

MR & KM Hussey



5th August 2024

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2, The Square
Bristol
BS1 6PN

Pins Reference EN010137 Mona Offshore Wind farm
Interested Party Numbers MNOW-S57019 & MNOW-S57018

Dear Sir/Madam

1.0 Introduction

Whilst we support the ambition for a Low Carbon renewable energy solutions and the drive for net zero, this proposed development will have significant effects on us personally, which are set out in Section 2 along with some points for clarification and a summary (Section 2.4). Additional general comments regarding the project as a whole are set out in Section 3.

We have sought resolution with the applicant prior to this submission as we recognise that in developments of National Significance it is the Planning Inspectorate and Secretary of State's role to examine in the public interest and not necessarily private interest, however we were advised by the applicant to continue to engage with the consenting process being designed to explore fully and independently the application, including the efficacy of proposed mitigation. We trust that you will consider our particular personal concerns with fairness and openness.

It has been difficult to fully digest the 1000's upon 1000's of technical pages submitted by the applicant in support of their scheme without independent professional advice, which for individuals like ourselves is cost prohibitive. We therefore hope we have not misinterpreted any of the information or misunderstood the correct process for raising these issues and concerns.

Section 2 Personal Impacts

2.1 Noise

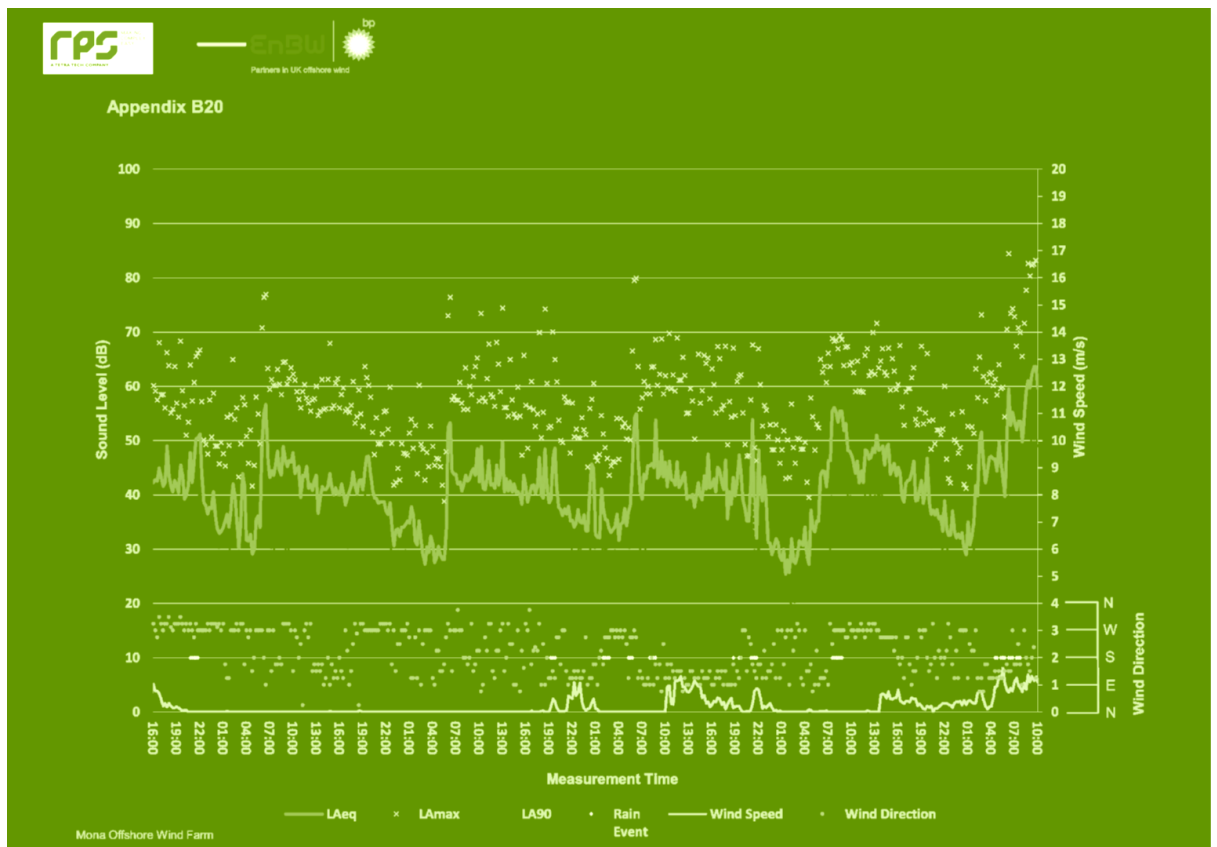
2.1.1 Base Line Examination Library Reference APP-178 Document Reference F7.9.1 dated February 2024

