery of substation transformers and other large components. If a port has now been identified, what is the proposed AIL route to the substation construction site? Are any changes required to road infrastructure along the route?	The Applicant continues to engage with port operators in undertaking a review of available ports and to understand the suitability of ports to support the construction of the Project's works, including delivery of Abnormal Indivisible Loads (AILs) for the onshore substation (OnSS). Those discussions are commercially confidential in nature. As set out in section 9.10.5 of Traffic and Transport (APP-070), an Abnormal Load Assessment Report will be prepared post-consent, as part of the final Construction Traffic Management Plan, to confirm the routeing and any

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			modifications to the highway network that might be required between the port of origin for delivery of the substation transformers (once this has been identified) and the route to the site.
20.3	The Applicant	**Construction Port** Would you please provide an update on the port that will be used for the offshore works. If a port has now been identified, please provide an assessment of the effect of increased traffic movements on the local highway and transport network.	The Applicant continues to engage with port operators in undertaking a review of available ports and to understand the suitability of ports to support the construction of the Project's offshore works. Those discussions are commercially confidential in nature. The Port that would be used for transporting the offshore components has yet to be identified, however consideration will be given to sustainable options for transportation of components, along with potential impacts on the highways network in the vicinity of ports under consideration, when this decision is being made. A decision on which port, or ports, are used to support the offshore construction works will likely be taken after consent for the Project is granted.
20.4	The Applicant	**Construction Plant** ES Volume 5, Annex 10.3: Construction Plant [APP-153] suggests that some of the plant to be used in the construction of the onshore cable route and OnSS will require delivery by low loader: a) Have all access routes been checked to ensure they can accommodate the swept path of such vehicles? b) What modifications, if any, are required to the highway infrastructure on each of the routes to accommodate such vehicles? And c) Are there any sub-standard bridges with respect to height or load carrying capacity on any of the access routes that will require special measures to negotiate?	a) The Applicant can confirm that the access routes can accommodate the swept path of a low loader. Traffic management measures such as shuttle working (the use of traffic signals to alternate directional flow) for some sections of access routes and the use of banksmen at a site access, are likely to be required to allow the low loader to encroach on opposing lanes or overhang footway. There may be a requirement a banksman being present to allow the load loader to encroach on opposing lanes or overhang footway safely, however, this would be detailed for approval in the final Construction Traffic Management Plan (APP-319). b) The Applicant can confirm that no modifications would be required. c) The Applicant can confirm that there are no sub-standard bridges with respect to height or load carrying capacity on any of the access routes that will require special measures to negotiate.
20.5	DCC	**Assessment** As highway authority, do you agree with the methodology, baseline data and predicted traffic movements used to assess traffic and transport impacts in ES Chapter 9: Traffic and Transport	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has engaged with DCC throughout the pre-application stage via EIA scoping, bilateral discussion, via Expert Topic Group (ETG)

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		[APP-070]? Please identify any outstanding issues and how you would like them to be addressed.	discussions and through provision of the PEIR and subsequent consultee responses. Through this process the Applicant has discussed aspects of the traffic assessment including assessment parameters, trip generation, routing, access points and baseline data. A draft version of the assessment was provided within the PEIR and DCC feedback on PROW was incorporated.
20.6	DCC	**Assessment** In ES Volume 5, Annex 9.1 [APP-148], a 15% uplift has been added to new traffic data collected in April 2021 to account for the effects of Covid-19. Are you satisfied with this approach?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The approach to using an uplift was discussed with DCC during an Expert Topic Group (ETG) meeting on Traffic and Transport (ETG Group 9 Human Environment) held on the 29 March 2021. During the meeting, DCC confirmed 10-15% had been used elsewhere, and so the higher value of 15% has been utilised for the assessment of traffic for AyM. This approach has been consulted upon through the ETG meetings and was included within the PEIR at Statutory Consultation. The Applicant received no feedback with regard to the 15% uplift following Statutory Consultation and so the use of the uplift remains unchanged in the ES.
20.7	DCC	**Assessment** Are you satisfied that only a qualitative assessment has been carried out with regard to traffic and transport impacts for the de-commissioning phase of the project?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The PEIR presented the same information regarding decommissioning phase as is provided within the ES with no feedback received from consultees regarding this approach. Details surrounding the decommissioning phase are yet to be fully clarified and there is potential for onshore cables to remain in situ, which would see a reduction in impacts and resulting level of significance in comparison to the assessment of construction effects. The decommissioning methodology would be finalised nearer to the end of the lifetime of AyM, to be in line with current guidance, policy and legislation. Any such methodology would be agreed with the relevant authorities and statutory consultees. The draft DCO includes a requirement to submit a written scheme of decommissioning for onshore works for approval by DCC six months in advance of decommissioning.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
20.8	DCC	**Draft Development Consent Order** As Highway Authority are you content with the proposed powers contained in Articles 9 to 13, Part 3, Streets, of the draft Development Consent Order (dDCO) [AS-014]? If not, how would you like them to be amended, why and to what effect?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant considers that the concerns DCC has raised regarding the duration and reinstatement of temporary disruptions/diversions of PROW can adequately be addressed via the need for approval of the Public Access Management Plan (PAMP) under DCO R10. The Applicant has continued discussion on concerns regarding powers relating to PROW and proposed to provide an amended version of the PAMP that includes proposals to agree the duration and reinstatement of PROW. In addition, DCO Requirement 17 imposes a 6-month time limit on reinstatement of agreed stages of onshore works (once construction activity has finished) so further controlling the duration of temporary disruptions/diversions of PROW.
20.9	The Applicant	**Outline Travel Plan** An outline Travel Plan is provided in Appendix 9 of the outline Construction Code of Practice (oCoCP) [APP-321]: a) What is the likely effect of the proposed package of measures on reducing private car use? b) How will the effect of the Plan be monitored? c) How will corrective action be identified and agreed with the LPA? d) Over what timescales will corrective action be initiated? and e) How will the provisions of the Outline Travel Plan be secured in the dDCO?	The assessment of construction personnel traffic in Volume 3, Chapter 9 Traffic and Transport (APP-070) assumed 100% of construction personnel arrive by car, with an average car occupancy of 1.5. The full version of the Travel Plan; which will be prepared based on confirmed construction personnel figures and details of the package of Travel Plan measures to be implemented by the Principal Contractor, will set out realistic targets for a reduction in single occupancy vehicle use. The Outline Code of Construction Practice (CoCP) Appendix 9, Outline Travel Plan (APP-321) sets out how the effect of the Travel Plan will be monitored in Section 5.2 and 5.3. This will be further defined in the full version of the Travel Plan following consultation with DCC to ensure it aligns with current best practice and policy requirements. The monitoring schedule to be agreed with DCC as part of the final Travel Plan will also include a mechanism for identifying any corrective action should it be identified after two consecutive monitoring periods that the trip generation or mode share targets are not being met. This mechanism is likely to be on a monthly basis. The provisions of the final Travel Plan will be secured via DCO R10(3) which secures compliance with the approved CoCP and associated Management Plans.

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
20.10	DCC	**Outline Code of Construction Practice – Associated Appendices** Are you satisfied with Appendices 7, 8 & 9 of the oCoCP, the outline Construction Traffic Management Plan, [APP-319], outline Public Access Management Plan [APP-320] and outline Travel Plan [APP-321] respectively? Are you content that their provisions are adequately secured by the dDCO [AS-014]? If not, what changes would you like to see and why?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has engaged with DCC throughout the pre-application stage via EIA scoping, bilateral discussion, via Expert Topic Group (ETG) discussions and through provision of the PEIR. Draft copies of the 3 documents were provided at Statutory Consultation and copies of the PAMP have been issued separately to DCC for comment. DCC has recently provided post-submission feedback on the PAMP that the Applicant is reviewing and will revise accordingly.
20.11	Royal Mail	**Outline Construction Traffic Management Plan** Are you content with proposals in the outline Construction Traffic Management Plan [APP-319] to consult on potential traffic disruption during the construction phase of the project and mitigate its effects?	N/A
20.12	Network Rail	**Horizontal Directional Drilling** Are you satisfied that proposals to use Horizontal Directional Drilling (HDD) under the North Wales Mainline are feasible and will not result in any significant effect on rail infrastructure or services?	N/A
20.13	Network Rail	**Draft Development Consent Order** Are you satisfied with the protective provisions in Part 6, Schedule 9 of the dDCO [AS-014]? What changes, if any, would you like made and why?	N/A
20.14	Welsh Government	**Horizontal Directional Drilling** Are you satisfied that proposals to use Horizontal Directional Drilling (HDD) under the A55 Trunk Road are feasible and will not result in any significant effect on its infrastructure or main line and junction traffic flows?	It is acknowledged that this Question is not directed at the Applicant, but the Applicant has provided the following response which may be useful context for the ExA. The Applicant has been in discussions with Highways and the necessary property agreements and a Section 61 agreement are being drawn together between the two Parties to permit the crossing to proceed.
20.15	Welsh Government	**Draft Development Consent Order** What protective provisions for the A55 Trunk Road, if any, would you like to see included in Part 6, Schedule 9 of the dDCO [AS-014]?	N/A

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
20.16	The Applicant	**Onshore Substation Access** What other routes were considered for accessing the OnSS site which do not include Glascoed Road (e.g. from the north or east via St. Asaph Business Park)? Why were these alternative routes discounted? Please demonstrate that on balance, the route selected has the least adverse impact.	The Applicant can confirm that several other access routes were considered for the purposes of onshore substation access. Within the PEIR for the proposed project two 'access zones' were considered, an initial access route to the north, and a further access route to the south (Glascoed Rd). During the internal evaluation process further consideration was given to the principle of a route from the east, via St Asaph Business Park, however this was discounted due to the risk of a long-term irreversible effect that would result on the Glascoed Nature Reserve and are of Great Crested Newt ponds immediately adjacent to the proposed substation location if an access route was taken through it. The location of this nature reserve can be seen on (APP-010) on sheet 11. Similarly a route immediately north of the Crematorium was considered, however it was discounted before an access zone was defined due to the risk of traffic management related effects at the entrance of the Crematorium during the construction period. A BRAG (Black-Red-Amber-Green) process was undertaken for the defined northern and southern access zones (Figure 26 of the SSA PEIR chapter following PEIR consultation, and although the engineering and EIA analysis indicated both the north and south zones to be broadly comparable, the landowner preferences were considered to influence the emerging design preference more positively towards the southern option. The landowner noted that the northern option may more negatively impact the property and operations of the farm in the short and long term, whilst the southern option would not have the same level of long-term impact. From an engineering perspective the northern route represented a slightly greater degree of pre-commencement constraint, to modify the entrance to the farm and allow adequate turning space for AILs. From an environmental perspective the norther route represented a significantly greater loss of tree habitat as a result of the same need to modify the entrance to the farm and the embankment immediately to the west of the farm. By comparison the southern route was considered to have a lower requirement for substantive construction work at the periphery of the access zone, and although there were noted visual and noise impacts during the construction phase, these were considered to be marginally less adverse than the northern route constraints. The decision was however very much balanced, and stakeholder feedback received

QUESTION NUMBER	QUESTION ADDRESSED TO	QUESTION	APPLICANT'S RESPONSE
			from the landowner was considered to be material in the planning balance.
20.17	The Applicant	**Maintenance Access Route** A maintenance access route is proposed adjacent to the western boundary of Denbighshire Memorial Park and Crematorium [plot 436, Land Plan (Onshore) [AS-005] and Book of Reference [AS-020a]]. Please provide details of: a) How frequently it is likely to be used; b) The plant and machinery that will be using it; c) The operations that will be carried out; and d) Alternative access routes that were considered and why they were discounted.	The Applicant has responded to RR-031 on this matter. The operational access described would be used infrequently (typically 1-2 times a year) to access link boxes along the cable corridor as set out in paragraph 190 of (APP-062). Access would be taken in a small vehicle driving south along this route to access the cable route located well beyond the extend of the Denbighshire Memorial Park and Crematorium to the South. The disturbance associated with any routine works here would certainly be no more than the use of the existing agricultural access point and agricultural field within which this access is located or from existing traffic on the Glascoed Road which runs a similar distance away from the Denbighshire Memorial Park and Crematorium to the North. Operational access taken at this location will not cause any significant disturbance to a user of the Denbighshire Memorial Park and Crematorium. Routine maintenance involves lifting the link box lid and conducting tests on the equipment inside. The works on any one link box will be completed within 1 day.The Applicant has utilised existing access routes through the affected property to the cable corridor from the nearest adjoining highway. The operational access route has been proposed following consultation conducted between the Applicant's land agent Dalcour Maclaren and the affected interest. Following the Applicant's review of the land parcel, the access route cannot be located further east up an old trackway as it no longer exists. The access route cannot be located further west against the field boundary due to the restrictions around the SP Manweb pylon and overhead line. The Applicant shall continue to engage with the affected interest appointed land agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.

3 References

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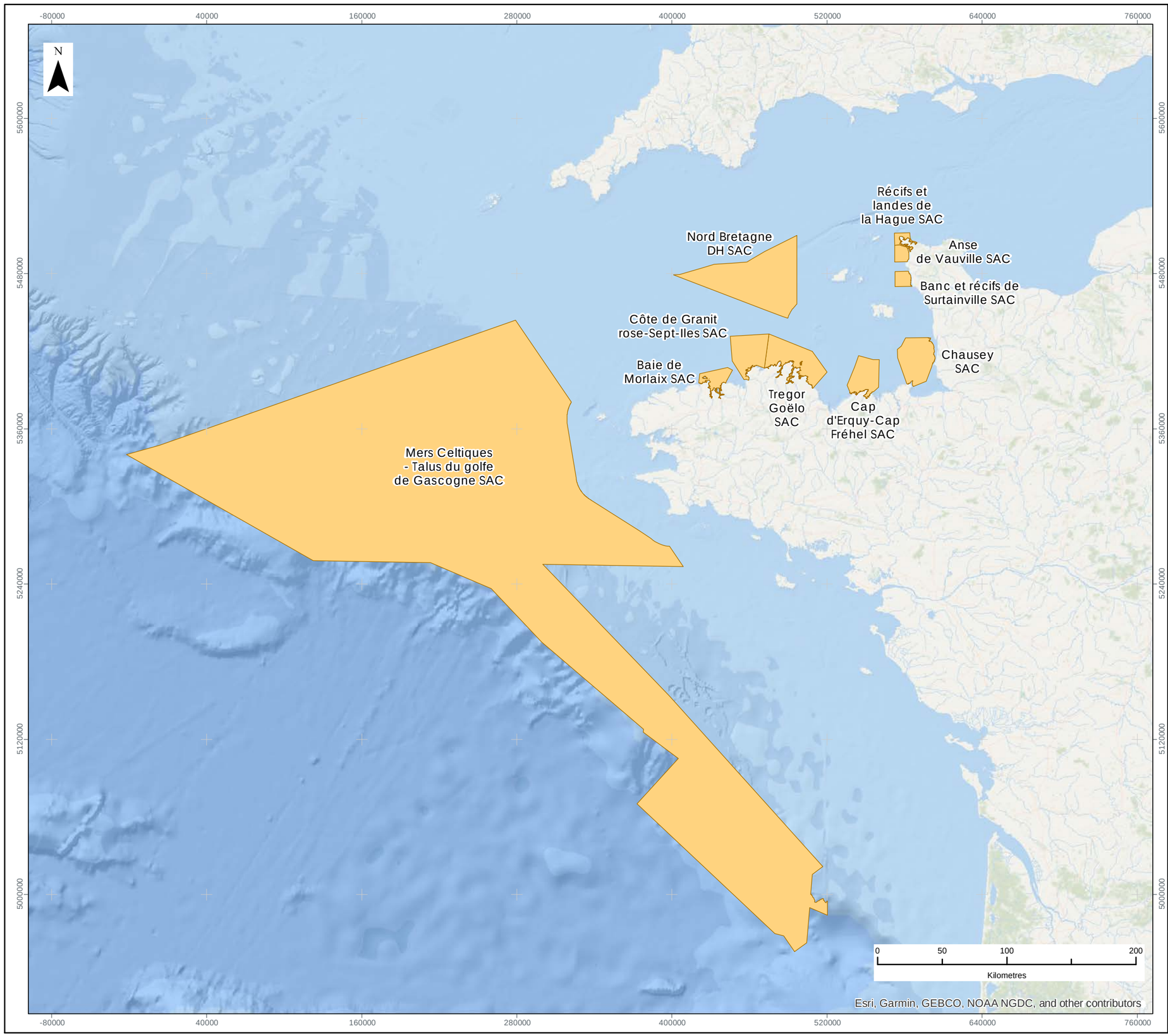
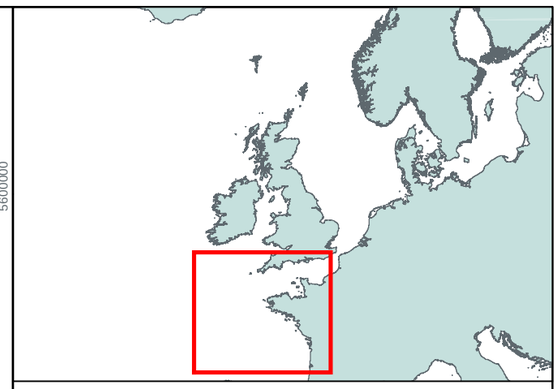
4 Appendix A – Figure of French Sites Screened into RIAA





LEGEND

Designation (SAC)

PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

French sites screened into the assessment

VER	DATE	REMARKS	Drawn	Checked
1	06/10/2022	For Issue For Examination	BPHB	BJ

FIGURE NUMBER:

Figure 4a

SCALE:	PLOT SIZE:	DATUM:	PROJECTION:
1:3,000,000	A3	WGS84	UTM30N

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

G:\GIS\GIS_Projects\0141 AyM\GIS\Figures\Examination\RIAA\AyM_RIAA_Fig4a_Designations_French_Sites.mxd

5 Appendix B – Table of Temporary Plots

Response to ExA First Written Questions, Question 3.14

Question 3.14: To assist with the consideration of whether the extent of the land to be used temporarily is no more than is reasonably required for the purposes of the Proposed Development, please provide further details to justify the extent of the land sought to be used temporarily (including in respect of Rhyl Golf Club).

Response: The Applicant has set out below the further detail requested for all of the plots for which only temporary possession is sought. The table below is based on that set out in Schedule 6 of the dDCO with the additional detail added in response to this question in new column.

Number of plot shown on land plans	*Purpose for which temporary possession may be taken*	*Relevant part of authorised development*	*Written Question 3.14 Response*
2	Temporary use as a construction working area, use for cable installation vessel anchoring and for access to facilitate construction of Work Nos 2A, 3 and 4	Work No. 3A	The temporary area extends on both sides of the cable route. The extent of the area has been defined based on experience with cable installation vessel anchoring on similar schemes. The exact location of the vessel anchors will be within this area and cannot be further refined until the installation concept has been defined, in the construction phase.
3, 4, 5, 24, 27	Temporary use as a construction working area, use for cable installation vessel anchoring and for access to facilitate construction of Work Nos. 2A, 3 and 4	Work Nos. 3A and 6	The extent of the area for cable installation vessel anchoring has been defined based on experience with cable installation vessel anchoring on similar schemes. The exact location of the vessel anchors will be within this area and cannot be further refined until the installation concept has been defined, in the construction phase. The extent of the area for construction access has been defined to enable construction vehicles to pass either around or through the groynes based on the beach profile present at the time of construction
37, 38, 39, 40, 43, 44, 45, 46	Temporary use as a construction working area, use for cable installation vessel anchoring and for access to facilitate construction of Work Nos.2A, 3, 4, 5 and 41	Work Nos. 3A and 7	The extent of the area for cable installation vessel anchoring has been defined based on experience with cable installation vessel anchoring on similar schemes. The exact location of the vessel anchors will be within this area and cannot be further refined until the installation concept has been defined, in the construction phase.

			The extent of the area for construction access has been defined to enable construction vehicles to pass either around or through the groynes based on the beach profile present at the time of construction
7, 9, 10, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, 88	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 2A, 3, 4, 5, 7 and 41	Work No. 6	Temporary access is required for over-ground tracing of the trenchless crossing within Work Number 5. Access is to be taken across plot 22 which is the Rhyl Golf Club by personnel in an off road vehicle to access Work 5. The extent of the area for access has been defined to ensure that access remains possible whilst the Central Prestatyn Coastal Defence scheme and Rhyl Golf Club make changes to the land in this area.
92, 93, 94, 95, 96, 98	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 5 and 7	Work No. 6	Temporary access is required for over ground tracing of the trenchless crossing of the Lyons Robin Hood Holiday Park. Access is likely to be taken through plots 96 and 98 by personnel in an off road vehicle. The extent of the area for access has been defined to ensure that access remains possible whilst the Lyons Robin Hood Holiday Park is operating and making changes to the land in this area.
15	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 2A, 3, 4, 5, 7 and 41	Work Nos. 6 and 6A	The extent of the area has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes.
47, 49, 50, 52, 54, 57, 59, 60, 62, 64, 65, 67, 68, 69, 69a 70, 71, 72, 73, 74 , 79, 80, 81, 84, 85, 86	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 2A, 3, 4, 5, 7 and 41	Work No. 7 and temporary mitigation area	Temporary access to land is required to facilitate construction of the landfall works on the beach. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
75	Temporary use as a construction working area, use as a temporary construction compound and	Work Nos. 7 and 7A	Temporary use as a Temporary Construction Compound is required to service the landfall works.

	for access to facilitate construction of Work Nos. 2A, 3, 4, 5, 7 and 41		The extent of the area has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes.
104, 107, 108, 109, 110, 111, 112, 113, 117, 121, 122, 123, 124,	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 5, 8, 8A, 9 and 41	Work No. 8	Temporary use for construction access to a Temporary Construction Compound and the onshore cable corridor. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles.
119, 127, 130, 132, 133, 137, 138	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 9, 11 and 41	Work No. 10	Temporary use for construction access to a Temporary Construction Compound and the onshore cable corridor The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles.
120, 128	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 9, 11 and 41	Work No. 10A	Temporary use for a Temporary Construction Compound and access to the compound, and construction access to and the onshore cable corridor. The extent of the area has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes. The extent of the access area has been defined to ensure construction access can be taken with the necessary construction vehicles.
159, 161	Temporary use as a construction working area and for access to facilitate construction of Work No. 11	Work No. 12	Temporary use for access to the onshore cable corridor. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles.
170, 171, 172, 173,	Temporary use as a construction working area and for access to facilitate construction of Work No. 11 and temporary mitigation area	Work No. 13 and temporary mitigation area	Temporary use for access to the onshore cable corridor and temporary mitigation area.

176, 181, 182			The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
195, 197, 205	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 11, 15 and 41 and temporary mitigation area	Work Nos. 14, 14A and temporary mitigation area	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
210, 211, 212, 215, 218, 219	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 11, 15 and 41 and temporary mitigation area	Work No. 14 and temporary mitigation area	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
221, 237	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 11, 15 and 41	Work Nos. 16 and 16A	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.

223, 224, 227, 228, 229, 230, 231, 232, 234	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 11, 15 and 41	Work No. 16	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
248, 249, 251,	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 15, 18 and 41	Work No. 17	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
270, 271, 273, 274	Temporary use as a construction working area for drainage during construction of Work No. 19	Work No. 19	Temporary use to facilitate drainage from the onshore cable corridor. Appropriate drains were identified and the most suitable routing between the drain and the Works has been defined for the purpose of enabling drainage from the Works.
276, 277, 279, 282	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 19, 21 and 41	Work Nos. 20 and 20A	Temporary use for access to the onshore cable corridor and temporary mitigation area and as a Temporary Construction Compound. The extent of the area has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes. The extent of the access area has been defined to ensure construction access can be taken with the necessary construction vehicles.

			The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
283, 284, 289, 290	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 19, 21 and 41	Work No. 20	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
303	Temporary use as a construction working area for drainage during construction of Work No. 21	Work No. 21	Temporary use to facilitate drainage from the onshore cable corridor. Appropriate drains were identified and the most suitable routing between the drain and the Works has been defined for the purpose of enabling drainage from the Works.
307, 308, 313	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 21, 23 and 41	Work Nos. 22 and 22A	Temporary use as a Temporary Construction Compound, access to that compound and the Onshore Cable Corridor and temporary mitigation area. The extent of the area has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes. The extent of the access area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
310, 311, 312, 314, 315, 323, 324, 325,	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 21, 23 and 41	Work No. 22	Temporary use for access to onshore cable corridor, Temporary Construction Compound and Temporary mitigation area.

326, 327, 328, 329			The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The extent of the access area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
357	Temporary use as a construction working area for drainage during construction of Work No. 23	Work No. 23	Temporary use to facilitate drainage from the onshore cable corridor. Appropriate drains were identified and the most suitable routing between the drain and the Works has been defined for the purpose of enabling drainage from the Works.
330, 331, 332, 333, 334, 338, 339, 340, 341, 343, 345	Temporary use to improve visibility splays and for access to facilitate construction of Work Nos. 23 and 41	Work No. 24	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
348, 350, 351, 352	Temporary use a construction working area and for access to facilitate construction of Work No. 23	Work No. 25	Temporary use for access to the onshore cable corridor The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles.
369, 370, 375	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 23 and 41, and temporary mitigation area	Work Nos. 26, 26A and temporary mitigation area	Temporary use as a Temporary Construction Compound, access to that compound and the Onshore Cable Corridor and temporary mitigation area.

			The extent of the area has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes. The extent of the access area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
404, 405, 406, 411, 414	Temporary use as a construction working area and for access to facilitate construction of Work Nos. 23 and 41, and temporary mitigation area	Work No. 27 and temporary mitigation area	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.
424, 433, 434	Temporary use as a construction working area, use as a temporary construction compound and for access to facilitate construction of Work Nos. 33, 34, 36 and 41, and temporary mitigation area	Work Nos. 37, 37A and temporary mitigation area	Temporary use as a Temporary Construction Compound, access to that compound and the Onshore Cable Corridor and temporary mitigation area. The extent of the area has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes. The extent of the access area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified.

441, 442, 443, 449, 450, 451, 452, 454, 455	Temporary use to improve visibility splays and for access to facilitate construction of Work Nos. 36 and 41, and temporary mitigation area	Work No. 38 and temporary mitigation area	Temporary use for access to the onshore cable corridor and temporary mitigation area. The extent of the area has been defined to ensure construction access can be taken with the necessary construction vehicles. The mitigation land has been defined based on the land take required for the Works and potential impacts identified. The size of visibility splays is driven primarily by highway safety considerations and they have been sized to ensure that the Applicant can meet the relevant highway standards to ensure the junction can be safely used.
463, 464	Temporary use as a construction working area, use as a temporary construction compound, improvement of existing accesses and for access to facilitate construction of Work Nos. 36, 40 and 41, and temporary mitigation area	Work Nos. 39, 39A and temporary mitigation area	Temporary use as a construction compound and access to the onshore cable corridor, works required to connect AyM to the National Grid Substation and temporary mitigation areas. These plots (together with plots 465 and 466 where cable rights are sought) form the area for the temporary construction compound Work No.39A. The area needed for the construction compound has been defined to meet the Applicant's requirement for a temporary construction compound, based on their experience of similar compounds on other schemes. This area is also needed for the access elements of Work No. 39
474, 475. 476, 477, 493, 494, 495, 498, 499	Temporary use as a construction working area, improvement of existing accesses and for access to facilitate construction of Work Nos. 36, 40 and 41, and temporary mitigation area	Work No. 39 and temporary mitigation area	Temporary use as access to the onshore cable corridor, works required to connect AyM to the National Grid Substation and temporary mitigation areas. Plots 474, 475, 476 and 477 form the area for part of Work No.39 and are required to allow a working area around the existing substation and its access. It has also been designed toretain some flexibility to accommodate the design of the extension to the substation which is being developed by National Grid. It may, for example, be necessary

			for the Applicant to connect to the southern side of the substation or its extension (within Work No.40) and this working area will required to facilitate that connection. This area is also needed to carry out the access improvement elements of Work No. 39 as the current access runs through part of these plots and will be improved and extended. Plots 493, 494, 495, 498 and 499 are required for visibility splays for the use of the junction from Glascoed Road to the existing access to the National Grid substation. The size of these splays is driven primarily by highway safety considerations and they have been sized to ensure that the Applicant can meet the relevant highway standards to ensure the junction can be safely used.

6 Appendix C – Update on Negotiation with Landowners, Occupiers and Statutory Undertakers and Other Utilities

Table 1: Update on negotiation with landowners and occupiers.

The table below sets out the latest status of negotiations with landowners and occupiers. Where land is subject to a lease or tenancy, the respective leaseholder or tenant is listed directly below each respective landlord.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
Action for Children	Owner	Acquisition of new rights and imposition of restrictions	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but a call was held between DM and the appointed agent on 28 March 2022 to discuss output from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with the latest discussions being held on 12 September 2022. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Arthur Horron Wynne Davies & Hugh Henry Wynne Davies & Mary Williams & Michael Williams & Robert Haydn Wynne Davies	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed agent attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022 and continuing communications in relation to the HoTs. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Catherine Nerys Thomas	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but a call was held between DM and the appointed agent on 3 February 2022 to discuss outputs from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 12 July 2022 and 4th October 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
P Grindal & J.G Jones	Occupier	Acquisition of new rights and imposition of restrictions & Temporary Possession	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent. The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
David Watkin Williams-Wynn Bt	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but a call was held between DM and the appointed agent's colleague on 3 February 2022 to discuss output from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 20 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and October. Negotiations and discussions with the affected party are ongoing with a meeting being held between DM and colleagues acting on behalf of the landowner's appointed agent on 12 July 2022. A further meeting with the land interest's appointed agent was held on 4 October 2022. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Arthur Elwy Morris Owen	Occupier	Acquisition of new rights and imposition of restrictions & Temporary Possession	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent. The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.
Betty May Jones	Owner	Acquisition of new rights & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively and attempts were made to engage further outside of this forum.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with a meeting being held between DM and the landowner's appointed agent on 07 June 2022. The Applicant is awaiting detailed feedback on the HoTs and is actively seeking this from the land interest's appointed agent. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Denbighshire County Council	Owner & Occupier		Heads of Terms (HoTs) in respect of land owned and occupied by Denbighshire County Council (DCC) were issued to representatives from Denbighshire County Council on 15 June 2022. HoTs for a tripartite agreement between the Applicant, DCC and two of their respective leaseholders were also issued to those same representatives on the same date. Communication and discussion have been ongoing between the parties with meetings being held on 8 June 2022 and 22 July 2022. During the course of these meetings and in associated correspondence, it was determined that the triparty approach to addressing the leasehold interests was not favoured by DCC and as such, further drafting was required to amalgamate the HoTs for all DCC owned land into one composite document. The updated HoTs were issued on 14 October 2022 and a meeting to discuss the updated drafting is scheduled for 25 October 2022. The Applicant shall continue to engage with DCC and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Lakeside (Prestatyn) Limited	Occupier	Acquisition of new rights & Temporary Possession	As noted below, the Applicant has been engaging with the land interest's landlord (Denbighshire County Council) in order to confirm the preferred approach to the acquisition of the required land rights over land within the land interest's lease demise. Regard has been had to the preference of the landlord and the terms of the lease and an acquisition strategy has been agreed with the landlord.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			The Applicant's appointed agents have attended meetings with the land interest's representative on 2 August 2022 and 7 September 2022 and will continue to work towards a voluntary agreement. The Applicant's appointed agents intend to issue Heads of Terms to reflect this agreed strategy imminently.
Denbighshire Leisure Limited	Occupier	Acquisition of new rights & Temporary Possession	As noted below, the Applicant has been engaging with the land interest's landlord (Denbighshire County Council) in order to confirm the preferred approach to the acquisition of the required land rights over land within the land interest's lease demise. The Applicant has requested a copy of the lease to enable an assessment of the land interest's capacity to grant the necessary rights to be undertaken. Notwithstanding this and noting the provisions of other similar leases within the landlord's portfolio, regard has been had to the preference of the landlord and an acquisition strategy has been agreed with the landlord. The Applicant's land agents (Dalcour Maclaren (DM) have attended meetings with the land interest's representatives on 2 August 2022 and 7 September 2022 and will continue to work towards a voluntary agreement. The Applicant's appointed agents intend to issue Heads of Terms to reflect this agreed strategy imminently.
Rhyl Golf Club	Owner and Occupier	Acquisition of new rights and imposition of restrictions (of the occupied land) & Temporary Possession (of the owned land)	The land interest is both the owner and occupier of land with the Project's order limits. Land which is owned is subject to temporary possession only whereas land over which the land interest holds a lease is subject to both temporary possession and permanent rights. **Owned Land** A letter was sent to the land interest on 19 May 2022 confirming that no permanent rights were being sought by the project over land within their ownership and that a licence to undertake visibility splay works would be entered into between the respective parties in due course. **Occupied Land** The Applicant's land agents issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			representing other affected persons to be held in January 2022. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed agent attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively and submitted comments on the draft HoTs. Further to these initial discussions and as noted above, the Applicant has been engaging with the land interest's landlord (Denbighshire County Council) in order to confirm the preferred approach to the acquisition of the required land rights over land within the land interest's lease demise. Regard has been had to the preference of the landlord and the terms of the lease and an acquisition strategy has been agreed with the landlord. The Applicant's appointed agents attended a meeting with the land interest's appointed agent and representative on 15 August 2022 and will continue to work towards a voluntary agreement. The Applicant's appointed agents intend to issue Heads of Terms to reflect this agreed strategy imminently.
Eirian Evans & John Berwyn Evans	Owner	Freehold	**Freehold Acquisition** Generic Heads of Terms (HoTs) in respect of the freehold acquisition of land were issued to the land interest's appointed agent on 23 December 2022. Following the issue of these HoTs, the Applicant has continued to engage with the agent through virtual and face-to-face meetings and email and telephone correspondence with regards to matters including but not limited to substation design, visual impact, landscaping and ecological mitigation and drainage. Populated HoTs were issued to the appointed agent on 5 May 2022. Negotiations on the specific clauses and commercial elements included within the HoTs have been, and continue to be, ongoing with the latest correspondence being received by the Applicant's agents on 11 October 2022. **Permanent Rights** The Applicant's land agents issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Comments on the populated HoTs were received by the Applicant's agents on 24 August 2022 with a follow up clause-by-clause review exercise being undertaken by the respective appointed agents on 6 October 2022. Following on from this meeting, the Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Elizabeth Alice Jones	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively but a call was held between DM and the appointed agent on 03 February 2022 to discuss output from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 12 July 2022 and 4th October 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Elizabeth Eirlys Williams & Islwyn Williams	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but a call was held between DM and the appointed agent on 18 March 2022 to discuss output from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 30 May 2022, 12 September 2022 and 3 October 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Frances Mary Wilma Thomas & The Executor of the Estate of the Late Elwyn Lloyd Thomas	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Gareth Jones	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued Heads of Terms to the land interest on 10 May 2022 and remain in ongoing discussions. DM have engaged with the land interest via email and telephone and have held a site meeting on 30 June 2022. The latest correspondence received from the land interest was received on 6 October 2022 and indicated a preference to sign the HoTs and progress to negotiating the formal legal documentation. The Applicant is hopeful that the necessary land rights can be secured through a voluntary agreement.
George Berwyn Lloyd Kerfoot & Iola Morris Kerfoot & Jeremy Charles Salisbury	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the land interest's appointed agent have been and continue to be ongoing through email and telephone correspondence and meetings

