

CELTPOWER LIMITED

NATURAL RESOURCES WALES

MID-WALES CONJOINED WIND FARM INQUIRY

STATEMENT OF COMMON GROUND ON THE IMPACT OF THE LLANDINAM REPOWERING SCHEME ON PEATLAND

1 Introduction

- 1.1 This is a statement of common ground between CeltPower Limited (CeltPower) and Natural Resources Wales (NRW) in respect of the application by CeltPower for the repowering and extension of Llandinam Wind Farm. NRW had objected to CeltPower's application on the basis of its impact on peat. The Secretary of State therefore decided that this was one of the matters to be addressed in an inquiry into CeltPower's application, which is part of the present Mid-Wales Conjoined Wind Farm Inquiry
- 1.2 CeltPower and NRW have reached agreement with regard to the impact on peat of the proposed repowering of Llandinam wind farm. NRW has therefore (subject to conditions proposed to the inquiry) withdrawn its objection on this ground to the application for repowering and extension of Llandinam wind farm.

2 The micro-siting exercise

- 2.1 CeltPower has carried out peat survey work at the Llandinam site, undertaking in total 1,767 peat depth probes and 7 cores. The results are presented in Technical Appendix A8-2 of the 2013 SEI. CeltPower also had a National Vegetation Classification survey carried out on its behalf with the aim of providing more detailed information on the extent of peatland habitats on the Llandinam site. The results of these updated NVC surveys are presented in Technical Appendix A8-1 of the 2013 SEI. CeltPower and NRW agree that the peat probing carried out for the environmental impact assessment of the proposed development indicates peat depths across the development site are generally shallow (60% of samples showing less than 50 cm of peat) with areas of deeper peat.
- 2.2 The parties disagreed with regard to the likely impact of the design for the proposed wind farm considered in the supplementary environmental information published in 2013 (2013 SEI). NRW stated that it considered the impact on peat was significant, that it had not been minimised, and that mitigation was required. In discussions, it indicated its concern was primarily about the impact on valley mire (or soligenous fen). However, since the submission of the 2013 SEI, CeltPower has agreed to consider what might be done in micro-siting elements of the wind farm infrastructure in order to avoid areas of peaty soils with regard to which NRW had stated it was concerned.
- 2.3 CeltPower has considered micro-siting infrastructure in discussion with NRW. The outcome of the micro-siting exercise is shown in plan Drawing No. LLA-P-009 Rev A3 Sheets 1 & 2 (which is

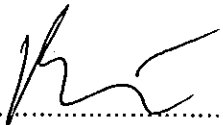
before the inquiry as document reference CPL-SOCG-005A). This shows the micro-siting tolerance of the proposed wind farm shaded grey. Within the micro-siting tolerances, there are "restricted areas" hatched in red. These are areas of peaty soils about which NRW has stated it has a concern.


- 2.4 CeltPower agrees to use the micro-siting tolerances so that it avoids the restricted areas. Where infrastructure was proposed in the design assessed in the 2013 SEI that would fall within the restricted areas, it will be micro-sited away from them. An indication of the revised layout is shown in green. CeltPower also agrees not to use micro-siting tolerances to move infrastructure into the restricted areas. In three places, CeltPower proposes that a track should run for a short distance outside the micro-siting tolerance. This latter change to the design is non-material and would have no significant environmental effects.
- 2.5 CeltPower and NRW agree that these proposals may be secured by condition referring to the agreed micro-siting plan. They agree that draft condition 8 in CeltPower's revised schedule of conditions (CPL-SOCG-005C), or with similar effect, is suitable for this purpose.
- 2.6 Upon adopting the proposed micro-siting exercise, the impact on soligenous fen is reduced by 2.24 ha to 3.79 ha. This represents 0.026% of the total Welsh resource of soligenous fen. The overall impact on peatland generally at the site, taking a precautionary assumption as to the loss as a consequence of hydrological disturbance, is predicted to impact upon just over 10 ha. This represents 0.014% of the total Welsh resource.
- 2.7 There will be some residual effects on peaty soils. CeltPower does not consider these are significant or that they require further mitigation. Whether this is the case or not, CeltPower and NRW agree that, were it the case that compensation was required, the measures proposed in CeltPower's draft habitat management plan dated 23 September 2013 and referred to in draft Condition 20 with regard to habitat management for peat (CPL-ECO-013A) would represent adequate compensation for residual impacts on peat resulting from the proposed repowering of Llandinam wind farm.
- 2.8 On the basis that permission is granted subject to the proposed conditions 8 and 20, or conditions with similar effect, both parties agree that the impact on peatland resource has been minimised and will not be unacceptable.

3 Conclusion

- 3.1 NRW and CeltPower agree that, subject to planning condition 8 in the CeltPower draft conditions schedule (CPL-SOCG-005B), or a condition with similar effect providing for the proposed micro-siting, and to condition 20 regarding a revised Habitat Management Plan dated 23 September 2013, or a condition with similar effect, the proposed development will not have an unacceptable impact upon peat. On this basis NRW withdraws its objection on this ground.

Signed:

 For and on behalf of CeltPower Limited

 For and on behalf of Natural Resources Wales