Base line noise surveys are important as they are used to inform the assessment of impacts for construction and operational activities.

It is recognised by the applicant, both in PEIR documents and base line noise surveys that we are a low noise climate due to the rural nature of the area we live in.

In order to establish a baseline for Tyddyn Meredydd, survey reference LT20 was carried out with equipment placed at the Northern boundary edge of our property, from 15:15 hours on 14th September 2023 until 11:05 hours on 19th September 2023.

Copy of the graphical data taken from Appendix B20



To which we make the following observations:

- There appear to be outliers (peaks) at the start of each day and a step change in increased dB levels on the final day.
- Some rain fall and maximum wind speeds of around 1.5m/s are recorded.

Commenting further:

- a) The peaks at start of day where noise levels increase by around 15dB (occurring between 06.00 to 06.30) appear unique to this site as no similar results were recorded at Maes Cefn or Plas Hafod, being the closest survey stations at the time.
- b) The applicant states that any periods where precipitation events or wind speeds >5m/s then the data was omitted during analysis so an assumption is made that for the periods where rain was recorded that they have been omitted, however the wind speeds noted appear open to question:
 - Weather results recorded were from equipment positioned at Maes Cefn which is on the opposite side of a hill, to the West, sitting between our properties and it is common to experience different wind conditions
 - The wind speed results recorded do not reflect that which we observed at the time nor Meteorological Office data.
 - We noted it being very gusty on the 19th September all morning
 - Summary of Meteorological Office data from Rhyl No2 station (4-5Km NE from Tyddyn Meredydd) is shown below.

Date	Daily rainfall mm	Daily Mean Wind speed Kn	Daily Max Gust Kn	Time of Max gust
14/9/23	7.8	4	21	23:53
15/9/23	Tr	3	10	17:13
16/9/23	2.8	3	15	18:34
17/9/23	15.2	3	14	11:08
18/9/23	7.8	8	26	17:02
19/9/23	10.2	12	36	07:34

- Although the Meteorological Office wind speed data is recorded in Knots (5m/s = 9.7Kn) it does support our observations and would reasonably explain the step change in increased recordings on the last day.
- It is also worth noting that on the penultimate day (18/9/23) where daily mean wind speed of 8Kn and maximum gust of 26Kn are recorded by the Meteorological Office that these wind speeds do not appear to be reflected in the weather data recorded by the applicant.

The step changes early each morning have now been explained by the applicant with the frequencies recorded and time being most likely attributed to bird noise, however high and gusty winds on the final morning would logically explain the increased noise levels recorded that day and that, if omitted, would reduce the base line dBA figure by several points.

Therefore on this basis we consider the baseline noise levels published for our property to have been over stated.

2.1.2 Construction Noise Examination Library Reference APP-179 Document Reference F7.9.2 dated February 2024 and Examination Library Reference APP-072 Document Reference F3.9 dated February 2024

Modelling software has limitations as it is only ever as good as the data and assumptions inputted.

An assumption used in the model (document F7.9.2 section 1.5.1.7) is that an acoustic barrier of height 2.4m has been included around the perimeter of construction activity.