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			with the Applicant's appointed agents. Meetings were held on 12 May 2022 and 23 August 2022 respectively. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
E & F Thomas & Sons	Occupier	Acquisition of new rights and imposition of restrictions & Temporary Possession	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent. The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.
Helen Owen Proffitt & Janet Johnson & Rachel Georgina Hughes & Sandra Archdale	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
Howard Glyn Hughes & Mair Edmund Hughes	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party have been and continue to be ongoing with comments on the HoTs being received by the Applicants agents on 24 August 2022 and a meeting being held between DM and the landowner's appointed agent on 6 October 2022 to discuss and review those comments. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Hugh Henry Wynne Davies	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
James Dominic Sebastian Bellis & Serena Athene Bellis	Owner	Acquisition of new rights	The Applicant has received signed HoTs on 6 October 2022 and will now progress negotiations of the legal documents through the party's respective legal representatives.
Hon Owain Grenville Rowley-Conwy & Hon Thomas Rowley-Conwy & James Vernon & Ralph Collins	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but a call was held between DM and the appointed agent's colleague on 3 February 2022 to discuss output from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and September. Negotiations and discussions with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 12 July 2022 and 04 October 2022. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Glyn Jones	Occupier	Acquisition of new rights and imposition of restrictions & Temporary Possession	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.
Gwilym Howatson	Occupier	Acquisition of new rights	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent. The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.
Lois Oldfield Williams	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but a call was held between DM and the appointed agent on 18 March 2022 to discuss outputs from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 30 May 2022 and 3 October 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Lyons Holiday Park Limited	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively and DM made endeavours to call the appointed agent following the meetings to discuss outputs from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 20 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 11 July 2022 in addition to continuing email and telephone communications in relation to the HoTs. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Mark Gerard Brian Webster & Robert Frank William Webster	Owner	Acquisition of new rights and imposition of restrictions	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held 20 January 2022 and 11 February 2022 respectively, and DM made endeavours to call the appointed agent following the meetings to discuss outputs from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. A meeting was held with the land interest's appointed agent to review the HoTs on 30 June 2022, following which the Applicant continued to seek formal feedback on the HoTs from the agent. Negotiations with the affected party are ongoing with the latest communications in relation to comments on the HoTs being issued on 4 October 2022. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
S.R. Beech & Sons LLP	Occupier	Acquisition of new rights and imposition of restrictions & Temporary Possession	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent. The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.
Mona Elizabeth Davies & Robert Bryn Davies	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. A further set of updated HoTs was issued on 5 October 2022. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 15 July 2022 and 27 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Hon Owain Grenville Rowley-Conwy	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but a call was held between DM and the appointed agent's colleague on 3 February 2022 to discuss output from the roundtable discussions and updates to the project design.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and September. Negotiations and discussions with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 12 July 2022 and 4 October 2022. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Glyn Jones	Occupier	Acquisition of new rights and imposition of restrictions & Temporary Possession	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent. The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.
Philip Edward Beech	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, and DM made endeavours to call the appointed agent following the meetings to discuss outputs from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. A meeting was held with the land interest's appointed agent to review the HoTs on 30 June 2022, following which the Applicant continued to seek formal feedback on the HoTs from the agent. Negotiations with the affected party are ongoing with the latest communications in relation to comments on the HoTs being issued on 4 October 2022.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Raymond Ivor Beech	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Richard David Proffitt & Helen Owen Proffitt	Owner	Acquisition of new rights and imposition of restrictions	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Richard David Proffitt & Helen Owen Proffitt & Toni Mayne & Kelly Proffitt	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022 and continuing communications in relation to the HoTs. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
Richard Gratton	Owner	Acquisition of new rights & Temporary Possession	The Applicant has received signed HoTs on 29 September 2022 and will now progress negotiations of the legal documents through the parties respective legal representatives.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
Robert Mervyn Llwyd Owens & Robert Michael Llewelyn Owens & John Frederick Lloyd Owens & David Thomas Charles Owens	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. The appointed agent did not attend either of the sessions held on 20 January 2022 and 11 February 2022 respectively, but DM made endeavours to call the appointed agent following the meetings to discuss outputs from the roundtable discussions and updates to the project design. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. A meeting was held with the land interest's appointed agent to review the HoTs on 30 June 2022, following which the Applicant continued to seek formal feedback on the HoTs from the agent. Negotiations with the affected party are ongoing with the latest communications in relation to comments on the HoTs being issued on 4 October 2022. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
E R Jones & Partners	Occupier	Acquisition of new rights and imposition of restrictions & Temporary Possession	Negotiations in respect of the rights required over land over which the land interest holds a tenancy are ongoing with the landlord's appointed agent. The Applicant shall continue to engage with the appointed agent for both the land interest and their landlord with regards to the requirement for an occupier's consent agreement.
The Executor of the Estate of the Late George Edward Brookes & Helen Owen Proffitt	Owner	Acquisition of new rights and imposition of restrictions	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
The National Assembly for Wales	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's appointed land agents (Dalcour Maclaren (DM)) issued Heads of Terms (HoTs) to the land interest's representatives on 20 May 2022. To date, the Applicant has held three meetings specifically relating to property matters on 28 June 2022, 26 July 2022 and 19 October. Between and subsequent to these meetings, the Applicant has endeavoured to progress matters through the completion of actions arising from the meetings and further email correspondence with the land interest. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
The King's Most Excellent Majesty in Right Of His Crown	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	Discussions are ongoing between the Applicant and The Crown Estate (TCE) in respect of the acquisition of land rights over land at the foreshore and the crossing of the River Clwyd with the parties in regular contact to discuss matters as they arise and to agree the necessary next steps. These discussions have been ongoing since July 2021 with earlier discussions relating to land ownership being undertaken from January 2021. With regards to the crossing of the River Clwyd, the Applicant has been informed that TCE have completed their precedent option and lease documents are in draft form and are undergoing final checks from TCE's appointed legal representatives. The Applicant hopes to be in receipt of these

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			draft documents shortly and will continue to engage with TCE with regards to the timescales for the issuing of these documents. Discussions in respect of the temporary and permanent rights required over the foreshore are ongoing with the proposal for the required permanent rights to be incorporated into the Application for Lease. In addition to this, the parties are continuing to discuss the basis on which temporary possession would be taken. The Applicant understands that the TCE's appointed legal representatives are due to provide feedback shortly on whether, given the presence of a regulating lease, a separate licence agreement would be required over these areas. Again, the Applicant will continue to engage with TCE to progress matters in a timely manner. TCE's representatives have expressed a willingness to move matters forward in a timely fashion, with the Applicant sharing and being grateful for this view. The Applicant is certainly hopeful that agreement will be reached prior to the end of the examination but until such a time as the Applicant is in receipt of the precedent documents for the River Clwyd crossing, it reserves the right to make any definitive assessments on timescales for completion of the necessary agreements.
The Secretary Of State For Wales	Owner	Acquisition of new rights and imposition of restrictions	The Applicant's appointed land agents (Dalcour Maclaren (DM)) issued Heads of Terms (HoTs) to the land interest's representatives on 20 May 2022. To date, the Applicant has held three meetings specifically relating to property matters on 28 June 2022, 26 July 2022 and 19 October. Between and subsequent to these meetings, the Applicant has endeavoured to progress matters through the completion of actions arising from the meetings and further email correspondence with the land interest. The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
The Welsh Ministers	Owner	Acquisition of new rights and imposition of restrictions	The Applicant's appointed land agents issued Heads of Terms (HoTs) to the land interest's representatives on 20 May 2022. To date, the Applicant has held three meetings specifically relating to property matters on 28 June 2022, 26 July 2022 and 19 October. Between and subsequent to these meetings, the Applicant has endeavoured to progress

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			matters through the completion of actions arising from the meetings and further email correspondence with the land interest The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land.
NS Shelfco 1 Limited	Owner	Acquisition of new rights	The Applicant's appointed land agents (Dalcour Maclaren (DM)) issued Heads of Terms (HoTs) to the land interest on 13 May 2022. During the course of subsequent correspondence and a meeting on 26 May 2022, the land interest's representative confirmed that the land interest does not enter into option agreements as a matter of policy but would be willing to discuss an agreement in relation to the necessary rights in the event that the Project proceeds to construction. The Applicant has noted these comments and is seeking to confirm them in writing.
Wendy Rashid	Owner	Acquisition of new rights and imposition of restrictions & Temporary Possession	The Applicant's land agents (Dalcour Maclaren (DM)) issued a generic set Heads of Terms (HoTs) to the land interest's appointed agent on 23 December 2021. As part of the issuing of the HoTs, the appointed agent was invited to participate in a round table discussion and feedback session with agents representing other affected persons to be held in January. These sessions additionally provided an opportunity for the Applicant to provide an update on the refinement of the PEIR boundary to the draft Order Limits. The appointed attended both of these sessions held on 20 January 2022 and 11 February 2022 respectively. A set of landowner specific HoTs were issued on 10 May 2022 with further editions of the HoTs incorporating minor updates being issued between June and August. Negotiations with the affected party are ongoing with meetings being held between DM and the landowner's appointed agent on 31 May 2022 and 12 September 2022. Communications in relation to the HoTs are continuing through email and telephone correspondence between meetings.

LAND INTEREST	TENURE	REASON FOR ACQUISITION OR TEMPORARY USE	STATUS OF NEGOTIATIONS
			The Applicant shall continue to engage with the appointed agent and is hopeful that the necessary land rights can be secured through a voluntary agreement.
The Executors of the Estate of the Late Wynford Davies	Owner	Temporary Possession	A letter was sent to the land interest on 19 May 2022 confirming that no permanent rights were being sought by the project over land within their ownership and that a licence to undertake visibility splay works would be entered into between the respective parties in due course.
Eryl James Gomer Davies & Nesta Wyn Davies	Owner	Temporary Possession	A letter was sent to the land interest on 19 May 2022 confirming that no permanent rights were being sought by the project over land within their ownership and that a licence to undertake visibility splay works would be entered into between the respective parties in due course.

Table 2: Update on negotiations with Statutory Undertakers and other Utilities.

UNDERTAKER OR OTHER APPARATUS OWNER	NATURE OF UNDERTAKING	PROJECT IMPACT ON LAND, RIGHTS OR APPARATUS	APPLICABILITY OF SECTIONS 127 AND 138 OF THE PLANNING ACT 2008	STATUS OF NEGOTIATIONS
Network Rail Infrastructure Limited (NRIL)	Maintaining and operating the railway infrastructure	Land & Rights	The Applicant considers that the land and rights can be acquired without serious detriment to the carrying on of NRIL's undertaking and NRIL has not suggested otherwise. Adequate protection for NRIL's assets and access are included within the Protective Provisions at Part 6 of Schedule 9 of the draft DCO [AS-014]. As a result, the Applicant considers that any interference caused will not be a serious detriment to NRIL carrying on its undertaking. The Applicant is not intending to extinguish any rights belonging to NRIL.	The Applicant has been in discussions with NRIL with regards to the railway line crossing. The Applicant has secured Business Clearance and Technical Clearance from Network Rail and has agreed a Basic Asset Protection Agreement. Discussions regarding the commercial aspects of required land rights are at a relatively early stage with a meeting having been held between the Applicant's appointed land agents and a representative from NRIL on 14.10.2022. During the course of this meeting a roadmap setting out a proposed route to agreement was set out and follow up actions agreed. The Applicant will endeavour to undertake those follow up actions and continue to proactively engage with NRIL with a view to securing a voluntary agreement.

UNDERTAKER OR OTHER APPARATUS OWNER	NATURE OF UNDERTAKING	PROJECT IMPACT ON LAND, RIGHTS OR APPARATUS	APPLICABILITY OF SECTIONS 127 AND 138 OF THE PLANNING ACT 2008	STATUS OF NEGOTIATIONS
				Active discussions are ongoing in relation to Protective Provisions for NRIL. The Applicant has received a mark-up of the Protective Provisions included in the draft DCO [AS-014] and has responded with further comments. The Applicant anticipates that both parties will be able to agree the Protective Provisions before the end of the Examination.
National Grid Electricity Transmission plc (NGET)	Electricity transmission network owner and operator	Land & Rights & Apparatus	The Applicant considers that the land and rights can be acquired without serious detriment to the carrying on of NGET's undertaking and NGET has not suggested otherwise. Adequate protection for NGET's assets and access are included within the Protective Provisions at Part 3 of Schedule 9 of the draft DCO [AS-014]. As a result, the Applicant considers that any interference caused will not be a serious detriment to NGET carrying on its undertaking. The Applicant is not intending to extinguish any rights belonging to NGET.	Negotiations in respect of the permanent rights sought over plot 484 are currently on hold pending further development of NGET's proposals for extension of the existing substation. Active discussions are ongoing with NGET in relation to Protective Provisions for NGET. The Applicant has received a mark-up of the Protective Provisions included in the draft DCO [AS-014] and has responded with further comments. The Applicant anticipates that both parties will be able to agree the Protective Provisions before the end of the Examination.
Openreach Limited (OL)	Telecommunications	Apparatus	N/A. OL has not made any representation in relation to the AyM application.	The Applicant has not included specific Protective Provisions for OL in the draft DCO. The Applicant has included Protective Provisions in Part 5 of Schedule 9 of the draft DCO [AS-014] for operators of electronic communications networks. To date no comment on these Protective Provisions or indication that any additional forms of agreement are required has been received from OL.
SP Manweb PLC (SPM)	Electricity distribution network operator	Rights & Apparatus	The Applicant considers that the rights can be acquired without serious detriment to the carrying on of SPM's undertaking and SPM has not suggested otherwise.	Active discussions have been ongoing and both parties are hoping to formally agree the Protective Provisions for SPM by Deadline 2

UNDERTAKER OR OTHER APPARATUS OWNER	NATURE OF UNDERTAKING	PROJECT IMPACT ON LAND, RIGHTS OR APPARATUS	APPLICABILITY OF SECTIONS 127 AND 138 OF THE PLANNING ACT 2008	STATUS OF NEGOTIATIONS
			Adequate protection for SPM's assets and access are included within the Protective Provisions at Part 4 of Schedule 9 of the draft DCO [AS-014]. As a result, the Applicant considers that any interference caused will not be a serious detriment to SPM carrying on its undertaking. The Applicant is not intending to extinguish any rights belonging to SPM.	
Wales and West Utilities Limited (W&W)	Gas distribution network owner and operator	Rights & Apparatus	The Applicant considers that the rights can be acquired without serious detriment to the carrying on of W&W's undertaking and W&W has not suggested otherwise. The Applicant is not intending to extinguish any rights belonging to W&W.	The Applicant has not included specific Protective Provisions in the draft DCO [AS-014] for W&W and these have not been requested by W&W. The parties are in active discussions to enter into a Private Agreement.
Diamond Transmission Partners BBE Limited (Diamond Transmission)	Generation and transmission of electricity	Rights & Apparatus	The Applicant considers that the rights can be acquired without serious detriment to the carrying on of Diamond Transmission's undertaking and Diamond Transmission has not suggested otherwise. The Applicant is not intending to extinguish any rights belonging to Diamond Transmission.	The Applicant has not included specific Protective Provisions for Diamond Transmission in the draft DCO [AS-014]. The Applicant has included Protective Provisions in Part 1 of Schedule 9 of the draft DCO [AS-014] for electricity, gas, water and sewerage undertakers and to date no comment on these Protective Provisions has been received from Diamond Transmission.
Dwr Cymru Cyfyngedig (DC)	Water supply and wastewater treatment	Land & Rights & Apparatus	The Applicant considers that the land and rights can be acquired without serious detriment to the carrying on of DC's undertaking and DC has not suggested otherwise. Adequate protection for DC's assets and access are included within the Protective Provisions at Part 2 of Schedule 9 of the draft DCO [AS-014]. As a result, the Applicant considers that any interference caused will not be a serious detriment to DC carrying on its undertaking.	The Applicant is seeking permanent rights and temporary rights over plot 253 for operational and construction access purposes. This plot is within the ownership of DC. The Applicant's land agents issued Heads of Terms on 12th May 2022 and followed this up by attending a meeting with DC's appointed agent. Discussions are ongoing in respect of the detail of the Heads of Terms but the Applicant remains hopeful

UNDERTAKER OR OTHER APPARATUS OWNER	NATURE OF UNDERTAKING	PROJECT IMPACT ON LAND, RIGHTS OR APPARATUS	APPLICABILITY OF SECTIONS 127 AND 138 OF THE PLANNING ACT 2008	STATUS OF NEGOTIATIONS
			The Applicant is not intending to extinguish any rights belonging to DC.	that agreement can be reached and the necessary land rights acquired through negotiation. Active discussions are ongoing in relation to Protective Provisions for DC. The Applicant has received a mark-up of the Protective Provisions included in the draft DCO [AS-014] and has responded with further comments. The Applicant anticipates that both parties will be able to agree the Protective Provisions before the end of the Examination.
Zayo Group UK Limited (ZGUL)	Telecommunications	Apparatus	N/A. ZGUL has not made any representation in relation to the AyM application.	The Applicant has not included specific Protective Provisions for ZGUL in the draft DCO [AS-014]. The Applicant has included Protective Provisions in Part 5 of Schedule 9 of the draft DCO [AS-014] for operators of electronic communications networks. To date no comment on these Protective Provisions or indication that any additional forms of agreement are required has been received from ZGUL.
Centrica PLC	Transmission of gas	Rights	N/A. Centrica has not made any representation in relation to the AyM application.	Centrica PLC hold rights over land within the order limits. The Applicant is not seeking to acquire rights from Centrica PLC and is not directly affecting their apparatus but will endeavour to engage with them in the event that they have any issues or concerns with the Project. The Applicant has not included specific Protective Provisions for Centrica PLC in the draft DCO [AS-014]. The Applicant has included Protective Provisions in Part 1 of Schedule 9 of the draft DCO [AS-014] for electricity, gas, water and sewerage undertakers. To date no comment on these Protective Provisions or indication that any additional forms of agreement are required has been received from Centrica PLC.

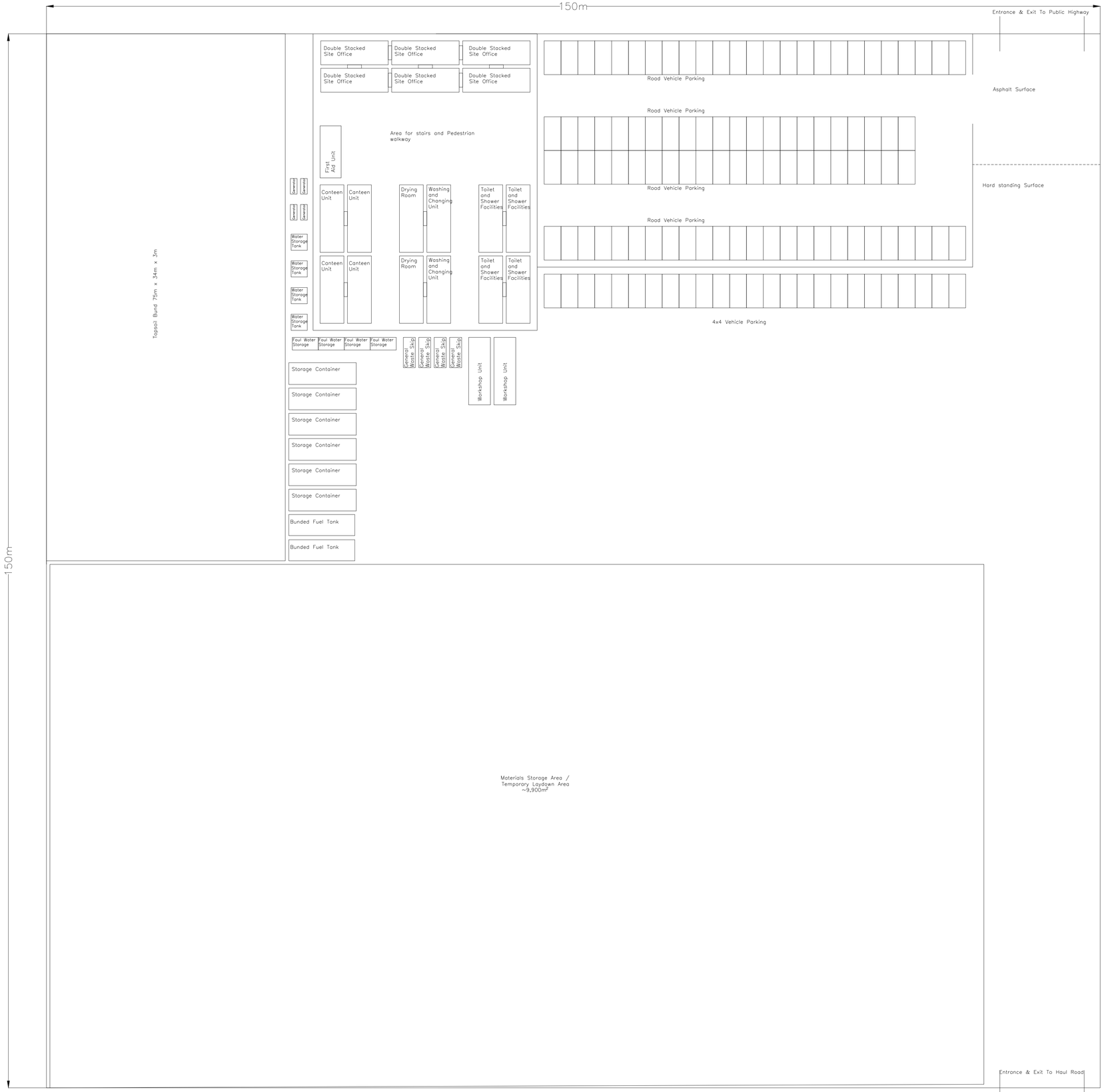
UNDERTAKER OR OTHER APPARATUS OWNER	NATURE OF UNDERTAKING	PROJECT IMPACT ON LAND, RIGHTS OR APPARATUS	APPLICABILITY OF SECTIONS 127 AND 138 OF THE PLANNING ACT 2008	STATUS OF NEGOTIATIONS
Vodafone Limited	Telecommunications	Apparatus	N/A. Vodafone has not made any representation in relation to the AyM application.	The Applicant has not included specific Protective Provisions for Vodafone in the draft DCO [AS-014]. The Applicant has included Protective Provisions in Part 5 of Schedule 9 of the draft DCO [AS-014] for operators of electronic communications networks. To date no comment on these Protective Provisions or indication that any additional forms of agreement are required has been received from Vodafone.
The Natural Resources Body For Wales (NRW)	Environmental regulator	Rights	N/A	The Applicant has removed plot 26 from the Order Limits and therefore rights are no longer being sought over land within the ownership of NRW. The Applicant has not included specific Protective Provisions for NRW in the draft DCO [AS-014].
ESP Electricity Limited (ESPEL)	Independent electricity distribution network operator	Rights	N/A. ESPEL has not made any representation in relation to the AyM application.	ESPEL hold rights over land within the order limits. The Applicant is not seeking to acquire rights from ESPEL and is not directly affecting their apparatus but will endeavour to engage with them in the event that they have any issues or concerns with the Project. The Applicant has not included specific Protective Provisions for ESPEL in the draft DCO [AS-014]. The Applicant has included Protective Provisions in Part 1 of Schedule 9 of the draft DCO [AS-014] for electricity, gas, water and sewerage undertakers. To date no comment on these Protective Provisions or indication that any additional forms of agreement are required has been received from ESPEL.
Gwynt Y Mor OFTO PLC (GyM OFTO)	Generation and transmission of electricity	Rights	The Applicant considers that the rights can be acquired without serious detriment to the carrying on of GyM OFTO's undertaking and GyM OFTO has not suggested otherwise. The Applicant is not intending to extinguish any rights belonging to GyM OFTO.	A meeting was held on 4th July 2022 between the Applicant's appointed land agents and representatives of GyM OFTO. The Applicant is seeking permanent rights over plots 488 and 489 for operational and construction access purposes. GyM OFTO holds a lease over these plots and as such the Applicant's appointed agents have

UNDERTAKER OR OTHER APPARATUS OWNER	NATURE OF UNDERTAKING	PROJECT IMPACT ON LAND, RIGHTS OR APPARATUS	APPLICABILITY OF SECTIONS 127 AND 138 OF THE PLANNING ACT 2008	STATUS OF NEGOTIATIONS
				engaged with both the landlord and GyM OFTO to discuss the preferred method of documenting the necessary rights. Negotiations are ongoing and the Applicant is hopeful that the required land rights can be secured through negotiation. The Applicant has not included specific Protective Provisions for GyM OFTO in the draft DCO [AS-014]. The Applicant has included Protective Provisions in Part 1 of Schedule 9 of the draft DCO [AS-014] for electricity, gas, water and sewerage undertakers and to date no comment on these Protective Provisions has been received from GyM OFTO.

7 Appendix D – Table of Environmental Statement Conclusions

Please note that Appendix D has been superseded by Document 1.47 of the Applicant's Deadline 1 submission.

8 Appendix E – Indicative Temporary Construction Compound Annotated Plan Layout



TYPICAL MAIN TEMPORARY CONSTRUCTION COMPOUND LAYOUT
NOT TO SCALE

DO NOT SCALE FROM THIS DRAWING

NOTES

1. DO NOT SCALE FROM THIS DRAWING.
2. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS STATED OTHERWISE.
3. ALL LEVELS ARE IN METRES UNLESS STATED OTHERWISE.
4. DRAWING IS NOT FOR CONSTRUCTION.
5. LAYOUT OF TEMPORARY CONSTRUCTION COMPOUND AND NUMBERS OF OFFICE / WELFARE UNITS IS INDICATIVE ONLY. ACTUAL TCC DETAIL TO BE CONFIRMED AT DETAILED DESIGN STAGE AND BASED ON LAND AVAILABILITY AT EACH TCC LOCATION.

REV	DATE	REASON FOR ISSUE	BY	CHK	APP
02	23-08-2021	MINOR UPDATES	PM	AH	AH
01	16-07-2021	ISSUE AS FINAL	PM	NP	AH

Fferm Wynt Alltraeth
AWEL Y MÔR Offshore Wind Farm

wardell armstrong

PROJECT TITLE
AWEL Y MÔR OFFSHORE WIND FARM

DRAWING TITLE
TYPICAL MAIN TEMPORARY CONSTRUCTION COMPOUND LAYOUT

DRAWING STATUS
FINAL

SHEET SIZE	DESIGNED	DRAWN	CHECKED	APPROVED
A1	PM	PM	AH	AH
SHEET SCALE	DATE	DATE	DATE	DATE
NTS	23.08.2021	23.08.2021	23.08.2021	23.08.2021

WA DRAWING NUMBER	REVISION
ED13184-C-3034	02
AYM DOCUMENT NUMBER	REVISION
AYM-WAR-V2-XX-M2-C-0045-B	02
RWE ECODOC NUMBER / SHEET No	REVISION
003914186-02 / 001 OF 001	02

REV	DATE	REASON FOR ISSUE	PREPARED	CHECKED	APPROVED	RELEASED
02	23-08-2021	MINOR UPDATES	PM	AH	AH	PM
01	16-07-2021	ISSUE AS FINAL	PM	NP	AH	PM

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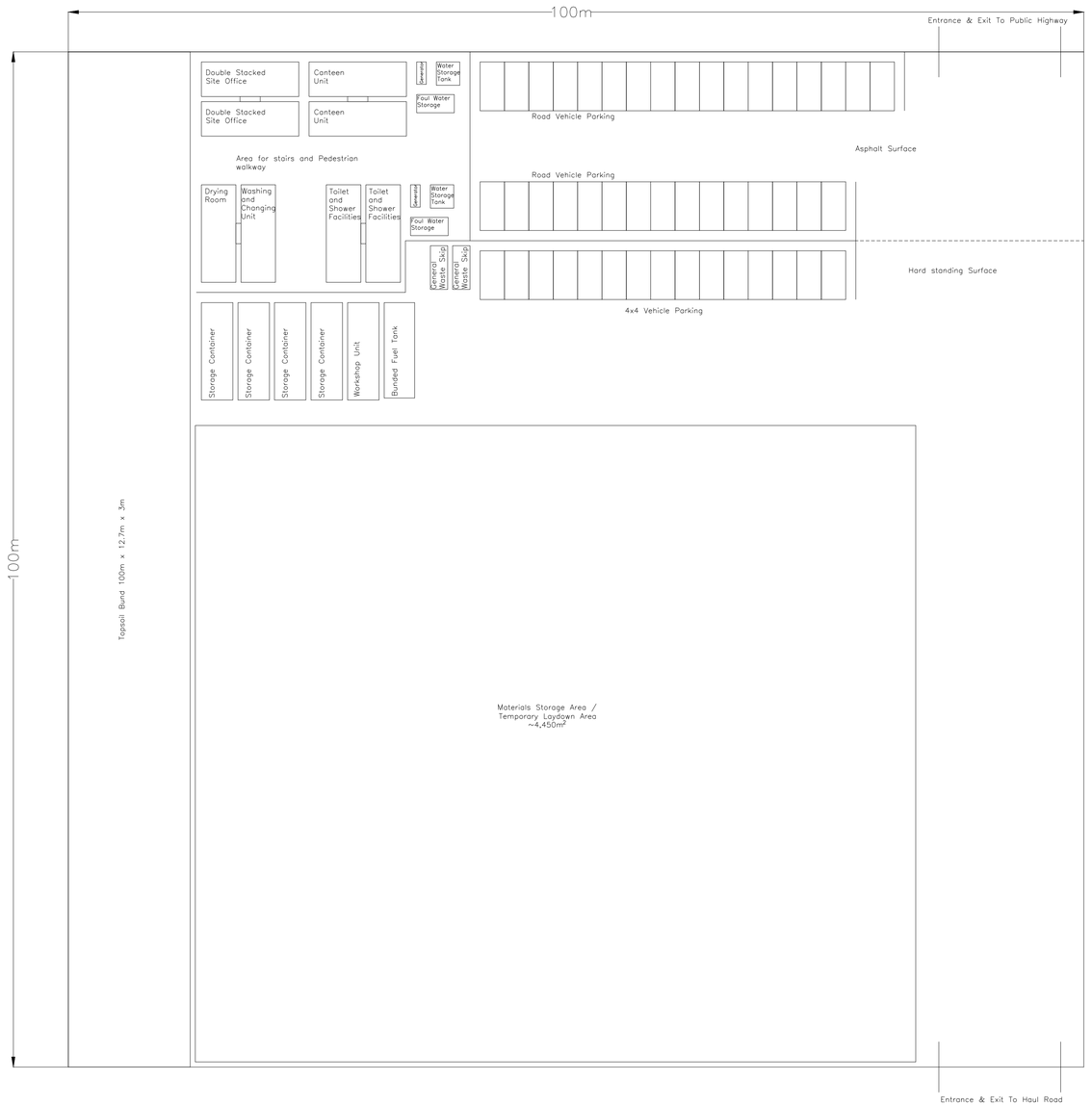

TYPICAL MINOR TEMPORARY CONSTRUCTION COMPOUND LAYOUT
NOT TO SCALE

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REV	DATE	REASON FOR ISSUE	BY	CHK	APP
02	23-08-2021	MINOR UPDATES	PM	AH	AH
01	16-07-2021	ISSUE AS FINAL	PM	NP	AH

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

wardell armstrong

PROJECT TITLE
AWEL Y MÔR OFFSHORE WIND FARM

DRAWING TITLE
TYPICAL MINOR TEMPORARY CONSTRUCTION COMPOUND LAYOUT

DRAWING STATUS
FINAL

SHEET SIZE	DESIGNED	DRAWN	CHECKED	APPROVED
A1	PM	PM	AH	AH
SHEET SCALE	DATE	DATE	DATE	DATE
NTS	23.08.2021	23.08.2021	23.08.2021	23.08.2021

WA DRAWING NUMBER	REVISION
ED13184-C-3035	02
AYM DOCUMENT NUMBER	REVISION
AYM-WAR-V2-XX-M2-C-0046-B	02
RWE ECODOC NUMBER	SHEET No / REVISION
003914193-02	001 OF 001 / 02

REV	DATE	REASON FOR ISSUE	PREPARED	CHECKED	APPROVED	RELEASED
02	23-08-2021	MINOR UPDATES	PM	AH	AH	PM
01	16-07-2021	ISSUE AS FINAL	PM	NP	AH	PM

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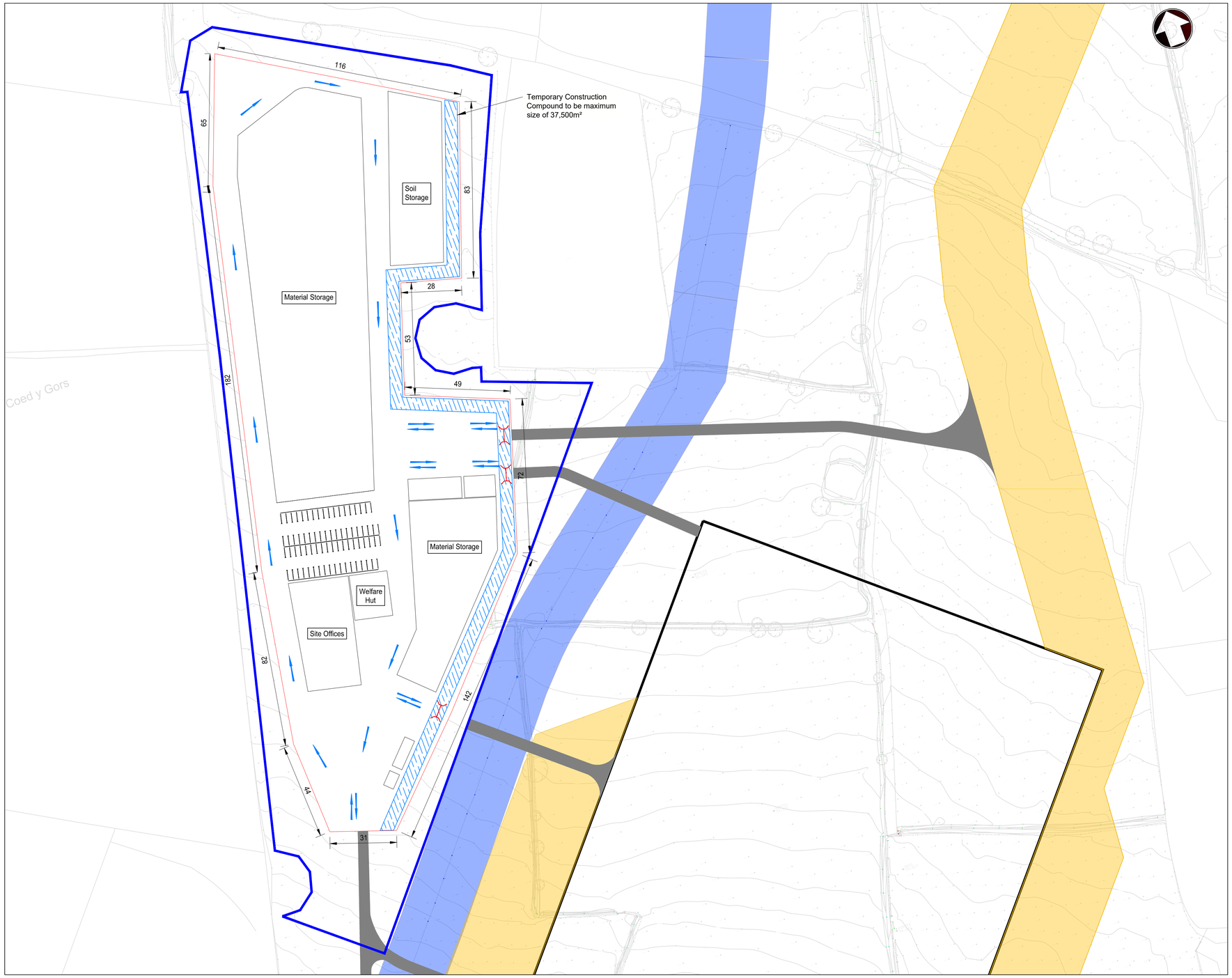

GENERAL ARRANGEMENT - PLAN

SCALE @ A1: 1:1250

1:50 0 2.5m 5m

1:1250 0 50m 125m

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Notes

1. Do not scale from this drawing.
2. Information on this drawing is based on drawing: "RWE AWEL Y MôR OFFSHORE WIND FARM_REV3" by 3D Engineering Surveys.
3. All dimensions are in metres unless otherwise stated.
4. This drawing is to be read in conjunction with relevant documents and drawings, see reference drawings below.
5. Proposed arrangement shown for indicative purposes only. Dimensions and design may vary, subject to detailed design phase.
6. No unauthorised disclosure, storage or copying.
7. All spatial coordinates relate to the Ordnance Survey, British National Grid (OSGB36).
8. All levels are in meters and relate to AOD (Ordnance Survey, Newlyn).

Key to symbols

- Denotes Water Main 30m Buffer Zone
- Indicative temporary access road
- Drainage Swale
- Denotes one-way system
- Temporary Construction Compound Zone
- Culvert over the swale
- Indicative 40m Cable Corridor
- Temporary Construction Compound Indicative Fenceline

Reference drawings

RWE AWEL Y MôR OFFSHORE WIND FARM_REV3.dwg - Topo/ GPR Data
OS_MasterMap_623632_832442_OS_Mastermap.dwg - OS Mapping

Rev	Date	Drawn	Description	Ch'k'd	App'd
05	18/10/22	JK	Updated as per comments	MB	SA
04	16/08/22	JK	Updated as per comments	MB	SA
03	20/06/22	JK	Updated as per RWE comments	MB	SA
02	21/09/21	PP	Updated to details and presentation	MB	SA
01	29/07/21	JB	PRELIMINARY ISSUE	MB	SA

Status Stamp: FOR REVIEW

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W www.mottmac.com

Client: Fferm Wynt Alltraeth AWEL Y MÔR Offshore Wind Farm

Title: Awel y Môr Offshore Wind Farm

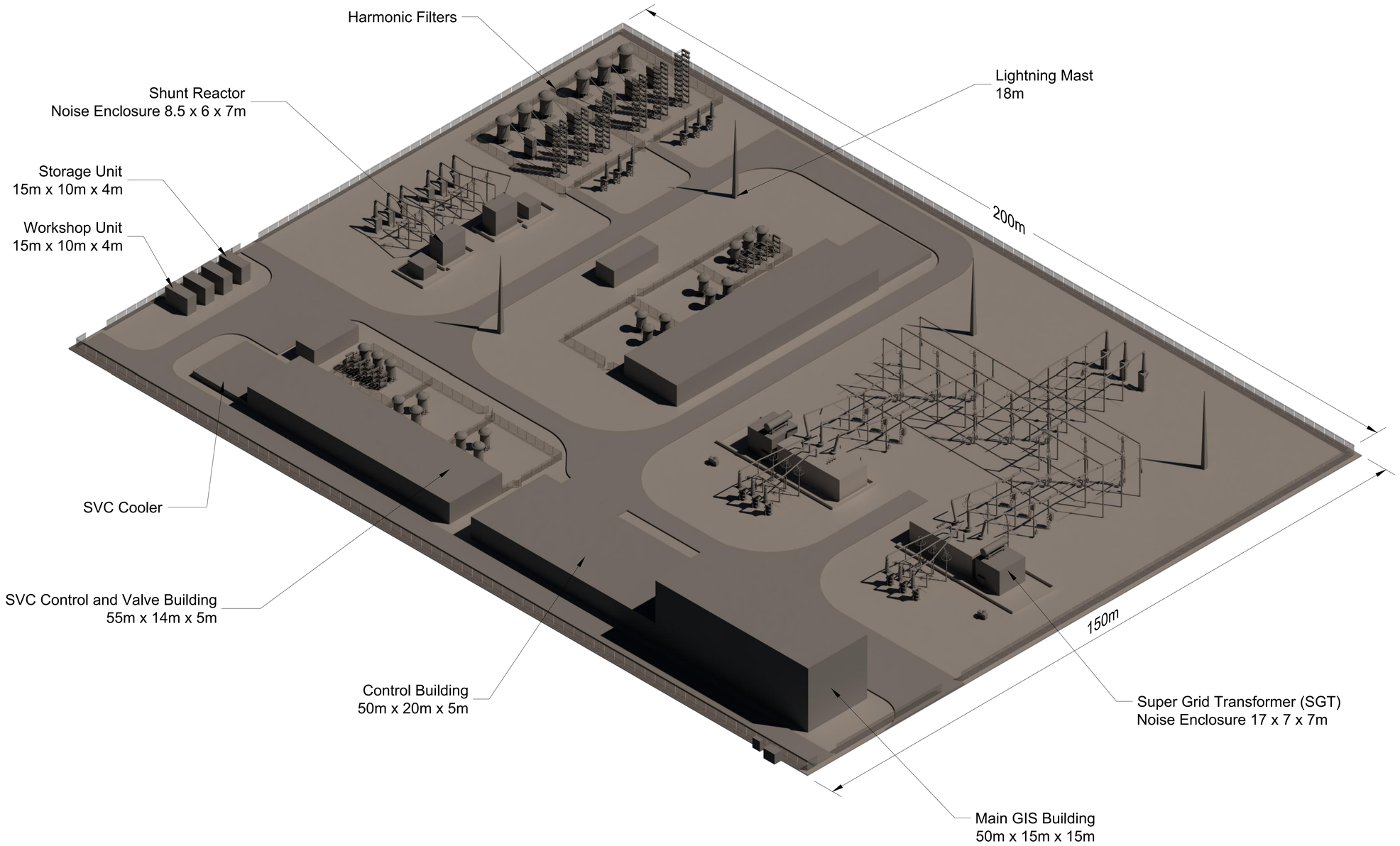
Construction Compound Indicative Layout

Sheet 01 of 01

Designed	M. Barton	MB	Eng check	M. Barton	MB
Drawn	J Bell	JB	Coordination	T. King	TK
Dwg check	T. King	TK	Approved	S. Anantharam	SA

MMD Project Number: 419577	Scale at A1: As Shown	Security: STD
Client Number: 003703878		Suit. Code: S3
Drawing Number: AYM-MMD-V0-XX-DR-C-0020		Revision: 05

9 Appendix F – Annotated Draft Substation Layout Plan



Notes

1. DIMENSION IS IN MM UNLESS STATED OTHERWISE.
2. THIS LAYOUT IS INDICATIVE ONLY. THE FOLLOWING ASPECTS SHALL BE CONSIDERED WHEN DEVELOPING THE DESIGN:
   - -MAGNETIC CLEARANCE FROM THE AIR CORE REACTORS
   - -FIRE SUPPRESSION SYSTEM
   - -SITE LIGHTING AND SECURITY SYSTEMS
   - -PEDESTRIAN ACCESS REQUIREMENT TO EQUIPMENT/BUILDING
   - -LIGHTNING PROTECTION
3. THE EQUIPMENT APPEARANCE AND SIZE SHOWN ARE INDICATIVE ONLY.
4. THE PROPOSED SOLUTION SHOWS AN ALTERNATIVE ARRANGEMENT FOR THE SUBSTATION WITH A WORST VISUAL IMPACT. HOWEVER, WE NOTE THAT THE ARRANGEMENT DOES NOT INTEND IN ANY WAY TO OPTIMISE THE LOCATION OF THE EQUIPMENT. THIS MODEL IS FOR PLANNING PURPOSES ONLY, WITH THE AIM TO SHOW A WORST VISUAL IMPACT OF THE SUBSTATION.

