

CMCC 240807 PI/MONA
Response 2

Planning Inspectorate Examination EN010137: Mona Offshore Wind

Cefn Meiriadog Community Council
MNOW-SP036

Response of the Community Council to issues raised at Issue-Specific Hearing 2

SUMMARY

Cefn Meiriadog Community Council's major concerns resulting from Issue-Specific Hearing 2 are:

- Working hours during construction and the 7am to 7pm core working hours sought by the Applicant. The Council contends that the core working hours should be set at 8am to 6pm Monday to Friday, and 8am to 1pm Saturday; and
- The flawed and unsatisfactory manner in which the Applicant has carried out its LVIA, in particular the failure to take into account a major aspect of the substation design and the approach taken to viewpoints and visualisations.

It is also concerned about two other matters:

- Unresolved matters between the Applicant and other parties affected by the DCO should it be granted; and
- Failure to acknowledge that the National Grid substation extension construction period must of necessity coincide with the Mona construction period.
- The need for active participation by Denbighshire County Council.

RESPONSE

1. In discussion of Agenda Item 3. Construction Matters. c. Cable laying & cable corridor, including crossings [APP-083] (?), it was clear from the concern expressed in the response to the Applicant of the SP Energy Networks representative, and from the Applicant's counter-response, that there remain unresolved conflicts over crossings and also over potentially rival claims to land required by Mona, Awel y Môr and National Grid to carry out their projects. CMCC expresses its own concern that these disputes and their eventual resolution not be allowed to impact negatively on the residents of Cefn Meiriadog in any way.

2. In discussion of cumulative effects, it is acknowledged by the Applicant that the Awel y Môr project is consented and that the construction periods for it and for Mona, if consented, will overlap. However the Applicant declined to engage in a similar manner in discussion of the National Grid (NG) substation extension proposals on the grounds that to date there are no published plans to respond to. Logic dictates, however, that the NG extension must be taken into consideration in respect of cumulative effects. NG state that its extension is being undertaken precisely to provide the increased capacity necessary to accommodate the electricity generated by the Awel y Môr and Mona wind farms. Mona's becoming operational, therefore, is contingent on the NG extension being completed, and Mona's becoming operational within the time frame it proposes, is likewise contingent on the NG extension being completed within that same time frame. Therefore the construction period of the NG extension must of necessity coincide with the construction period of the Mona substation.

3a. In discussion of Agenda Item 3. Construction Matters. d. Construction working hours, the Applicant stated they are seeking core working hours of 7am to 7pm, Monday to Saturday, throughout the duration of the project, with the construction of the substation alone scheduled to take three years. There would be IN ADDITION one hour of mobilisation either side of core hours, effectively making the working day 6am to 8pm six days per week throughout the year. This issue is of particular concern due to the inevitability of the Awel y Môr, Mona, and National Grid extension projects significantly overlapping in their construction phases, and the cumulative effects of noise, light (in winter months), traffic, etc. this will produce.

3b. The Applicant stated that in their opinion local residents preferred core working hours of 7am to 7pm, Monday to Saturday, in order to avoid prolonging a project's duration. However no grounds were given for claiming this, and the Conwy CBC representative present stated that Conwy's standard practice is to impose core working hours of 8am to 6pm Monday to Friday, and 8am to 1pm Saturday.

3c. On completion of the first day of ISH2 on 17 July, CMCC's representative at the hearing (myself) conducted a poll on the 'CefnMeiriadog & Bontnewydd Nr St Asaph' Facebook page. The poll read as follows:
"The Planning Inspectorate's examination has begun of Mona Wind Farm's proposal to build a 35-acre, 20-metre high substation on farmland between Marli and Cefn. Mona want construction work to be allowed from 7am to 7pm Monday to Saturday, all year round, with additional 'mobilisation' an hour either side, making a working day of 6am to 8pm. The alternative is 8am to 6pm working Monday to Friday, 8am to 1pm Saturday, again with an hour's mobilisation either side. As a resident of Cefn Meiriadog, which hours would you prefer? The construction is for approximately 3 years, with the 8am to 6pm option extending the production period by a few months."

3d. In the subsequent two days, Option 1, "Monday to Saturday, 7am to 7pm" received 0 votes. Option 2, "Monday to Friday 8am to 6pm, Saturday 8am to 1pm" received 27 votes. While it naturally cannot be claimed that the poll is scientific and that 100% of the whole population supports Option 2, equally it cannot be denied that it very clearly indicates local residents are strongly against being subjected to core working hours of 7am to 7pm, six days a week, or overall working days of 6am to 8pm when the hours of mobilisation are included.

3e. The Applicant stated that activity during the hour of mobilisation either side of the core working hours would be "non-noisy", but includes vehicles arriving, cleaning, maintenance, etc., while excluding HGVs, etc. However nearby residents affected by previous projects report that HGVs etc parked up on the nearest public roads, with engines running, to await the 7am start. Since one of the access roads then involved is to be used by Mona traffic, it must be assumed that the same problem will occur this time.

3f. With respect to working hours, on the issues of noise and light pollution it is important to point out that the area involved, both in cable-laying and substation construction, is largely open farmland or other countryside, and is normally very quiet and fully 'dark' during the hours of darkness. Although the Applicant referred to 'task lighting' being used for work during the hours of darkness, it is inescapable that having core working hours of 7am to 7pm and an overall working day of 6am to 8pm will result in noise and light pollution in December and January during some 5-6 hours of what would otherwise be in complete darkness.