- This assumption is questionable as it would surely be impractical to expect that such an acoustic barrier will be in place at all times between ourselves (including other receptors for that matter) and all construction activities throughout the several years of construction?
- The onshore substation itself will grow to a height of 15mts plus platform height with construction equipment such as cranes etc. even higher, the installation of an acoustic barrier between these activities and our property (or indeed other receptors) would therefore seem unrealistic.
- Even if, any acoustic barrier was possible then due to the topography between Tyddyn Meredydd and many of the construction activity sites would negate the effectiveness.

It is unclear as to what distances from each relevant construction activity for Tyddyn Meredydd have been used in the modelling as these would be a significant influencer. Statements in APP-072 Document F3.9 section 9.5.3.5 that:-

- Some works are assumed to be spread along sections of the onshore cable corridor. Construction noise levels for these works have been calculated at varying distances from the boundary of the temporary construction compounds.

The use of the wording temporary construction compounds implies lay down areas and therefore clarification would be appreciated as to actual distances used in the modelling for each activity in relation to our property.

On this basis and the assumptions used in the modelling make it open to doubt and questionable in assessing the true impacts for Tyddyn Meredydd.

When discussing acceptable threshold values for environmental noise, the applicant refers to the World Health Organisation on one hand and then BS 5228-1 2009+A1:2014 on the other where:

BS 5228 states Threshold values of 65dB for daytime (07.00 – 19.00) and 55dB for evenings (19.00 – 23.00)

However World Health Organisation guidelines don't differentiate between daytime and evening with just a daytime limit of 55dB (07.00 – 23.00)

It is noted that the applicant selects the more lenient limit for daytime threshold values from BS 5228 in assessing whether noise levels generated by its site activities are deemed significant.

For the predicted noise levels from various construction activities and their impact on human receptors/properties we make the following comments:

- Table 9.18 in APP-072 F3.9 for construction noise criteria lists our property as only being impacted by Substation but due to our unique position within this development we will also be impacted by cable route activities.
- APP-179 F7.9.2 Appendix B lists impacts by specific construction activity:-
 - For Substation ground works it appears that the closer you are to the work then the quieter it will be? For e.g., we have a predicted noise level impact of 23dB whereas Pentre Mawr farm and Ysgubor EOS, both much further away have 39dB and 51dB noise impact levels respectively.
 - For Trenchless Techniques the impact for Tyddyn Meredydd listed as Negligible whereas Pentre Meredydd is Low? It is difficult to see how Pentre Meredydd is closer to this activity and so it is hard to understand why there is any difference.
- Our experience of occasional works that have been carried out in the vicinity of our property, the likes of overhead lines, telegraph pole replacements, drainage works, bore holes as part of the applicants geological studies is that noise is noticeable and an annoyance but only for relatively short duration, whereas this development will require continuous construction activities 6 days a week over many years.
- The predicted figures quoted by the modelling appear remarkably low for some of the construction activities to what one might expect, for an e.g., transition joint bays excavation, base construction of between 33 and 39dB for Tyddyn Meredydd would imply on the face of it, that disturbance will be less than the current baseline. These

types of predicted dB figures are actually more what one might experience spending the day in the local library.

- The predicted figures used by the applicant have been separated by breaking down all the various activities and then individually assessed, however this fails to take into account any concurrent activities and therefore cumulative impacts. We will be exposed to both underground cabling and multiple substation construction activities as part of this development at the same time.
- The predicted figures do not take into account other major construction activities which will also be ongoing at the same time, the likes of National Grid extension and Pylon/overhead line works, Awel Y Môr cabling connection to National Grid, all scheduled to construct at similar timescales within relatively close proximity to our property, and so resulting in additional cumulative noise impacts.

We note the applicants statement in APP-072 F3.9 item 9.9.6.1 that;

Depending on the locations of the construction works and activities required, a noise monitoring strategy will be agreed as part of the Construction noise and vibration plan may be agreed upon with the relevant stakeholders to ensure compliance with the agreed threshold values.

Our opinion is that noise monitoring should be mandatory during the construction phase throughout the onshore cable corridor and onshore substation site to validate modelling assumptions, predictions and allow accurate monitoring of compliance to threshold values.