Key to symbols

Reference drawings

AYM-MOT-V7-ZZ-M3-E-0002 - On shore substation - GIS 3D Model
AYM-MOT-V7-XX-DR-E-0002 - Single Line Diagram

Rev	Date	Drawn	Description	Ch'k'd	App'd
05	17/10/22	MS	Updated as per Client Comments	GR	SA
04	31/03/22	JK	Client Comments Incorporated	GR	PL
03	28/03/22	JK	Updated Layout	GR	PL
02	10/08/21	JK	Title Change	MB	SA
01	22/04/21	JK	Preliminary Issue	MB	SA

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Fferm Wynt Alltraeth
AWEL Y MÔR Offshore Wind Farm

Title

Awel y Môr Offshore Wind Farm
Onshore Substation
Figure 1: Indicative GIS Substation

Sheet 01 of 01

Designed	J. Kensall	JK	Eng check	G. Rossi	GR
Drawn	J. Kensall	JK	Coordination	T. King	TK
Dwg check	T. King	TK	Approved	P. Lear	PL

MMD Project Number	Scale at A1	Security
419577	NTS	STD

Client Number	Suit. Code
003977836	S3

Drawing Number	Revision
AYM-MOT-V0-XX-DR-E-0053	05

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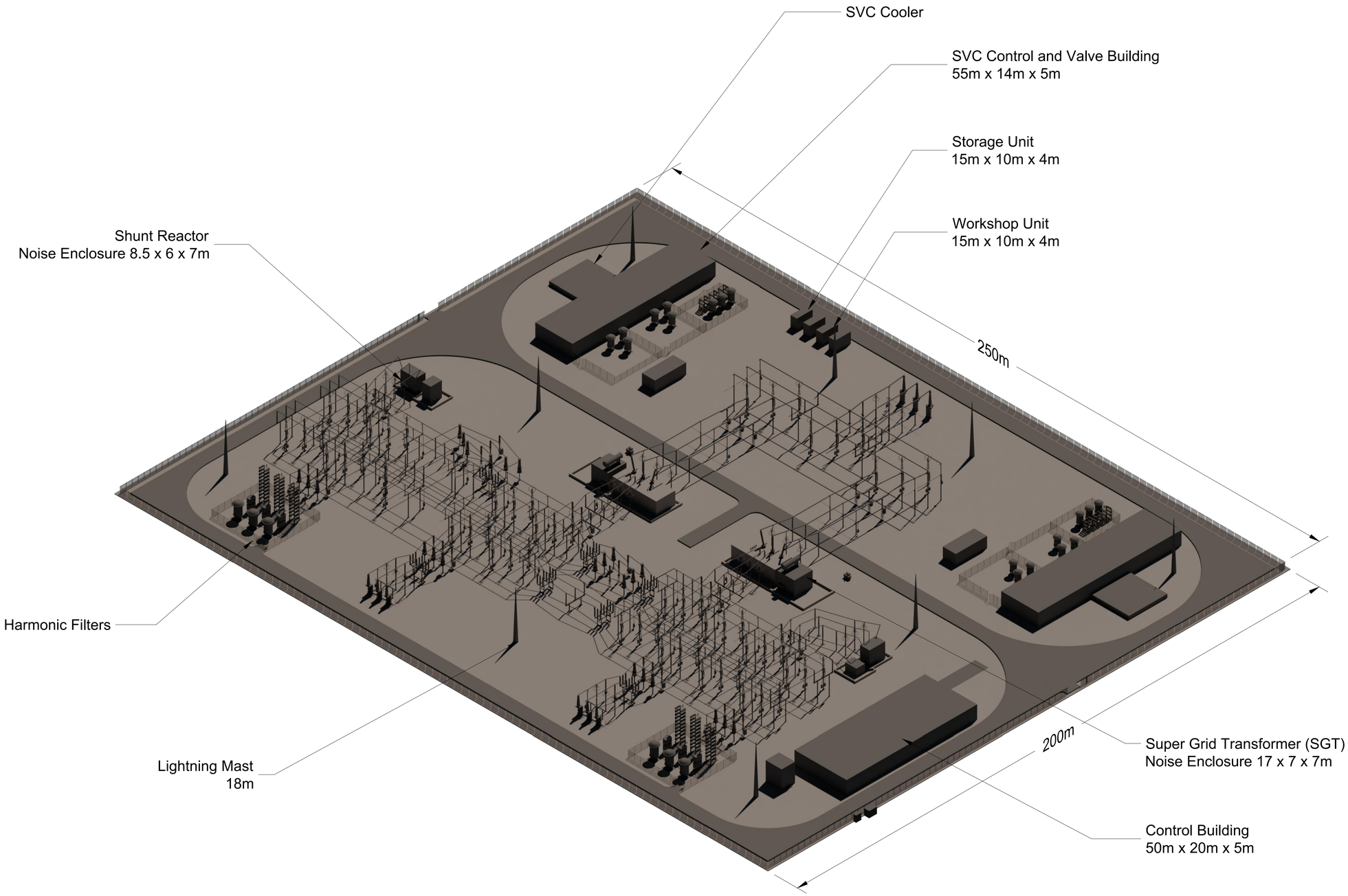

Notes

1. DIMENSION IS IN MM UNLESS STATED OTHERWISE.
2. THIS LAYOUT IS INDICATIVE ONLY. THE FOLLOWING ASPECTS SHALL BE CONSIDERED WHEN DEVELOPING THE DESIGN:
   - -MAGNETIC CLEARANCE FROM THE AIR CORE REACTORS
   - -FIRE SUPPRESSION SYSTEM
   - -SITE LIGHTING AND SECURITY SYSTEMS
   - -PEDESTRIAN ACCESS REQUIREMENT TO EQUIPMENT/BUILDING
   - -LIGHTNING PROTECTION
3. THE EQUIPMENT APPEARANCE AND SIZE SHOWN ARE INDICATIVE ONLY.

Key to symbols

Reference drawings

AYM-MOT-V7-ZZ-M3-E-0001

Rev	Date	Drawn	Description	Ch'k'd	App'd
03	17/10/22	MS	Updated as per Client Comments	GR	SA
02	10/08/21	JK	Title Change	MB	SA
01	22/04/21	JK	Preliminary Issue	MB	SA

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AWEL Y MÔR Offshore Wind Farm

Title

Awel y Môr Offshore Wind Farm
Onshore Substation
Figure 2: Indicative AIS Substation

Sheet 01 of 01

Designed	J. Kensall	JK	Eng check	M. Barton	MB
Drawn	J. Kensall	JK	Coordination	T. King	TK
Dwg check	T. King	TK	Approved	S. Anantharam	SA

MMD Project Number	Scale at A1	Security
419577	NTS	STD

Client Number	Suit. Code
003977835	S3

Drawing Number	Revision
AYM-MOT-V0-XX-DR-E-0052	03

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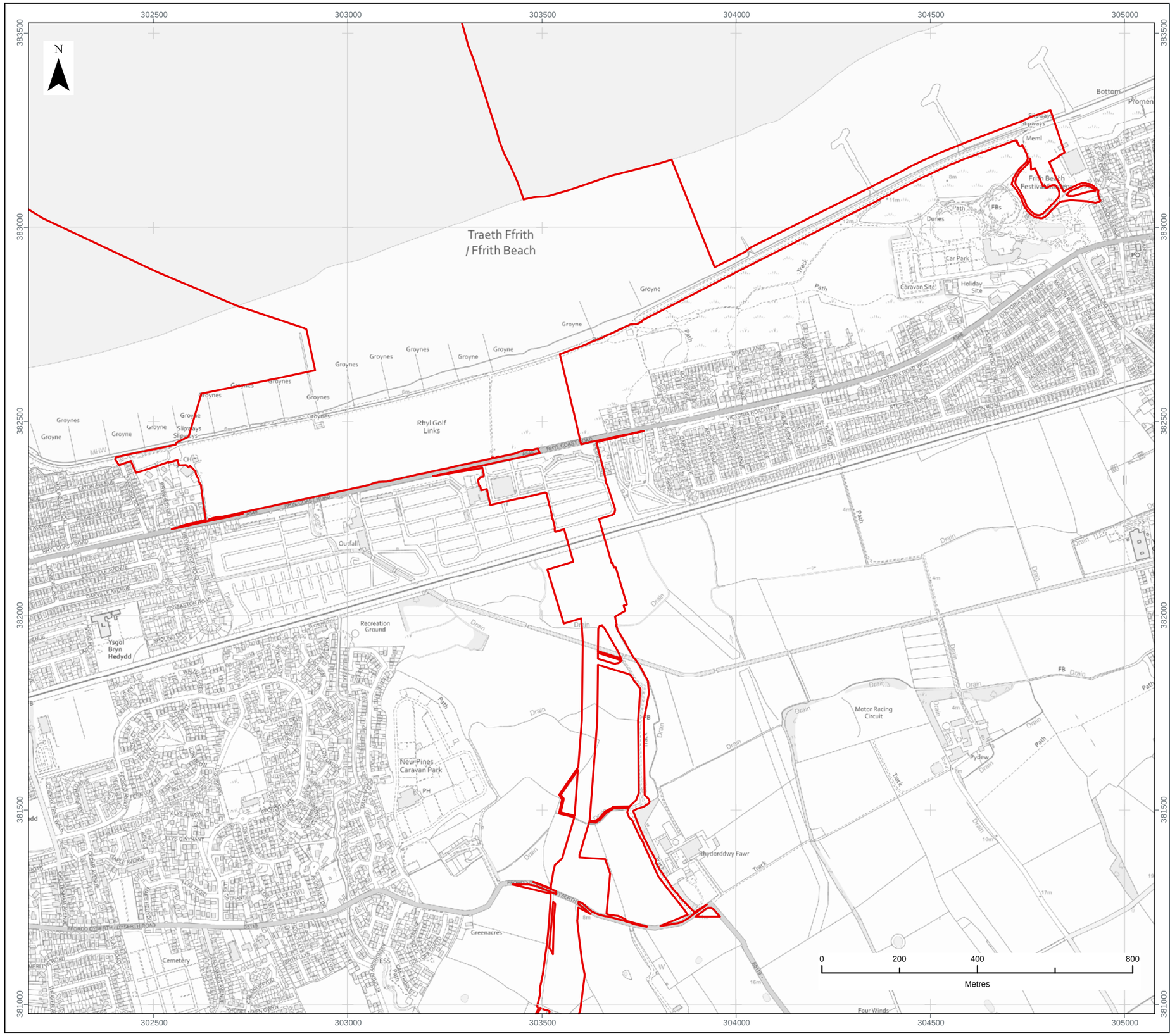
10 Appendix G – Indicative Image of Jack-Up Barge in the Shallow Sub-tidal Zone

Illustrative image of a jackup barge in the shallow sub-tidal zone during the Burbo Bank Extension cable pull on Ffrith Beach in 2016. Image courtesy of Aerial Pixed Ltd and sourced from https://www.youtube.com/watch?v=VBFRLgn9B3U

11 Appendix H – Response to ExQ1.2.49 – Main Woodlands



LEGEND

Order Limits

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX H - RESPONSE TO
ExQ1.2.49 - MAIN WOODLANDS

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

FIGURE 2
Page 1 of 5

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

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

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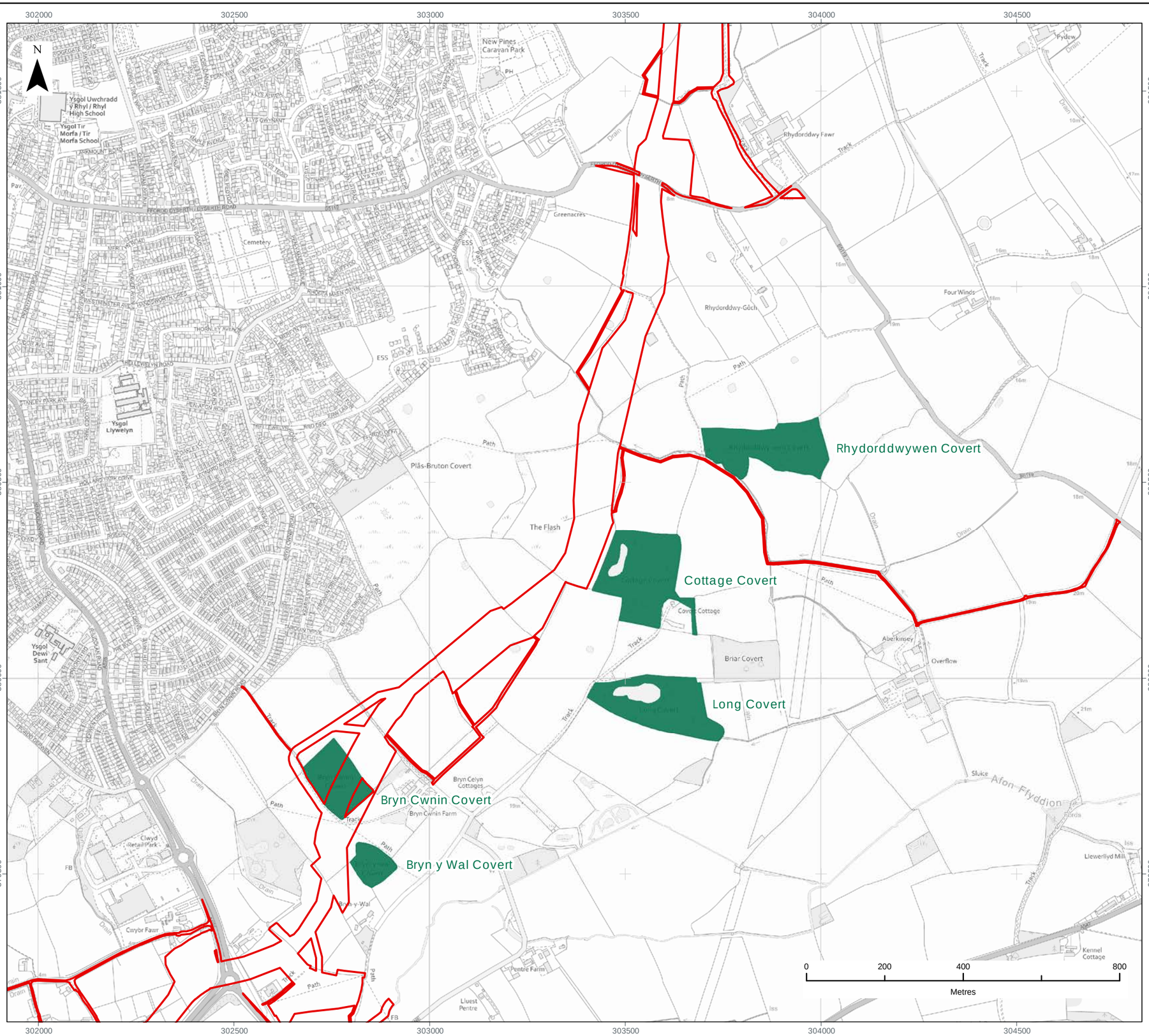

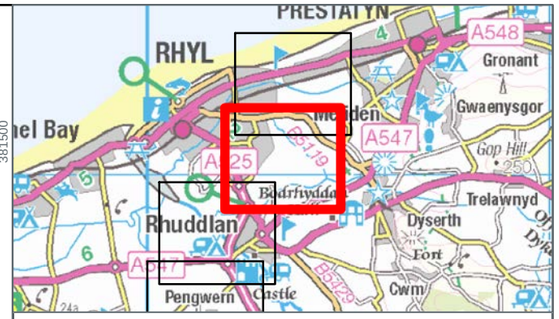

LEGEND

- Order Limits
- Referenced Woodland

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PROJECT TITLE:

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FIGURE TITLE:

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1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

FIGURE 2

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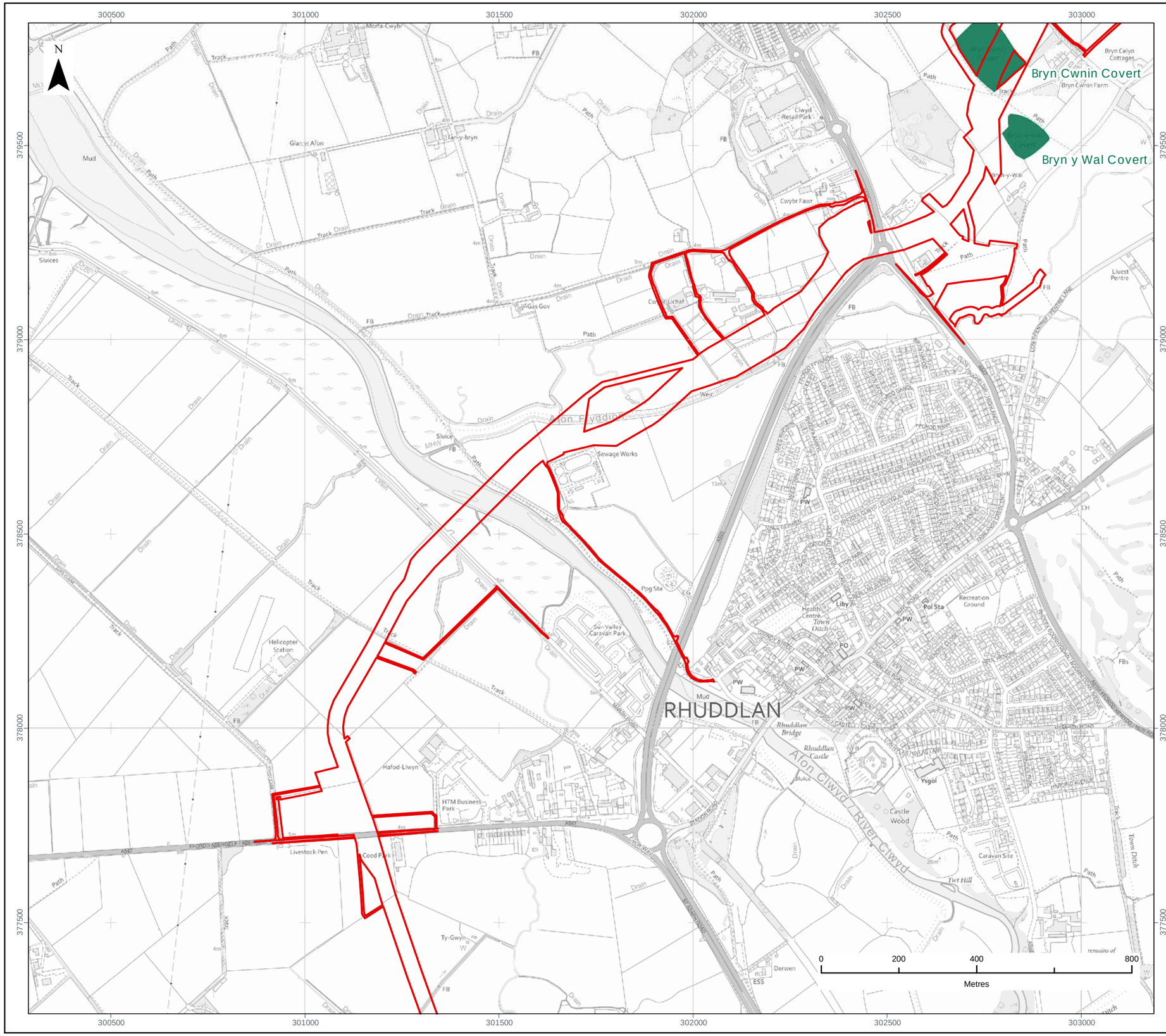

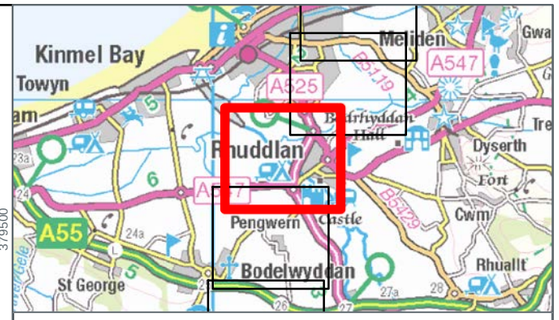

LEGEND

- Order Limits
- Referenced Woodland

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PROJECT TITLE:

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FIGURE TITLE:

APPENDIX H - RESPONSE TO
ExQ1.2.49 - MAIN WOODLANDS

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

FIGURE 2
Page 3 of 5

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
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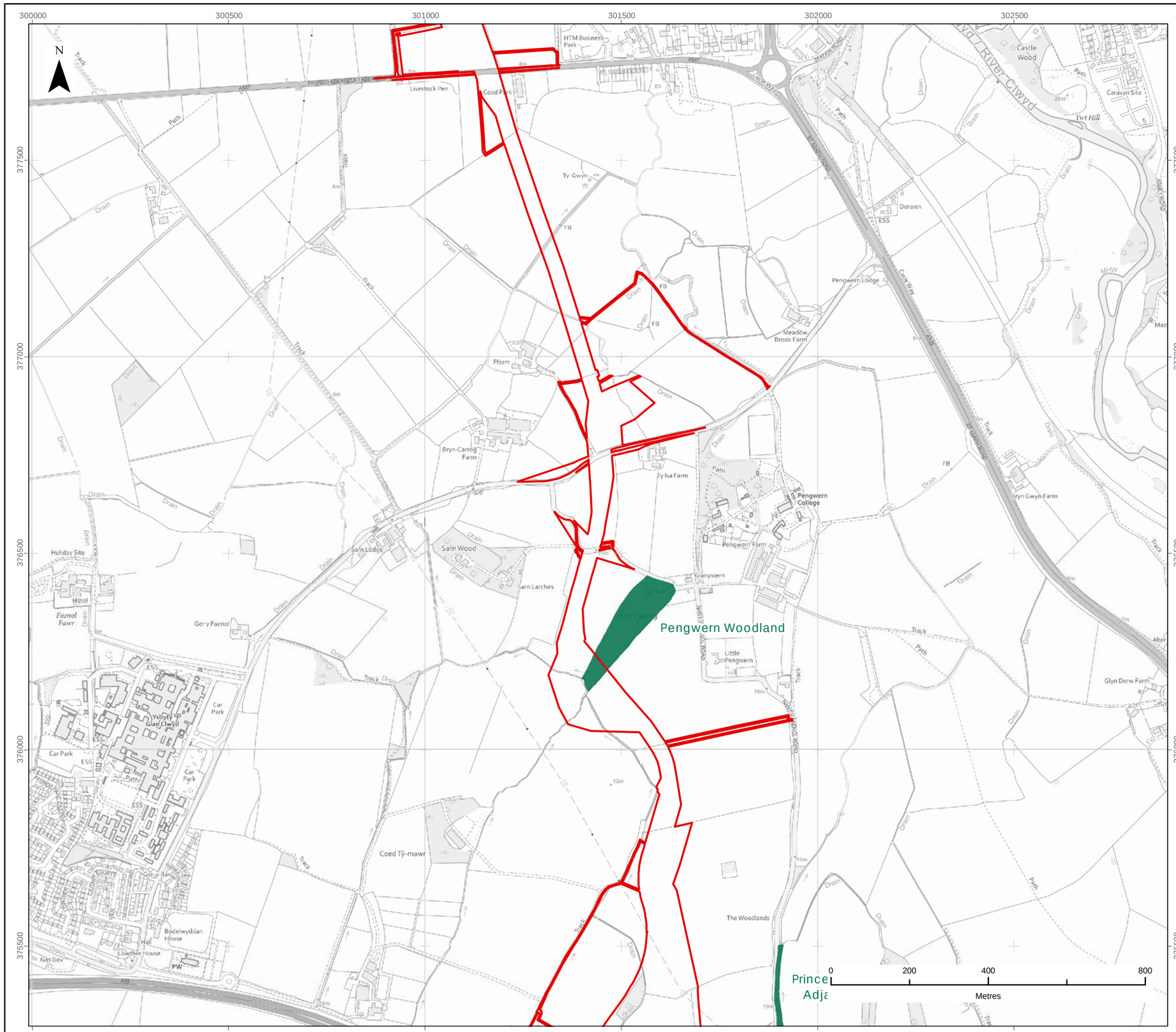

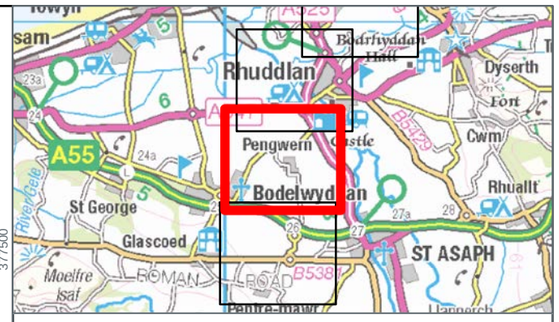

LEGEND

- Order Limits
- Referenced Woodland

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APPENDIX H - RESPONSE TO
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VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

FIGURE 2
Page 4 of 5

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
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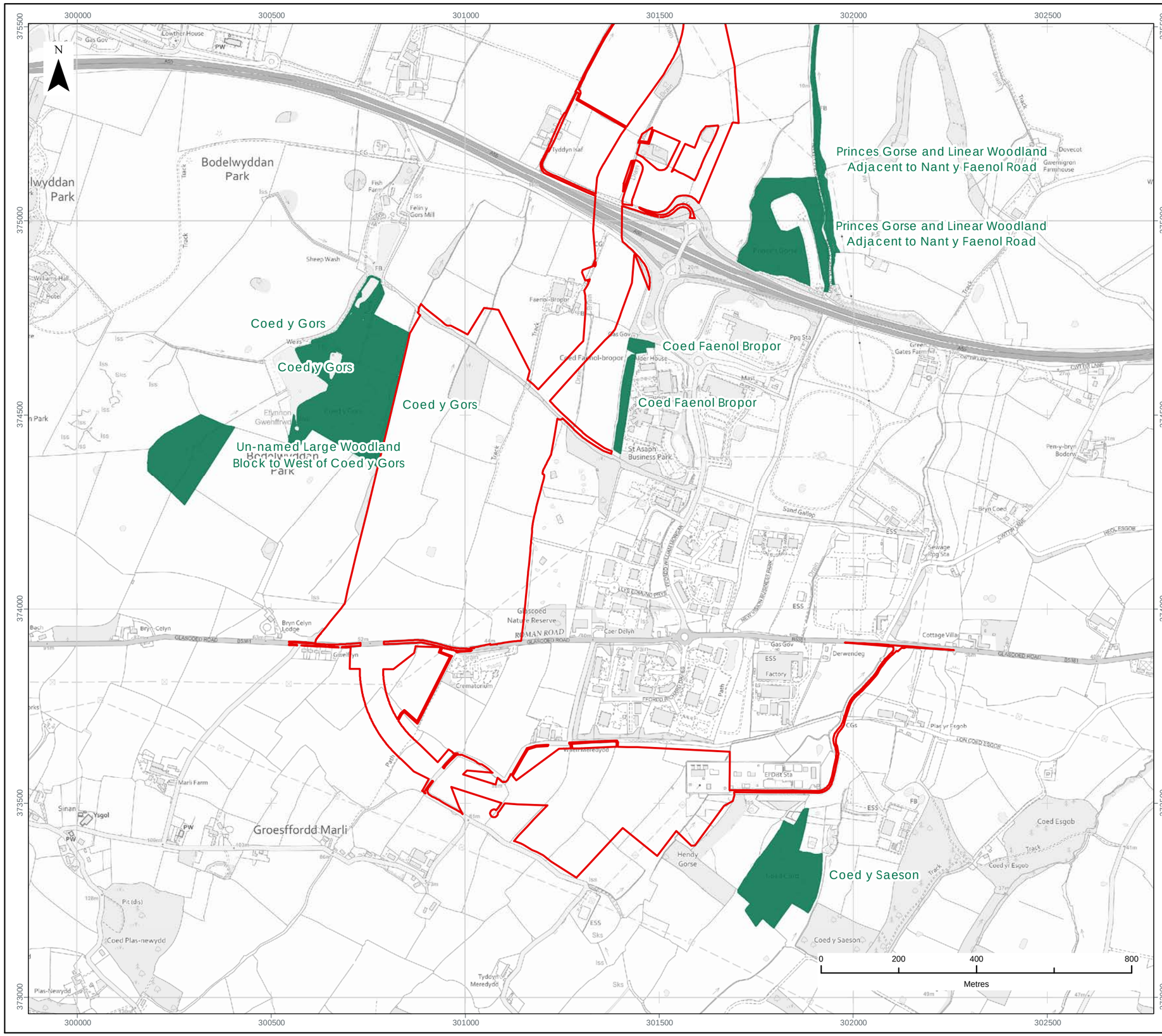

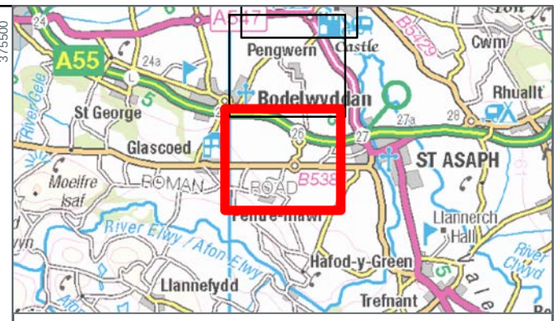

LEGEND

- Order Limits
- Referenced Woodland

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PROJECT TITLE:

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APPENDIX H - RESPONSE TO **ExQ1.**2.49 - MAIN WOODLANDS

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

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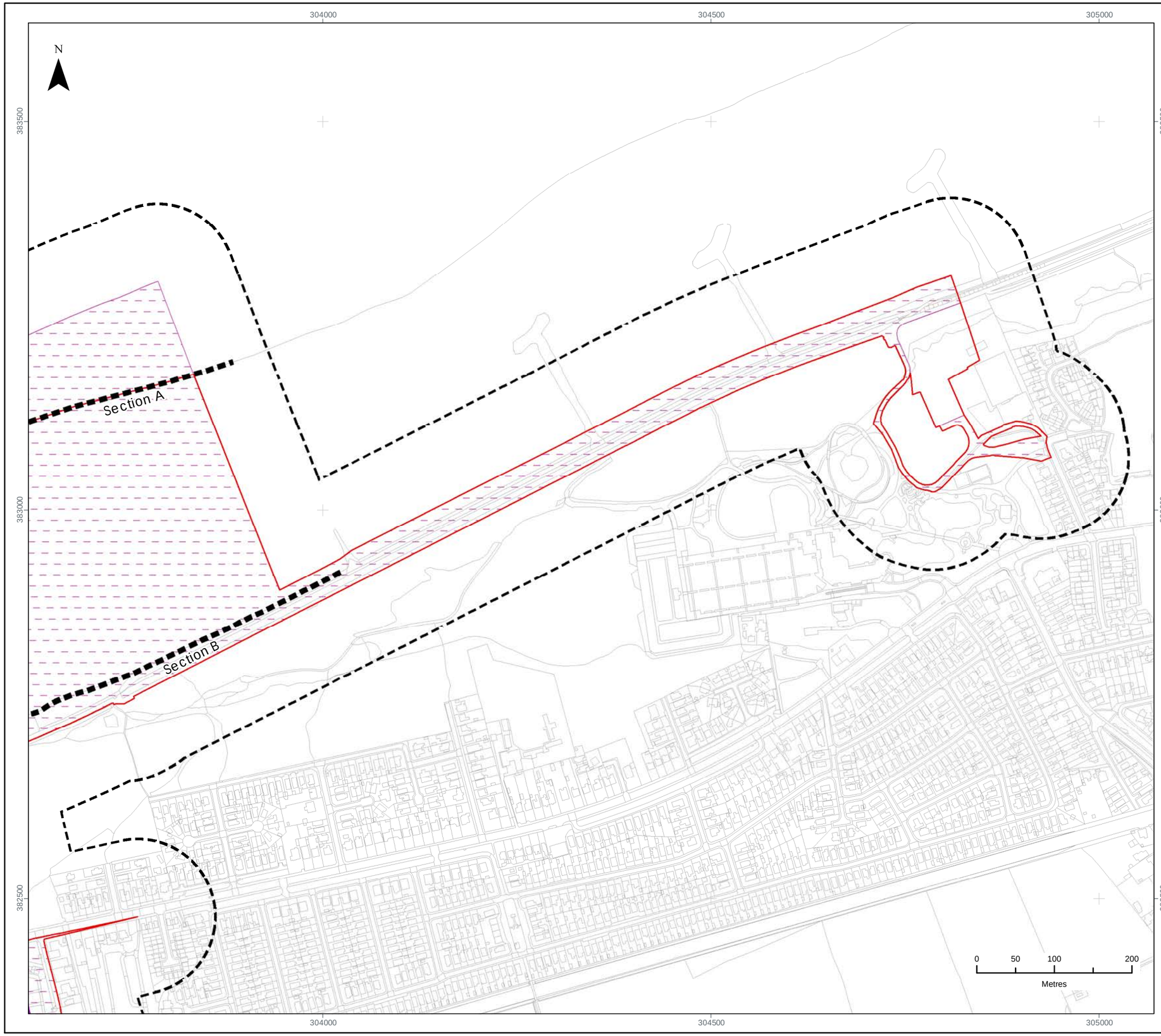
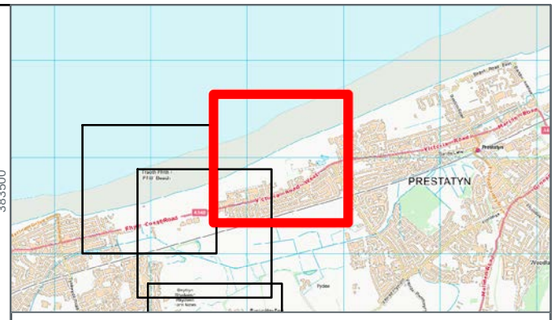
12 Appendix I – Response to ExQ1.2.86 – Update to Habitat and Hedgerow Survey





LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Secondary Codes	
10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural
17 - Ruderal / ephemeral	greenspace
19 - Ponds (Priority Habitat)	94 - Green lane
25 - Coastal and flood plain grazing marsh	117 - Dry
33 - Ancient woodland site	118 - Mesic
36 - Plantation	119 - Seasonally wet
37 - Semi-natural woodland	120 - Wet
38 - Secondary woodland	121 - Waterlogged
39 - Freshwater - man-made	122 - Inundation vegetation
40 - Freshwater - heavily modified	138 - Saline influence
41 - Freshwater - natural	147 - Falled dead wood abundant
47 - Native	148 - Flower forage abundant
55 - High forest	159 - Standing dead wood abundant
57 - Young trees - self-set	162 - Temporary waterbodies
58 - Grazed	173 - Swamp
64 - Mown	190 - Hedgerow with trees
	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO E**xQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

FIGURE NUMBER:

FIGURE 1

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

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Offshore Wind Farm

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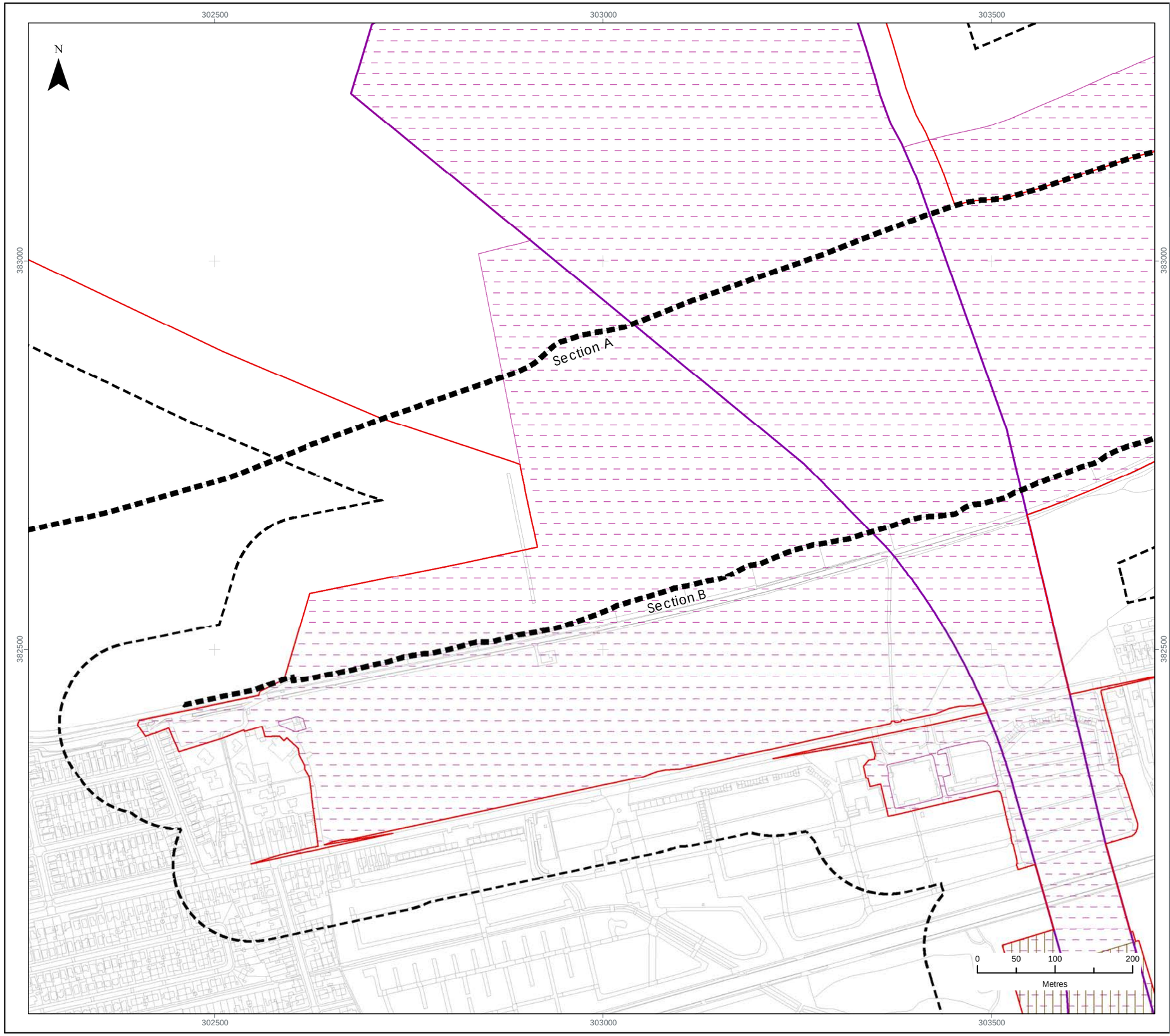

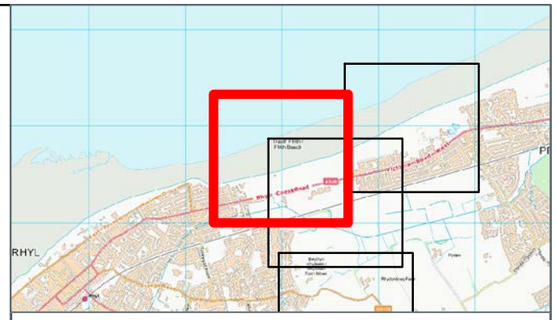

LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor
- Proposed Transition Joint Bay Construction Compound

Secondary Codes

10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural
17 - Ruderal / ephemeral	greenspace
19 - Ponds (Priority Habitat)	94 - Green lane
25 - Coastal and flood plain grazing marsh	117 - Dry
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37 - Semi-natural woodland	120 - Wet
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39 - Freshwater - man-made	122 - Inundation vegetation
40 - Freshwater - heavily modified	138 - Saline influence
41 - Freshwater - natural	147 - Falled dead wood abundant
47 - Native	148 - Flower forage abundant
55 - High forest	159 - Standing dead wood abundant
57 - Young trees - self-set	162 - Temporary waterbodies
58 - Grazed	173 - Swamp
64 - Mown	190 - Hedgerow with trees
	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

FIGURE NUMBER:

FIGURE 2

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

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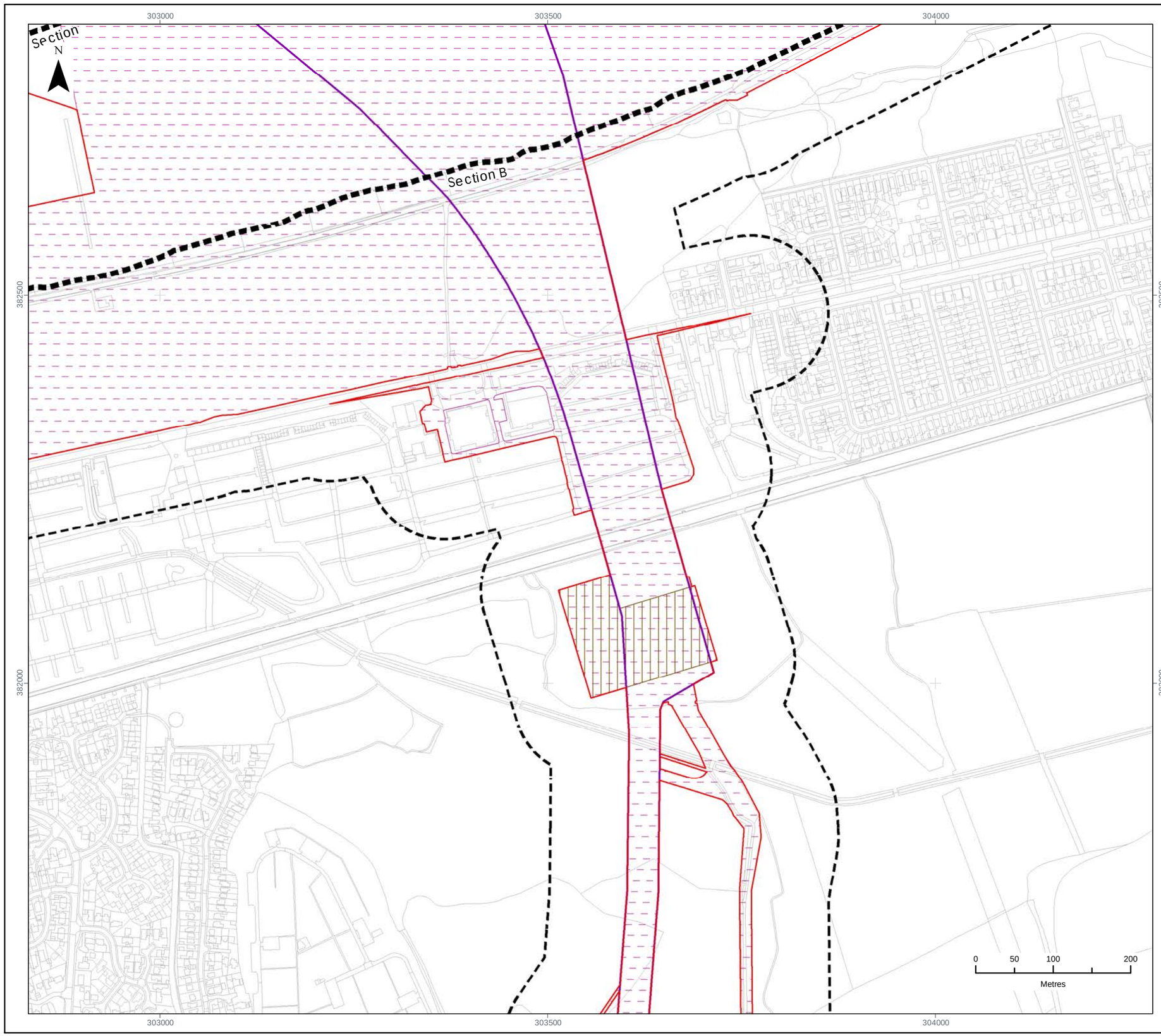
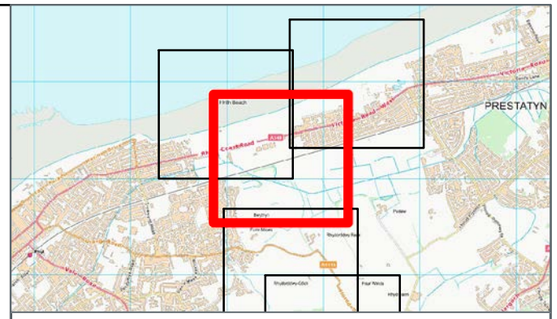
AWEL Y MÔR
Offshore Wind Farm





LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor
- Proposed Transition Joint Bay Construction Compound

Secondary Codes	
10 - Scattered scrub	66 - Frequently mown
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	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

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FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

FIGURE NUMBER:

FIGURE 3

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

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Offshore Wind Farm

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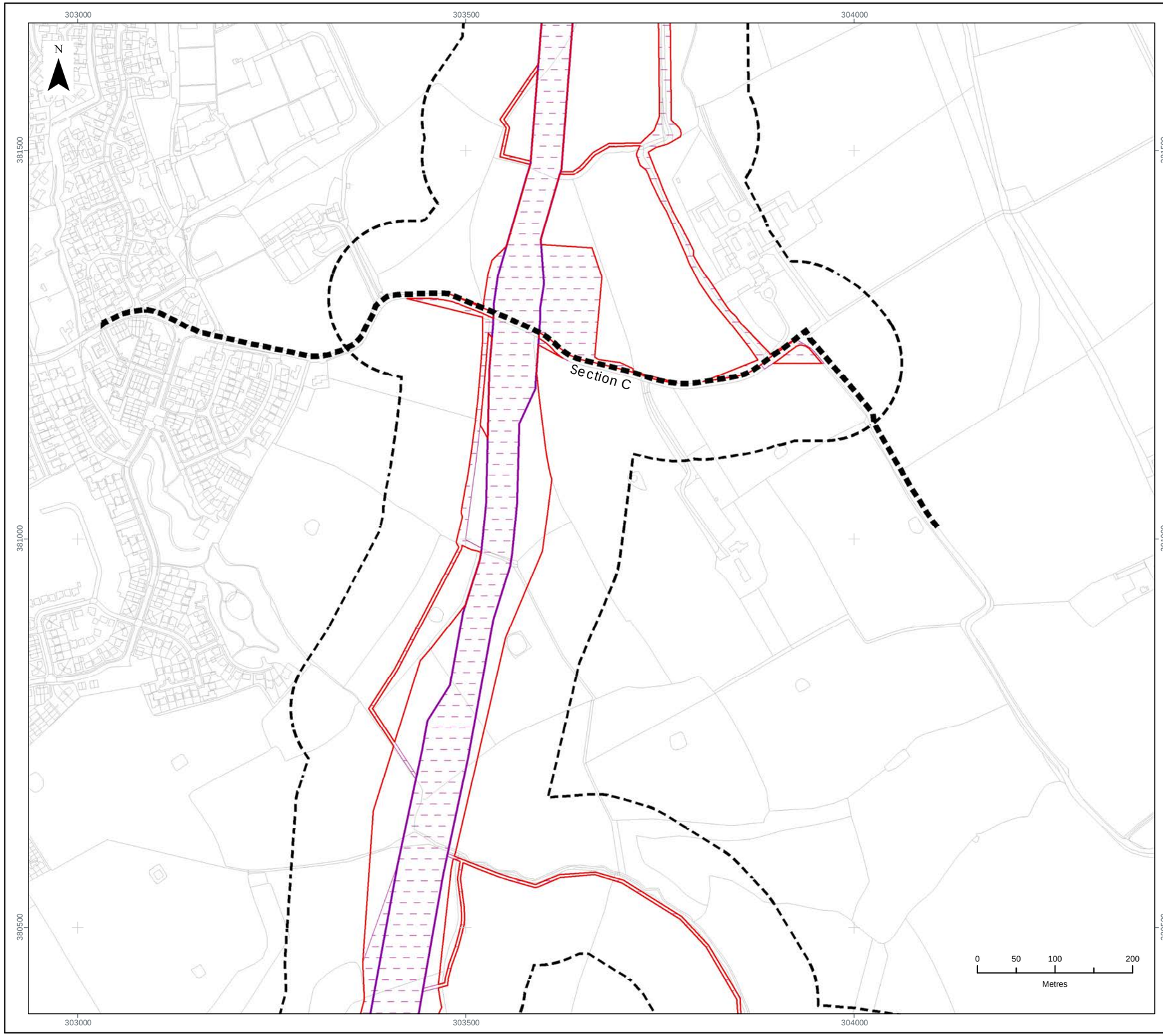

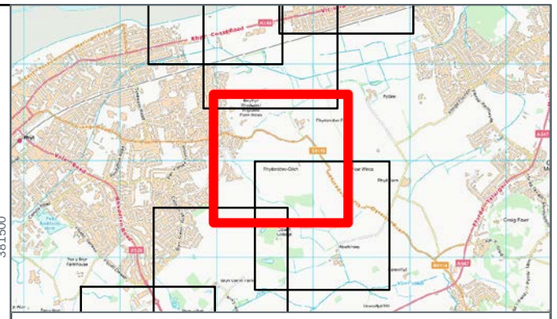

LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Secondary Codes	
10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural greenspace
17 - Ruderal / ephemeral	94 - Green lane
19 - Ponds (Priority Habitat)	117 - Dry
25 - Coastal and flood plain grazing marsh	118 - Mesic
33 - Ancient woodland site	119 - Seasonally wet
36 - Plantation	120 - Wet
37 - Semi-natural woodland	121 - Waterlogged
38 - Secondary woodland	122 - Inundation vegetation
39 - Freshwater - man-made	138 - Saline influence
40 - Freshwater - heavily modified	147 - Falled dead wood abundant
41 - Freshwater - natural	148 - Flower forage abundant
47 - Native	159 - Standing dead wood abundant
55 - High forest	162 - Temporary waterbodies
57 - Young trees - self-set	173 - Swamp
58 - Grazed	190 - Hedgerow with trees
64 - Mown	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

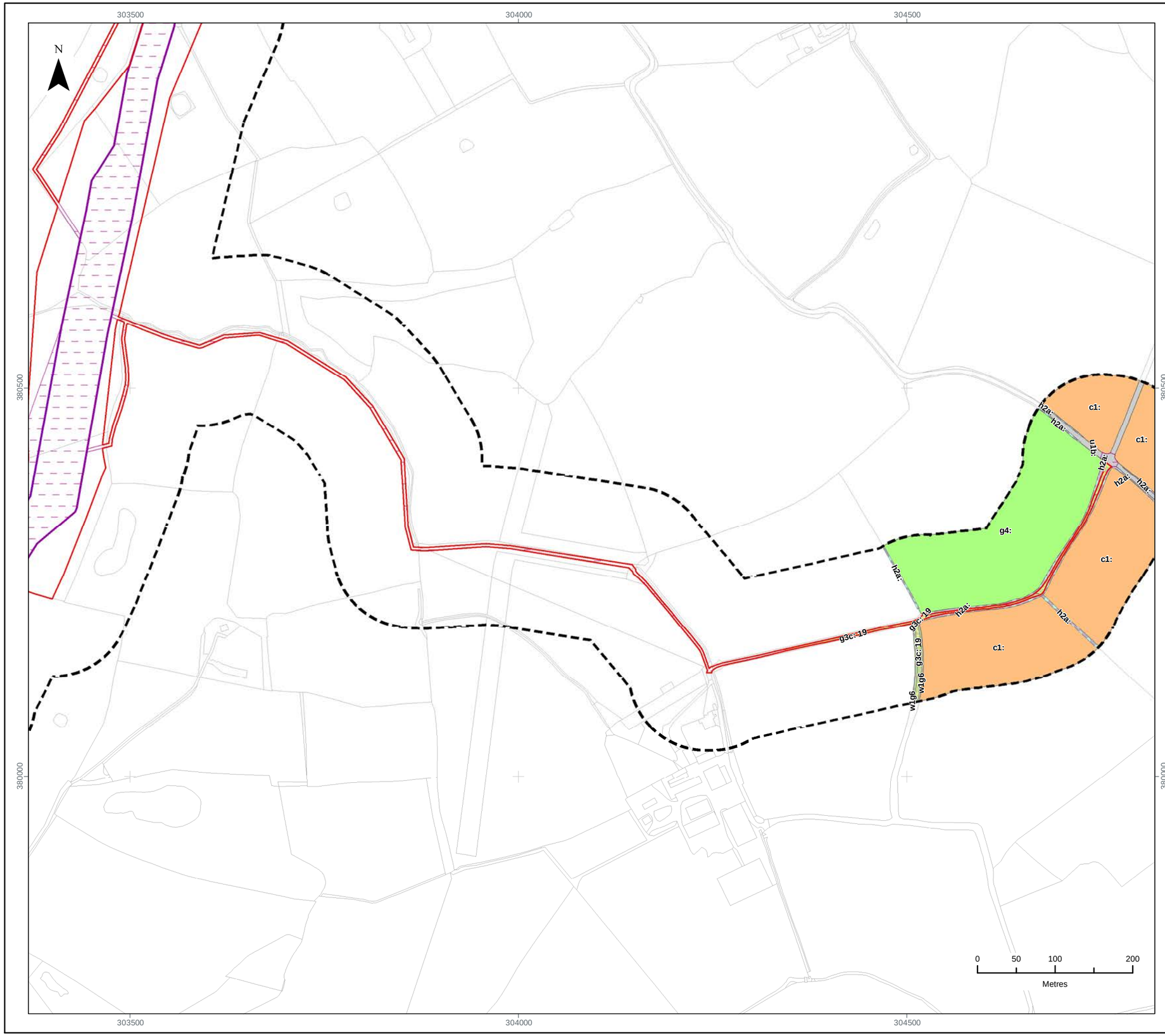
FIGURE NUMBER:

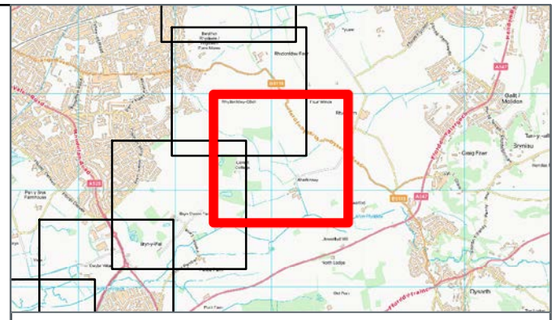
FIGURE 4

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

P:\05356 - GoBe Consultants Ltd\00009 Awel y Mor\Tech\GIS\Dwgs\Wking\202208 Post Submission Support\05356.00009.0324.0 Habitat Map Additional Habitats.mxd





LEGEND

- Order Limits
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Cropland - Arable and Horticulture
- c1 - Arable and Horticulture

Grassland - Neutral Grassland
- g3c - Other Neutral Grassland

Grassland - Modified Grassland
- g4 - Modified Grassland

Heathland and Shrub - Hedgerows
- h2a - Hedgerow (Priority Habitat)

Urban - Built-up Areas and Gardens
- u1b - Developed Land; Sealed Surface

Woodland and Forest - Broadleaved Mixed and Yew Woodland
- w1g6 - Line of Trees

Secondary Codes

10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb / ephemeral	86 - Accessible natural greenspace
17 - Ruderal	94 - Green lane
19 - Ponds (Priority Habitat)	117 - Dry
25 - Coastal and flood plain grazing marsh	118 - Mesic
33 - Ancient woodland site	119 - Seasonally wet
36 - Plantation	120 - Wet
37 - Semi-natural woodland	121 - Waterlogged
38 - Secondary woodland	122 - Inundation vegetation
39 - Freshwater - man-made	138 - Saline influence
40 - Freshwater - heavily modified	147 - Falled dead wood abundant
41 - Freshwater - natural	148 - Flower forage abundant
47 - Native	159 - Standing dead wood abundant
55 - High forest	162 - Temporary waterbodies
57 - Young trees - self-set	173 - Swamp
58 - Grazed	190 - Hedgerow with trees
64 - Mown	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

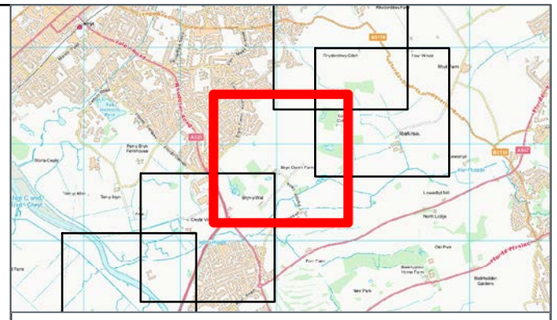
VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

FIGURE NUMBER:

FIGURE 5

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm



LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Secondary Codes	
10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural greenspace
17 - Ruderal / ephemeral	94 - Green lane
19 - Ponds (Priority Habitat)	117 - Dry
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36 - Plantation	120 - Wet
37 - Semi-natural woodland	121 - Waterlogged
38 - Secondary woodland	122 - Inundation vegetation
39 - Freshwater - man-made	138 - Saline influence
40 - Freshwater - heavily modified	147 - Falled dead wood abundant
41 - Freshwater - natural	148 - Flower forage abundant
47 - Native	159 - Standing dead wood abundant
55 - High forest	162 - Temporary waterbodies
57 - Young trees - self-set	173 - Swamp
58 - Grazed	190 - Hedgerow with trees
64 - Mown	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

FIGURE NUMBER:

FIGURE 6

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

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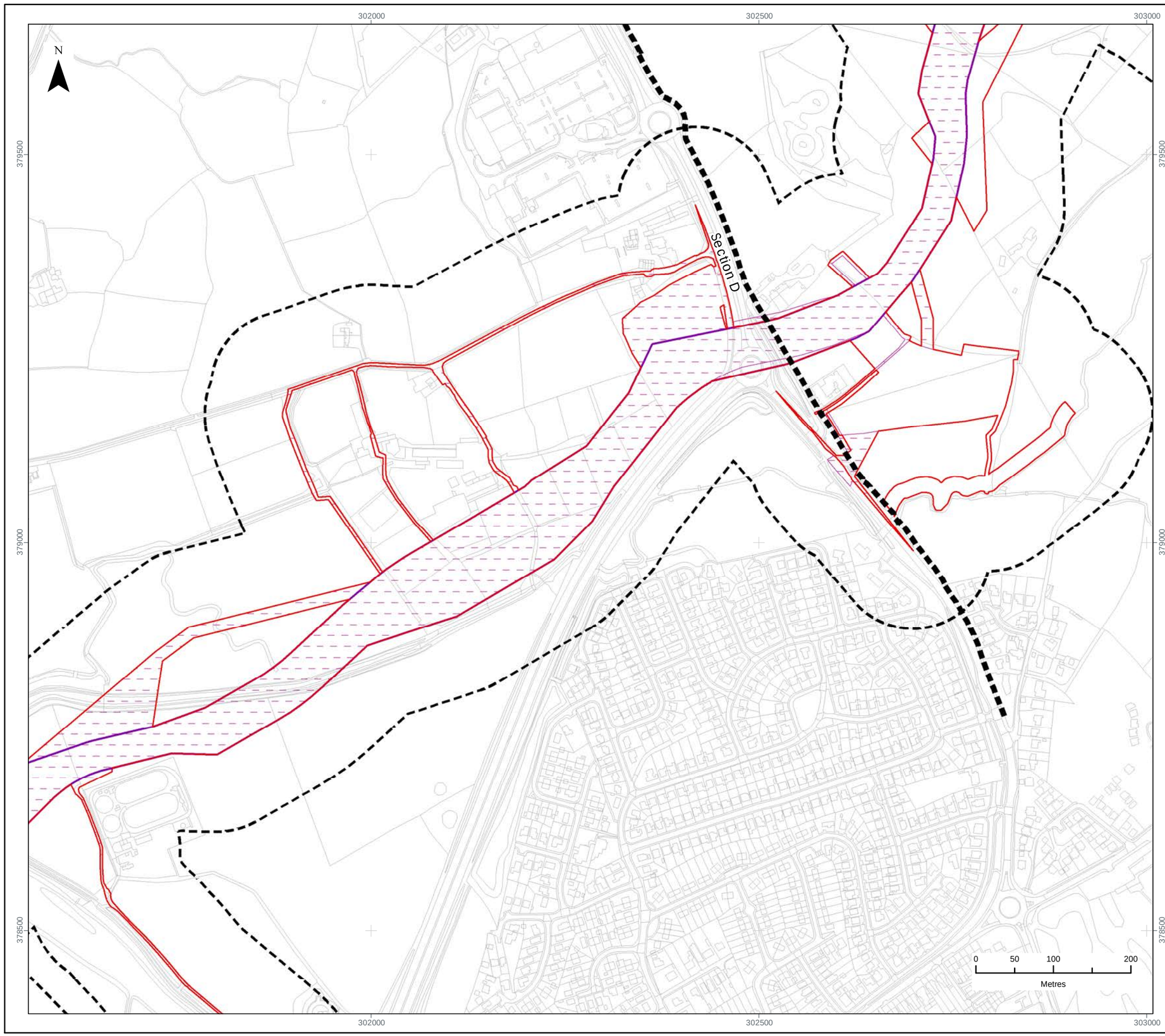

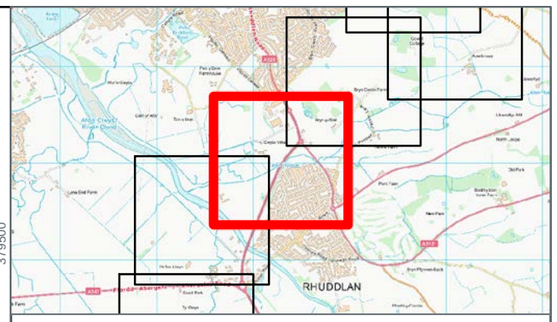

LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Secondary Codes

10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural greenspace
17 - Ruderal / ephemeral	94 - Green lane
19 - Ponds (Priority Habitat)	117 - Dry
25 - Coastal and flood plain grazing marsh	118 - Mesic
33 - Ancient woodland site	119 - Seasonally wet
36 - Plantation	120 - Wet
37 - Semi-natural woodland	121 - Waterlogged
38 - Secondary woodland	122 - Inundation vegetation
39 - Freshwater - man-made	138 - Saline influence
40 - Freshwater - heavily modified	147 - Falled dead wood abundant
41 - Freshwater - natural	148 - Flower forage abundant
47 - Native	159 - Standing dead wood abundant
55 - High forest	162 - Temporary waterbodies
57 - Young trees - self-set	173 - Swamp
58 - Grazed	190 - Hedgerow with trees
64 - Mown	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

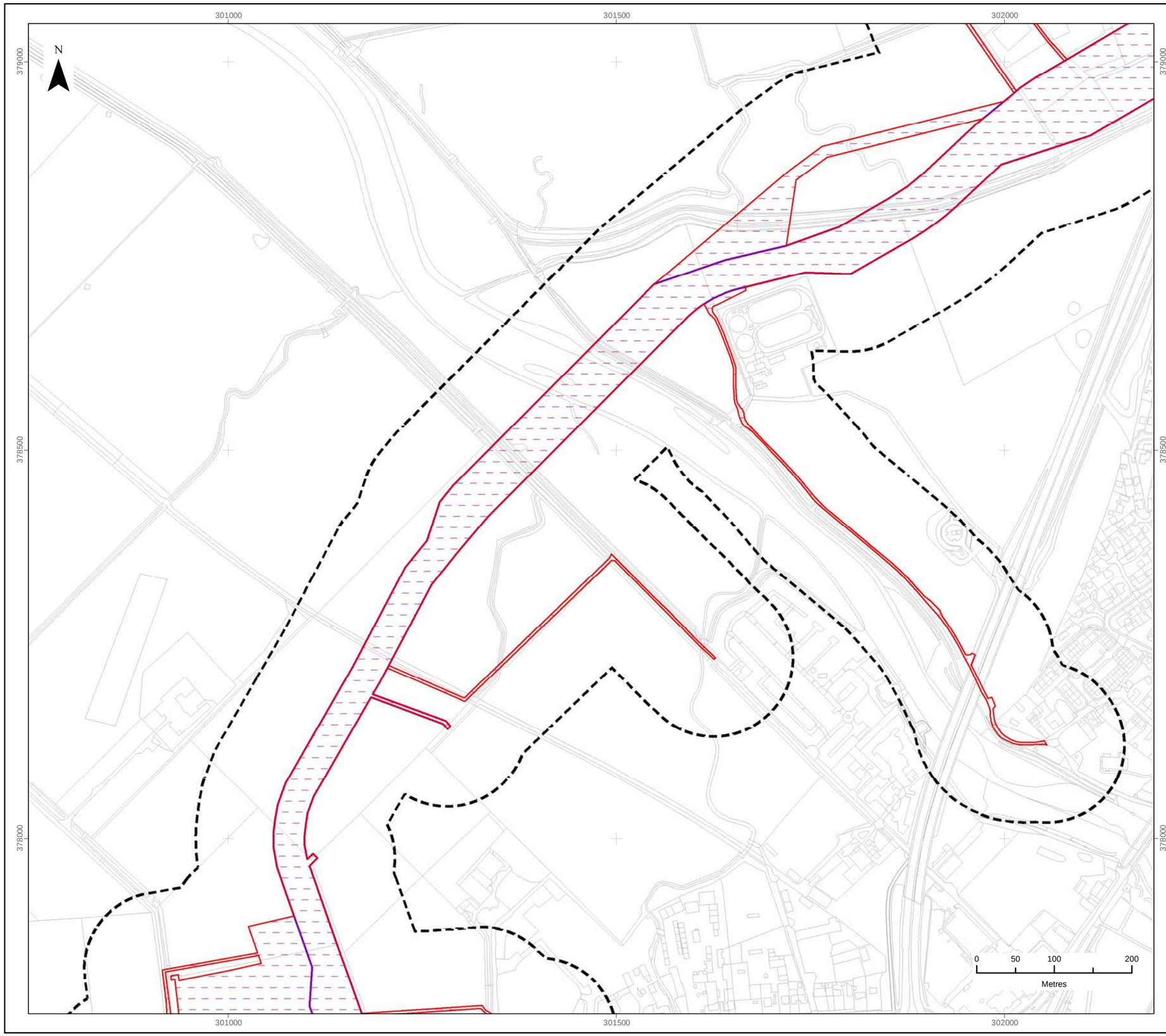
VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

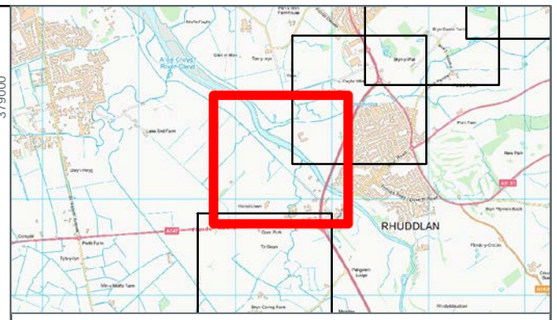
FIGURE NUMBER:

FIGURE 7

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm





LEGEND

- Order Limits
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Secondary Codes

10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb / ruderal / ephemeral	86 - Accessible natural greenspace
17 - Ponds (Priority Habitat)	94 - Green lane
25 - Coastal and flood plain grazing marsh	117 - Dry
33 - Ancient woodland site	118 - Mesic
36 - Plantation	119 - Seasonally wet
37 - Semi-natural woodland	120 - Wet
38 - Secondary woodland	121 - Waterlogged
39 - Freshwater - man-made	122 - Inundation vegetation
40 - Freshwater - heavily modified	138 - Saline influence
41 - Freshwater - natural	147 - Falled dead wood abundant
47 - Native	148 - Flower forage abundant
55 - High forest	159 - Standing dead wood abundant
57 - Young trees - self-set	162 - Temporary waterbodies
58 - Grazed	173 - Swamp
64 - Mown	190 - Hedgerow with trees
	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

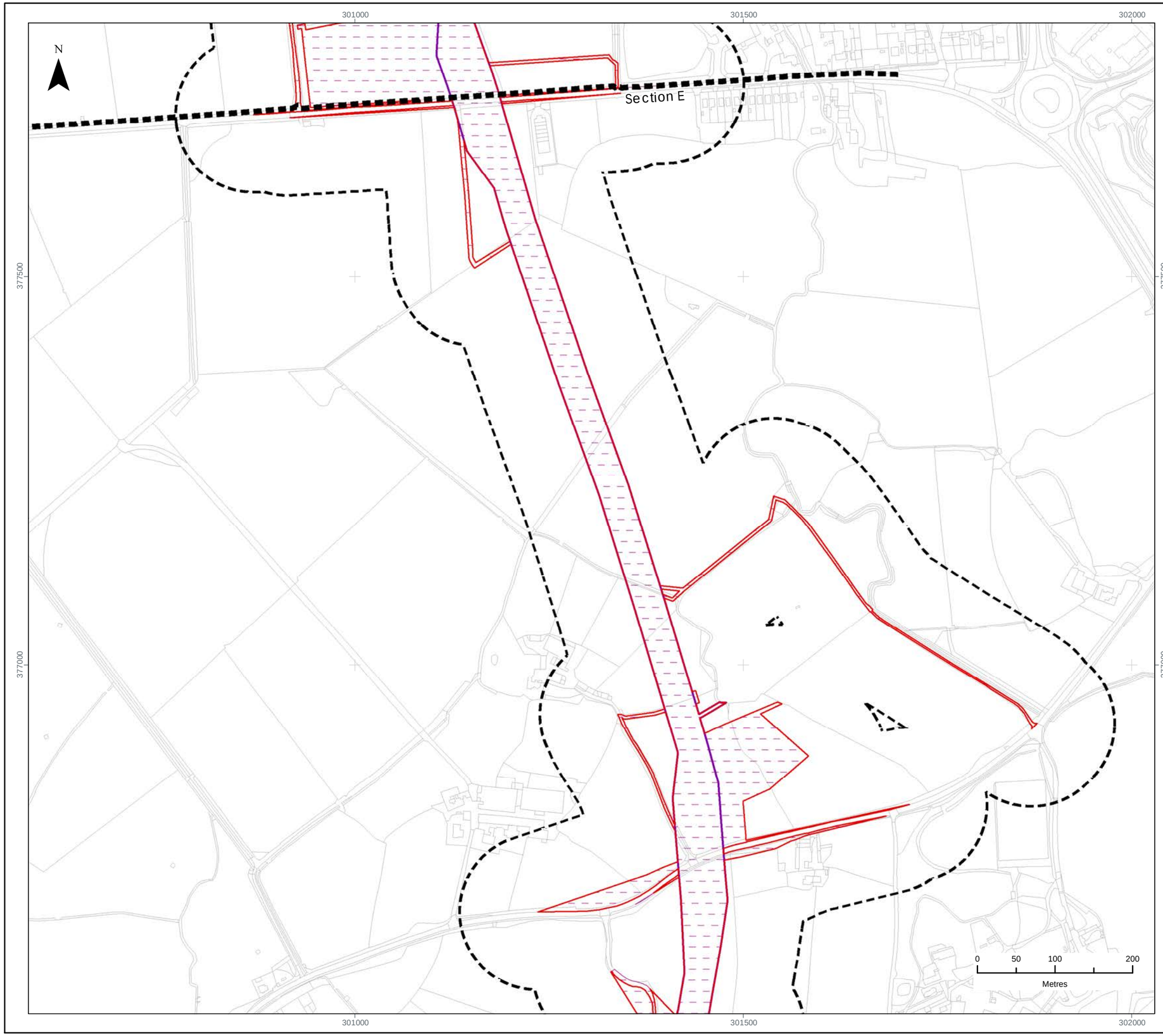
VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

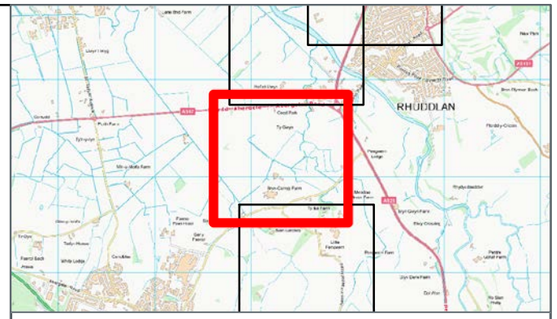
FIGURE NUMBER:

FIGURE 8

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm





LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Secondary Codes	
10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural greenspace
17 - Ruderal / ephemeral	94 - Green lane
19 - Ponds (Priority Habitat)	117 - Dry
25 - Coastal and flood plain grazing marsh	118 - Mesic
33 - Ancient woodland site	119 - Seasonally wet
36 - Plantation	120 - Wet
37 - Semi-natural woodland	121 - Waterlogged
38 - Secondary woodland	122 - Inundation vegetation
39 - Freshwater - man-made	138 - Saline influence
40 - Freshwater - heavily modified	147 - Failed dead wood abundant
41 - Freshwater - natural	148 - Flower forage abundant
47 - Native	159 - Standing dead wood abundant
55 - High forest	162 - Temporary waterbodies
57 - Young trees - self-set	173 - Swamp
58 - Grazed	190 - Hedgerow with trees
64 - Mown	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

FIGURE NUMBER:

FIGURE 9

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

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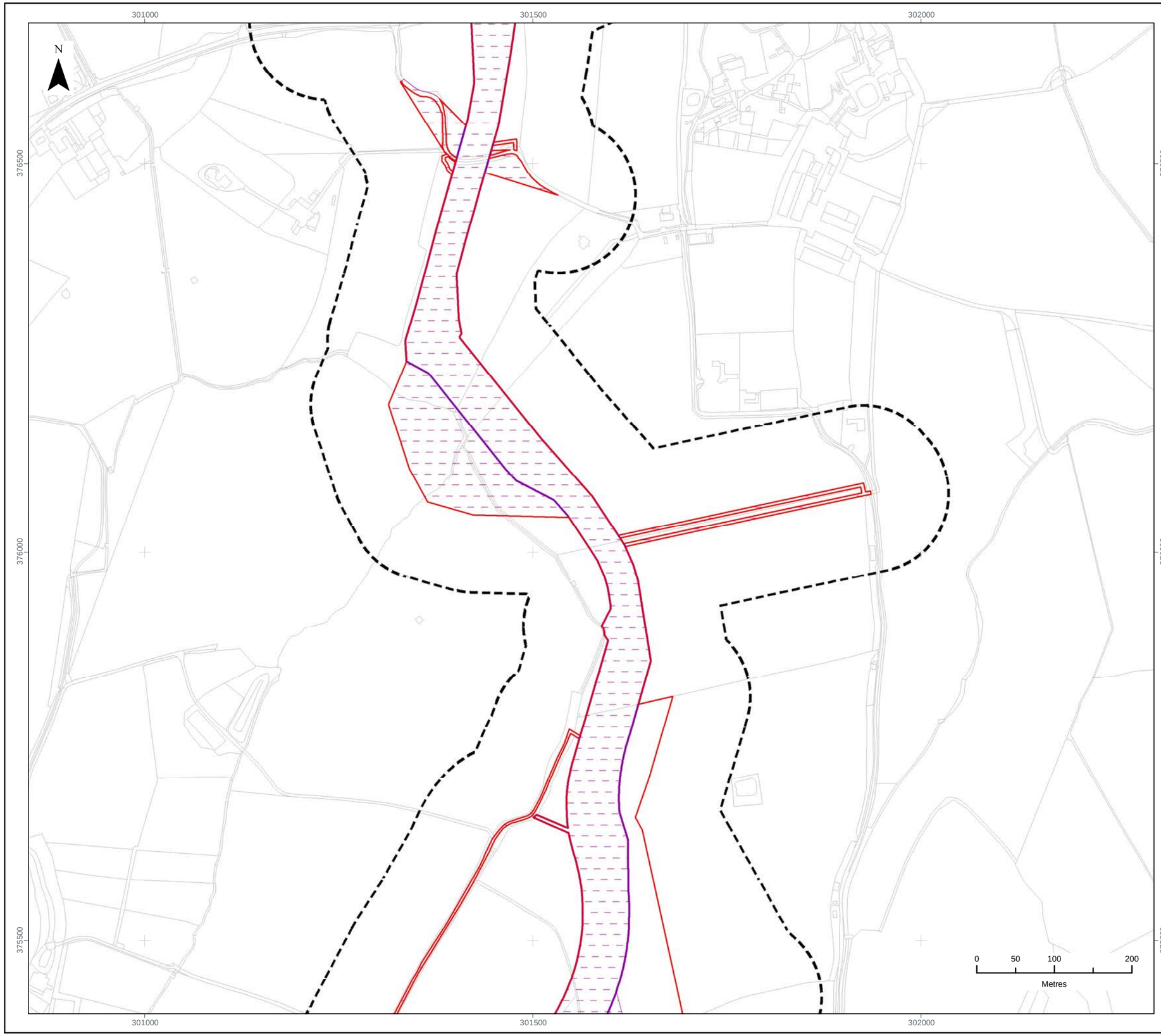

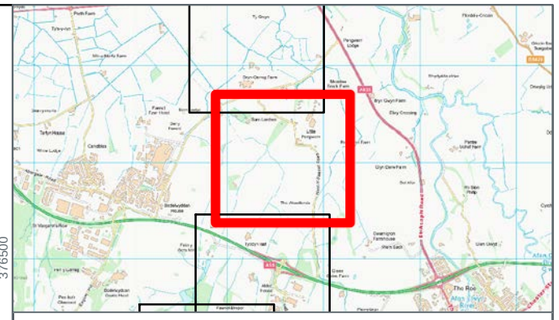

LEGEND

- Order Limits
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor

Secondary Codes

10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb / ephemeral	86 - Accessible natural greenspace
17 - Ruderal (Priority Habitat)	94 - Green lane
19 - Ponds	117 - Dry
25 - Coastal and flood plain grazing marsh	118 - Mesic
33 - Ancient woodland site	119 - Seasonally wet
36 - Plantation	120 - Wet
37 - Semi-natural woodland	121 - Waterlogged
38 - Secondary woodland	122 - Inundation vegetation
39 - Freshwater - man-made	138 - Saline influence
40 - Freshwater - heavily modified	147 - Falled dead wood abundant
41 - Freshwater - natural	148 - Flower forage abundant
47 - Native	159 - Standing dead wood abundant
55 - High forest	162 - Temporary waterbodies
57 - Young trees - self-set	173 - Swamp
58 - Grazed	190 - Hedgerow with trees
64 - Mown	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

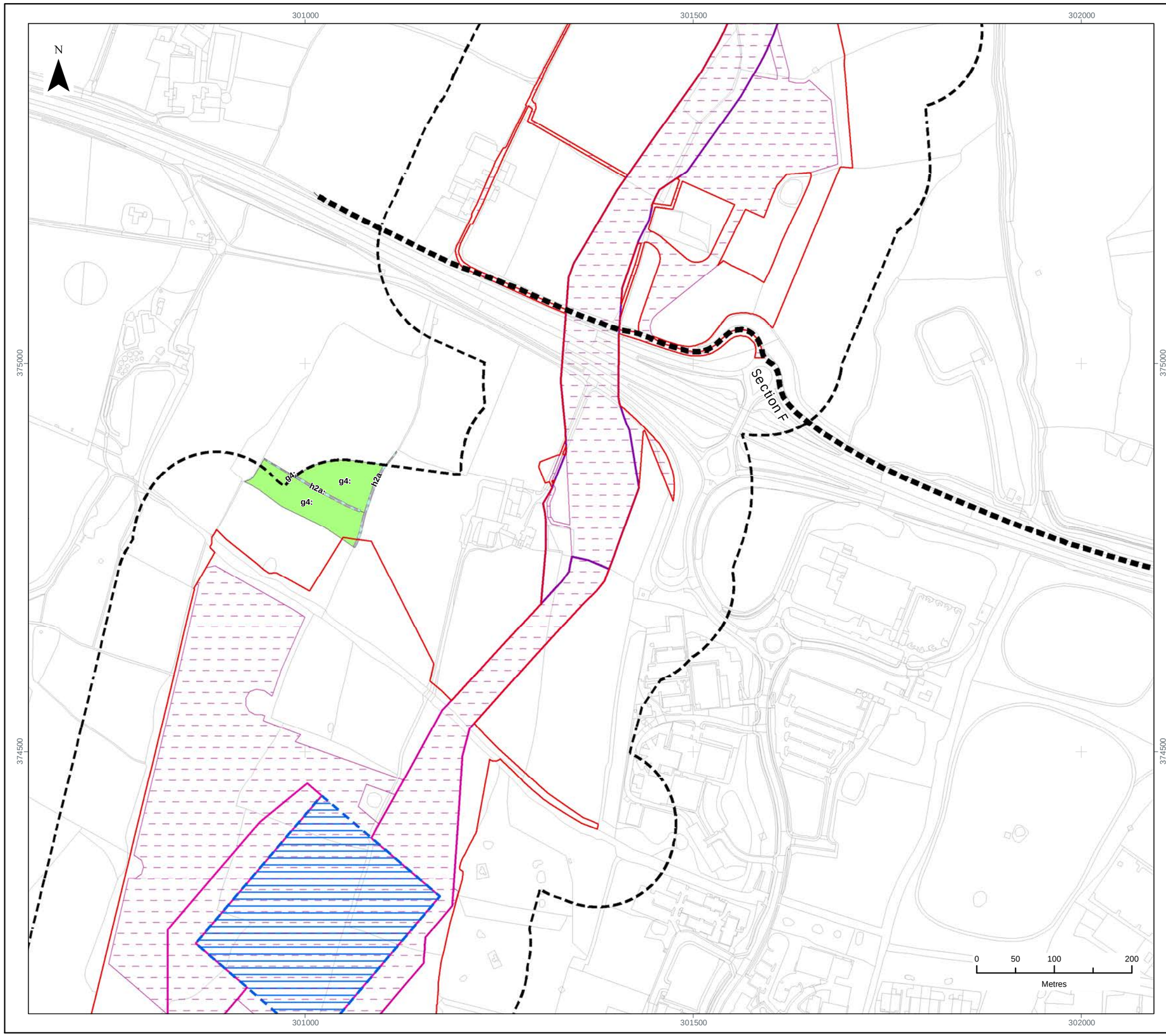
VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

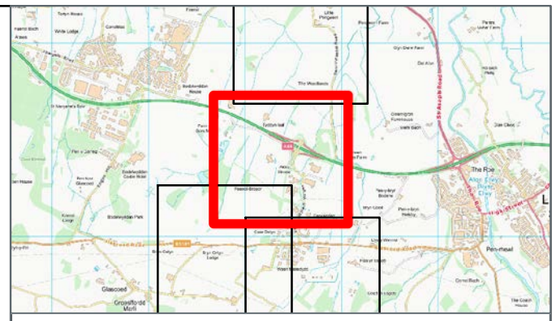
FIGURE NUMBER:

FIGURE 10

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm





LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor
- Proposed Substation Cable Corridor Zone
- Proposed Onshore Substation (OnSS) Footprint

Grassland - Modified Grassland

- g4 - Modified Grassland

Heathland and Shrub - Hedgerows

- h2a - Hedgerow (Priority Habitat)

Secondary Codes

10 - Scattered scrub
11 - Scattered trees
12 - Scattered bracken
14 - Scattered rushes
15 - Rushes dominant
16 - Tall herb / ephemeral
17 - Ruderal
19 - Ponds (Priority Habitat)
25 - Coastal and flood plain grazing marsh
33 - Ancient woodland site
36 - Plantation
37 - Semi-natural woodland
38 - Secondary woodland
39 - Freshwater - man-made
40 - Freshwater - heavily modified
41 - Freshwater - natural
47 - Native
55 - High forest
57 - Young trees - self-set
58 - Grazed
64 - Mown
66 - Frequently mown
75 - Active management
76 - Recent management
80 - Unmanaged
81 - Flailed hedgerow
86 - Accessible natural greenspace
94 - Green lane
117 - Dry
118 - Mesic
119 - Seasonally wet
120 - Wet
121 - Waterlogged
122 - Inundation vegetation
138 - Saline influence
147 - Failed dead wood abundant
148 - Flower forage abundant
159 - Standing dead wood abundant
162 - Temporary waterbodies
173 - Swamp
190 - Hedgerow with trees
191 - Ditch
540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

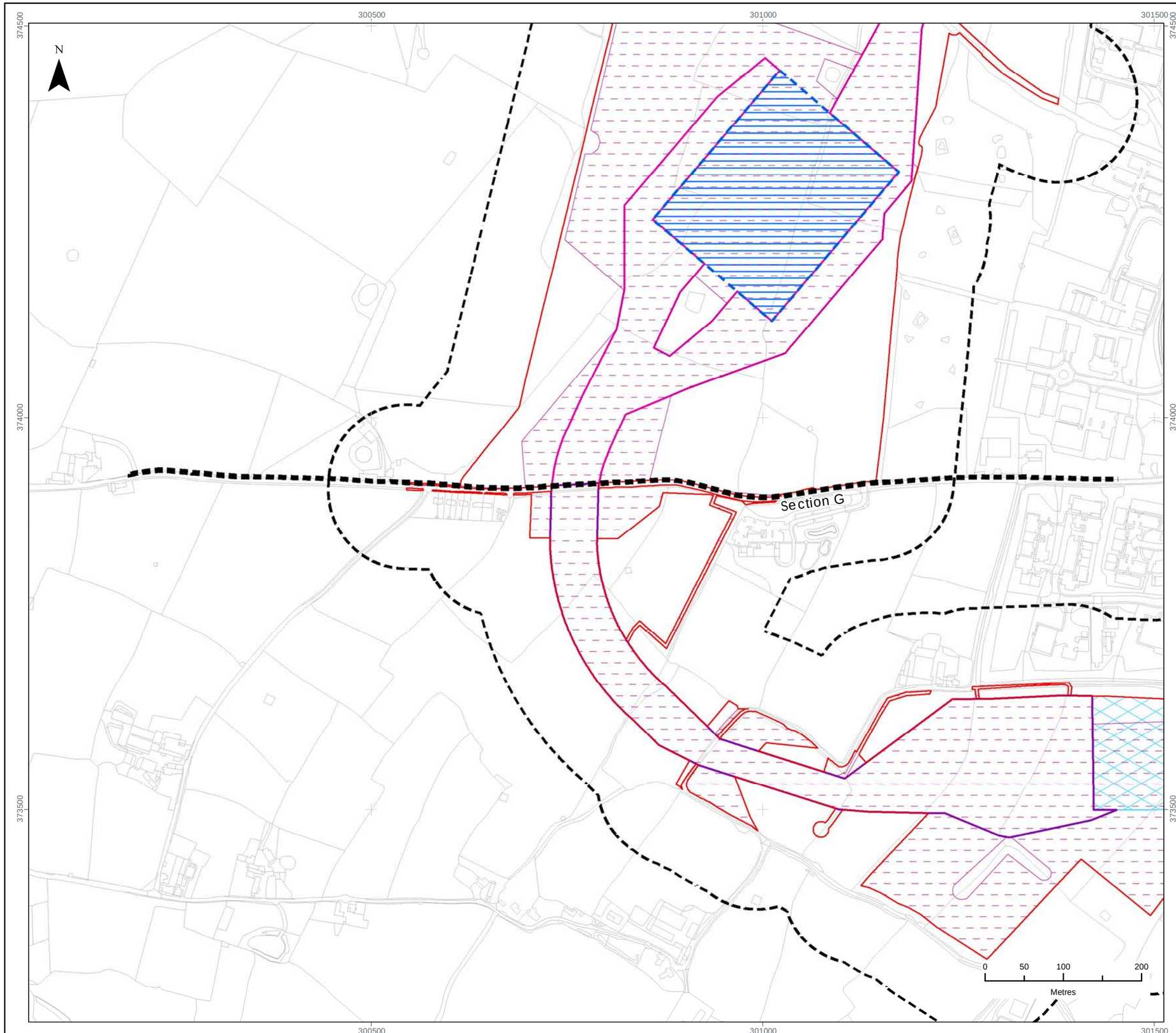
VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

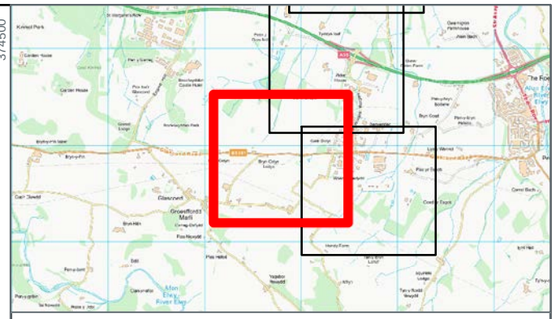
FIGURE NUMBER:

FIGURE 11

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm





LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor
- Proposed Substation Cable Corridor Zone
- Proposed Onshore Substation (OnSS) Footprint
- Unlicenced Work Zone

Secondary Codes

10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural
17 - Ruderal / ephemeral	greenspace
19 - Ponds (Priority Habitat)	94 - Green lane
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33 - Ancient woodland site	118 - Mesic
36 - Plantation	119 - Seasonally wet
37 - Semi-natural woodland	120 - Wet
38 - Secondary woodland	121 - Waterlogged
39 - Freshwater - man-made	122 - Inundation vegetation
40 - Freshwater - heavily modified	138 - Saline influence
41 - Freshwater - natural	147 - Falled dead wood abundant
47 - Native	148 - Flower forage abundant
55 - High forest	159 - Standing dead wood abundant
57 - Young trees - self-set	162 - Temporary waterbodies
58 - Grazed	173 - Swamp
64 - Mown	190 - Hedgerow with trees
	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

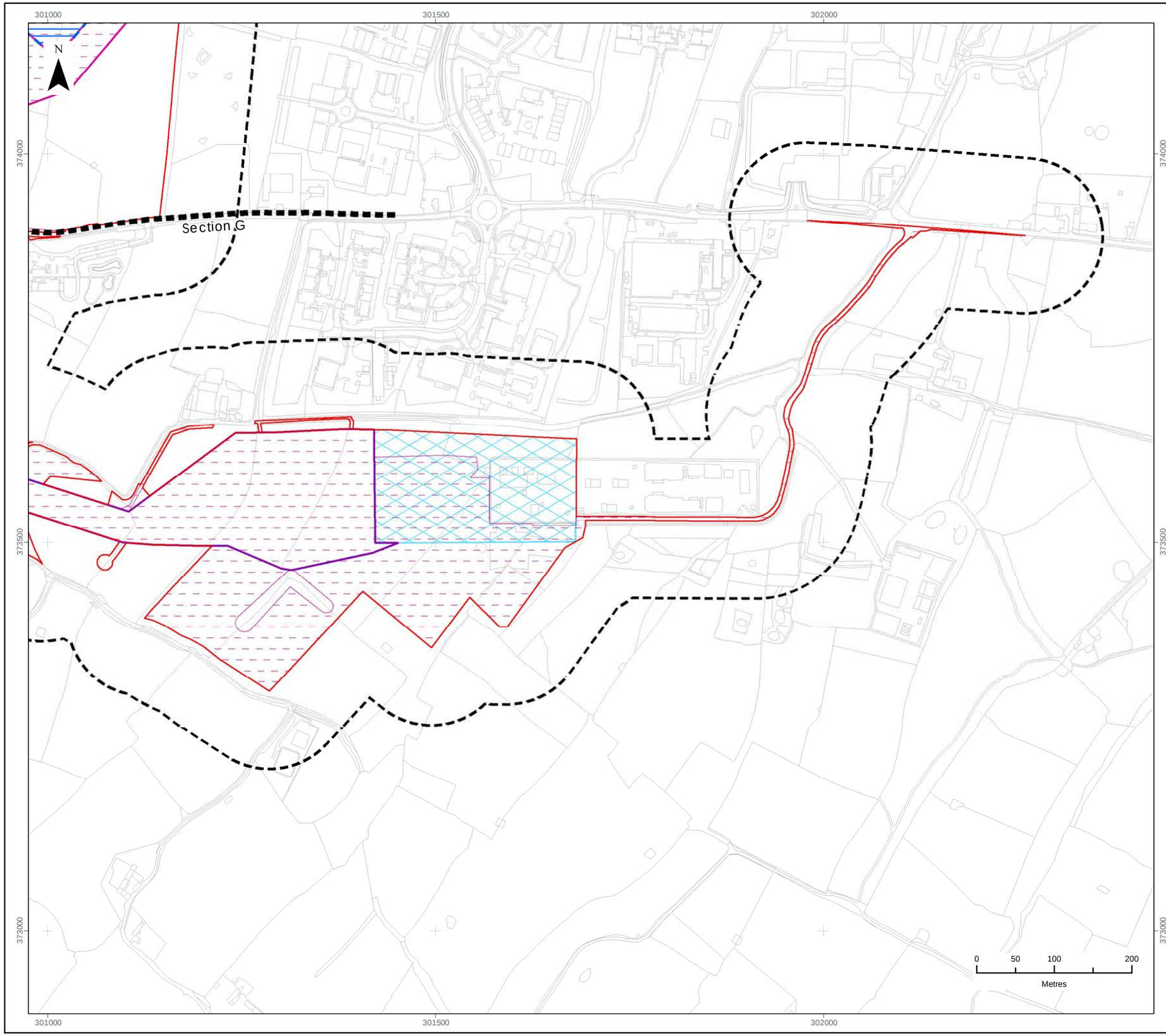
VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

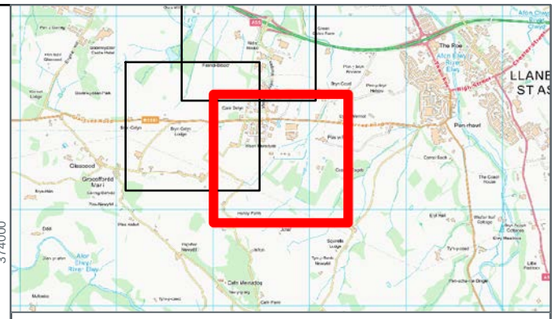
FIGURE NUMBER:

FIGURE 12

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm





LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Proposed Onshore Export Cable Corridor, Substation Footprint and Associated Infrastructure
- Proposed Onshore Export Cable Corridor
- Proposed Substation Cable Corridor Zone
- Proposed Onshore Substation (OnSS) Footprint
- Unlicenced Work Zone

Secondary Codes

10 - Scattered scrub	66 - Frequently mown
11 - Scattered trees	75 - Active management
12 - Scattered bracken	76 - Recent management
14 - Scattered rushes	80 - Unmanaged
15 - Rushes dominant	81 - Flailed hedgerow
16 - Tall herb	86 - Accessible natural greenspace
17 - Ruderal / ephemeral	94 - Green lane
19 - Ponds (Priority Habitat)	117 - Dry
25 - Coastal and flood plain grazing marsh	118 - Mesic
33 - Ancient woodland site	119 - Seasonally wet
36 - Plantation	120 - Wet
37 - Semi-natural woodland	121 - Waterlogged
38 - Secondary woodland	122 - Inundation vegetation
39 - Freshwater - man-made	138 - Saline influence
40 - Freshwater - heavily modified	147 - Falled dead wood abundant
41 - Freshwater - natural	148 - Flower forage abundant
47 - Native	159 - Standing dead wood abundant
55 - High forest	162 - Temporary waterbodies
57 - Young trees - self-set	173 - Swamp
58 - Grazed	190 - Hedgerow with trees
64 - Mown	191 - Ditch
	540 - Golf course

Note:
Please refer to Chapter 3.1, Figures 4-16 for detailed proposed infrastructure layout

Data Source:
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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX I - RESPONSE TO **ExQ1.**2.86 - UPDATE TO HABITAT AND HEDGEROW SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	For Survey	JRS	MF

FIGURE NUMBER:

FIGURE 13

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:5,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

P:\05356 - GoBe Consultants Ltd\00009 Awel y Mor\Tech\GIS\Dwgs\Wking\202208 Post Submission Support\05356.00009.0324.0 Habitat Map Additional Habitats.mxd

13 Appendix J – Response to ExQ1.2.88 – Technical note on Non-Road Mobile Machinery

APPENDIX K - Response to ExQ1.2.88.

Awel y Môr Offshore Windfarm

October 2022

1.0 Introduction

Following submission of the Development Consent Order (DCO) application, which included an Environmental Statement (ES), for the proposed Awel y Môr (AyM) Offshore Wind Farm, the Examining Authority issued their Representations and Examining Authority Questions (ExQ1)[1] to relevant stakeholders.

This technical note has been prepared on behalf of the Applicant to directly respond to ExQ1.2.88., which states:

> ***"Onshore – Habitat and Species***
>
> *Please can you explain and describe the approach to impact assessment for NOx emissions and acid depositing from non-road mobile machinery ("NRMM") to Local Wildlife sites."*

A qualitative assessment of NRMM emissions on nearby Local Wildlife Sites (LWSs) has been undertaken with reference to the Welsh Government's advice provided within Local Air Quality Management Technical Guidance (LAQM.TG(22))[2]. As per LAQM.TG(22), qualitative consideration is likely to provide sufficient screening of impacts. The outcomes of this qualitative assessment will be used to inform the likelihood of a significant effect arising. The scope of this assessment is based on the wording of ExQ1.2.88, and comprises:

- a summary of the approach adopted with respect to NRMM emissions;
- review of consultation outcomes received during the Environmental Impact Assessment (EIA) exercise to date;
- review of LWSs in proximity to onshore construction works, including:
  - standards for the protection of ecosystems and vegetation relating to NOx emissions; and
  - significance thresholds.
- review of likely NRMM proposed to be used for the following phases:
  - construction;
  - operational; and
  - decommissioning.

2.0 Assessment Context

Within Volume 3, Chapter 3.11 Air Quality, the following point relating to impacts associated with NRMM emissions was made:

> *148 "According to the IAQM guidance (ibid), experience of assessing exhaust emissions from NRMM suggests that they are unlikely to make a significant impact on local air quality. Furthermore, NRMM emissions are controlled through European Directives (e.g. Regulation EU 2016/1628) in terms of maximum operable emission limits."*

[1] The Planning Inspectorate, The Examining Authority's Written Questions and Requests for Information (ExQ1). 27th September 2022.

[2] Local Air Quality Management Technical Guidance 22, Published by Defra in partnership with the Scottish Government, Welsh Assembly Government and Department of the Environment Northern Ireland. August 2022.

The guidance referred to above derives from documentation provided by the Institute of Air Quality Management (IAQM) relating to the assessment of dust from demolition and construction[3] (IAQM, 2016).

Furthermore, guidance provided within the Welsh Government's LAQM.TG(22) states:

> *7.30 "Experience of assessing the exhaust emissions from on-site plant (NRMM) and site traffic suggests that, with suitable controls and site management, they are unlikely to make a significant impact on local air quality."*

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) (PINS ref. APP-315) to minimise NRMM emissions. These include:

> ***Preparing and maintaining the site***
>
> *"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."*
>
> ***Operating Vehicles/Machinery and Sustainable Travel***
>
> *"Ensure the vehicle fleet for construction activities are of low emission category where possible.*
>
> *Ensure all vehicles switch off engines when stationary - no idling vehicles.*
>
> *Avoid the use of diesel or petrol powered generators where possible and use mains electricity or battery powered equipment where practicable.*
>
> *Produce a construction logistics plan to manage the sustainable delivery of goods and materials.*
>
> *Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, in accordance with the Construction Method Statement (CMS) (an outline version of which is provided in Appendix 2 to the outline CoCP (application ref: 8.13.2) and with the agreement of DCC , where appropriate)."*

Implementation of the CoCP is secured as a requirement of the DCO and an outline version of the oAQMP is provided as appendix 3 to the oCoCP.

In accordance with the Welsh Government and IAQM, impacts on LWSs associated with construction phase generated NRMM emissions are not likely to be significant. Furthermore, impacts associated with NRMM emissions are believed to be temporary (given the nature of construction works), with no long-term deterioration of conditions.

2.1 Consultation Outcomes

Throughout the course of completing the EIA, consultation with statutory consultees was undertaken to agree upon the extent and scope of the air quality assessment. This has included undertaking EIA Scoping with Secretary of State via the Planning Inspectorate (PINS), under which process Natural Resources Wales (NRW) was a consultee to PINS, and also direct consultation with NRW (among other statutory consultees), has been undertaken by the Applicant comprising:

- Submission of a Scoping Report to seek a Scoping Opinion;
- AyM Evidence Plan (Air Quality Expert Topic Group (ETG)) process, comprising discussions with NRW and Denbighshire County Council; and

[3] Institute of Air Quality Management (IAQM), Guidance on the Assessment Dust from Demolition and Construction (2016).

- Statutory Consultation (Section 42) that was accompanied by a Preliminary Environmental Information Report (PEIR) that included a draft air quality chapter setting out the methodology, baseline data and assessment conclusions.

Consideration of impacts from NRMM emissions on LWSs for inclusion within the air quality assessment was not requested or raised as an issue for consideration by any relevant stakeholder during the pre-application consultation process.

In its response to the AyM Statutory Consultation, NRW requested clarification of whether PM_{10} emission contributions from NRMM have been considered in establishing the sensitivity of the area with regards to human health impacts only (as part of the construction dust assessment), as per Table 8 of ES Volume 3, Chapter 3.11 (PINS ref. AS-030).

In accordance with NRW's request, due consideration was given to likely NRMM PM_{10} emission contributions whilst characterising the surrounding sensitivity with respect to human health impacts with use of Table 8 ES Volume 3, Chapter 3.11. Human health impacts associated with NRMM emissions were considered to be not significant, following the application of control measures, as contained within the AQMP – part of the overall CoCP and secured as a requirement of the DCO. No further comment on this element has been raised.

3.0 NRMM Qualitative Assessment

3.1 Review of Local Wildlife Sites

Table 1 details the extent of LWSs (and known habitats) within 50m of onshore construction activities. These locations are illustrated in Figure 1.

Following a review of approaches adopted for other Nationally Significant Infrastructure Projects (NSIP) where extensive onshore construction activities are proposed, a 50m distance screening threshold in relation to NRMM emissions has been accepted by statutory consultees and the Planning Inspectorate (England)[4] (Northampton Gateway, 2019). The basis for this distance screening threshold relates to guidance co-authored by the Welsh Government in LAQM.TG(22), used for the purposes of establishing background monitoring stations to ensure there is no additional influence of local pollution sources:

> *"For urban background or suburban sites there should be no major sources of pollution (for example a large multi-storey car park) within 50m. There should be no medium sized emission sources (for example, petrol stations, boiler vents, or ventilation outlets to catering establishments) within 20m."*

Following submission and with use of this assessment criteria, the DCO application for the Northampton Gateway Rail Freight Interchange was granted by the Secretary of State in 2019[5] (Infrastructure Planning, 2019). Use of 50m for screening impacts from NRMM emissions is therefore considered appropriate for AyM.

A 50m buffer has been applied to the Draft Order Limits initially to inform the spatial extent of the LWS (%) which may be affected by NRMM emissions (Table 1). The spatial extent of affected areas for all LWSs are below 30% relative to the whole designation, and less than 15% for three. Use of the Draft Order Limits in this context (assuming that all 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 oCoCP - Appendix 3 - oAQMP (Section 1.0). Implementation of this measure will reduce the proportion of affected areas of each LWS.

[4] The Northampton Gateway Rail Freight Interchange Order 201X. Applicants' Response to Secretary of State's Request for Comments. 5th September 2019. https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050006/TR050006-001311-Applicants%20Responses%20to%20Secretary%20of%20State%20Request%20for%20Comments.pdf

[5] Statutory Instruments. 2019 No. 0000 Infrastructure Planning. The Northampton Gateway Rail Freight Interchange Order 2019. https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050006/TR050006-001344-191009%20Northampton%20Gateway%20Rail%20Freight%20Interchange%20Order%20-%20PINS.pdf

Table 1 – Local Wildlife Sites in Proximity to the Onshore Construction Activities

LWS Name	Spatial Extent of Affected Area (%) within LWS	Habitat
Clwyd Estuary and Adjacent Fields	8.6	Arable and Horticulture
		Broadleaved Mixed and Yew Woodland
		Coastal and Floodplain Grazing Marsh
		Coastal Saltmarsh
		Fen, Marsh and Swamp
		Hedgerow (Priority Habitat)
		Improved Grassland
		Neutral Grassland
Y Ffrith, Prestatyn	29.0	Dunes, Shingle & Machair
		Improved Grassland
		Neutral Grassland
Bryn Cwnin Wetland	13.1	Broadleaved Mixed and Yew Woodland
		Fen, Marsh and Swamp
		Hedgerow (Priority Habitat)
		Improved Grassland
		Neutral Grassland
Coed Cord / Coed y Saeson	12.4	Broadleaved Mixed and Yew Woodland
		Hedgerow (Priority Habitat)
		Improved Grassland
		Neutral Grassland

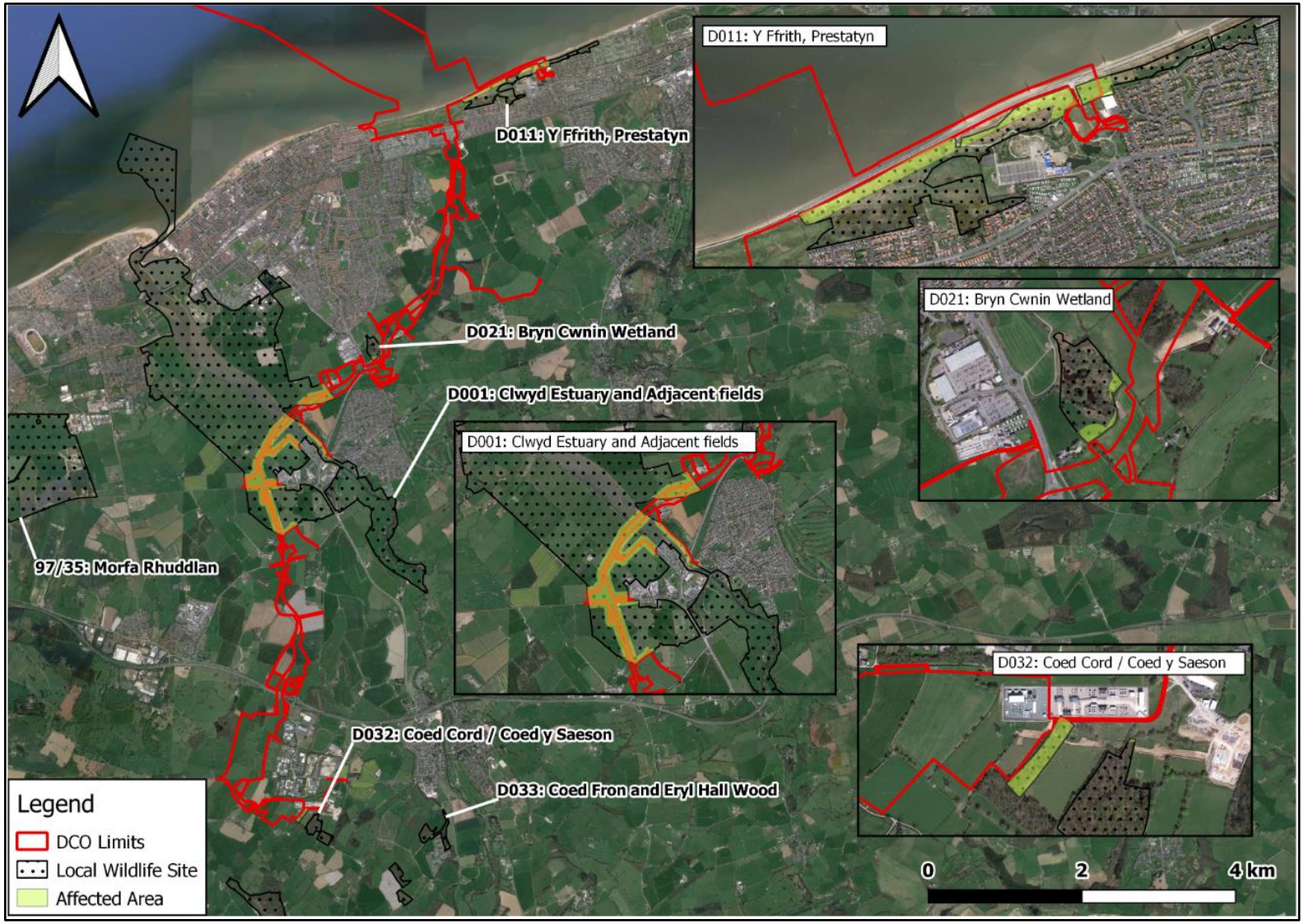


Figure 1 - Spatial Extent of Local Wildlife Sites in Relation to Onshore Construction Activities

3.1.1 Standards for the Protection of Ecosystems and Vegetation

Ecological designations are provided environmental protection with respect to air quality, through the application of standards known as Critical Levels for airborne concentrations and Critical Loads for deposition to land from air.

The Critical Levels and Loads of relevance to NOx emissions are provided below.

Critical Levels

Critical Levels are a quantitative estimate of exposure to one or more airborne pollutants in gaseous form, below which significant harmful effects on sensitive elements of the environment do not occur, according to present knowledge. Critical Levels for the protection of vegetation and ecosystems are specified within relevant UK air quality legislation.

Table 2 provides details of the Critical Levels of relevance to NOx emissions – as requested by ExQ1.2.88.

Table 2 – Applicable Critical Levels for the Protection of Vegetation and Ecosystems

Pollutant	Concentration (µg/m^3)	Averaging Period	Habitat
NOx	30	Annual mean	All ecosystems
	75 (200) [(a) (b)]	Daily mean	All ecosystems

Table Notes:
(a) Non statutory
(b) 75µg/m^3 Critical Level only considered appropriate where levels of SO_2 and O_3 are close to their Critical Level. Where O_3 and SO_2 are not elevated above their Critical Level (common across the UK) a value of 200µg/m^3 is recommended for assessments (IAQM, 2020)[6].

Critical Loads

Critical Loads are a quantitative estimate of exposure to deposition of one or more pollutants, below which significant harmful effects on sensitive elements of the environment do not occur, according to present knowledge.

In relation to NOx combustion emissions, Critical Loads for eutrophication and acidification are relevant which can both occur via wet and dry deposition. Wet deposition occurs due to rainout (within cloud) scavenging and washout (below cloud) scavenging, whereas dry deposition occurs when particles are brought to the surface by gravitational settling and turbulence. For the assessment of short range emissions, dry deposition is considered the predominant removal mechanism. Wet deposition can therefore be discounted from further assessment.

Critical Loads for eutrophication are habitat/species specific (derived from a range of experimental studies), whereas Critical Loads for acidification are dependent on soil chemistry, as well as habitat type.

3.2 Significance Criteria

For the assessment of LWSs, the approach adopted by NRW is to initially assess emissions generated by proposed activities alone (commonly referred to as Process Contributions (PCs)) with reference to the applicable Critical Levels or Loads. Further assessment is not required where the short-term or long-term emission contributions (PC) from proposed activities are less than 100% of the Critical Level or Load alone. Emissions can consequentially be considered insignificant. Baseline conditions are not considered.

As established in Section 2.0, exhaust emissions from NRMM are unlikely to have a significant impact on local air quality where suitable controls are implemented, as per guidance provided by the IAQM and Welsh Government. A series of construction phase control measures were included within the oCoCP - Appendix 3 - oAQMP to

[6] IAQM, A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites, v1.1 2020.

minimise NRMM emissions. Therefore, despite the proximity of LWSs in relation to proposed construction works, consistent with advice provided by the IAQM and Welsh Government, the likelihood of short-term or long-term NRMM emissions causing an exceedance of Critical Levels and/or Loads alone (i.e. >100%) is low.

3.3 Construction Phase

Construction activities associated with the onshore export cable corridor (along which the LWS are located) are likely to commence in 2026 and last 1.5 years. Onshore construction activities will occur in a phased manner and will vary along the spatial extent of the Draft Order Limits, according to specific works (e.g. construction of the substation). Discrete construction activities will not occur concurrently in the same location (e.g. evacuation and construction).

NRMM will be used during construction working hours, as agreed with the Local Authority, through approval of the CoCP and associated environmental management plans. Typically, construction activities will be daytime only, 07:00 to 19:00 from Monday to Saturday. Certain "time critical activities" would occur outside these hours. Any requirement to work outside of these normal hours would only occur with prior agreement with the Local Authorities. Therefore, NRMM will not be used continuously.

