

Planning Inspectorate Examination EN010137: Mona Offshore Wind

**Cefn Meiriadog Community Council
MNOW-ISP002**

Deadline 2, 27 August 2024

Response of the Community Council to issues raised by Deadline 1 (7 August 2024) submissions

1. Cefn Meiriadog Community Council (CMCC) notes various submissions made to the Examination in response to Deadline 1 and in particular notes the Local Impact Report (LIR) submitted jointly by Denbighshire County Council (DCC) and Conwy County Borough Council (CCBC).

2. CMCC's own Voluntary Local Impact Report (VLIR), submitted for Deadline 1, was a qualitative assessment, based on comprehensive and robust local knowledge, of the impacts the Mona development, if consented, will have on the community, both short-term in relation to the construction period, and long-term in relation to the siting of the onshore substation in the location proposed. Its assessment was that the impacts would be seriously detrimental to the well-being of the community, to its visual and landscape character and thereby its community identity, with particular concern being expressed over the cumulative effects of the Mona proposal considered in conjunction with other existing, ongoing and proposed infrastructure projects.

3. While CMCC had neither the means nor skills to make a detailed, quantitative assessment in its VLIR of the Applicant's LVIA forming part of the application, in Section 4 of its 'Response of the Community Council to issues raised at Issue-Specific Hearing 2', also submitted for Deadline 1, it expressed "serious concerns over the reliability of the Applicant's landscape visual impact assessment (LVIA) of the substation", listing various reasons for doing so, and concluding (4h): "Overall therefore, CMCC finds the Applicant's LVIA flawed as far as it affects Cefn Meiriadog and in particular the proposed substation site".

4. CMCC notes with particular interest therefore, the DCC/CBCC LIR, where the qualitative assessments of CMCC's VLIR and the sense, expressed in its 'Response of the Community Council to issues raised at Issue-Specific Hearing 2', of the flawed and unreliable nature of numerous aspects of the Applicant's LVIA, are strongly echoed in the DCC/CBCC LIR.

5. While it is unnecessary to repeat all the points made in the DCC/CBCC LIR with which CMCC concurs, the view is expressed on p.25 of the LIR that "The Councils are concerned that the methodological issues above and/or errors in the assessment have led to under reporting of landscape, visual and cumulative effects". This precisely mirrors CMCC's belief, expressed in its 'Response of the Community Council to issues raised at Issue-Specific Hearing 2', 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 the 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".

6. CMCC shares the view expressed in paragraph 3.5.2 'Assessment Methodology and Baseline' of the DCC/CCBC LIR (p.34) that "...the study area being set to 1km from the Onshore Mona Development Area does mean that a wider, more strategic assessment has not been undertaken. This is pertinent to the Cumulative Effects Assessment (CEA) which has been limited as a result". A 1km distance might be felt appropriate to an urban or industrial setting where noise, light pollution, visual impacts, etc, are rapidly dissipated or discounted within the overall levels of the surrounding environment, but it is not the case in the open countryside with wide vistas and low ambient noise levels normally characteristic of Cefn Meiriadog. Cefn Meiriadog residents are familiar with the fact that, depending on wind, weather, traffic conditions and topography, on some days the road noise of the A55 can be audible from significantly greater distances than 1 km."

7. An important point on which CMCC does find the DCC/CBCC LIR insufficiently robust concerns the network of twelve 30 m high lightning masts referred to above which the Applicant chose to omit from its LVIA. In paragraph 1.2.2 'The onshore substation infrastructure' (p.2), the LIR states "It is recognised that the largest building structure for the onshore substation will have a maximum height of 15 m above the finished ground level. All other equipment ... would not exceed 15 m above finished ground level with the exception of slender lightning masts which could be up to 30 m in height". There is no indication to date of how "slender" the proposed masts will be, but CMCC reiterates its belief that a grid of twelve 30 m high masts will potentially be at least as dominant a visual characteristic of the site as the 15 m high substation buildings themselves. It notes that a revised LVIA will include the masts.