In summarising the noise impact effects on Tyddyn Meredydd, the applicant rates as either Low or Negligible which we firmly believe is inaccurate due to the unique position of our property within the construction areas, the implausible use of acoustic barriers at all times, the impulsive characteristic of some of the activities (piling as an e.g.), lack of cumulative impact assessment and the impacts not being of a short or limited duration, which together with the following:-

- Noise impacts and their consequential effects can only rarely be properly determined solely by simple numerical differences and is only a starting point.
- The noises generated by this development during construction may be intermittent throughout the day and so draw more attention.
- We will be affected by more than one type of noise source.
- The noise occurrences, repeated over many days, weeks, months and years will cause annoyance and disturbance.

- The noises generated during construction will be significantly different to our baseline and so much more noticeable.
- Because we live in a quiet rural area the impacts will be substantive.
- The night time impacts between 23:00 to 07:00, even where there are no periods of 24hr workings will be noticeable and intrusive during the hour of mobilisation starting at 06:00 each morning, a period where we will still want to sleep.

And so overall:

- We consider the Magnitude to be adverse and Moderate to Substantive.
- We consider the Sensitivity to be Medium to High.
- Combining these we consider our impact to be Substantial.

2.2 Visual PEIR document Volume 4 chapter 26. PEIR Document Non – Technical Summary, Examination Library Reference APP-189 Document Reference J3, Examination Library Reference APP-069 Document Reference F3.6

Throughout the supporting documentation provided by the applicant, greater emphasis has been given to the visual impacts on transient receptors such as walkers, cyclists, vehicle occupants and views from afar.

This fact was stressed by the applicant on 2 occasions at ISH 2 on the 18th July 2024 referring to the Clwydian range as being the most and highest sensitivity viewpoint.

We feel this is wholly incorrect and that our susceptibility to the proposed change and the value we attach outweighs that of infrequent visitors to the Clwydian range, or is the applicant seriously suggesting that our particular sensitivity will increase if we drive away from our property and view the development from afar?

The Topography of the onshore substation site will require a cut and fill method and platform with the North Eastern end requiring raising. Although the subsequent substation height is now indicated to be 15mts it is unclear of the actual height above current ground level in order to account for the platform height and any drainage requirements. One hopes that the statement in the applicant's document ref APP-189 - J3 – Design Principles, section 3.4.2.1 is incorrect where it anticipates platform height of between 57mts and 61mts!

The applicant makes a statement in Document F3.6 Landscape and Visual Resources section 6.5.7.7 that resident's ground floor rooms are completely or significantly screened from the onshore substation and therefore not considered further.

This is simply untrue for Tyddyn Meredydd and highlights a failure by the applicant to correctly assess our viewpoints.

Our principal ground floor living space is the conservatory at the front of our property (used all year round), offering direct views of the North Eastern side of the substation, the area where the platform and subsequently the substation building will be the highest above current ground levels. Even after 15 years of mitigation/screening, due to the topography, the substation will still be clearly visible and a prominent feature. (See additional comment re conservatory in section 2.3.1)

Viewpoints published by the applicant from our property do not accurately reflect the true impact. At the time photographs were taken we made offers to take representative images from our conservatory (principal ground floor living space) and from the NE boundary of our property, both of which were declined by the applicant's representative.

Similarly, the view points from behind our property used by the applicant to compare year 1 and year 15, once screening measures have matured are biased. (Image references Annex 6.5 figure 5 year 1 and Annex 6.5 figure 6 year 15)

- Year 1 was taken 17/3/22 whereas Year 15 used as a direct comparison was taken 9/8/23, the latter of which shows a much denser foliage covering throughout due to the differences in time of year and therefore not a true and accurate comparison.
- Other comparative views, in and around this vicinity (although noted as using the same date stamped photograph) have been photo montaged to show heavily foliated existing vegetation compared to base line year 1 and therefore not a true and accurate comparison.
- For a more accurate representation then
 - The same seasonal views should be shown in each year's comparison.
 - Base line year 0 (current view without any development) should be shown.
 - For onshore substation site, representative views during construction.
 - And for onshore substation the night time impacts both during and post construction

- Landscape and Visual Assessment Guidelines GLVIA3 to which the applicant referred, section 6.28 states that;-
 - Consideration should be given to the seasonal differences in effects arising from the varying degree of screening of views by vegetation that will apply in summer and winter.