3g. Regarding traffic on Glascoed Road (B5381), it hardly needs stating that the overlapping of the Mona, Awel y Môr and National Grid construction phases will present issues for the residents of dwellings along Glascoed Road, in particular the five dwellings close to the access road from Glascoed Road.

3h. The Community Council calls therefore for the core working hours to be set at no longer than 8am to 6pm Monday to Friday, and 8am to 1pm Saturday, for there to be strong restrictive conditions set on what noise levels and light levels may be incurred during the hours of mobilisation preceding

and following working during core working hours, for there to be limitations on light levels during the hours of darkness, and for there to be stringent safeguards against the abuse of emergency working regulations, as has occurred to the detriment of residents during previous construction projects.

4a. CMCC has serious concerns over the reliability of the Applicant's landscape visual impact assessment (LVIA) of the substation. From questioning in ISH2, Agenda item 8. Landscape, Seascapes and Visual Effects, it emerged that the Applicant deliberately chose NOT take into account a proposed grid of twelve 30-metre high lightning conductor masts, instead basing visualisations and assessments on the proposed 15-metre height of the substation buildings. The Council welcomes the fact that the Applicant has now agreed to include the masts in a revised assessment to be submitted by Deadline 2. However CMCC's concern is how indicative the original decision to omit the masts might be of the Applicant's approach to producing, interpreting and presenting data that might be seen as detrimental to its application. A useful and relevant reference for the 30-metre masts is that each one of the twelve would be the same height as the tower of St Asaph Cathedral, which is highly visible from many locations in Cefn Meiriadog. While one or two masts might not have the visibility of a volume like the Cathedral tower, a grid of twelve 30-metre masts is very clearly going to be at least as dominant a visual characteristic of the completed substation site as the 15-metre height of the substation buildings, especially when seen from within Cefn Meiriadog.

4b. The Applicant's stated reason for omitting the masts from the visualisations and the assessments - that there is an electricity pylon nearby which is taller than the proposed masts - is not only unconvincing, but raises further questions about the reliability of the Applicant's whole approach. This is epitomised by discussion around PDA034, Figure 1 of Landscape Visualisations (reproduced below). Therefore this visualisation is discussed as representative of the flaws underlying the Applicant's assessments of visual impact.



4c. National Grid has already stated in its published documents and its consultations that the pylon shown in the foreground will be removed following the extension to its 'Bodelwyddan Substation' (actually in Cefn Meiriadog) being carried out precisely to be able to accommodate the additional power generated by Mona and Awel y Môr. The line it carries to the NG substation will be replaced by two lines, neither coinciding with the position of the pylon shown. The Applicant acknowledges being in regular contact with NG (and other relevant parties), therefore it is puzzling in the extreme that this view has been chosen for a critical visualisation.

4d. Critical because the Applicant stated that the "Minor to moderate adverse significance" found to be the visual impact associated with this viewpoint was for the most part due to the "existing infrastructure", i.e. the pylon and the (largely obscured) ground station to its right. Not only has NG stated that the pylon will be removed, it has said also that the ground station will be decommissioned and the site levelled.

4e. The choice to compose and present a visualisation in which the proposed substation is seen through the legs of a pylon (albeit one that will no longer be there) is highly questionable since it is a fundamental of the laws of perspective that objects depicted in this manner will cause the object in the background to be perceived as smaller than they would be if the foreground object were not present, and smaller than they would be perceived in real life. Viewpoints a few metres either side of the one chosen would not have had this effect and its deliberate choice must be questioned.

4f. Another indication of the flawed nature of the Applicant's LVIA was the Applicant's representative's assertion that the road partially seen in the bottom right of the visualisation is not a right of way. This is simply erroneous, as will be confirmed by Denbighshire County Council who maintain the road as the lesser of two routes linking Groesfordd Marli on the northern side of Cefn Meiriadog with Cefn Mairwen on the southern side, and serving approximately 12-15 dwellings. It also forms part of a popular circular route used by walkers, cyclists and riders, and it is frankly misleading to describe it as "not a right of way". It has even on (admittedly rare) occasions been used as a diversionary route during severe blockages on the A55.

4g. CMCC agrees with Mr Martyn Hussey who has pointed out that the 'before and after' LVIA visualisations are not consistent in the way they show seasonal variation, and they do this in a way that presents the project in the best possible light.

4h. Overall therefore, CMCC finds the Applicant's LVIA flawed as far as it affects Cefn Meiriadog and in particular the proposed substation site. It believes that the methodologies used to assess visual impacts on viewpoints and visual receptors, and residents and visitors generally, are designed to minimise those impacts in such a way as to disguise the fact that substation is a 65,000 square metre construction of buildings 15 metres high, with a grid of 12 30-metre high masts in what is open farmland in a rural landscape, and is in fact a highly visible and inappropriate intrusion into that landscape.

5. CMCC is extremely concerned about the lack of participation by Denbighshire County Council in the hearings. The importance of DCC's role in various aspects of the application and the implementation of the DCO should it be granted, not least in matters of enforcement, cannot be over-stated. The Community Council has neither the means, the expertise, nor the authority to respond meaningfully to many if not most of the issues involved and looks to DCC to provide an informed, considered and, where necessary, robust response to the issues affecting it. The Inspectors' concern, expressed at ISH2, that DCC should find the means to participate fully in the Examination was noted and is fully supported.

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