As established previously, NRMM emissions are controlled through European Directives (e.g. Regulation EU 2016/1628) in terms of maximum operable emission limits. Emissions standards are applied to NRMM engines at the point of placing on the market – and typically become stricter following the introduction and availability of cleaner technologies and fuels. The most recent stringent emission standards, Stage V, were effective from 2019 for engines below 56 kW and above 130 kW, and from 2020 for engines of 56-130 kW. By the time construction activities are expected to commence (2026), all NRMM will comply with Stage V emissions, as a minimum – or a later emission standard introduced in the interim period. Furthermore, suitable controls as secured by the DCO will be implemented to minimise potential effects from NRMM. These are detailed in Section 2.0.

Additionally, it is recognised (including by the Welsh Government) that air quality is expected to improve in future years and in the interim period before the commencement of construction activities for AyM – following the introduction of policy, legislation and the availability of cleaner technologies. Therefore, the likelihood of impacts occurring during the construction phase is low.

Despite the above, a review of construction activities and NRMM proposed within 50m of each LWS has been undertaken. It should be worth noting that where there is uncertainty and/or optionality regarding the extent of specific construction activities within 50m of each LWS (e.g. a jointing bay), all possible construction activities have been considered for completeness. This is considered worst-case, as it is possible that the full extent of construction activities and NRMM identified may not be relevant or occur within 50m of each LWS. However, this approach ensures all potential scenarios and associated impacts have been assessed for completeness.

Table 3 details the full extent of construction activities likely to occur within 50m of each LWS, whereas the extent of supporting NRMM is detailed in Appendix A. The inventory of NRMM is considered to be exhaustive.

Table 3 – Worst-Case Construction Activities Occurring Within 50m of the LWSs

Relevant Activity	Spatial Extent of Affected Area (%)
Clwyd Estuary and Adjacent Fields	
Establish Access and TCC (including HDD compounds)	8.6
Site Preparation, Including Fencing, Haul Road Construction and Topsoil Strip	
Trench Excavation and duct installation	
Trench Backfill	
Jointing Bay Excavation	
Jointing Bay Base Construction	
Pulling and Connection of Cables	

Relevant Activity	Spatial Extent of Affected Area (%)
Backfill over Jointing Bay	
Trench Route Reinstatement / Topsoil Reinstatement	
Haul Road Removal and Removal of fencing and Reinstatement	
TCC and Access Road Removal (including HDD compounds)	
Temporary Construction Compound Operations	
HDD Compound Operations (daytime)	
HDD Compound Operations (night working, where applicable)	
Y Ffrith, Prestatyn	
Establish Access and TCC (including HDD compounds)	29.0
TCC and Access Road Removal (including HDD compounds)	
Landfall Beach Operations	
Temporary Construction Compound Operations	
Bryn Cwnin Wetland	
Site Preparation, Including Fencing, Haul Road Construction and Topsoil Strip	13.1
Trench Excavation and duct installation	
Trench Backfill	
Jointing Bay Excavation	
Jointing Bay Base Construction	
Pulling and Connection of Cables	
Trench Route Reinstatement / Topsoil Reinstatement	
Haul Road Removal and Removal of fencing and Reinstatement	
HDD Compound Operations (daytime)	
Coed Cord / Coed y Saeson	
Site Preparation, Including Fencing, Haul Road Construction and Topsoil Strip	12.4
Trench Excavation and duct installation	
Trench Backfill	
Jointing Bay Excavation	
Jointing Bay Base Construction	
Pulling and Connection of Cables	
Backfill over Jointing Bay	
Trench Route Reinstatement / Topsoil Reinstatement	
Haul Road Removal and Removal of fencing and Reinstatement	
Unlicensed Works (Assumed Plant Requirements)	

It is acknowledged that the inclusion of trenchless crossing works will increase the scope of construction activities proposed within 50m of the Clwyd Estuary and Adjacent Fields LWS, in comparison to other LWSs. However, NRMM emissions at this location have the potential to only effect 8.6% of the total designation, therefore have a limited potential to cause a significant effect. Furthermore, NRMM emissions have the potential to effect 29.0% of the Y Ffrith, Prestatyn LWS. Despite this, the extent of NRMM activities are smaller in comparison to other LWSs – so have a limited potential to cause a significant effect.

Whilst taking into account the extent of NRMM proposed to be used (type, quantum and emission standards), associated control measures and the transient / phased nature of the construction works – the likelihood of NRMM emissions resulting in a PC >100% of the Critical Levels and/or Loads alone is low (Section 3.2). Emissions are therefore believed to be insignificant. Effects on this basis are believed to be not significant. Furthermore, despite this, impacts arising from construction activities are considered temporary.

3.4 Operational Phase

Onshore operational activities, limited to maintenance, are expected to be intermittent/infrequent in comparison to the assessed construction activities. To give an indication of the extent of operational activities, planned maintenance to the substation would comprise 1 visit per week, which may increase to daily for a 2 week period per year during annual maintenance. In relation to the onshore cable route, planned maintenance may involve 1 visit to each cable joint pit per year. NRMM may not be utilised during the full extent of these maintenance activities.

The extent of NRMM proposed to be used during the operational phase is not expected to be greater in comparison to the construction phase. For these reasons, operational activities are not anticipated to exceed the construction phase worst-case criteria assessed, and impacts are likely to be lesser in comparison and can be concluded as not significant.

3.5 Decommissioning Phase

Details surrounding the decommissioning phase are yet to be fully clarified. In addition, it is also recognised that policy, legislation and local sensitivities evolve, which will limit the relevance of undertaking an assessment at this stage.

Decommissioning activities and associated NRMM utilised are not anticipated to exceed the construction phase worst-case criteria assessed, and impacts are likely to be lesser in comparison, given the following:

- Landfall infrastructure is expected to be left in situ where appropriate, to abate potential future impacts and minimise the extent of decommissioning activities and NRMM;
- NRMM emission restrictions are expected to tighten in future years and in the interim before decommissioning activities occur (>25 years). This forecast is based on the introduction and availability of cleaner technologies and fuels, alongside enforcement by legislation. Therefore, emission contributions from NRMM emissions generated during the decommissioning phase are expected to be lower in comparison; and/or
- Air quality is expected to improve in future years, and in the interim before decommissioning activities occur (>25 years). This forecast is based on the introduction of policy and legislation, and availability of cleaner technologies. The likelihood of a significant effect arising during the decommissioning phase is therefore low.

These elements (alone and/or in combination) would result in a reduction in the level of significance in comparison to the assessment of construction effects. The outcomes of the construction phase assessment indicate impacts from NRMM emissions on LWSs are not significant. Further assessment in relation to the decommissioning phase is therefore not required.

Nonetheless, the decommissioning methodology would be finalised nearer to the end of the lifetime of AyM, to be in line with current guidance, policy and legislation. Any such methodology would be agreed with the relevant authorities and statutory consultees. The DCO includes a requirement to submit a written scheme of decommissioning 6 months before decommissioning starts.

4.0 Conclusions

This technical note has been prepared to provide consideration of potential air quality impacts upon LWSs arising from NRMM emissions. The scope of the assessment is based on the explicit wording of ExQ1.2.88.

A qualitative assessment of NRMM emissions on nearby LWSs has been undertaken with reference to the Welsh Government's advice provided within LAQM.TG(22). As per LAQM.TG(22), qualitative consideration is likely to provide sufficient screening of impacts.

Within ES Volume 3, Chapter 3.11, consideration was given to NRMM emissions – with reference to relevant guidance, indicating NRMM emissions are unlikely to make a significant impact on local air quality. Furthermore, a series of construction phase control measures were included within the oCOCP – Appendix 3 – oAQMP – minimise NRMM emissions. Implementation of the CoCP is secured as a requirement of the DCO. In accordance with this, impacts on LWSs associated with construction phase generated NRMM emissions are not likely to be significant.

Throughout the course of completing the EIA, consultation with statutory consultees was undertaken to agree upon the extent and scope of the air quality assessment. Consideration of NRMM emissions on LWSs for inclusion within the air quality assessment was not raised or requested by any relevant stakeholder during the pre-application consultation process.

A review of LWSs in proximity (50m) of onshore construction activities was undertaken – consistent with approved methods applied for other NSIPs. Consequently, four LWSs were identified for further consideration. The spatial extent of worst-case affected areas for all LWSs are below 30% relative to the whole designation, and less than 15% for three. Sites of nature conservation importance are provided environmental protection with respect to air quality, through the application of standards known as Critical Levels for airborne concentrations and Critical Loads for deposition to land from air. For the assessment of LWSs, the approach adopted by NRW is to initially assess emissions generated by proposed activities alone with reference to the applicable Critical Levels or Loads. Further assessment is not required where the short-term or long-term emission contributions from proposed activities are less than 100% of the Critical Level or Load alone. Emissions can consequentially be considered insignificant.

A review of activities intended to be undertaken for each discrete onshore phase (construction, operational and decommissioning) has been undertaken.

In relation to the construction phase, a review of construction activities and NRMM proposed within 50m of each LWS has been undertaken. Where there is uncertainty and/or optionality regarding the extent of specific construction activities within 50m of each LWS, all possible construction activities have been considered for completeness. This is considered worst-case, as it is possible that the full extent of construction activities and NRMM identified may not be relevant or occur within 50m of each LWS. However, this approach ensures all potential scenarios and associated impacts have been assessed for completeness. The outcomes of the qualitative construction phase NRMM assessment indicate that the likelihood of NRMM emissions resulting in a PC >100% of the Critical Levels and/or Loads alone is low. Emissions are therefore believed to be insignificant. Effects on this basis are believed to be not significant and so it is considered that the ES does not require any amendment or revision. Despite this, impacts arising from construction activities are considered temporary.

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.

Based on the above, impacts on LWSs associated with NOx emissions from NRMM are considered not significant. No further assessment is needed.

References

Infrastructure Planning (2019). The Northampton Gateway Rail Freight Interchange Order 2019.

IAQM (2016). Guidance on the Assessment of Dust from Demolition and Construction.

Northampton Gateway (2019). Applicant's Response to Secretary of State's Request for Comments.

Welsh Government (2022). Local Air Quality Management Technical Guidance (TG22), August 2022.

Appendix A: NRMM Inventory

Clwyd Estuary and Adjacent Fields

Table A.1 – Worst Case NRMM To Be Operated Within 50m of the Clwyd Estuary and Adjacent Fields LWS

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Backfill over Jointing Bay	**21**	-
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	1	75
Establish Access and TCC (including HDD compounds)	**27**	-
20T Dumper	3	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	1	100
Grader	1	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Road surface paver & roller (Not required for HDD compounds)	1	25
Smooth Drum vibro road roller	1	100
Telehandler	1	70
Temporary lighting	6	25
Tractor & fencing kit	1	100
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	70
Tractor & Water bowser (for dust suppression)	1	25
Haul Road Removal and Removal of fencing and Reinstatement	**32**	-
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Smooth Drum vibro roller	1	50
Temporary lighting	12	25
Tractor & fencing kit	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & soil tiller, roller, seeder	1	25
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
HDD Compound Operations (daytime)	**9**	-
Cuttings / Recycling Tank	1	100
Directional Drill Generator	1	100
Generator	1	100
Mixing Tank	1	100
Mounting supports for directional drill (hydraulic hammer)	1	25
Mud Pump	1	100
Telehandler	2	75
Vibratory Piling Rig	1	10
HDD Compound Operations (night working, where applicable)	**7**	-
Cuttings / Recycling Tank	1	100
Directional Drill Generator	1	100
Generator	1	100
Mixing Tank	1	100
Mud Pump	1	100
Telehandler	2	75
Jointing Bay Base Construction	**14**	-
Mobile concrete pump / cement mixer truck	1	50
Mobile generator	2	50
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Jointing Bay Excavation	**18**	-
20T Dumper	2	100
21T excavator	1	50
30T excavator	2	100
5T Forward Tipping Dumper	1	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Smooth Drum vibro roller	1	10
Temporary lighting	4	25

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Pulling and Connection of Cables	**12**	**-**
Cable winch	1	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Temporary lighting	4	25
Tractor & cable drum trailer	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Site Preparation, Including Fencing, Haul Road Construction and Topsoil Strip	**31**	**-**
20T Dumper	3	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	1	100
Grader	1	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro road roller	1	100
Telehandler	1	70
Temporary lighting	12	25
Tractor & fencing kit	1	100
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	70
Tractor & Water bowser (for dust suppression)	1	25
TCC and Access Road Removal (including HDD compounds)	**26**	**-**
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Smooth Drum vibro roller	1	50
Temporary lighting	6	25
Tractor & fencing kit	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & soil tiller, roller, seeder	1	25
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Temporary Construction Compound Operations	**4**	**-**
Generator	2	100

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Road Sweeper	1	10
Telehandler	1	75
Trench Backfill	**29**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	25
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	25
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	75
Trench Excavation and duct installation	**30**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Crawler Crane	1	10
Loading shovel	2	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	50
Trench Route Reinstatement / Topsoil Reinstatement	**24**	**-**
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro roller	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Tractor & Water bowser (for dust suppression)	1	25
Trench Backfill	**29**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	25
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	25
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	75
Trench Excavation and duct installation	**30**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Crawler Crane	1	10
Loading shovel	2	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	50
Trench Route Reinstatement / Topsoil Reinstatement	**24**	**-**
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro roller	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25

Y Ffrith Prestatyn

Table A.2 – Worst Case NRMM To Be Operated Within 50m of the Y Ffrith, Prestatyn LWS

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Establish Access and TCC (including HDD compounds)	**27**	-
20T Dumper	3	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	1	100
Grader	1	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Road surface paver & roller (Not required for HDD compounds)	1	25
Smooth Drum vibro road roller	1	100
Telehandler	1	70
Temporary lighting	6	25
Tractor & fencing kit	1	100
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	70
Tractor & Water bowser (for dust suppression)	1	25
Landfall Beach Operations	**8**	-
21T excavator	1	10
Cable winch	1	10
Pump	2	50
Temporary lighting	4	25
TCC and Access Road Removal (including HDD compounds)	**26**	-
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Smooth Drum vibro roller	1	50
Temporary lighting	6	25
Tractor & fencing kit	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & soil tiller, roller, seeder	1	25
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Temporary Construction Compound Operations	**4**	-
Generator	2	100

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Road Sweeper	1	10
Telehandler	1	75

Bryn Cwnin Wetland

Table A.3 – Worst Case NRMM To Be Operated Within 50m of the Bryn Cwnin Wetland LWS

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Haul Road Removal and Removal of fencing and Reinstatement	**32**	-
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Smooth Drum vibro roller	1	50
Temporary lighting	12	25
Tractor & fencing kit	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & soil tiller, roller, seeder	1	25
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
HDD Compound Operations (daytime)	**9**	-
Cuttings / Recycling Tank	1	100
Directional Drill Generator	1	100
Generator	1	100
Mixing Tank	1	100
Mounting supports for directional drill (hydraulic hammer)	1	25
Mud Pump	1	100
Telehandler	2	75
Vibratory Piling Rig	1	10
Jointing Bay Base Construction	**14**	-
Mobile concrete pump / cement mixer truck	1	50
Mobile generator	2	50
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Jointing Bay Excavation	**18**	-
20T Dumper	2	100
21T excavator	1	50
30T excavator	2	100
5T Forward Tipping Dumper	1	50
Mobile generator	2	25

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Mobile self-contained welfare unit	1	25
Pump	2	100
Smooth Drum vibro roller	1	10
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Pulling and Connection of Cables	**12**	**-**
Cable winch	1	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Temporary lighting	4	25
Tractor & cable drum trailer	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Site Preparation, Including Fencing, Haul Road Construction and Topsoil Strip	**31**	**-**
20T Dumper	3	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	1	100
Grader	1	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro road roller	1	100
Telehandler	1	70
Temporary lighting	12	25
Tractor & fencing kit	1	100
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	70
Tractor & Water bowser (for dust suppression)	1	25
Trench Backfill	**29**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	25
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	25
Tractor & Water bowser (for dust suppression)	1	25

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Trench Roller	2	75
Trench Excavation and duct installation	**30**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Crawler Crane	1	10
Loading shovel	2	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	50
Trench Route Reinstatement / Topsoil Reinstatement	**24**	**-**
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro roller	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Haul Road Removal and Removal of fencing and Reinstatement	**32**	**-**
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Smooth Drum vibro roller	1	50
Temporary lighting	12	25
Tractor & fencing kit	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & soil tiller, roller, seeder	1	25
Tractor & trailer	1	50

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Tractor & Water bowser (for dust suppression)	1	25
HDD Compound Operations (daytime)	**9**	**-**
Cuttings / Recycling Tank	1	100
Directional Drill Generator	1	100
Generator	1	100
Mixing Tank	1	100
Mounting supports for directional drill (hydraulic hammer)	1	25
Mud Pump	1	100
Telehandler	2	75
Vibratory Piling Rig	1	10
Jointing Bay Base Construction	**14**	**-**
Mobile concrete pump / cement mixer truck	1	50
Mobile generator	2	50
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Jointing Bay Excavation	**18**	**-**
20T Dumper	2	100
21T excavator	1	50
30T excavator	2	100
5T Forward Tipping Dumper	1	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Smooth Drum vibro roller	1	10
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Pulling and Connection of Cables	**12**	**-**
Cable winch	1	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Temporary lighting	4	25
Tractor & cable drum trailer	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Site Preparation, Including Fencing, Haul Road Construction and Topsoil Strip	**31**	**-**
20T Dumper	3	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
D6 Dozer	1	100
Grader	1	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro road roller	1	100
Telehandler	1	70
Temporary lighting	12	25
Tractor & fencing kit	1	100
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	70
Tractor & Water bowser (for dust suppression)	1	25
Trench Backfill	**29**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	25
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	25
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	75
Trench Excavation and duct installation	**30**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Crawler Crane	1	10
Loading shovel	2	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	50
Trench Route Reinstatement / Topsoil Reinstatement	**24**	**-**
20T Dumper	2	100

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro roller	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25

Coed Cord / Coed y Saeson

Table A.4 – Worst Case NRMM To Be Operated Within 50m of the Coed Cord / Coed y Saeson LWS

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Backfill over Jointing Bay	**21**	-
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	1	75
Haul Road Removal and Removal of fencing and Reinstatement	**32**	-
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	2	25
Smooth Drum vibro roller	1	50
Temporary lighting	12	25
Tractor & fencing kit	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & soil tiller, roller, seeder	1	25
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Jointing Bay Base Construction	**14**	-
Mobile concrete pump / cement mixer truck	1	50
Mobile generator	2	50
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Jointing Bay Excavation	**18**	-

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
20T Dumper	2	100
21T excavator	1	50
30T excavator	2	100
5T Forward Tipping Dumper	1	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Smooth Drum vibro roller	1	10
Temporary lighting	4	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Pulling and Connection of Cables	**12**	-
Cable winch	1	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Temporary lighting	4	25
Tractor & cable drum trailer	1	50
Tractor & Fuel bowser (or self-propelled)	1	10
Site Preparation, Including Fencing, Haul Road Construction and Topsoil Strip	**31**	-
20T Dumper	3	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	1	100
Grader	1	100
Loading shovel	1	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro road roller	1	100
Telehandler	1	70
Temporary lighting	12	25
Tractor & fencing kit	1	100
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	70
Tractor & Water bowser (for dust suppression)	1	25
Trench Backfill	**29**	-
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100

Activity / NRMM	Indicative Number	Estimated % of Operation During Activity
Telehandler	1	25
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	25
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	75
Trench Excavation and duct installation	**30**	**-**
20T Dumper	2	100
21T excavator	2	100
30T excavator	2	100
5T Forward Tipping Dumper	2	100
Crawler Crane	1	10
Loading shovel	2	50
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Pump	2	100
Telehandler	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & trailer	1	50
Tractor & Water bowser (for dust suppression)	1	25
Trench Roller	2	50
Trench Route Reinstatement / Topsoil Reinstatement	**24**	**-**
20T Dumper	2	100
21T excavator	1	100
30T excavator	2	100
5T Forward Tipping Dumper	1	100
D6 Dozer	2	100
Loading shovel	2	100
Mobile generator	2	25
Mobile self-contained welfare unit	1	25
Smooth Drum vibro roller	1	50
Temporary lighting	8	25
Tractor & Fuel bowser (or self-propelled)	1	10
Tractor & Water bowser (for dust suppression)	1	25
Unlicenced Works (Assumed Plant Requirements)	**7**	**-**
21T excavator	1	25
5T Forward Tipping Dumper	1	25
Mobile crane	1	25
Mobile generator	1	25
Pump	1	25
Temporary lighting	1	25
Trench Roller	1	10

14 Appendix K – Response to ExQ1.4.7 – Waste Management Sites in North Wales

The maximum waste generated at this early stage is approximately 0.28 million tonnes. It should be emphasised that this is a conservative estimate of the maximum theoretical values, and much of the materials would not necessarily be generated during the construction phase but would instead be generated at during decommissioning.

The following provides a review of estimated available capacity of waste management sites in north Wales that has been undertaken using the following NRW data sources:

- North Wales Permitted Site Waste Returns, 2021 (site inputs);
- Estimated Landfill Void Wales 2018; and
- Remaining landfill capacity: England as at end 2020.

The review demonstrates that there is sufficient capacity in North Wales to treat, or dispose, wastes generated by construction of AyM. Although the data sources listed above relate to data from 2018, 2020 and 2021, the aggregated treatment capacity of 1.9m tonnes and disposal capacity of 7.7m tonnes are considered appropriate to demonstrate sufficient available capacity.

Construction & Demolition (C&D) Wastes

North Wales had nearly 100 Permitted facilities that received over 1.16 million tonnes of C&D wastes in 2021, with the top 20 sites having received c.0.97 million tonnes (see table below). The recycling of materials will generally be prioritised where available, and the sites chosen for processing of wastes from AyM will also include suitable 'on site' mobile plant and nearby operations operating under an exemption (and therefore not listed under the Permitted list of facilities).

SITE NAME	FACILITY TYPE	SITE POST CODE	INERT C+D TOTAL (KT)
Shotton Paper Mill EPR/BT4885IT	Co-Incinerator	CH5 2LL	192
Cambrian Quarry	Deposit of waste to land (recovery)	CH7 5LW	117
Ewloe Waste Transfer Station	Non-Haz Waste Transfer	CH7 6LG	99
Rhuddlan Bach Quarry Landfill Site	Inert LF	LL78 7JJ	62
Seiont Mill Brickworks and Quarry	Deposit of waste to land (recovery)	LL55 2YL	61
Alan's Skip Hire Ltd	Deposit of waste to land (recovery)	CH5 2LL	55
Maes Mynan Quarry	Deposit of waste to land (recovery)	CH7 5UB	52
P M Dromgoole & Sons Agricultural Ltd	Physical Treatment	CH4 0EW	48
Hafod Quarry Landfill Site	Non Hazardous LF	LL14 6ET	42
The Windmill Site	Non-Haz Waste Transfer	LL22 9SE	36
Gwynedd Skip And Plant Hire Ltd	Non-Haz Waste Transfer	LL55 2BD	26
K M Environmental Ltd	Non-Haz Waste Transfer	LL17 0DS	26
Ty Mawr Farm Landfill	Inert LF	LL22 8AA	25
Penstrowed Quarry	Physical Treatment	SY17 5SG	21

SITE NAME	FACILITY TYPE	SITE POST CODE	INERT C+D TOTAL (KT)
GTR Aggregates and Recycling Limited	Non-Haz Waste Transfer	CH6 6HJ	21
Gary Catton Haulage Ltd	Material Recycling Facility (MRF)	CH5 2LL	20
Alltami Soil & Aggregate Recycling Facility	Material Recycling Facility (MRF)	CH7 6NZ	20
Lelo Metal Recycling Ltd	Metal Recycling	LL21 9SD	18
Old Bridge Inn	Inert Waste Transfer	CH7 4JD	17
Llanddulas Landfill EPR/BU0800IZ	Non Hazardous LF	LL22 8HP	14

Household/Industrial/Commercial wastes

North Wales had over 120 Permitted facilities that received over 1.6 million tonnes of Hhold/Ind/Com wastes in 2021, with the top 10 sites having received c.0.93 million tonnes (see table below). These sites are potential off-takers for wastes from construction of AyM such as packaging generated by delivery of construction materials and general mixed residual (i.e. black bag) waste.

SITE NAME	FACILITY TYPE	SITE POST CODE	HHOLD/IND /COM TOTAL (KT)
Parc Adfer Energy Recovery Facility	Incineration - municipal waste	CH5 2LL	199
Shotton Paper Mill EPR/BT4885IT	Co-Incinerator	CH5 2LL	179
Hafod Quarry Landfill Site	Non Hazardous LF	LL14 6ET	120

SITE NAME	FACILITY TYPE	SITE POST CODE	HHOLD/IND /COM TOTAL (KT)
Mobile Plant	Mobile Plant - Unknown	SY15 6SR	103
Parry and Evans Ltd	Non-Haz Waste Transfer	CH5 2LR	74
GP Biotec Ltd	Physical Treatment	LD3 0DL	70
The Windmill Site	Non-Haz Waste Transfer	LL22 9SE	53
Gwynedd Skip And Plant Hire Ltd	Non-Haz Waste Transfer	LL55 2BD	50
ASH Wrexham Recycling Centre	Non-Haz Waste Transfer	LL13 9RD	43
Ewloe Waste Transfer Station	Non-Haz Waste Transfer	CH7 6LG	39

Hazardous Wastes

North Wales had over 65 Permitted facilities that received over c.60 thousand tonnes of Hazardous wastes in 2021, with the top 10 sites having received 49 thousand tonnes (see table below). Whilst these facilities offer a range of recovery and disposal options for hazardous wastes produced by the project, it should be emphasised that due to the specialist and varied nature of Hazardous wastes, these materials may sometimes travel longer distances to ensure materials are sent to the optimum treatment facility to minimise environmental impact. Significant Hazardous waste infrastructure is located in the North West of England, which would remain an option to offtake Hazardous wastes from the Proposed Development.

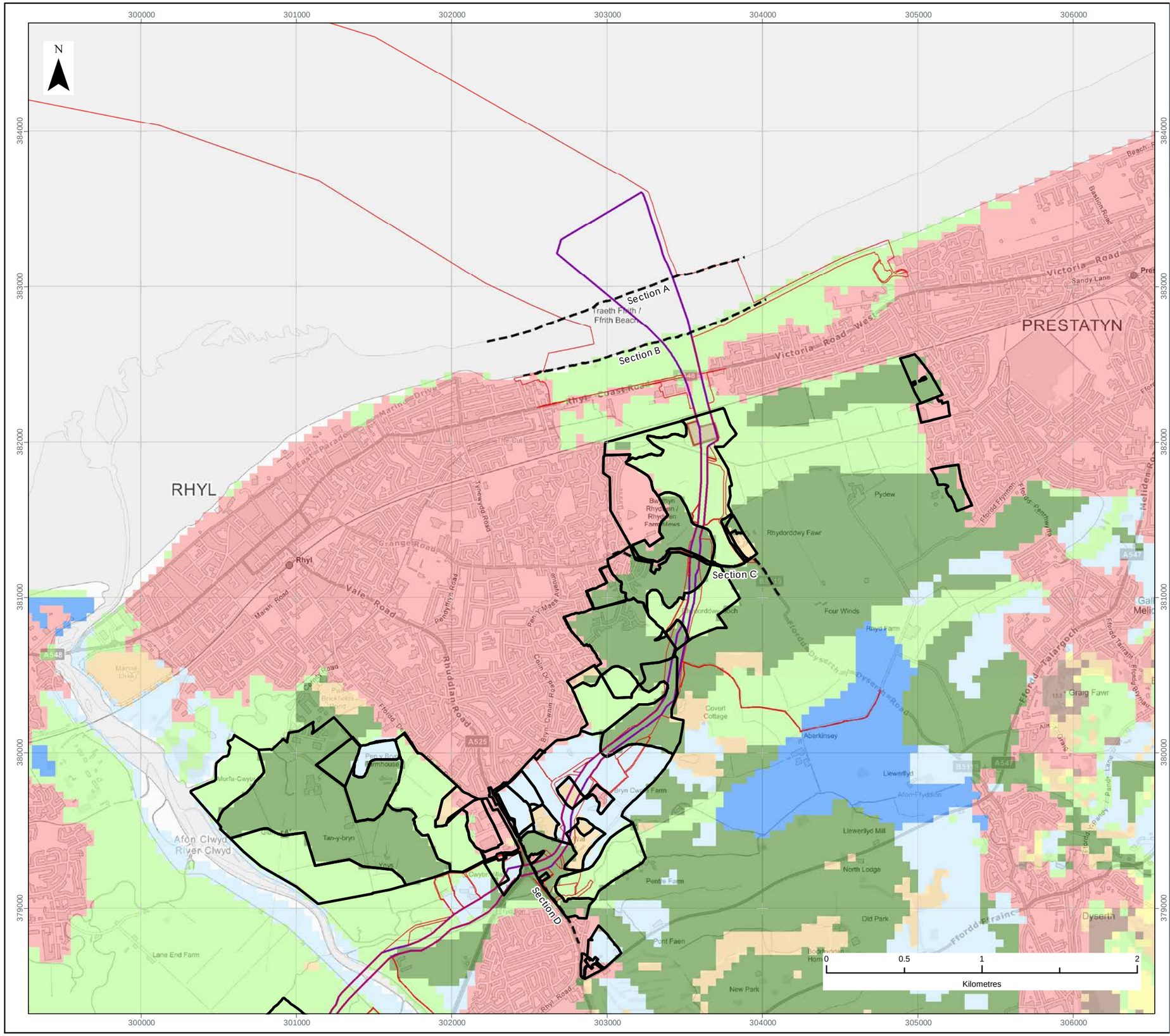
SITE NAME	FACILITY TYPE	SITE POST CODE	HAZARDOUS TOTAL (KT)
Padeswood Cement Works	Co-Incinerator	CH7 4HB	23
Whitchurch Salt Slags	Material Recycling Facility (MRF)	SY13 3PA	5
Sandycroft Waste Management Centre	Non-Haz Waste Transfer	CH5 2Px	5
Lelo Metal Recycling Ltd	Metal Recycling	LL21 9SD	5
Phoenix Metals And Colin Davies Non-ferrous Metals	Metal Recycling	LL60 6HR	3
Lovatt Brothers	Haz Waste Transfer	SY15 6NW	2
Safetykleen Broughton	Haz Waste Transfer	CH4 0BY	2
Wrexham Clinical Waste Treatment Facility (HDU & TS)	Physical Treatment	LL13 9RJ	2
Wrexham Clinical Waste Treatment Facility (Incinerator)	Incineration - clinical waste	LL13 9RJ	1
Entrec Ltd	Metal Recycling	LL13 9RD	1

Disposal Contingency

Disposal to landfill can be seen as a contingency, to be considered in the event that alternative treatment facilities are unavailable (e.g. due to maintenance). The following landfills in North Wales have been identified as a disposal contingency:

EPR NUMBER	TYPE	NAME	AREA	EST. REMAINING VOID SPACE CUBIC METRES	DATE OF ESTIMATE
BU0800IZ	Non haz	FCC Environment (Llandullas)	North Wales	167,922	2018
PP3139GB	Non haz	Cory Environmental Central Ltd - Hafod Quarry	North Wales	2,218,538	2018
GP3030BE	Non haz	Corus UK Ltd	North Wales	47,694	2018
BP3330LS	Inert	Griffiths Griffith Wyn, Edward Lloyd And Gwenfrai Rees (Ty Mawr Farm)	North Wales	397,791	2018
FP3590LV	Inert	Clive Hurt (Plant Hire) Ltd	North Wales	337,500	2018
RP3337SE	Inert	Nant Newydd Quarry	North Wales	262,500	2018
WP3432SC	Inert	Treborth Lesuire Ltd.	North Wales	16,885	2018
AP3238GH	Haz	Bostock Landfill	NW England	1,432,575	2020
BP3633LN	Haz	Randle Landfill Site	NW England	2,811,636	2020

15 Appendix L – Response to ExQ1.9.1– Predictive Agricultural Land Classification



LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Onshore Export Cable Corridor
- Transition Joint Bay Construction Compound

Predictive Agricultural Land Classification (Grade)

- 1
- 2
- 3a
- 3b
- 4
- 5
- Non Agricultural
- U
- Post 1988 Agricultural Land Classification Survey Boundary

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX L - RESPONSE TO **ExQ1.**9.1
PREDICTIVE AGRICULTURAL LAND CLASSIFICATION

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

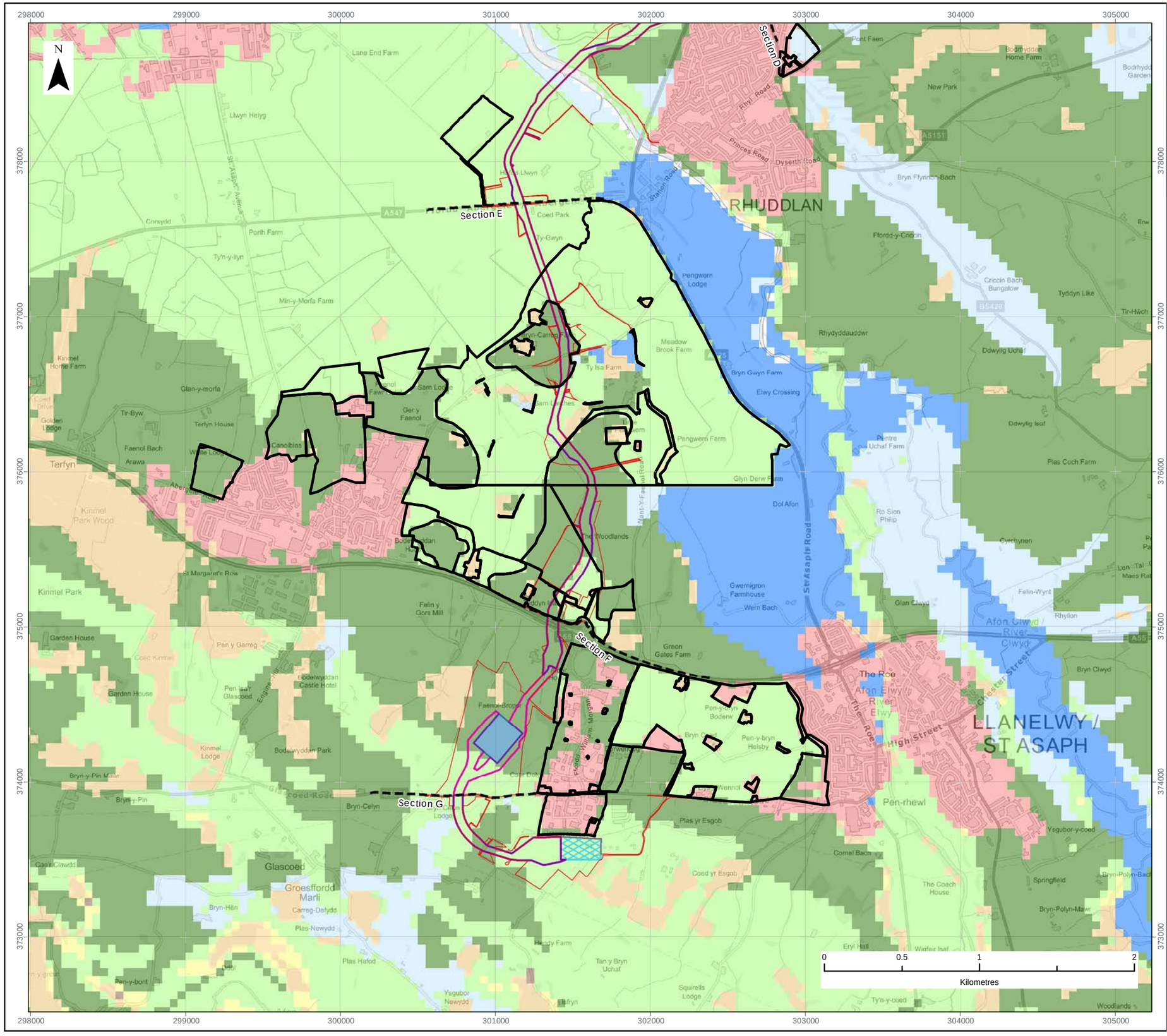
FIGURE NUMBER:

FIGURE 2
Page 1 of 2

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:25,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

P:\05356 - GoBe Consultants Ltd\00009 Awel y Mor\Tech\GIS\Dwgs\Wking\202208 Post Submission Support\05356.00009.0326.0 Predictive Agricultural Land Classification Overview.mxd



LEGEND

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

Predictive Agricultural Land Classification (Grade)

- 1
- 2
- 3a
- 3b
- 4
- 5
- Non Agricultural
- U
- Post 1988 Agricultural Land Classification Survey Boundary

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX L - RESPONSE TO **ExQ1.**9.1
PREDICTIVE AGRICULTURAL LAND CLASSIFICATION

