

## Appendix 7.1b

## Meeting Summary: Peatland at Llanbrynmair and Carnedd Wen Wind Farms

**Location:** Microsoft Teams

**Date:** 21/01/2022. **Duration:** 12:30 – 13:39

**Present:** Peter Jones (Lead Specialist Advisor for Peatland), Geraint Blayney (Advisor, Development Planning) [both Natural Resources Wales]; Chris Jackson (Senior Development Project Manager), Elliot Smith (Development Project Manager), Mark Crabtree (Senior Civil Design Engineer) [all RES]; Jennifer Pearson (Development Project Manager) RWE Renewables; Owain Gabb (Director) BSG Ecology; Andy Mills (Director), East Point Geo.

ITEM	ITEM	ACTION
1	<b>Introductions</b>	
2	<p><b>Purpose of meeting</b></p> <p>OG set out the objectives of the meeting as being to establish a point of contact within NRW with regard to peatland issues, understand whether any guidance or other reference material was likely to emerge with regard to peatland, and discuss NRW's views on construction and mitigation on peat based on experience in recent years.</p> <p>OG noted that the wind farms will comprise separate planning applications. Pre-application consultation and some elements of technical work are being progressed in tandem where it is logical to do so.</p>	
3	<p><b>Proposed Development</b></p> <p><i>Carnedd Wen</i></p> <p>JP introduced the scheme:</p> <ul style="list-style-type: none"> <li>• The scheme was withdrawn from consideration by DBEIS in 2020 as technologies had changed and the layout would need to be adjusted. The original planning submission was in 2008.</li> <li>• The new scheme is likely to have the same red line boundary as the previous application. The layout is also likely to be similar overall – a northern cluster with a 'tail' to the south.</li> <li>• RWE are currently looking at 30 turbines (but are early on in scheme design so this may be adjusted) with a tip height between 180-220 m. Height has therefore increased but there has been a reduction in the overall number of turbines (the original application was for 50 turbines). There is potential for different tip heights across the site.</li> <li>• The overall capacity is likely to be the same as the previous application if not higher.</li> <li>• Access will continue to be from the north.</li> <li>• Peat and other considerations will inform layout.</li> </ul>	

	<p><i>Llanbrynmair</i></p> <p>CJ provided an overview:</p> <ul style="list-style-type: none"> <li>• Planning consent was achieved for a wind farm of 30 turbines (up to tip height of 126.5 m) on 17 December 2021.</li> <li>• As per RWE’s comments, RES are now looking to submit a new application for larger but fewer turbines due to changes in technology since submission (in 2008).</li> <li>• The preliminary layout is 21 turbines with a maximum tip height of 230 m.</li> <li>• The location of the turbines are similar to those of the consented scheme.</li> <li>• Access will be from the north via Carnedd Wen.</li> </ul>	
4	<p><b>Summary of Previous Baseline Work</b></p> <p><i>Carnedd Wen</i></p> <p>AM gave a short presentation which included showing the previous (submitted) and indicative (new) turbine locations for Carnedd Wen on a terrain map, identifying the position of Sites of Special Scientific Interest (SSSIs) in relation to the Carnedd Wen site boundary, and listing the documents concerning peatland produced to support the previously-submitted application (a Peatland Management Plan, Drainage Management Plan and Forest Management Plan).</p> <p>These documents, in combination with ecological survey results, were used to inform an innovative and comprehensive Outline Habitat Restoration and Management Plan (OHRMP) for the site. This had the support of the forest owners at the time, and was substantially informed by dialogue with CCW/NRW.</p> <p>AM noted that the site is heavily drained (with many channels cut to the base of the peat), mainly as a result of forestry practices, and that blocking of drainage channels was a core part of the OHRMP.</p> <p>AM indicated peat depths and the distribution of peat on the Carnedd Wen site (using figures), and identified good quality areas of bog within the onsite SSSI and towards the southern end of the site.</p> <p><i>Llanbrynmair</i></p> <p>CJ noted that figures showing the distribution and depth of peat at Llanbrynmair had been provided to PJ prior to the meeting.</p>	
5.	<p><b>NRW Response to Questions</b></p> <p>Various questions were raised at the start of the meeting and through the presentation provided by AM. PJ’s responses to these are summarised below:</p>	

