Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

Sent via e-mail

Our reference: 005415890-01

11th October 2024

Subject: Awel y Môr Offshore Wind Farm: Approach to Benthic Monitoring

Dear Nia,

Awel y Môr Offshore Wind Farm (AyM) are writing to the Natural Resources Wales Advisory team (NRW (A)) to request confirmation of the proposed approach to discharge monitoring condition 3.32.1 of the AyM Marine Licences (MLs) ORML2233 Generation (G)and Transmission (T). specifically to inform the development of the benthic monitoring plan

The benthic monitoring plan will be developed according to required timescales and submitted to Natural Resources Wales Marine Licensing Team (NRW MLT) in due course.

Marine Licence Conditions

Relevant Benthic monitoring conditions, extracted from the MLs, are outlined in Table 2-1.

Table 2-1: Conditions outlining benthic monitoring requirements.

Document Reference	Condition	Requirement	Proposed Mitigation
ORML2233G/ORML2233T	Condition 3.32.1, Point 3	*"The Licence Holder must submit an Environmental Monitoring Plan (EMP)*	*"Monitoring surveys designed to ensure minimal disturbance to*

		including the specification of the Pre-construction, construction and Post construction Monitoring to the Licensing Authority for written approval. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority."	*and loss of **key benthic habitats** and species during the construction including the identification of areas for micro-siting where possible"*

Benthic Monitoring Plan

A benthic monitoring plan will be developed in order to discharge Condition 3.32.1 within ORML2233G and ORML2233T and submitted to NRW for review and approval. Informed by the findings of the EIA (see Appendix 1), it is proposed that the area of focus for the benthic monitoring plan will be limited to the consideration of the key benthic habitat of *Sabellaria alveolata (S. alveolata),* within the intertidal area.

The monitoring plan will set out an appropriate methodology for assessing the presence and extent of *S. alveolata* within the intertidal area of the export cable corridor (ECC), in relation to the location and extent of any proposed works in that area. AyM will also give consideration to a pre- and post-construction intertidal walkover survey and population assessment. If it is determined that an intertidal survey is necessary, the methodology will be set out in detail within the benthic monitoring plan.

Upon agreement of the above a monitoring plan will be developed and submitted according to the required timescales for consultation and approval by NRW.

Yours sincerely,

Sinead Petersen

Awel y Môr Offshore Wind Farm Ltd

Appendix 1 – Summary of EIA findings

1.1 Overview

Baseline benthic and ecology surveys were conducted within the AyM Array Area, ECC and Intertidal ECC to inform the Environmental Impact Assessment (EIA). A summary of the findings together with the outcomes of the EIA, are outlined in the below sections. The aim of conducting the baseline surveys was to inform the EIA assessment with respect to the presence of any key benthic habitats present within the AyM development area.

1.2 Array Area

1.2.1 Baseline survey findings

There was a clear spatial distribution in the habitat types present within the Array Area and this reflected the sediment character. One habitat, two biotope complexes and two sub-biotopes were present within the Array Area.

The sediments observed throughout the survey area were identified as comprising the United Kingdom Biodiversity Action Plan (UKBAP) priority habitat 'subtidal sands and gravels' which is also a habitat listed under Section 7 (S7) of the Environment (Wales) Act 2016. However, this habitat is the most widely distributed subtidal habitat in the UK.

No other Annex I habitats or Annex II species, OSPAR threatened and/or declining species and habitats, or habitats and species listed under S7 of the Environment (Wales) Act 2016, were observed within the surveyed Array Area.

1.2.2 Sensitivity of Array Area habitat

Within the EIA the 'subtidal sands and gravels' priority habitat was also identified to be valued ecological receptors (VERs). However, their protection status is 'None' and the habitat is widespread both nationally and regionally. Due to their widespread distribution around the UK these habitats have been attributed a sensitivity of **low** within the EIA sensitivity assessment. The magnitude of impact was also deemed as **low adverse** resulting in an effect of **minor adverse** which is not significant in EIA terms.

1.3 Export Cable Corridor (ECC)

A spatial pattern in the sediment type was apparent along the ECC whereby predominantly sand sediments were identified within the nearshore portion of the route and farthest offshore portion, adjacent to the Array Area. One habitat, three biotope complexes and two biotopes were identified within the subtidal portion of the ECC.

The sediments observed throughout the survey area were identified as comprising the UKBAP habitat 'subtidal sands and gravels' (as listed under S7 of the Environment (Wales) Act 2016).

No other Annex I habitats or Annex II species, OSPAR threatened and/or declining species and habitats, or habitats and species listed under S7 of the Environment (Wales) Act, were observed within the subtidal ECC survey area.

1.3.1 Sensitivity of ECC habitat

Within the EIA these sediments are also identified to be VERs. However, their protection status is 'None' and the habitat is widespread both nationally and regionally. Due to their widespread distribution around the UK these habitats have been attributed a sensitivity of **low** within the EIA sensitivity assessment. The magnitude of impact was also deemed as **low adverse** resulting in an effect of **minor adverse** which is not significant in EIA terms.

1.4 Intertidal Export Cable Corridor

1.4.1 Sabellaria alveolata

The nationally important habitat species, *Sabellaria alveolata* (*S. alveolate)* was found during baseline surveys conducted within the AyM intertidal ECC. The following text is taken from Volume 2, Chapter 5 of the AyM Environmental Statement (ES):

"The honeycomb reef worm Sabellaria alveolata was observed encrusting an upper shore boulder in the offshore ECC survey area as well as between the boulders at the base of the outflow pipe. The general distribution of the species was not sufficiently extensive to map its presence as a separate habitat type, and the species presence was not considered to be Annex I biogenic reef, or reef for the purposes of study area of the Environment (Wales) Act 2016. However, aggregations of S. alveolata up to approximately 30 cm in height were present at the outflow pipe, which for the purposes of assessment is considered to be

representative of the study area/ Section 7 of the Environment (Wales) Act 2016 priority habitat 'S. alveolata Reefs'."

S. alveolata reef was found to be extremely limited in extent within the intertidal ECC and associated with an outfall pipe. Although this species is Nationally important, it is only present due to the stabilisation provided by the outfall pipe.

1.4.2 Peat and clay exposure with piddocks

On the mid to upper shore of the intertidal ECC survey area, exposed peat was reported with piddocks present. Due to the observation of faunal burrows and emergent piddock shells, these areas also have the potential to represent the S7 habitat 'peat and clay exposures with piddocks'.

Peat and clay sediments found within the mid to upper shore of the intertidal portion of the intertidal ECC have a protection status of 'None', the sediments are deemed to be Nationally important however limited patches are present within the intertidal ECC area.

1.4.3 Sensitivity of intertidal habitats

None of the aforementioned habitats that could to be affected by any construction activities within the intertidal area are rare or geographically restricted. The area of impact therefore represents a very small footprint compared to their overall extent. The magnitude of the impact has been assessed as **low adverse** on the basis that the impact is of temporary duration, reversible, and localised.

The sensitivity of the *S. alveolata* reef, and the piddocks found within the clay, has been assessed according to a detailed MarESA sensitivity assessment (ES Volume 2, Chapter 5: Table 16). Both the small patches of *S. alveolata* and piddocks in clay are found on either an existing pipeline or in small patches on the boundary of the cable route and will remain in place and undisturbed; therefore, this impact on these habitats was not assessed further here for these receptors.

The worst-case scenario effect was determined to be of **minor adverse** significance which is not significant in EIA terms.