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**Project Ref: EN010112**

*Review (11/7/23) of cumulative and in-combination effects submitted by Awel y Môr Offshore Windfarm*

The review is unsatisfactory in two main aspects.

Firstly, for the review to find in so many respects that the cumulative and in-combination effects of two projects as large in scale as Awel-y-Môr and Mona are non-existent or insignificant indicates that the measures chosen to quantify the changes, and the formulae used to calculate their impact, are not adequate to describe their effects, or are deliberately chosen so as to minimise them.

With three years of construction running concurrently on the two projects, it is scarcely credible that there will be no additional impact on traffic and transport in the area. With numerous listed buildings relatively close to the project areas, the same applies to onshore archaeology and cultural heritage. Since a large part of tourism and recreation in Cefn Meiriadog involves driving, running, walking, cycling or horse riding along the country lanes in the area, it is unrealistic to contend that recreation will somehow remain unaffected.

Where landscape visual impacts and seascape visual impacts do acknowledge possible additional effects, these are then dismissed or reduced to insignificance by reference to Mona's statements on mitigation. Given the visibility in the landscape of local landmarks like St Asaph Cathedral, Bodelwyddan Castle, Rhuddlan Castle and Bodelwyddan church, it stretches credibility to contend, as the review does, that two 20-metre high structures on the scale of the proposed substations - and Awel-y-Mor is aiming to acquire no less than 80 acres of land - will have no visual impact on the landscape. Further, the playing down of the visual impact by reference to mitigation by planting does not trouble to mention the number of years that it will take for this to become in any way effective in screening a 20-metre high structure from view, a period during which many of those affected by the project

will pass away.

The seascape visual impact does not mention the crucial fact that the addition of Mona's offshore array will mean that the entire seascape of northeast Wales will be populated by wind turbines, with no area of open horizon any longer visible, and that at night the view out to sea, apart from the flare from a gas platform, will consist solely of the turbines' red warning lights from the Dee estuary to beyond the Great Orme.

It is of course in Awel y Môr's interest that it's own measures, calculations and conclusions regarding additional effects should find that these are non-existent or minimal, since clearly any other conclusion has the potential to incur cost, delay or modification to the project or even, hypothetically, cancellation of it. Metaphorically speaking, however, it is clearly a question of "marking one's own homework" and the results as set out in the review bear that out all too well.

Secondly, and more importantly, the review is seriously flawed in restricting itself to considering only the cumulative and in-combination effects of the two projects Awel y Môr and Mona taken together. This response ignores the reference in the review to Elwy Solar Farm as that project was rejected in 2022 by the Welsh Government, although it is worth pointing out that including it after it has long been rejected does indicate an unwelcome disregard for accuracy and professionalism in the review. However it also clearly indicates an implicit awareness by Awel y Môr that infrastructure projects other than Mona should be included in any assessment.

Taken as a whole, completed, current and planned electricity-generation infrastructure projects in the Cefn Meiriadog area number no less than twelve, of which half already exist. Awel y Môr and Mona account for a further two, with a further four projects in different stages of the development and planning stages.

Awel y Môr will naturally argue that they cannot take these existing and planned projects into account, but it is particularly disingenuous to fail to consider the planned extension to the National Grid Bodelwyddan substation. National Grid state that the extension is needed to provide capacity for the Awel y Môr and Mona projects, therefore its construction is tied directly to Awel y Môr and will take place simultaneously with it (and Mona) in order to be ready when Awel y Môr begins operation. That there will be cumulative and in-combination effects with Awel y Môr and Mona seems incontrovertible. Similarly, the review dismisses concerns

over visual impacts around the planned site of Mona's substation by citing Mona's proposed mitigation measures. Yet in precisely that area, and within a few hundred metres of a listed building and the historic landscape feature called 'The Bryn', a defining feature of Cefn Meiriadog's identity, National Grid state their intention to "separate the existing single line into two by removing one pylon and two gantries, and replacing these with four new pylons", the pylons being very substantially taller than the gantries they will replace.

It would appear that National Grid are waiting until Awel y Môr receive consent for their project before going to public consultation, since clearly they will then be able to argue that if Awel y Môr is given the go-ahead, the National Grid substation extension must also be consented in order to accommodate it.

Further projects which are planned (MaresConnect, St Asaph Solar Farm) seem certain to coincide with Mona, Awel y Môr and National Grid's construction phases, which Awel y Môr give indicatively as 2026-30. Awel y Môr will contend that they cannot consider potential impacts of planned projects, and will naturally decline to take into account existing infrastructure. However the sheer scale of the impact on the 4.7 square miles of the community of Cefn Meiriadog must surely then mean that there must be an independent review of the effects on the community of all the projects taken together, and a pause to projects while it is carried out. Cefn Meiriadog is a small community whose identity and character are completely bound up in its rural and agricultural nature and landscape. Over the past ten years or so it has had to accept numerous infrastructure projects, including large-scale ones, which have already significantly compromised that rural character and identity. With the planned MaresConnect interconnected station taking up 15 acres, and the planned St Asaph Solar Farm taking up 80 acres, it is understandable that the cumulative effects of the current Awel y Môr, Mona and National Grid extension projects with the existing and planned ones are seen by residents as changing forever the community as they know it.

Some local farmers and landowners are currently dealing with up to three different infrastructure developers whose projects are affecting their land, plus changes to overhead lines across their land and approaches from battery storage developers. A very experienced local land agent currently dealing with Awel y Môr, Mona and National Grid all communicating over how their projects will affect a particular client's land, including compulsory purchase, hedgerow destruction, and

constructing access roads over it, uses the word “insane” to describe the situation. A resident with experience of eastern Europe in the 1970s has likened the situation to “like living in Ceausescu’s Romania”. Hyperbole of this nature should have no place in planning considerations, but it nevertheless expresses in microcosm the perceived threat to the community’s nature and identity from the effects of Awel y Môr and other projects, and the inadequacy of the developers’ responses in acknowledging, assessing and dealing with them, including in this review.

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