It was stated during ISH 2 on the 18th July 2024 that worst case scenarios had been used in the photo montage images to which we make the following comment:

- Worst case scenario does not appear to have been applied for the onshore substation platform.
 - Using image Annex 6.5 figure 5 year 1 viewpoint 3 and assuming that the substation buildings are represented as 15mts in height would show a platform height above ground level of approximately 1mt
 - Since this development is indicative and evolving the actual platform height has not yet been declared so an assumption of worst case, i.e. highest potential platform height should have been used.

Additionally, we will have clear visibility of the substation construction traffic daily as it accesses and egresses the site past the current national Grid substation, of which some 55HGV's and 127LGV's per day are estimated by the applicant.

Below is an indication of our current principal ground floor conservatory view towards the proposed North Eastern substation proposed site (year 0):



The applicant's own visualisation below shows the position of the substation in relation to our property and clearly, how it will dominate, loom over and overshadow our outlook.



The impacts of this proposed, very large industrial building in the middle of open countryside will be a significant change, overbearing, oppressive, and intrusive, a large contrast to that which we currently enjoy and a blot on the landscape.

Final comment is that as referenced in Landscape Institute Technical Guidelines - Visual impact assessments are only ever a judgement and that even with qualified and experienced professionals there can be differences in the judgements made.

We consider the judgement made by the applicant in our case to be incorrect and lost sight of in the scale and complexity of the assessment.

2.3 Additional Other Personal Impacts

In addition to noise and visual there are a number of other issues that will impact upon us and although might be considered minor in isolation, never the less, they do build on the cumulative impact.

- **2.3.1 Change In Behaviour**

During the prolonged construction period we will have to keep our windows, doors shut and severely restrict the use of outside areas.

- Having to keep windows and doors shut of our conservatory (principal ground floor room) will render it unusable during any periods of good weather.

We are likely to have disruption to sleep patterns due to:

- 1 hour mobilisation periods very early each morning
- Equipment operating 24 hours a day in close proximity.
- Periods of 24hour construction works in close proximity.

This proposed development will be very disruptive and a significant inconvenience over its many years of construction.

- **2.3.2 Privacy**

We currently enjoy a rural aspect surrounded by open countryside, however the planned construction in its close proximity, workings behind, alongside and in front of our property will result in a loss of privacy and diminish our right to enjoy our home peacefully.

- **2.3.3 Vibration**

Our experience when occasional works have been undertaken in fields behind and in front of our property is that vibration effects can be felt due to the nature of the ground with its Limestone groups.

The required use of piling hammers, HDD drilling and rock breakers are likely to cause similar impacts (noticeable and disruptive) on close proximity residents and therefore disagree that Vibration is scoped out.

- **2.3.4 EMF's**

Whilst accepting in general that scientific evidence has not found health concerns to the public from EMF's.

In 2000, an international group led by Professor Anders Ahlbom took separate epidemiological studies of childhood leukaemia and magnetic fields, pooling the results. They found that in categories of homes with a field of >0.4 microteslas, averaged over 24hours that there was a statistical suggestion of increased risk.

If this development goes ahead then we will have underground cabling to the rear, side and front of our property, along with the substation to the front. In addition we already have National Grid 400Kv overhead lines and Scottish Power HV overhead lines in relative close proximity and so due to the potential cumulative effect and the 2000 study of low level exposure over a protracted period we remain anxious and concerned that EMF's are scoped out.

- **2.3.5 Open Space – Leisure and Play**

Living in the idyllic rural area of Cefn Meiriadog has contributed to our enjoyment of life in the open countryside. With suitable permissions, we have routinely, walked our dogs across lands that are now earmarked for compulsory purchase by the applicant. This current rural aspect of life provides health and recreational value to us and whilst open space is not necessarily a given right, it is yet another nail in the coffin of the damage and harm that this proposed development will have on our daily lives.