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

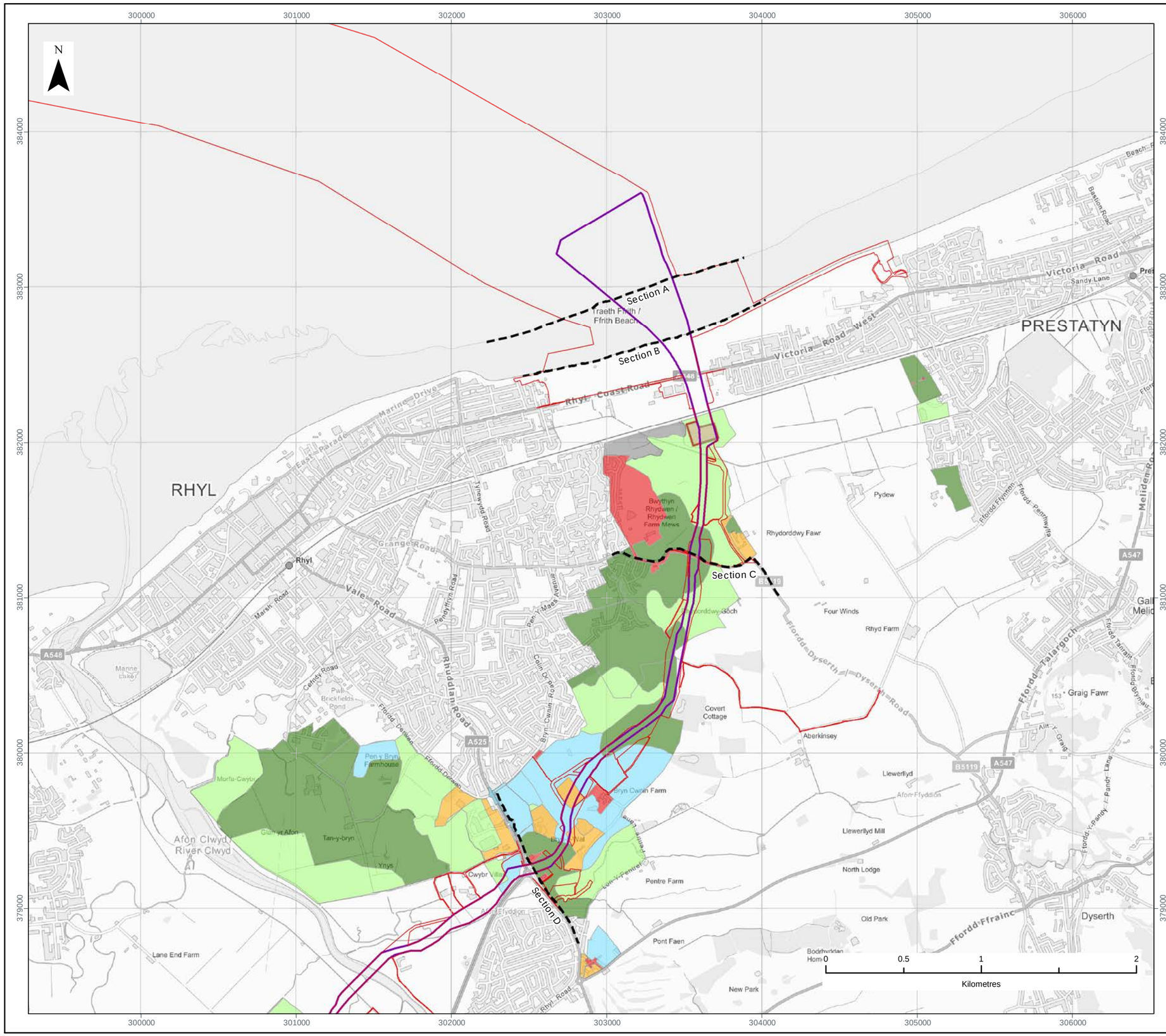
FIGURE 2
Page 2 of 2

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:25,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

P:\05356 - GoBe Consultants Ltd\00009 Awel y Mor\Tech\GIS\Dwgs\Wking\202208 Post Submission Support\05356.00009.0326.0 Predictive Agricultural Land Classification Overview.mxd

16 Appendix M – Response to ExQ1.9.1–Agricultural Land Classification (Wales) Surveys



LEGEND

- Order Limits
- Onshore Cable Route Section Breaks
- Onshore Export Cable Corridor
- Transition Joint Bay Construction Compound

Post1 988 Agricultural Land Classfication Grades

- Grade 2
- Grade 3a
- Grade 3b
- Non - Agricultural
- Not Surveyed
- Urban

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX M - RESPONSE TO **ExQ1.**9.1 AGRICULTURAL LAND CLASSIFICATION (WALES) SURVEY

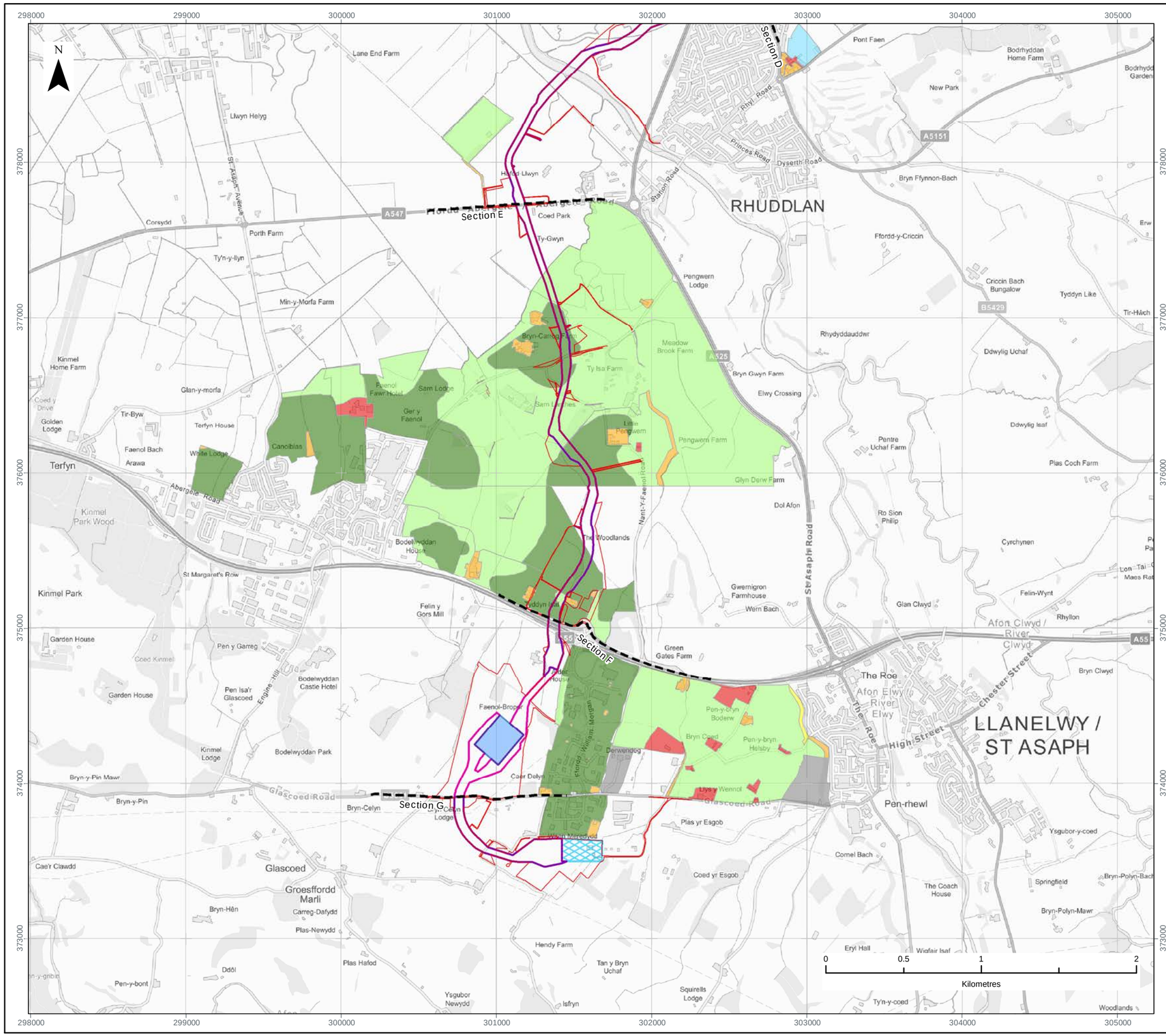
VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

FIGURE 2

SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:25,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm



LEGEND

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

Post1 988 Agricultural Land Classfication Grades

- Grade 2
- Grade 3a
- Grade 3b
- Grade 4
- Non - Agricultural
- Not Surveyed
- Urban

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX M - RESPONSE TO **ExQ1.**9.1 AGRICULTURAL LAND CLASSIFICATION (WALES) SURVEY

VER	DATE	REMARKS	Drawn	Checked
1	18/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

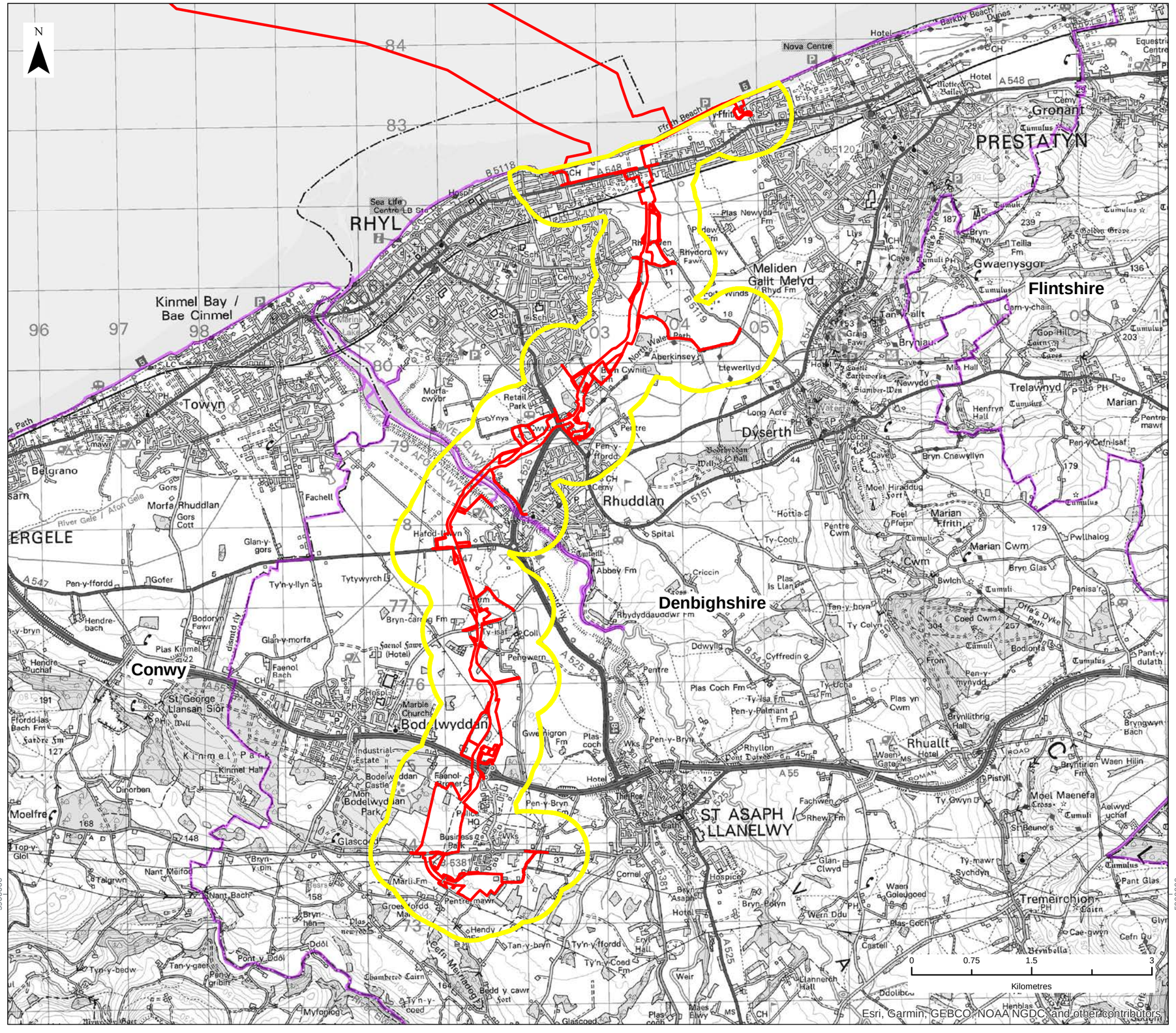
FIGURE 2

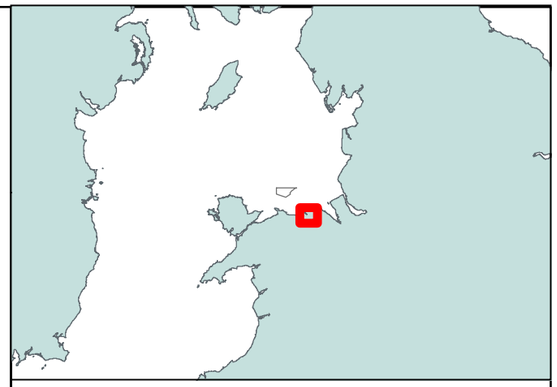
SCALE:	PLOT SIZE:	DATUM:	COORDINATE SYSTEM:
1:25,000	A3	ODN	British National Grid

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

P:\05356 - GoBe Consultants Ltd\00009 Awel y Mor\Tech\GIS\Dwgs\Wking\202208 Post Submission Support\05356.00009.0327.0 Post 1988 Agricultural Land Classification.mxd

17 Appendix N – Response to ExQ1.18.14 – Socio Economics Chapter [APP-064] Figures 1 and 4 at 1:50,000 scale





LEGEND

- Order Limits
- Local Authority District Boundaries
- Local Area of Inluence

Data Source: Contains Ordnance Survey data © Crown copyright and database right

PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE: Study areas used in the socio-economic assessment

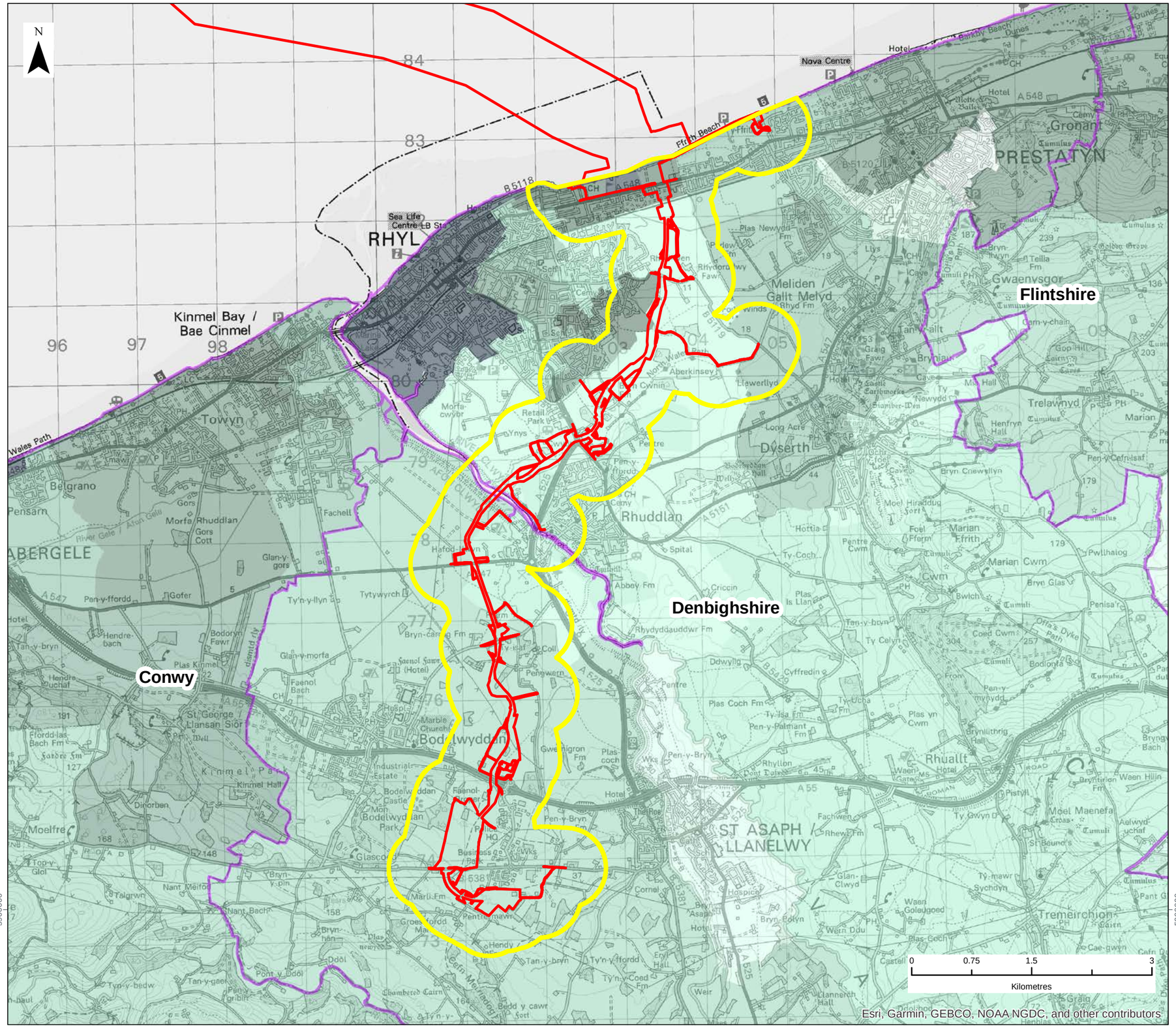
VER	DATE	REMARKS	Drawn	Checked
1	10/19/2022	For Issue	MI	SL

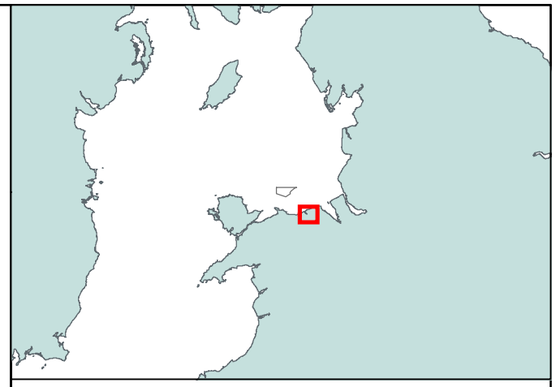
FIGURE NUMBER:

Figure 1

SCALE:	PLOT SIZE:	DATUM:	PROJECTION:
1:50,000	A3	WGS84	UTM30N

Fferm Wynt Alltraeth AWEL Y MÔR Offshore Wind Farm





LEGEND

- Order Limits
- Local Authority District Boundaries
- Local Area of Inluence

Welsh Index of Multiple Deprivation (2019)

Deciles:

- 1 (most deprived 10%)
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10 (least deprived 10%)

Data Source: Contains Ordnance Survey data © Crown copyright and database right

PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

Overall deprivation along the North Wales coast

VER	DATE	REMARKS	Drawn	Checked
1	10/19/2022	For Issue	MI	SL

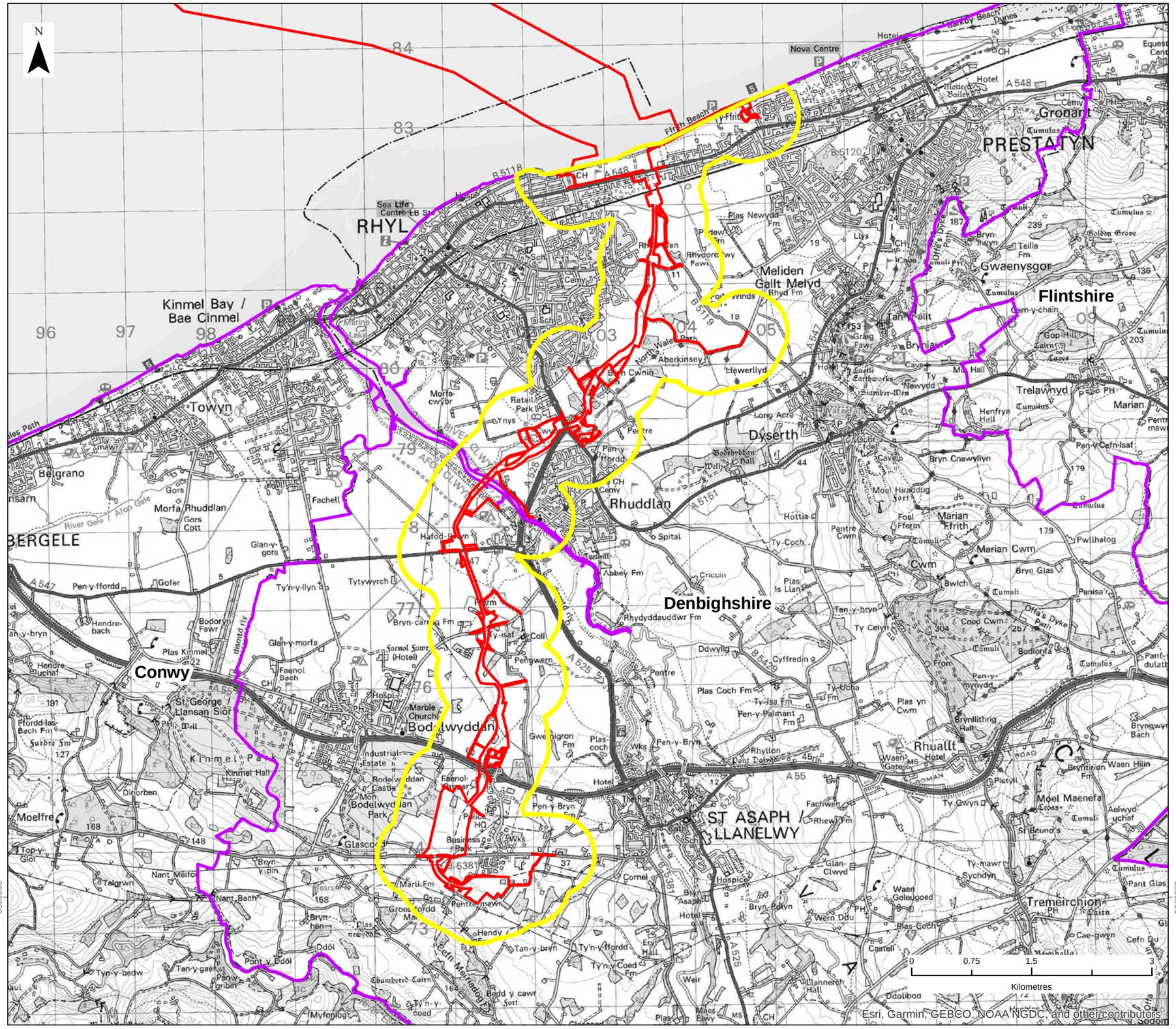
FIGURE NUMBER:

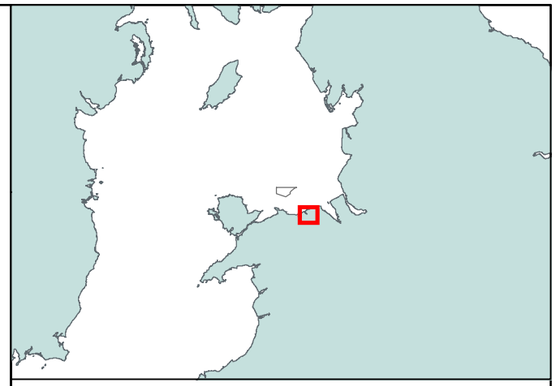
Figure 4

SCALE:	PLOT SIZE:	DATUM:	PROJECTION:
1:50,000	A3	WGS84	UTM30N

Fferm Wynt Alltraeth AWEL Y MÔR Offshore Wind Farm

18 Appendix O – Response to ExQ1.19.9 – Tourism and Recreation Chapter [APP-065] Additional Plan of Study Areas used





LEGEND

- Order Limits
- Local Authority District Boundaries
- Local Area of Inluence

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

Study areas used in the tourism & recreation assessment

VER	DATE	REMARKS	Drawn	Checked
1	10/19/2022	For Issue	MI	MI

FIGURE NUMBER:

Figure 1

SCALE:	PLOT SIZE:	DATUM:	PROJECTION:
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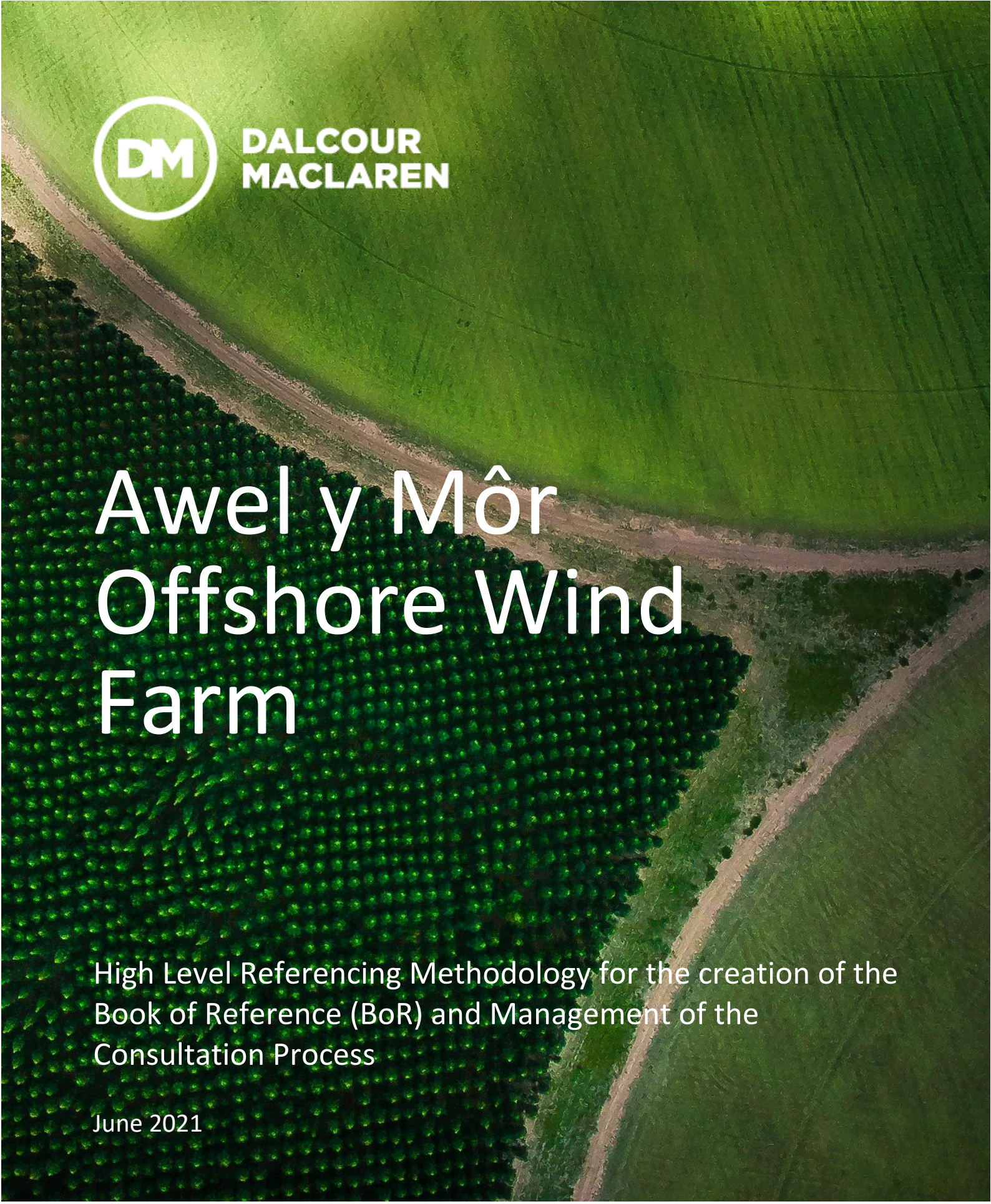
Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

19 Appendix P – Land Referencing Methodology



DALCOUR MACLAREN

Awel y Môr Offshore Wind Farm

High Level Referencing Methodology for the creation of the Book of Reference (BoR) and Management of the Consultation Process

June 2021

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Project Details

Project Name	Awel y Môr Offshore Wind Farm
Scheme Number	197212
Report Number	1

Prepared by	
Oliver Kerr	Dalcour Maclaren

Approved by	

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Introduction

This document sets out the technical guidelines to ensure the process of land referencing is consistent route-wide in order to prepare data for the Section 42 consultation and then for the Book of Reference (BoR) as part of the Development Consent Order (DCO) application up to and including Section 56 notification.

Purpose and Objectives of the Technical Guidelines

The purpose of this document is to provide guidance and ensure consistency in the preparation of recording all interests in land required or affected by the Awel y Môr Offshore Wind Farm project and the creation of associated land parcels and land plots.

Responsibilities/deliverables

Dalcour Maclaren's (DM) land referencing service;

i. ensures a thorough process of land referencing and;

ii. delivers consistent and accurate landowner data based on diligent and professional inquiry with affected landowners

DM is responsible for providing the information and postal list required for the Section 42 consultation and provides proofs of activities either for the DCO application and/or during the DCO examination, if required.

DM is responsible for delivering a consistent and accurate Book of Reference based on diligent inquiry.

The DM land referencing team will work alongside the DM mapping team, the DM surveyor team and any DM contracted solicitors or other third parties to ensure the data is collated with the required diligence.

Land Referencing

RWE Renewables UK Limited (RWE) and the project company Awel y Môr Offshore Windfarm Ltd have statutory obligations under Section 42 of the 2008 Planning Act to undertake diligent inquiry in order to identify all persons with relevant interests in land for the purpose of consultation and subsequent inclusion in a Book of Reference to support an application for compulsory acquisition powers within a DCO.

A land referencing programme is required to assist with the preparation of the Book of Reference (BoR) as one of the key components of the submitted Development Consent Order (DCO) application. The BoR sets out all interests in land and the reputed owners which have been established throughout the land referencing activities.

Project Initiation and Data Transfer

In order for Dalcour Maclaren to start the land referencing process, the land referencing boundary in digital format is to be provided to DM by RWE. This land referencing boundary will encapsulate all land that RWE believes could potentially

be affected by the project either directly (BoR category 1 & 2 interests through the acquisition of land) or indirectly (BoR category 3 interests through ability to make a potential claim).

Best Practice: *the land referencing boundary is the greatest extent that BoR category 1, 2 & 3 interests specified above can be identified within. Once the Section 42 and DCO boundary extents have been decided, these should fall within the land referencing boundary in their entirety. If this is not the case, the land referencing process will need to be conducted for these additional areas and additional time will be needed to complete this.*

Once the digital land referencing boundary is received, a new project on our in-house database system, CONNECT, and associated GIS database, MapThat, will be created. Ordinance Survey (OS) mapping data will be sourced to add to MapThat to be used as the background mapping for any land plans required during the land referencing process. Using the digital land referencing boundary, the DM GIS mapping team will spatially query His Majesty's Land Registry (HMLR) National Polygon Service (NPS) dataset to identify all the HMLR titles located within the land referencing boundary.

Initial HMLR Data Processing

A spreadsheet listing these HMLR titles will be sent to HMLR to provide the associated tenure, names and addresses of the proprietors and the names and addresses of any mortgagees for these proprietors.

The polygons are imported into DM's GIS spatial database and our Referencing administrators process the csv file to enable an accurate import of attribute data into our GIS tables. This data is then imported into our in-house database system, CONNECT.

The data provided by HMLR will then be checked and cleansed to ensure the addresses are formatted correctly to match the official Royal Mail address and to ensure all organisations listed have the current organisation name and registered address. This is achieved through checking the registered address of organisations on the UK Companies House website. For any organisations that are registered outside of the UK, foreign Companies House websites are used to identify their registered addresses. For unregistered organisations, desktop research is used to define the most appropriate address to which to send correspondence to.

Once the data is checked and cleansed, this spreadsheet is sent to the DM GIS mapping team to add this data to the appropriate title on CONNECT and MapThat. The HMLR title boundaries are used by the DM GIS mapping team to create land parcels. These parcels are added to CONNECT listing their corresponding HMLR titles and the land parcels are populated with the respective proprietors and mortgagees. The HMLR titles are added to CONNECT also where the associated HMLR documents can be attached and a link between the HMLR title and the land parcels can be made.

For any land within the land referencing boundary that is unregistered, land parcels are created for these areas to ensure all land within the land referencing boundary is covered by an associated land parcel.

The title descriptions listed on the HMLR registers will be used as parcel descriptions and reviewed to ensure the land has been described appropriately. All unregistered parcels are also given a parcel description using satellite imagery available on Google Maps and Bing Maps+.

Initial Contact, Survey Access Request & Survey Access Licence Letters

Once the above is complete, a list of all landowners and their addresses will be exported from CONNECT.

DM will provide RWE with the first draft of the initial contact cover letter, survey access questionnaire, access licence agreement and unknown owner site notice templates. RWE will then make any necessary amends to the templates prior to approval for use.

This correspondence will be sent via 1st class post to all landowners within the current land referencing boundary to make all landowners aware of the project and also request access to their land for the purposes of conducting surveys.

Survey access questionnaires and signed access licence agreements received will be logged on CONNECT and any additional information provided on the questionnaire will be added to CONNECT. Whether a landowner has given or declined consent to access to their land and if they require prior contact before surveys being carried out is to be recorded on CONNECT. This information is shared with those conducting the surveys to allow them to arrange access for landowners who have given consent.

For unregistered land within the land referencing boundary, site visits will be conducted to these parcels or to those who own the adjacent parcels to attempt to ascertain who owns the unregistered parcels. If the site visit is unsuccessful in obtaining this information a site notice will be erected asking for those that do have any ownership information to contact DM.

Reminder letters will be sent to those that have not responded to the initial letter out to encourage further responses. TraceIQ will be used to source any phone numbers and/or email addresses so that those that have not responded to the initial letter can be contacted to chase a response.

The surveys to be conducted will inform changes to be made to the land referencing boundary prior to conducting the tasks listed below.

Further HMLR Data Processing

A spreadsheet listing all HMLR titles within the updated land referencing boundary will be sent to HMLR to provide the corresponding HMLR registers and title plans.

A review of the HMLR title plans will identify any discrepancies between the HMLR NPS polygon dataset and the actual extent of the titles shown on the HMLR title plans. Any discrepancies will be reflected in the HMLR polygon and the respective parcel on MapThat.

Desktop research will be undertaken to identify land which could be classed as Special Category Land. Sources of information will include MAGIC Maps, local authority websites, Commons Register, Natural England, English Heritage, Highways England, Crown Estate and the National Trust. CONNECT will be updated to reflect any Special Category Land identified through this process.

Each of the registers that relate to an HMLR title located within the land referencing boundary will be reviewed to ensure any beneficiaries, rights, easements, covenants, provisions and restrictions are also listed under the appropriate parcels. Any interests identified that relate to only part of the parcel will trigger a request to the DM GIS mapping team to split from the respective parcel and a new parcel created. All interests listed in the original parcel will be copied over to this new parcel and addition interests identified added.

Desk Based Interest Gap Identification and Filling

All unregistered parcels will be populated with an unknown freeholder occupier interest. Desktop research will be conducted and TraceIQ will be used to identify any occupying interests that are missing from the relevant parcels. Any assumed owners will also be added to these unregistered parcels. These interests include; adjacent owners, frontage (ad medium filum) interests, watercourse interests, railway interests and rights of access interests.

A request for the location of utilities and their owner within the land referencing boundary will be made to Atkins by providing them with the land referencing boundary to provide a quote. This will be sent to RWE for approval before commencing this utility search.

A request for location of adopted highways, rights of way and common land within the land referencing boundary will be made to the relevant local authority/authorities. Any request for payment will be sent to RWE for approval before commencing the local authority searches.

Land Interest Questionnaires (LIQs)

The DM land referencing team will send a Land Interest Questionnaire (LIQ) along with a plan of their land once all non-contact referencing has been conducted. This form asks landowners and other interested parties to clarify contact information and confirmation of ownership, occupiers, tenants and any other party with an interest in their land such as rights of way or option agreements.

The other purpose of the LIQs is to ensure that land ownership boundaries of occupation are correctly identified. Recipients of the LIQs are able to identify if this boundary is incorrect and can amend the LIQ land plan. Any changes made will be made to the parcels and reflected within CONNECT and MapThat.

Prior to sending out Land Interest Questionnaires to confirm the accuracy of the information received from desktop referencing, cover letter, questionnaire and land plan templates will be provided to RWE for approval for use.

Prior to sending out Land Interest Questionnaires, for any interests that are identified as clients of DM, contact will be made with the appropriate DM client lead to establish the best method for sending LIQs to a particular individual via post or email.

Best Practice: *The LIQ cover letter should provide contact details for RWE should anyone have a query regarding the project itself and contact details for DM who can field any queries relating to the LIQ itself. A deadline for response is recommended to be at least 3 weeks. Any queries received by DM regarding the project that DM are unable to answer will be forwarded to RWE.*

Best Practice: *The LIQ will list details of how to return the LIQ to DM. Options provided should be via email, via post and via online form. A unique online code is to be provided for each LIQ so that recipients can complete the questionnaire online.*

Land Interest Questionnaires will then be created for all interests (other than unknown interests) pre-populating the information that DM have already identified through desktop referencing using mail merge. DM GIS mapping team will create all the necessary land plans showing the extent of each of the interests.

Best Practice: *Once the LIQs have been created, a sense check is to be conducted to ensure the correct information is pulling through into the LIQ and has been printed in the correct format. A sample check of 10% of the LIQs and a check of all LIQs to ensure they are present is recommended. LIQs to be sent in the post 1st class and a freepost return envelope enclosed to encourage response.*

LIQ responses will be logged on CONNECT and any additional information provided will be added to CONNECT. Any additional interests identified in an LIQ response for which we have not sent an LIQ will require DM to send an LIQ to the new interest identified.

Best Practice: *If any information received on the LIQ is missing or ambiguous, contact is to be made with the interest to confirm the missing or ambiguous information either via email or phone call.*

LIQ reminder letters are to be sent to all interests that have not returned all their LIQs after the deadline for responses stated on the LIQ cover letter to encourage response.

Sites of Large Scale Occupancy

Where sites are identified as potentially being occupied by a large number of individual occupiers (such as caravan holiday parks), DM shall use reasonable endeavours to identify those occupiers in collaboration with the landowner and/or site manager(s). This will involve an LIQ being issued to the owner and all potential occupiers of caravan pitches. The LIQ will be accompanied by a covering letter and a plan. The Plan will be used to identify an individual occupier's area of occupation which in the case of a caravan park would be a specific 'pitch' on the site. We would propose to distribute LIQs by hand to each 'pitch' but in the event that this is not agreeable with the landowner and/or site manager, they will be delivered to the park's reception for distribution by the park staff. Delivery of the LIQs and all subsequent notices to the park's reception will be documented by means of photographic evidence and through the Collector mobile app.

The process for the delivery of any and all follow up correspondence and subsequent notices will mirror the process set out above.

Unknown Interest Site Notice Erection & Monitoring

For those interests that we have identified through desktop referencing but have been unable to ascertain who the interest relates to, since we cannot send LIQs to these interests, unknown interest site notices will be erected.

