

**Response by CEFN MEIRIADOG COMMUNITY COUNCIL
to the updated review of cumulative and in-combination effects
submitted by Awel y Môr Offshore Windfarm Ltd, dated 11/7/23, in
response to the Secretary of State's request for further information**

Project Ref: EN010112

1. The Community Council notes the view of the Welsh Government's Minister for Climate Change, Julie James, in a letter to Senedd Member Mark Isherwood dated 7 July 2023: "While it is clear to me that we need new infrastructure to achieve our net zero commitments, we also need to ensure that our approach to new grid infrastructure is developed with the minimal impact on the environment and on communities".
2. We believe that the cumulative effects on the environment and on the local community of the Awel y Môr and other projects cannot plausibly be described as having a minimal impact, and we believe that the AyM's submission dated 11 July 2023 ('the Submission') is flawed and unreliable.
3. With its statement on p.6, 1.3 Methodology, 12, the Submission confirms AyM's awareness that the impacts of "other plans, projects and activities" may interact with AyM's to produce cumulative effects.
4. It is surprising therefore that with one exception the Submission refers exclusively to the Mona, Morgan and Morecambe projects, to the exclusion of the all other existing, ongoing and planned projects affecting the community and landscape of Cefn Meiriadog.
5. This response will to a large extent ignore the potential effects of the Morgan and Morecambe projects as being relatively minor compared with those of Mona and other projects.
6. In the Submission, consideration of such other projects apart from Mona, Morgan and Morecambe is limited to brief mentions of Elwy Solar Farm. Elwy Solar Farm was turned down by the Welsh Ministers and is therefore presumed not to be going ahead (although there are some reports that the decision is subject to a judicial review). However the reference to Elwy Solar Farm implicitly acknowledges that the potential for cumulative effects from other projects, including solar farms, must be taken into account.
7. Discussion of cumulative effects cannot be limited to consideration of

AyM's potential interaction with ongoing developments like Mona, but must also be considered in relation to existing infrastructure projects located within the community of Cefn Meiriadog. It is important to bear in mind that all such existing infrastructure projects are a maximum of only ten years old and are, for the most part, more recent than that.

8. The existing infrastructure projects are as follows:

- (1) National Grid 'Bodelwyddan' substation;
- (2) Burbo Bank substation and underground cable route;
- (3) Gwynt y Môr substation and underground cable route;
- (4) Scottish Power energy network substation;
- (5) Overhead pylon line from Clocaenog into Scottish Power substation; and
- (6) STOR reserve storage facility.

As stated, all have been constructed within the community of Cefn Meiriadog within the past decade, and cannot be described as forming a long-established and accepted part of the perceived landscape and community, or contributing in any way to sense of place.

As 'ongoing' projects already under active assessment we include:

- (7) AyM onshore substation and cable route; and
- (8) Mona onshore substation and cable route.

Both are large-scale projects in terms of energy generation, Mona especially. The Submission ostensibly considers potential cumulative effects of the two projects and our comments are below. Here we note only that while in the Submission (and elsewhere), the indicative size of the Mona substation, the larger of the two, is given as 12.5 hectares, the area AyM seeks to acquire for its substation is in excess of 33 hectares. We feel an explanation of this discrepancy is required.

9. 'Planned' projects in Cefn Meiriadog are those that currently the various developers are actively bringing forward within the normal development and planning process. They are:

- (9) National Grid 'Bodelwyddan' substation extension;
- (10) National Grid replacement of single pylon line by two pylon lines;
- (11) MaresConnect Interconnector converter station; and
- (12) St Asaph Solar Farm.

10. Speculative developments obviously have no place in the current discussion. We do however note that back-up storage schemes are required with all renewables developments. We note with concern therefore that there have been and continue to be multiple approaches to local landowners in Cefn Meiriadog by developers of such schemes

seeking the sale of land for them. We are not aware that the need for back-up storage facilities and their potential effects on the community has formed any part of the discussion around major projects such as AyM and Mona.

11. We believe that consideration of potential cumulative effects on the community must be extended to include planned projects, to the extent that such projects are known about and their development is in train. Thus we note that in an email dated 17 August 2023 (“Proposals to upgrade our Bodelwyddan substation”) to Dr James Davies MP and County Councillor James Elson, National Grid outline their own proposals to double the size of their existing substation and to separate the existing overhead single line into two by constructing new pylons.

12. The NG email also refers to the MaresConnect and Mona projects as well as its own proposals. It is surprising therefore that there is no acknowledgement of the NG and MaresConnect proposals in the Submission, since both have been ‘in the pipeline’ for an extended period of time. Indeed, the need for the NG substation extension has been framed precisely in terms of the need to increase capacity to accommodate the AyM and Mona projects.

13. To the extent that the rejected Elwy Solar Farm is considered in the Submission, it is also surprising that the planned 32-hectare St Asaph Solar Farm project receives no consideration.