- **2.3.6 Light Pollution**

Light pollution is known to have negative impacts on human health, mental and wellbeing. We currently enjoy the relative dark skies of the undeveloped area. The development of the substation in close proximity with its 24 hour security lighting, car park lighting, vehicular activity (mobilisation) very early in the mornings and late into the evenings with occasions of 24hour workings will impact negatively on our residential amenity.

2.4 Personal Impact Summary – Quality of Life and Well Being

Given the over estimation of our baseline noise levels.

Given our experiences of disturbance to date where occasional works have been undertaken in close proximity.

Given the questionable assumption in the modelling of a 2.4mt acoustic barrier between ourselves and all construction works.

Given the long construction hours with 3 ½ to 4 years prolonged exposure 6 days a week, which with current working hours proposed (including mobilisation) equates to disturbances of 75% of our waking time.

Given that being retired we will have no respite, no escape and that even construction workers will get more opportunity for breaks away and peaceful sleep.

Given that the area is a quiet environment where any construction noise will be noticeable, disruptive and a substantive effect.

Given that one of us suffers with [REDACTED]

Given that we will need to change our behaviour.

Given that there will be periods of 24 hour working in close proximity to our property.

Given that the applicant proposes to use trenchless techniques (higher noise levels and potential for 24 hour workings) in close proximity to our property.

Given the lack of cumulative noise assessment and the unique position of our property within the construction zones.

Given the types of heavy duty industrial construction equipment that will be used in close proximity:
CAT 360 excavators/Rock breakers/Concrete munchers/ Piling/Hammers/HDD etc.

Given the high probability that we will suffer noise level increase, disturbance and significant effects over our current ambient noise for periods >10 or more working days in any 15 consecutive days and >40 days in any 6 consecutive months.

Given the failure to accurately assess our visual impacts.

Given that our health linked to the levels of residential amenity we enjoy will be significantly affected.

Given that this development would negatively impact our property value.

Given the detrimental impacts on our quality of life and wellbeing.

Given the clear and obvious cumulative impacts.

We believe that no amount of mitigation can adequately protect and shield us from the significant detrimental impacts that this development will cause, therefore:

We ask that if yourselves as Planning Inspectors cannot reject this application as a result of our personal impacts then in line with:

BS5228-1:2009+A1:2014 That if noise levels generated by site activities for residential properties result in disturbance and interference with activities or sleep for a significant extent of time e.g. in excess of 6 months, then there might be advantages in offering permanent rehousing

BP Project Consultation Brochure summer 2022 where project director Richard Haydock stated “Committed to making sure we deliver it in a way that works for people that live and work in the areas that these projects are located”

BP Code of conduct – Core principles setting out standards for how to do the right thing

Wanting to help improve people’s lives

Committed to doing the right thing when engaging with communities

Wanting to be a trusted neighbour

Putting themselves in other people's shoes

That through no fault of our own and being in this regrettable and unenviable position, the ethical and moral option is to recommend that the applicant purchases our property as part of this scheme should the development be granted Development Consent Order

Section 3 In addition to Personal Impacts we make the following comments and their impacts on the wider community

3.0 Onshore Site Selection

3.1 Suitability

Individual radial connections are not fit for purpose for a modern energy system, less efficient, more expensive overall and therefore more costly to consumers.

This proposed scheme is a sister development to Morgan offshore wind which is sited approximately 11Km away from Mona with same developers and similar timescales for construction. It is illogical to have 2 distinctly separate developments resulting in major environmental and community impacts affecting multiple communities. It requires duplications in documentations, surveys, people, resources and planning inspectorate time, more cost to the developer to construct and maintain and therefore more cost having to be passed on to the end user.

The electricity generated by this development is not for the benefit of Denbighshire or North Wales, nor will it provide any medium or long term benefits, the area is being used merely as a transition hub. Denbighshire and Cefn Meiriadog are already doing more than its fair share for renewable energy.

It is noted that the developer has yet to commit as to what the electricity generated will be used for, suggesting last year that they might want to use the electricity to power their own charging points throughout the country, something which will enhance BP and EnBW profitability and something for which we in North Wales will be left to pay for in real terms.