An unknown interest site notice template will be sent to RWE for approval for use prior to erection.

An analysis of unknown interests within the land referencing boundary will be identified within CONNECT and unknown interest site notices will be accompanied by a plan showing the extent of the unknown interest. The notice will also provide full contact details for DM's land referencing team. A reference number will be shown on the plan and notice to ensure any data received is processed accurately on CONNECT.

The notice shall request that any party with an interest in the land to come forward and make claim to their interest and provide contact details to receive formal notification of the DCO Application.

The Collector App is used by the DM GIS mapping team that shows the unknown interest parcels on a phone app and allows the ability to log; the notice number, date/time of check, who checked the notices, action taken (erection, checked, replaced, removed), a photograph of the notice for each check and any relevant additional comments.

Best Practice: *Unknown Interest Site Notices are to be laminated and erected in publicly accessible areas nearest to the relevant parcel to ensure the highest visibility to the public. They are to be erected on street furniture (ideally lampposts) as close to the unknown landed interest as possible. They are not to be erected on private roads, private fences or gates.*

Best Practice: *Unknown Interest Site Notices are to be monitored weekly and replaced if either weather damaged or removed.*

At the end of the notice monitoring period, all notices shall be removed from site, and materials recycled as far as is practical.

Contact Site Referencing

Before contact site visits are conducted, a site visit calling card template is to be sent to RWE for approval for use.

An analysis of those that are yet to return their LIQ(s) is to be conducted to identify those properties that can be visited on site to chase LIQ response.

The Collector App is set up to show the properties to be visited and allows the action taken to be logged. For those that do not answer when conducting door knocking, a calling card is left to encourage LIQ response.

Best Practice: *Preparation completed in advance of site visits is required to ensure where and when to meet to start door knocking each day. Health and safety policy dictates that door knocking must be conducted in pairs. Health and safety and avoiding conflict policies to be adhered to. Land referencers and surveyors not to enter any property where they do not feel safe and a note is to be made of any reasons for this so those conducting future site visits are aware of this also.*

Any LIQs completed out on site and the action taken at each property is to be logged on CONNECT.

Best Practice: *If more than one site visit is required then they are to be conducted weekly or fortnightly (depending on number) and at different times of the day and different days of the week (if possible) to ensure highest chance of response to door knocking.*

For those interests that DM are unable to visit out on site, chasing LIQ responses will be conducted either through phone calls, emails or further reminder letters sent in the post. All attempts at contacting interests will be logged on CONNECT.

All returned LIQs and communications received from interests will be logged on CONNECT and any additional information provided is reflected on CONNECT. Where it is unclear if all the necessary information has been provided in the returned LIQ, communication will be made to follow up with those that have returned their LIQ if appropriate to ensure all the necessary information is confirmed.

Best Practice: *A minimum of 3 attempts (either by reminder letter, phone call, email, site visit) will be made to contact all interests within the land referencing boundary.*

Section 42 Consultation

Once the desktop and contact site referencing has been completed, work is to be conducted for Section 42 consultation.

In the first instance, a refresh of the HMLR data is to be requested from Land Registry. DM will request all edition dates for all the HMLR titles be provided and these are then compared with the edition dates of the HMLR titles ordered before conducting desktop and contact site land referencing.

For those HMLR titles with a more recent edition date, the new edition of the HMLR title is to be ordered and the changes made to the HMLR title identified.

Any updated information that is relevant such as new proprietors, new or removed mortgagees etc. is to be reflected within CONNECT.

UK Companies House and TraceIQ will be checked again to ensure that the registered address for organisations is current and correct and that those interests sourced from TraceIQ are still located at the address previously sourced.

A Section 42 notice template will be sent to RWE to incorporate consultation information, appropriate contact details to which to send comments regarding the proposed development and approval for use. This will include a template for the Section 42 cover letter, the Section 48 notice and any land plans to be enclosed within the letter.

A recipient list of all individuals and organisations that have an interest within the land referencing boundary will be provided to RWE including names and addresses. A recipients list of a number of additional statutory consultees can also be provided to RWE for review and approval.

RWE to provide any additional consultees beyond that provided by DM to collate a final recipients list for which DM can produce a mail merge, check and print the Section 42 notices. DM will collaborate with RWE and their other subject matter experts as appropriate to identify if there are any additional Category 3 consultees owning land or property which falls outside of the land referencing boundary to which a Section 42 notice should be sent.

Best Practice: *Section 42 notices to be sent to all recipients ideally 2 weeks before consultation commences. Any additional Section 42 notices to be sent will need to be sent within 28 days before the end of the consultation period. If not, the consultation period is to be extended for these recipients that receive the Section 42 notice after this 28-day window.*

Best Practice: *Section 42 notices are statutory notices and therefore a check needs to be done to ensure every recipient receives a Section 42 notice and that it is complete with all necessary information enclosed.*

Where areas are added to the DCO boundary which were not included in the Section 42 consultation boundary, newly identified interests and interests who were previously consulted with but have additional land in the revised DCO boundary should be issued with targeted Section 42 consultation letters. This will ensure they have the opportunity to provide feedback to RWE on the updated proposals.

Section 42 Unknown Interest Site Notices

A Section 42 unknown interest site notice template will be sent to RWE for approval prior to erection.

For unknown interests, a Section 42 unknown interest site notice is to be erected for these parcels.

An analysis of unknown interests within the land referencing boundary will be identified within CONNECT and Section 42 unknown interest site notices will be accompanied by a plan showing the extent of the unknown interest. The notice will also provide full contact details for DM's land referencing team. A reference number will be shown on the plan and notice to ensure any data received is processed accurately on CONNECT.

The notice shall request that any party with an interest in the land to come forward and make claim to their interest and provide contact details to receive formal notification of the DCO Application.

The Collector App is used by the DM GIS mapping team that shows the unknown interest parcels on a phone app and allows the ability to log; the notice number, date/time of check, who checked the notices, action taken (erection, checked, replaced, removed), a photograph of the notice for each check and any relevant additional comments.

Best Practice: *Section 42 Unknown Interest Site Notices are to be laminated and erected in publicly accessible areas nearest to the relevant parcel to ensure the highest visibility to the public. It is advised to also erect generic Section 42 site notices throughout the length of the land referencing boundary to make as many people aware of the project and encourage comments regarding the proposed development. They are to be erected on street furniture (ideally lampposts) as close to the unknown landed interest as possible. They are not to be erected on private roads, private fences or gates.*

Best Practice: *Unknown Interest Site Notices are to be monitored weekly for the duration of the Section 42 consultation period and replaced if either weather damaged or removed.*

At the end of the monitoring period, all notices shall be removed from site, and materials recycled as far as is practical.

Confirmation Schedules

Confirmation schedules are necessary to ensure the information held by DM is still correct based on desktop referencing, returned LIQs and contact site referencing prior to DCO Book of Reference submission.

In the first instance, a refresh of the HMLR data is to be requested from Land Registry. We request all edition dates for all the HMLR titles be provided and these are then compared with the edition dates of the HMLR titles ordered before conducting desktop and contact site land referencing.

For those HMLR titles with a more recent edition date, the new edition of the HMLR title is to be ordered to identify the changes made to the HMLR title.

Any updated information that is relevant such as new proprietors, new or removed mortgagees etc. is to be reflected within CONNECT.

A confirmation schedule template will be sent to RWE for approval for use.

Once refresh of HMLR data is completed, confirmation schedules are created asking the recipients to confirm the information held by DM is still current and correct.

All confirmation schedule responses will be logged on CONNECT and any new information provided will be reflected on CONNECT and any additional confirmation schedules sent.

Confirmation schedule reminder letters are to be sent to all interests that have not returned all their confirmation schedules after the deadline for responses stated on the confirmation schedule cover letter to encourage response.

Site Walkover

A site walkover is conducted to identify any information not obtained from desktop research or contact site referencing.

Contact is to be made with the necessary landowners and occupiers to ensure they agree for DM to access their land prior to conducting the site walkover on land not publicly accessible within the DCO boundary. Any land where access has not been agreed will not be accessed as part of the site walkover.

The Collector App will be used to log any changes in land use that could result in a change of ownership or interest. Any evidence of additional interests will be recorded using the Collector App and incorporated on CONNECT. A photograph is to be taken for each parcel and for any features that suggest a change in land use or ownership/occupation.

Book of Reference Production & Submission

RWE is to provide an updated DCO boundary and works plans following a review of feedback from the s.42 consultation. Allocation of acquisition type and rights class is then undertaken based on the works areas.

DM GIS will use the DCO boundary, works plans and the extent of different acquisition types to split up the land parcels plots.

These plots will inform the DCO BoR Land Plans that show the plots within the DCO boundary and their associated acquisition type. Any special category land or crown land identified will have corresponding land plans created to show this land.

Each plot will be given a plot description by reviewing the land using online mapping tools (Google Maps and Bing Maps).

Each plot interest will be reviewed to ensure it is located within the extent of the plot. If this is not the case, the interest will be excluded from the plot and will not appear within the BoR. A review of the following information is to be conducted to ensure all information is correct;

- Land Registry titles
- LIQ and confirmation schedule responses
- Utility information
- PROW information
- Registered Company Addresses
- Frontage interests
- Duplicate interests
- Site walkover information
- Plot descriptions

A review of any gaps in the information will trigger a check of all sources of information to ensure no further information can be obtained.

DM will provide RWE with the BoR template for approval for use. Any comments or amends suggested by RWE will be made to the templates.

Once plots have been created and interests allocated to those plots, a further multi-disciplinary review of potential Category 3 claimants will be undertaken, confirmation of any special category land to be included will be sought and ultimately a draft BoR is to be created. This will be used for DM to conduct a plot by plot review to ensure the information shown is correct. CONNECT will be updated accordingly with any changes required to the data shown in the BoR.

A draft BoR will be submitted to RWE for legal review. Any comments or amends required from the RWE legal review will be incorporated into the BoR and another plot by plot review will be conducted to ensure all amends requested have been incorporated before final submission.

Post Book of Reference Submission & s.56 Notification

Section 55 - Upon submission of the DCO application, the Planning Inspectorate (PINS) has 28 days to accept or reject the application for examination. If the application is accepted a Section 55 notice is provided outlining any queries or points of clarification that are required. Should any of these relate to the BoR or the Land Plans, DM review and confirm any changes with the Project Team.

Section 56 - Following acceptance, site notices will be erected around the application area. A general rule is that they are placed in the same locations Section 42 site notices were placed. These notices shall be placed on public highways, bridleways or public footpaths. Any notice locations proposed to be located on private land will require the consent of the landowner. The notices will remain on site for a period of 6 weeks.

Once the DCO application is submitted to the Planning Inspectorate (PINS), DM will prepare a spreadsheet that lists any further updates to the information to the BoR that have become apparent after submission and make the respective changes to the BoR in preparation for further requests for an updated BoR by PINS.

If the DCO application is accepted, Section 56 notices are to be sent to all those interests listed in the BoR inviting them to make relevant representations ahead of the commencement of the DCO examination period.

In the first instance, a refresh of the HMLR data is to be requested from HM Land Registry. We request all edition dates for all the HMLR titles be provided and these are then compared with the edition dates of the HMLR titles ordered before conducting desktop and contact site land referencing.

For those HMLR titles with a more recent edition date, the new edition of the HMLR title is to be ordered to identify the changes made to the HMLR title.

Any updated information that is relevant such as new proprietors, new or removed mortgagees etc. is to be reflected within CONNECT.

Section 56 notices are printed and sent out via 1st class post.

Best Practice: *It is recommended to send the Section 56 notice by recorded delivery to ensure recipients have received the notice directly.*

Undeliverable Mail

From time to time, LIQs, Section 42 notices, confirmation schedules and Section 56 notices do not reach the intended recipient and are returned to DM.

An analysis as to why the letter did not reach the intended recipient will be conducted and any information that needs updating in order for the letter to be successfully delivered will be updated on CONNECT.

The letter will be re-issued appropriately to ensure that the letters reach the intended recipients.

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20 Appendix Q – Table of Wind Turbine Generator Maximum Design Scenarios

Table of Wind Turbine Generator Maximum Design Scenarios

Appendix Q to Document 1.7 of the Applicant's Deadline 1 submission

Table 1 should be read in conjunction with the Applicant's response to ExQ1.6.23, and demonstrates how the total rotor swept area operates to control the rotor diameter and tip height as the number of installed turbines increases.

For example, if 47 turbines are installed, then the maximum rotor diameter is 260.3m and the maximum upper tip height is 292.3m^{MHWS}.

Table 1 Wind Turbine Generator Maximum Design Scenarios

	Number of turbines	Maximum rotor diameter (m)	Maximum upper tip height (m^{MHWS})	Minimum lower tip height (m^{MHWS})	Total Swept area (km^2)
MDS B	50	250.0	282.0	22.0	2.500412
	49	254.9	286.9	22.0	
	48	257.5	289.5	22.0	
	47	260.3	292.3	22.0	
	46	263.1	295.1	22.0	
	45	266.0	298.0	22.0	
	44	269.0	301.0	22.0	
	43	272.1	304.1	22.0	
	42	275.3	307.3	22.0	
	41	278.7	310.7	22.0	
	40	282.1	314.1	22.0	
	39	285.7	317.7	22.0	
	38	289.4	321.4	22.0	
	37	293.3	325.3	22.0	
	36	297.4	329.4	22.0	
	35	301.6	332.0	22.0	
MDS A	34	306.0	332.0	22.0	
	<34	306.0	332.0	22.0	

21 Appendix R – ExQ1.9.7 Land Registry Title Area by Agricultural Land Classification

Table showing breakdown of Draft Order Limits by land title number showing the area of DOL within ALC

See Appendix S for plan showing Land Title Number areas

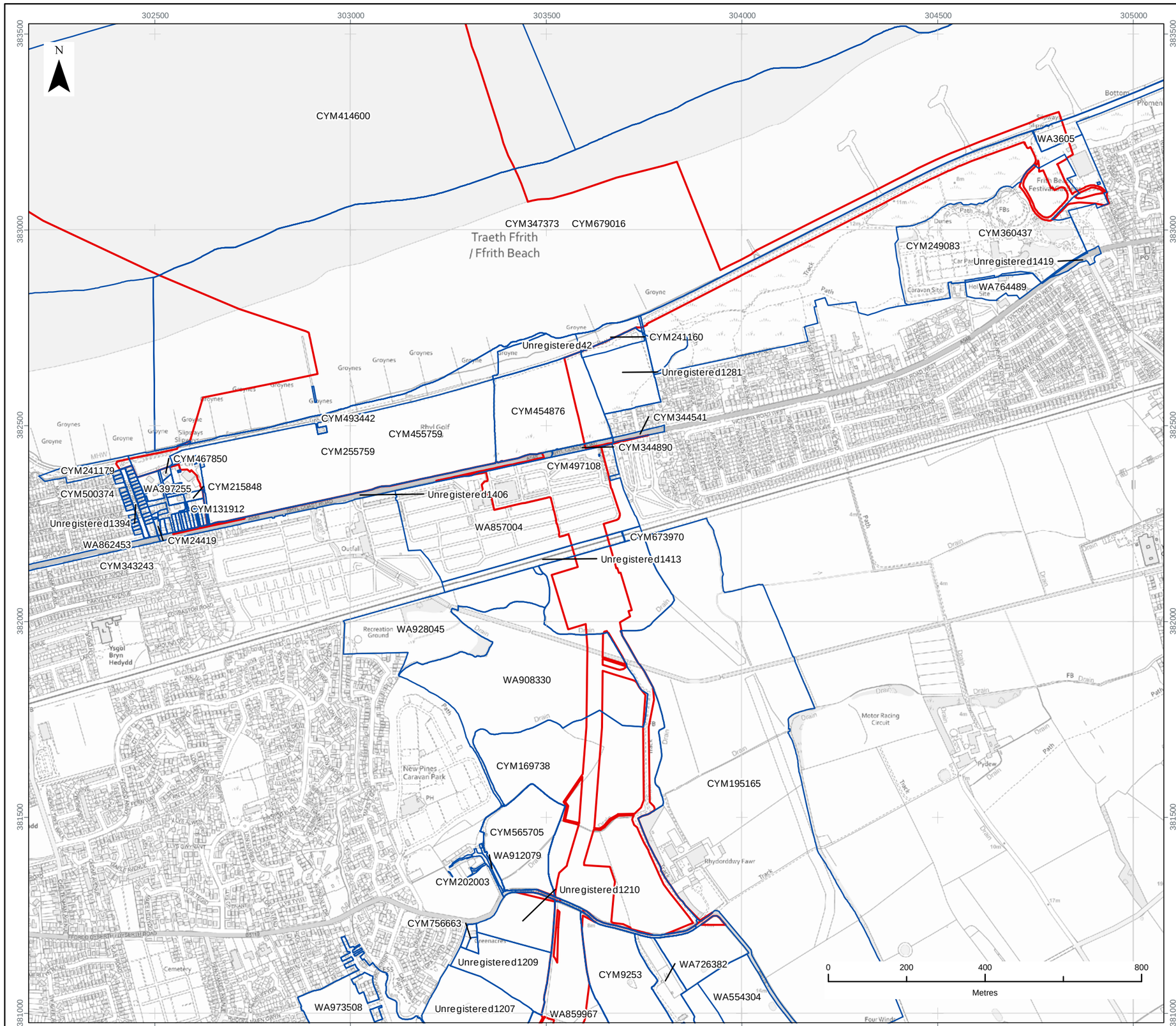
	ALC GRADE 1 LAND (HA)	ALC GRADE 2 LAND (HA)	ALC GRADE 3A LAND (HA)	ALC GRADE 3B LAND (HA)	OTHER (HA)	URBAN (HA)	TOTAL (HA)
WA607191 Faenol Bropor			20.22	10.86	1.47		**32.55**
CYM455759				18.87		0.76	**19.64**
CYM255759				15.98		1.02	**17.00**
CYM298742	0.07	4.54	6.09	0.70	0.13	0.01	**11.55**
CYM568240			1.32	8.52	0.11		**9.94**
CYM169738 TJB			1.92	5.83	0.14		**7.89**
CYM182785			4.80	1.96	0.22		**6.99**
WA859967			4.10	2.29			**6.39**
WA398993			1.24	4.69	0.07		**6.00**
CYM651103		3.66	0.99	0.86		0.02	**5.53**
WA865775 Faenol Bropor			5.35		0.16		**5.51**
CYM130979			0.61	4.81			**5.42**
WA892656			2.88	1.94	0.19		**5.01**
WA857004				2.72		2.20	**4.92**
CYM454876				4.48		0.06	**4.54**
CYM542758		0.33	2.97	1.15	0.01	0.02	**4.49**
CYM249083				3.28		0.24	**3.52**
WA888504			2.43	0.95			**3.38**
CYM347373				2.83			**2.83**

	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 (HA)
CYM679016				2.83			**2.83**
WA2529			0.60	2.22			**2.82**
WA982018				2.73			**2.73**
CYM735650				2.58			**2.58**
WA5943		0.06	0.02	2.14			**2.21**
WA641203				2.12			**2.12**
Unregistered42				1.59			**1.59**
CYM332543		0.84			0.66	0.01	**1.50**
WA898992				1.33			**1.33**
CYM456237		0.01	0.07	1.05			**1.13**
CYM250395			1.05	0.01			**1.05**
WA613551			0.02	0.97			**0.98**
WA730271			0.60	0.02			**0.62**
WA908330				1.04			**1.04**
CYM472358				0.95			**0.95**
WA982015				0.92			**0.92**
CYM360437				0.49		0.06	**0.54**
WA840017			0.46	0.07			**0.53**
CYM241160				0.52			**0.52**
WA444662		0.06		0.05	0.33		**0.44**
Unregistered1188		0.40		0.04			**0.44**
CYM475317				0.36	0.03		**0.39**
WA588181			0.37				**0.37**

	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 (HA)
CYM185643		0.01	0.34			0.01	**0.35**
WA3605				0.35			**0.35**
Unregistered1190			0.01		0.27		**0.27**
Total	**0.07**	**9.90**	**58.46**	**117.07**	**3.78**	**4.41**	**193.71**

Note: Land Tile parcles where DOL covers less than 0.25Ha have not been included in table

22 Appendix S – ExQ1.9.7 Land Registry Title Area and Draft Order Limits



LEGEND

- Order Limits
- Land Registry Title Boundary

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PROJECT TITLE:

AWEL Y MÔR OFFSHORE WINDFARM

FIGURE TITLE:

APPENDIX **S** - RESPONSE TO
ExQ1.9.7 - LAND REGISTRY TITLE AREA

VER	DATE	REMARKS	Drawn	Checked
1	21/10/2022	First Issue	JRS	MF

FIGURE NUMBER:

FIGURE 2
Page 1 of 5

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

Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

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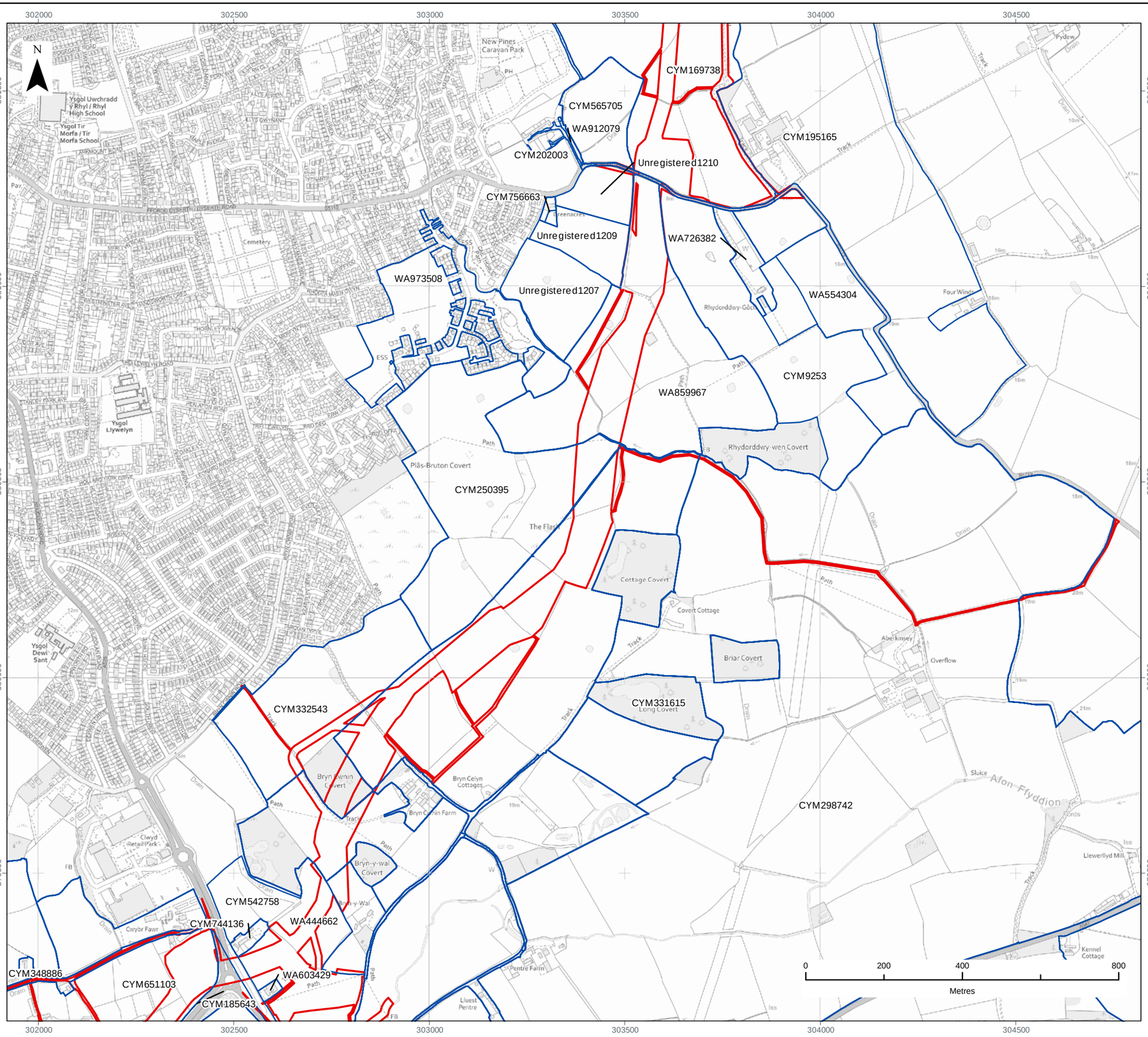

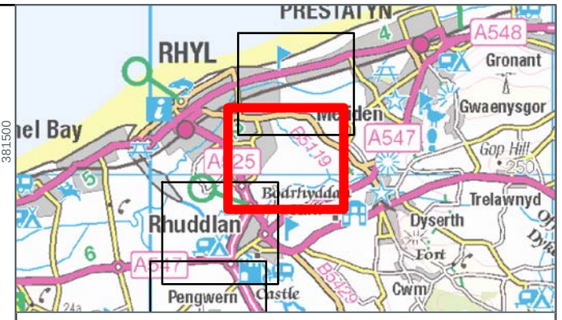

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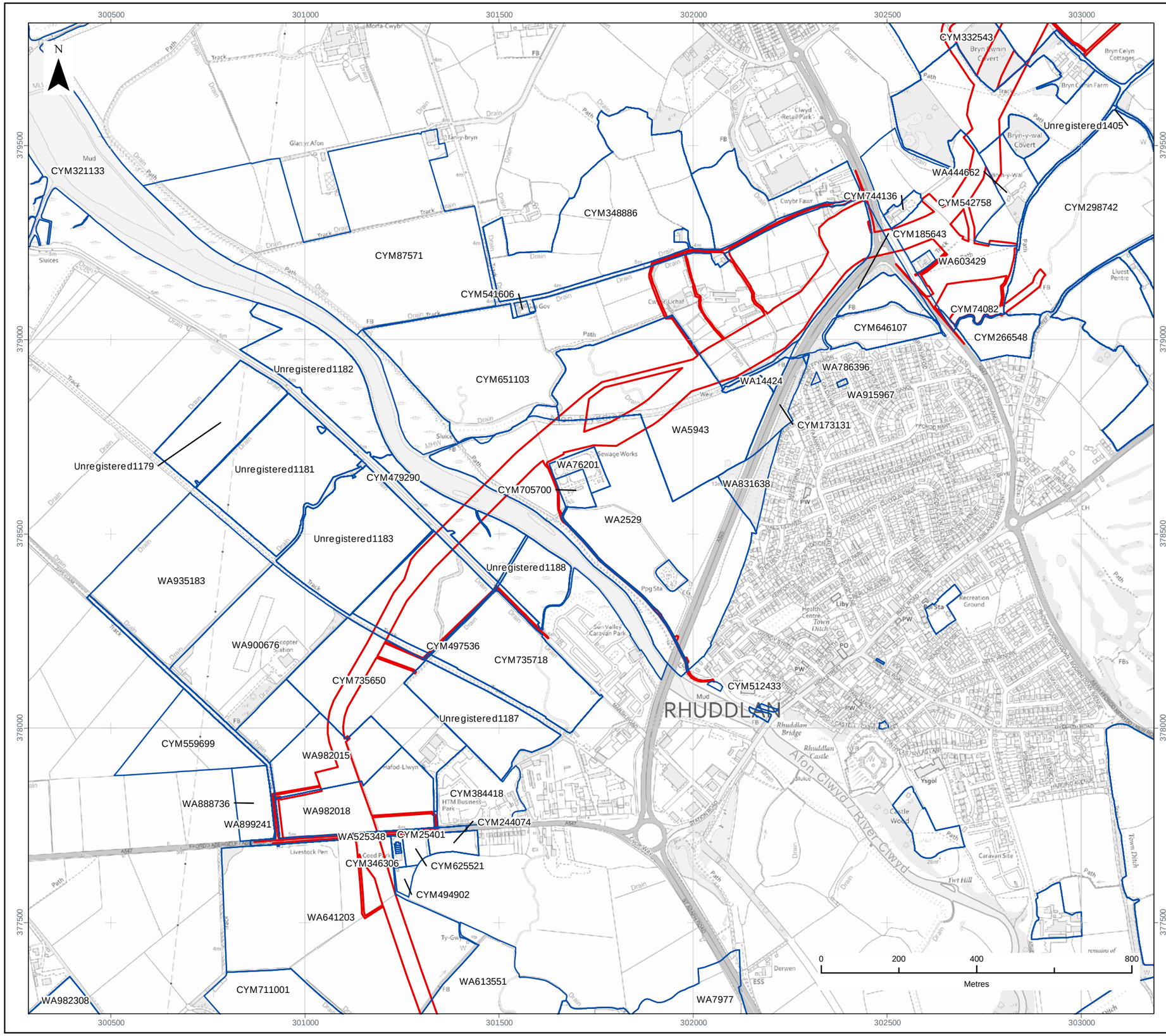
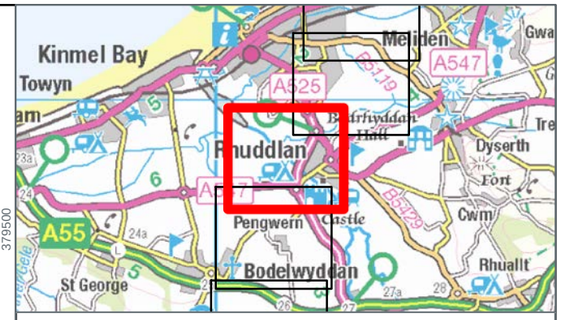
Offshore Wind Farm





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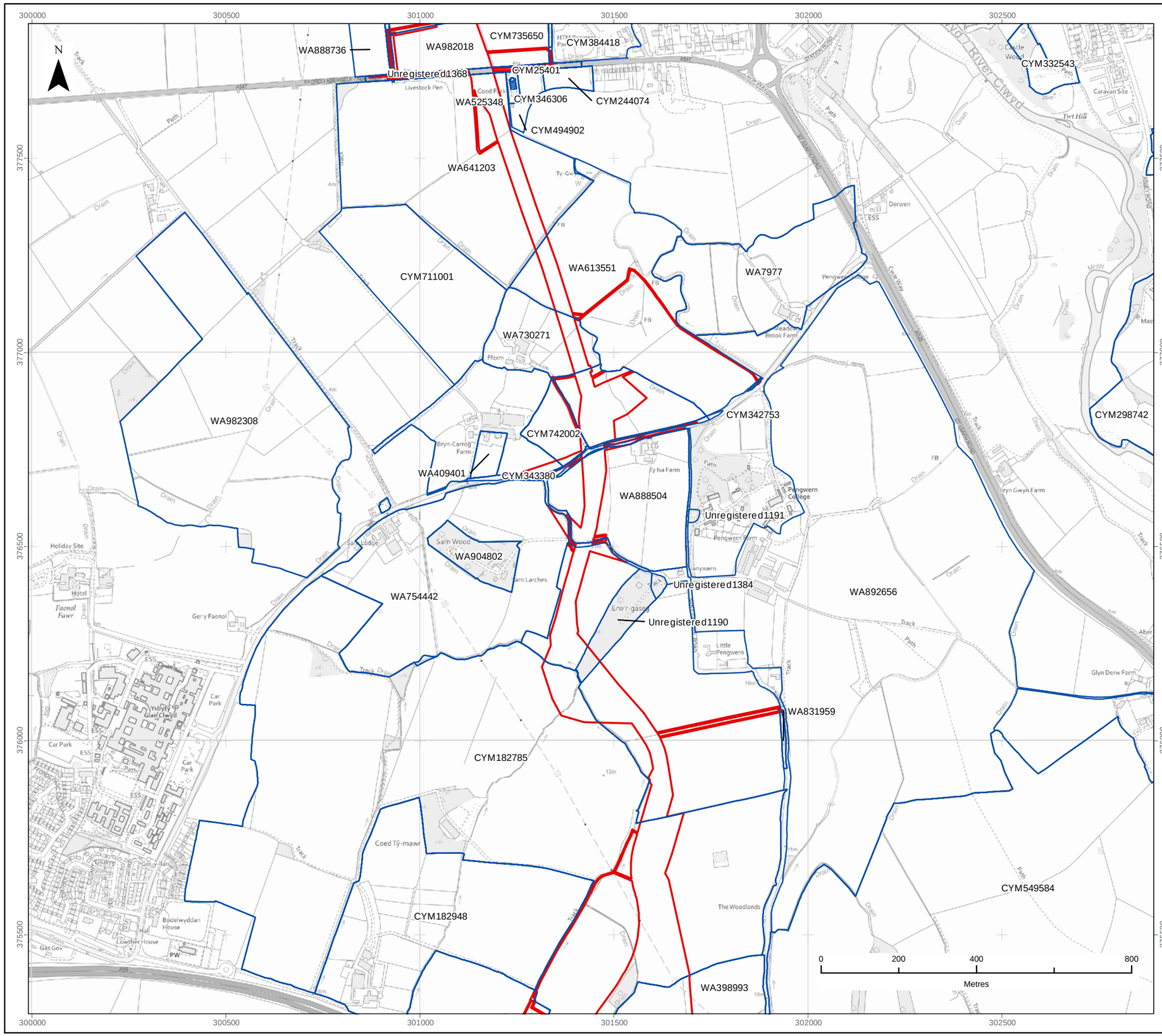

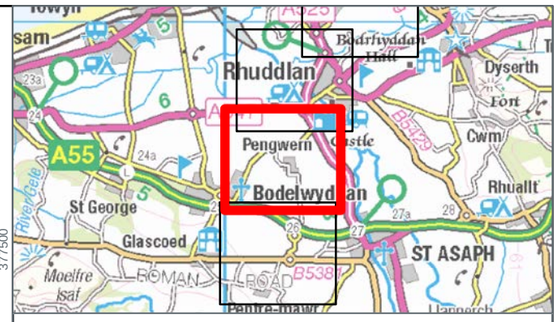

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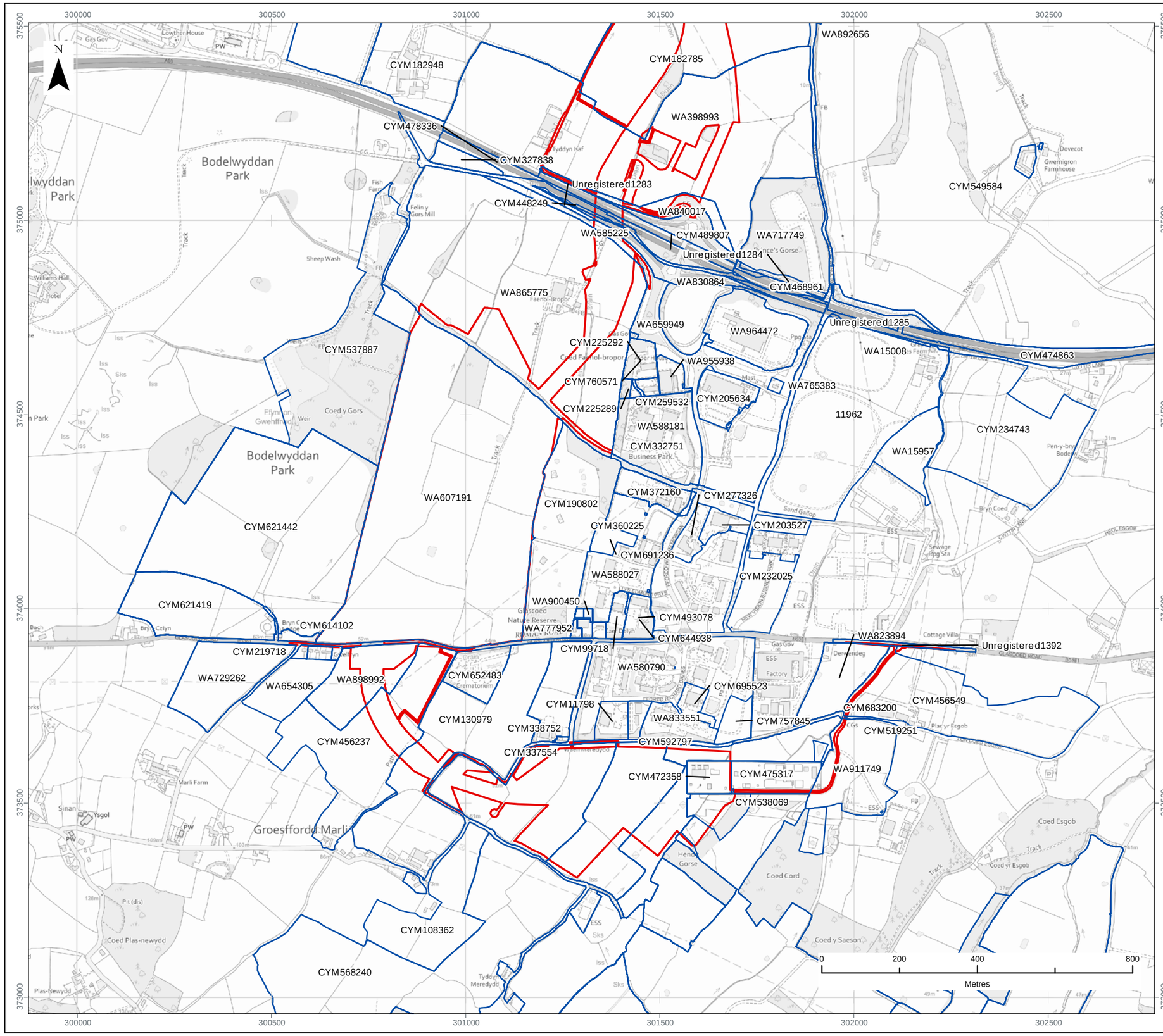

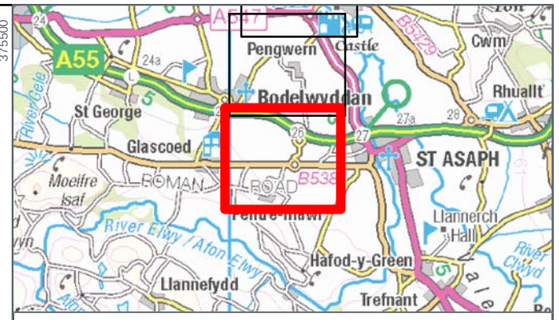

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