	<p><i>Point of Contact at NRW</i></p> <p>PJ indicated that he was familiar with both sites from involvement in the planning process leading up to the conjoined mid-Wales public inquiry.</p> <p>PJ confirmed that in the short-term he would act as the technical point of contact for both schemes concerning peat, but that questions / requests should be routed through GB. PJ has a broad portfolio of responsibility, and if he is unable to deal with enquiries, this should be raised with Liz Halliwell (his line manager) who will then consider the resource implications.</p> <p><i>Guidance and other Reference Material</i></p> <p>Guidance on peatland produced by CCW in 2010 remains relevant; the spirit of this guidance will be captured in any document that supersedes it. NRW are about to let an advisory contract to look at wind farm impacts on deep peat. This will draw together evidence with the output being a checklist / short guidance document. It is anticipated that the written output will be produced in autumn/winter 2022.</p> <p>More broadly, driven by the climate emergency and biodiversity crisis, Welsh Government are making funding available for peatland restoration initiatives by NRW and partners through the National Peatland Action Programme (NPAP), for which PJ offered to provide further information. The NPAP has 6 priority action themes and a budget of ~£1m/yr to restore ~600 ha/yr.</p> <p>PJ stated that it was reasonable to apply SEPA (2014) Phase 1 and Phase 2 probing guidance to establish peat resource, but qualified this by saying that it was difficult for NRW to give a definitive answer as to how much work was needed at any given site. This needs to be enough to determine the boundary of peat.</p> <p><i>Peat Mapping for Wales</i></p> <p>Welsh Government have let a contract with Cranfield University to produce a peat map for Wales. Peat will be mapped in 50 m cells, with a colour-code attributed to each based on confidence in accuracy. While NRW have no say over timelines, the map has been through two iterations and it is likely to be available in April 2022 (best estimate). GIS layers will be made available through Lle.</p> <p><i>NRW Position on Deep Peat</i></p> <p>PJ's view is that developing on deep peat is not compatible with the ethos of the National Peatland Action Programme funded by WG. His advice would be to design out impacts on deep peat wherever possible, and mitigate residual impacts where they cannot be avoided.</p>	<p>PJ</p>
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	<p>Deep peat covers only 4 % of Wales, so this appears reasonable and achievable in his view.</p> <p>NRW follows Soil Survey of England definitions of deep peat. These are:</p> <ul style="list-style-type: none"> <li>• &gt;40 cm of peat within the upper 80 cm of the organic horizon;</li> <li>or</li> <li>• &gt;30 cm of peat resting directly on the bedrock.</li> </ul> <p><i>NRW Position on Restocking of Forestry on Deep Peat</i></p> <p>The NPAP sets an objective to restore priority areas of afforested peatland. The UK Forestry Standard includes a presumption against planting on deep peat.</p> <p>PJ noted that in theory, with time, money and effort all peatland is restorable, so there needs to be a method of prioritisation. NRW are currently limiting peatland restoration in afforested areas to coupes with a yield class of less than 10 (where the C benefits are least equivocal). PJ also noted that areas close to SSSIs or other areas of high-quality habitat where forestry might be affecting condition or resilience might also be logically prioritised, regardless of yield class.</p> <p><i>Co-ordination of UK-wide Knowledge Sharing and Policy Initiatives</i></p> <p>In response to questions concerning how joined up the thinking was across the UK between the statutory agencies, PJ noted that there is scope for improved co-ordination across the UK, and that he / NRW had proposed a forum to pool resources, jointly commission evidence-based work and harmonise monitoring.</p> <p><i>Restoration and Mitigation Techniques that work well in Wales</i></p> <p>PJ indicated that NRW are currently undertaking work at the Tywi Forest which includes low elevation contour bunding and ground smoothing. NRW are also delivering restoration on Vattenfall's Pen y Cymoedd project where NRW peat restoration specialist Gareth Roberts has experience in ground smoothing.</p> <p>PJ noted that a technical workshop to discuss mitigation and restoration of peatland at the sites could be useful. PJ, Gareth Roberts, Jack Simpson and Robert Bacon would be keen to be involved in this (JS and RB are NPAP project officers).</p> <p><i>Availability of Suitable Contractors</i></p> <p>PJ stated that there were currently 17 approved contractors for the National Peatland Action Programme. Contractor capacity is an issue, but NRW are working to improve the situation, and by the time either scheme is built the situation should be better.</p>	
6.	<p><b>Limitations of Survey and Assessment Techniques</b></p> <p>AM commented that sampling / coring at some sites, particularly large proposed wind farms, was practically difficult due to the weight of</p>	

	<p>equipment and, in afforested habitats, the difficulty of accessing turbine locations.</p> <p>AM also noted that in Scotland SEPA require the division of acrotelm and catotelm in peat management plans. This is not captured in current guidance, with SEPA typically setting out this requirement at scoping / through formal consultation.</p> <p>AM stated that carbon calculations for all schemes were now derived via a standard calculator. While this ensured consistency in terms of approach, the calculator grossly simplifies the process, meaning that commonly occurring scenarios such as wind farms split across open moorland and plantation cannot be accurately accounted for.</p>	
7.	<p><b>Response to NRW Questions</b></p> <p>PJ raised a number of questions around current ownership and habitat restoration aspirations.</p> <p>JP confirmed that the site had changed ownership since 2008. The current owners were not averse to habitat creation. However, RWE are now considering a key-holed scheme. Habitat restoration would be completed at some scale, but needed to take account of the new landowner's commercial forestry aspirations.</p>	

Meeting Ends: 13:39