The options for Brown field sites have been ignored:
Initial survey options looking into potential connection sites undertaken by the developer did not recommend the National Grid substation at Bodelwyddan. Subsequent connection agreements were made to Wylfa, later changed to Bodelwyddan.
Reasons and restraints cited by the applicant for not opting for other potential sites such as Connahs Quay or Penworthan appear to be merely excuses and not reasons.

The developer, UK and Welsh governments say that connectivity points are up to National Grid, washing away all and any responsibility. However, National Grid appears unaccountable, have no interest in subsequent environmental and community impacts. Instead National Grid PLC puts its own profitability ahead of any environmental or community damage, safe in the knowledge that the planning processes protect them from real scrutiny.

3.2 Onshore Substation

The substation site is very prone to excess water and whilst engineering wise it may be feasible to be built, the creation of over 14 acres of impermeable ground and a 6-8mt wide permanent access road will only exacerbate issues further North East, towards the lower ground areas including lands where there are existing infrastructures.

The substation site chosen by the applicant was previously rejected by Awel y Môr due to proximity of residential properties, visual impacts, and impacts on historical landscapes, high risks of significant impacts for traffic, archaeology and a moderate risk for ecology receptor groups. These issues have not gone away and therefore question why it is now deemed suitable for much larger constructions.

The site proposed does not comply with rural economic policies where the permanent harm outweighs any short to medium term perceived benefits.

The site proposed does not comply with Future Wales strategy for renewable energy developments that there are no unacceptable adverse visual impacts on nearby communities and individual dwellings.

The site proposed does not comply with Planning Policy Wales - Key planning Principles – Achieving the Right Development in the Right place, Natural, historic and cultural assets must be protected, promoted, conserved and enhanced. Negative environmental impacts should be avoided in the wider public interest, meaning acting in the long term so that resources and/or assets are not irreversibly damaged or depleted.

The site proposed does not comply with Planning Policy Wales – Place making in Rural areas – The countryside is a dynamic and multipurpose resource, it must be conserved – open green spaces should be protected from development.

3.3 Scale

Over 60 acres of agricultural lands, including best and most valuable lands are proposed for compulsory purchase by the developer of which 30 acres is permanent footprint.

The statement made in PEIR volume 20 Land Use and Recreation, item 20.8.3.7 that:-

“The sensitivity of the holding affected by the permanent loss of land associated with the onshore substation is assessed as Low based on the loss of a single block of land within a large land holding”

Is irresponsible and shows a flippant attitude by the applicant and its agent.

This proposed substation development is simply too large and an unacceptable increase of activity into a working country environment. The scale and nature will harm the character and appearance of the whole rural area; it’s an overdevelopment and a blot of the landscape.

3.4 Environmental and Community Impact

The area of Cefn Meiriadog covers 3342 acres with approximately 180 households and a population of 359 people, it is a working rural area valued for its peace and tranquillity. This proposed development taking 60 acres of permanent land uptake, combined with the necessary modifications and extension to the National Grid Substation, the erection of 4 new pylons (towers) will result in a complete change of character, appearance and the way farmers and residents use the area. This development once operational will be a permanent eye sore .

Despite the permanent environmental and community impacts this development offers very little, if any, long term benefit for the area and local community. Future token financial donations to local causes cannot and do not justify the wholesale industrialisation of large swathes of this rural area.

3.4 Traffic *Glascoed Road B5381 and Ffordd William Morgan St Asaph Business Park*

Data presented by the applicant in Examination Reference APP-179, Document reference F9.7.2 Appendix C indicates traffic :

FFordd William Morgan to Engine Hill B5381	217 vehicle increase of which 68 are HGV's
FFordd William Morgan to Substation access	234 vehicle increase of which 95 are HGV's
A55 Junction and along Ffordd William Morgan	401 vehicle increase of which 162 are HGV's

Neither Glascoed Road nor Ffordd William Morgan are suitable for such large numbers of increased traffic and particularly not HGV's where the applicant indicates an estimated 101% increase.