8. Of particular importance to CMCC and the residents on whose behalf it speaks, referring to those other infrastructure projects whose cumulative effects with Mona need to be taken into account, paragraph 3.3.4 'Potential Effects' of the DCC/CBCC LIR states (pp.21-22): "Within 1km of the proposed Mona substation, receptors would concurrently, or within a short journey, be able to see the proposed development together with Tier 1 Awel y Môr onshore substation and the Tier 3 St. Asaph solar farm, the extension to National Grid's Bodelwyddan substation, and existing onshore wind schemes. These are all major developments with their own associated visual effects on receptors". Crucially for the community upon which these projects are being imposed, the LIR concludes that "The Councils are of the opinion that in combination, these schemes and the proposed development would have the cumulative effect of altering the landscape and visual environment to the extent that energy infrastructure would become a prominent or defining aspect of the local landscape and views" [Emphasis added]. Clearly, the damaging effects on the community of Cefn Meiriadog of energy infrastructure becoming a "defining aspect of the local landscape and views" cannot be overstated given the community's identity and sense of well-being being tied so strongly to its current rural agricultural landscape, and the fact that living in a rural community of this nature involves frequent passage through the landscape rather than remaining largely static in a single location as is often implied by the LVIA's assessments.

9. Given the above point, the emergence of the representation dated 12 August 2024 of the previously unknown IGP Solar, is highly relevant, stating as it does, "IGP intends to develop a Battery Storage Facility on the Site and is in the process of progressing a planning application in respect of it", and among other things refers to "the direct interrelation between the two projects at the Site". The map forming part of the IGP Solar representation suggests, when taken with the Mona site plans and the proposals published by National Grid (NG), that the proposed IGP facility, the Mona substation, the NG substation extension and the NG proposed pylon lines are in contiguous locations, most definitely making energy infrastructure the "defining aspect" of that particular local landscape, indeed leaving no room for anything else. Logically, the Applicant must now include the IGP facility in its consideration of cumulative effects, even if only dealt with qualitatively using generic indications for battery storage facilities of the capacity proposed.

10. Triangulating between (1) DCC's view that "these schemes and the proposed development would have the cumulative effect of altering the landscape and visual environment to the extent that energy infrastructure would become a prominent or defining aspect of the local landscape and views"; (2) the Welsh Government's commitment to the well-being of communities as expressed in PPW12 and in its Deadline 1 submissions, e.g. the need it identifies "to ensure local communities are protected", and "to secure and sustain vibrant, cohesive and sustainable communities that promote and protect culture, heritage and the Welsh language"; and (3) the Relevant Representation by the Design Commission for Wales [RR-014] recognising the need for 'strategic coordination', particularly around the Bodelwyddan substation and its relationship to others proposed or consented in the area (as referenced in the DCC/CBCC LIR, 10.2 'Potential Effects' (p.54)), it is difficult to reconcile the Mona proposal with any concept of the community of Cefn Meiriadog being in any way protected or sustained. Inevitably, one comes back to the fact that, notwithstanding the good intentions expressed by all the various parties concerned, a 65,000 square metre construction of buildings 15 metres high, with a grid of 30-metre high masts, in what is open farmland in a rural landscape, cannot but be a highly visible and inappropriate intrusion into that landscape and its community, and that as such a more appropriate location should be sought. Also, despite the obvious need for a strategic approach and the expressions of support for one coming from various parties, the sudden appearance of IGP Solar and its planning application makes clear that, far from a strategy-based approach, it is still a 'free for all' regarding energy infrastructure proposals, one in which the community of Cefn Meiriadog finds itself virtually powerless to determine its own future.

11. CMCC would like to use this opportunity to correct an error in its 'Voluntary Local Impact Report' document submitted for Deadline 1. Under Point 6 the penultimate sentence reads "It is acknowledged in the Mona application that the construction periods for it and for Mona, if consented, will overlap". This should read "It is acknowledged in the Mona application that the construction periods for it and for Awel y Môr, if Mona is consented, will overlap".

Martin Barlow
Councillor
Cefn Meiriadog Community Council