14. It will be argued that AyM cannot measure potential impacts as long as detailed plans are not available for planned projects. The acknowledgment however that “there is the potential for both spatial and temporal interaction between impacts arising from AyM and other plans, projects and activities” (1.3 Methodology, 12), is a clear argument for the need for an independent assessment of all potential cumulative effects, with a broader, holistic view of the likely interactions of existing, ongoing and planned projects.

15. The Submission states that the indicative construction programmes of AyM is 2026-2030, and that the indicative construction programme of Mona is 2026 onwards. Since Mona is bigger than AyM it will presumably be until at least 2030. Further, given that the need for the NG substation extension has been framed precisely in terms of the need to increase capacity to accommodate AyM and Mona, it is difficult to avoid the conclusion that the construction programme for the NG substation extension will fall within the same period. Likewise, given that

MaresConnect and St Asaph Solar Farm are both already advanced in their planning, it would seem highly likely that their construction phases would also fall within the period up to 2030 also.

16. The above therefore calls into question the effectiveness of Submission in identifying and measuring potential cumulative effects. There must also be concern over its methodology, criteria and measures. Taking just the category of 'Traffic and Transport' as an example, even in considering just Mona, it is simply implausible that two projects on the scale of AyM and Mona would have no significant effects, let alone if the NG substation extension is added (and, possibly, the other MaresConnect and St Asaph Solar Farm). Yet under both 'Traffic and Transport' and 'Noise and Vibration', under 'Additional Cumulative LSE?', the conclusion is 'No - Effects all remain minor and no LSE [Likely Significant Effects]'.

17. This conclusion, 'No - Effects all remain minor and no LSE', is repeated in category after category, and while this can clearly be the case in some of those categories, equally clearly where other categories are concerned, and in terms of a holistic picture of the effects on the community, it suggests the inability of the methodology, criteria and measures employed in the Submission to reflect the actual reality of the cumulative effects which will be experienced by residents and visitors. The Community Council is clearly not in a position to comment on this conclusion being drawn in regard to many of the categories, particularly those involving offshore activity, but would suggest that, in categories such as Tourism and recreation, Onshore archaeology and cultural heritage, Traffic and transport, Noise and vibration, and, possibly, Public Health, the methods and metrics adopted are, for whatever reason, inadequate to identify actual impacts.

18. Even under 'Landscape and visual impact assessment (LVIA)', the conclusion is: 'No - Additional cumulative effects identified, however these will not exceed those predicted in the AyM LVIA [i.e. the original assessment produced]'. Given the scale of the projects, it likewise suggests that the measures used to assess the landscape and visual impact assessment are flawed and/or inadequate. Using fixed, static visual receptors is not realistic or adequate to describe the experience of those living in a rural community where moving around in it, either on foot or by car or other vehicle, is a normal and necessary part of daily life, but thereby exposing them to multiple views of developments. Similarly, using bridle paths or footpaths to assess visual impact on Public Rights of Way is not a realistic means of assessment, since most

movement by walkers, horse riders and others is on roads and lanes. The assessment is unrealistic just in the context of the 'ongoing' AyM and Mona projects considered together, it is significantly more implausible taking into account the existing and planned projects listed above. It is to be noted, for example, that the National Grid project to replace the existing single pylon line by two pylon lines ((10) above) is in a location extremely close to the location chosen for the Mona onshore substation. A key flaw in landscape and visual impact assessment would appear to be the limitation of an acknowledgment of effect to a distance of 500m.

19. By extension, Tourism and recreation is clearly affected by landscape and visual impact and again it is implausible that the growing industrialisation of a hitherto rural area will have no effect on its tourism.

20. Similarly, it is noted that under 'Onshore archaeology and cultural heritage' no mention is made of various listed buildings in Cefn Meiriadog, one of which will be extremely close to the Mona substation and NG pylon replacement project.

21. As regards 'Landscape and visual impact assessment (LVIA)', and 'Seascape, landscape and visual impact assessment (SLVIA)', where additional cumulative effects are either identified but minimised or are described as "not possible to rule out", it is noted that heavy reliance is placed on Mona's stated intentions regarding mitigation in order to conclude that the effects will not be significant.

22. In conclusion, the Community Council finds the Submission to be inadequate and unreliable in its findings. This conclusion is reached based on the one hand on the failure of the submission to take into account existing, ongoing and planned projects affecting a community which, it must be remembered, is less than 5 square miles in area and has a population of less than 400. There is clearly a very disproportionate effect on the community relative to its size, and relative to effects on other communities. On the other hand we find that the conclusions reached reflect shortcomings in the methodology, criteria and measures used to calculate the significance of the effects on the community.

We note comments of the Inspector in a report into a similar project, as follows: "The PAC report indicates that the scale of the proposal and the sheer magnitude of the associated change has the potential to detract from local people's sense of place and connection to the land. My aim is

to improve people's lives, not add to their burden”, and would suggest that it is a very apt description of the situation facing the community of Cefn Meiriadog.

Karin Jones

Chair

Cyngor Cymenudol Cefn Meiriadog Community Council

28 August 2023