It is noted that initial plans to use HGV access from the A55 up Engine Hill have been shelved with Denbighshire County Council highlighting that it would be difficult for HGV's to pass each other in opposite directions. Glascoed Road is similar to Engine hill and for anyone who has followed an HGV along Glascoed road will know that they straddle the road making it difficult also for any HGV's to pass in opposite directions.

Roadworks and repairs along Glascoed Road are frequent. Below is a summary of road works that have been carried out in the last 5 years (20/6/19 to 20/6/24) from the proposed substation access to the top of engine hill (information sourced from Denbighshire County Council records)

- Burst water/leaks/repairs
 - 19 instances totalling 72 days of road restrictions

- BT/Open reach access to infrastructures
 - 10 instances totalling 11 days of road restrictions

- Carriage way repairs/drainage/grass cutting/patching etc.
 - 19 instances totalling 65 days of road restrictions

The additional increase in traffic, particularly HGV's, from this development along with other planned and proposed developments all requiring to use Glascoed Road will only add even more disruption and damage to this B road.

Regular repairs to manhole covers, siting directly in the driving line are often required along Ffordd William Morgan, increases of HGV's will exaggerate this problem even further. Additionally, although there are pathways within the business park area there is a lot of footfall activity especially during lunchtimes and large increases in traffic increases the risks to pedestrians.

3.5 Cumulative Impacts

There are a number of renewable energy schemes and associated infrastructures planned over the short to medium terms in and around Cefn Meiriadog/ St Asaph

This particular development is just one of those schemes but is far and away the largest and whose planned construction activities around Cefn Meiriadog /St Asaph will coincide with other developments. Any one of these schemes in itself is significant but in combination will be devastating for several years as they all focus on the single National Grid Connection point utilising the same access roads and routes.

The impacts of this scheme should not be considered in isolation. National Grid in their future energy scenarios accused the government of working in silos and a lack of communication, this is exactly what is happening now as:- At the moment because of the way planning is examined, there is no statutory body or agency considering the cumulative impacts of all these schemes that are already in place, that are planned or foreseeable. Each scheme is assessed in isolation, even though in the case of National Grid extension it is an indispensable component without which Mona cannot operate under its current plans.

There is a suspicion that National Grid are holding back on their formal application to the council until this examination closes, this will mean lack of evaluation of real cumulative impacts by the Mona development team, even though the extension to the National Grid substation is an integral part and whose construction needs to be undertaken at the same time.

The basic question is when is enough enough and how many energy schemes and infrastructures can, or should any area like Cefn Meiriadog accommodate?

3.6 National Policies

We note your request that reference to national policies should not be made but since the applicant throughout its supporting documentation refers frequently to National policies and selective parts as to how the development is supporting these policies then we would like to make the following comments.

This development as proposed fails to comply or deliver against the clear overall aims and objectives of National Policy even though it has obvious potential for an integrated solution and therefore less overall environmental and community impact:

NGESO Cost benefit analysis Offshore Transmission Network Design 2020:

- An integrated design has the potential for 18% savings in Capex (investment) and Opex (maintenance costs) and significant reduction in environmental, social and local impacts.

National Policy statement for Energy:

- Coordinated applications bring economic efficiencies and reduced environmental impact

National Policy Statement for Renewable Energy Infrastructure:

- A more coordinated approach to offshore-onshore transmission is required
- A coordinated approach will provide system benefits, reduce costs to the consumer and maximise market access for generators
- Greater coordination of transmission infrastructure will help lesson overall impacts

The OTR and each of its 3 work streams

- Early opportunities – Encourage developers and interconnectors to coordinate
- Pathway to 2030 – Point to point connections is not appropriate for the scale and ambition
- Enduring Regime – Consider the offshore transmission holistically

This development as proposed offers zero coordination, a non-holistic approach, a complete failure for North Wales, devastation for the rural area and the residents of Cefn Meiriadog.

As planning inspectors you might consider these points as out of scope but we simply ask:

If this is really a right and fit development and is it in the right place?