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MONA OFFSHORE WIND PROJECT

Response to Cefn Meiriadog Community Council D2 Submission

Deadline: 3

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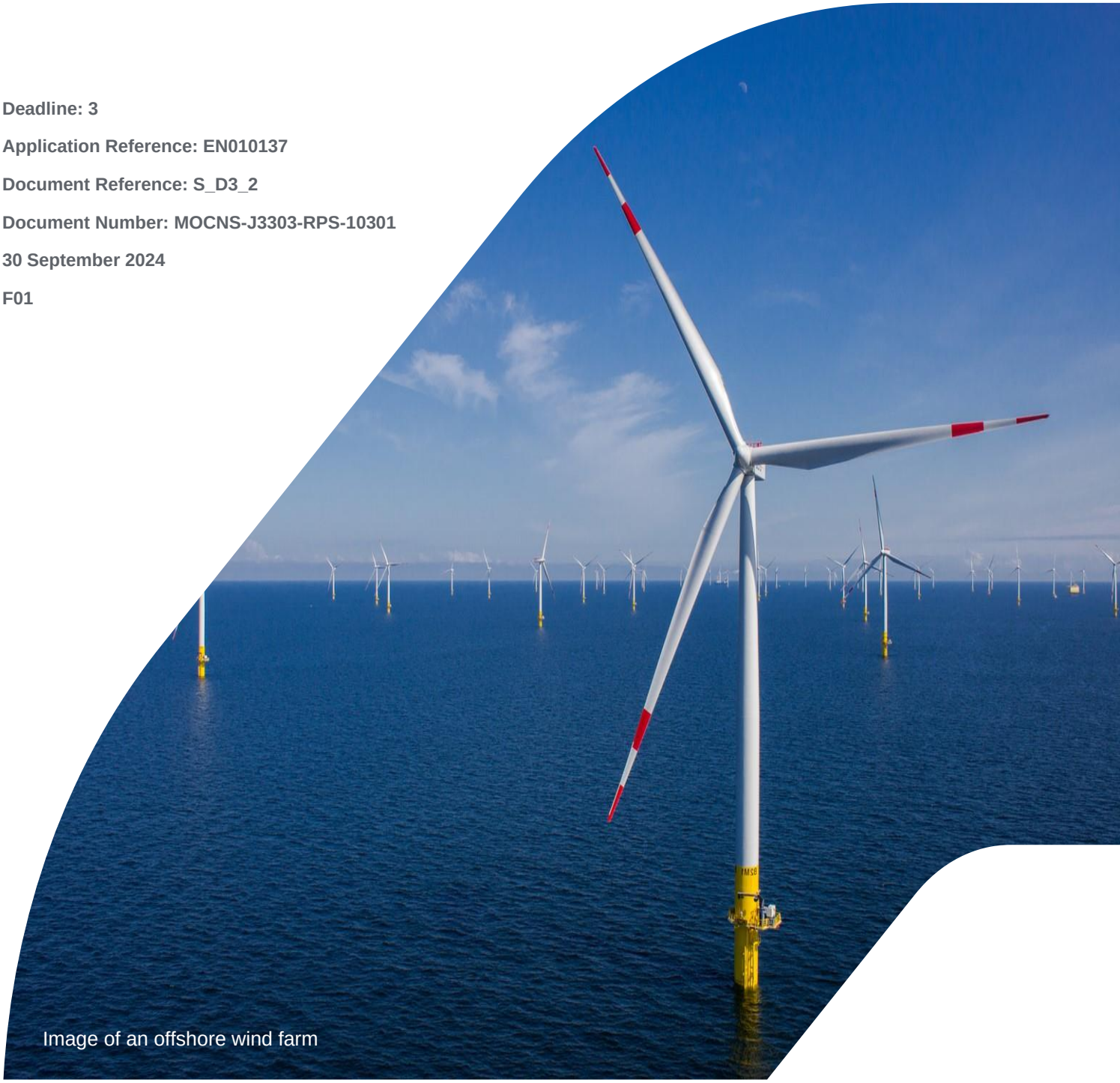

Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008.

Term	Meaning
	Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
HVAC	High Voltage Alternating Current
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
PDE	Project Design Envelope

Units

Unit	Description
GW	Gigawatt
km	Kilometres
km^2	Kilometres squared
kV	Kilovolt
MW	Megawatt

Unit	Description
nm	Nautical miles

1 Response to Cefn Meiriadog Community Council D2 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Cefn Meiriadog Community Council's deadline 2 submission below.

2 Responses to Cefn Meiriadog Community Council D2 Submission

Table 2.1: REP2-094 - Cefn Meiriadog Community Council

Reference	Written Submission Comment	Applicant's response
REP2-094.1	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).	The Applicant notes the response.
REP2-094.2	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.	The Applicant notes the response.
REP2-094.3	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".	The Applicant welcomed the VLIR and provided a response to the points raised at Deadline 2 (REP2-086). The Applicant has responded to the points REP1-049.7 to REP1-049.14 raised in the CCBC and DCC LIR regarding the LVIA methodology (REP2-085). The Applicant notes that the methodology for the LVIA is informed by GLVIA (Landscape Institute, 2011) and is presented in Volume 7, Annex 6.4: Landscape, Seascape and Visual Impact Assessment Methodology (APP-156). The Applicant maintains that landscape and visual assessment is robust.
REP2-094.4	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	

Reference	Written Submission Comment	Applicant's response
	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.	
REP2-094.5	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".	
REP2-094.6	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	The Applicant notes that the study area used to assess cumulative effects is specific to the topic chapter and is informed by the distance over which impacts are expected to occur. The reference to paragraph 3.5.2 of the CCBC/DCC LIR in REP2-094.6 relates to comments on the cumulative effects assessment for traffic and transport made in the CCBC and DCC LIR. The Applicant's response to this comment is provided in REP1.049.064 (REP2-085) and notes that the traffic and transport study area encapsulates the part of the highway network where potential impacts are most likely to occur (i.e. routes where construction traffic would not yet have dispersed across the highway network). The Applicant notes that local landscape and visual cumulative effects are considered within 10km from the outer edges of the Mona Onshore Substation platform (see paragraphs 6.13.1.8 and 6.13.1.9 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069) and takes into account the height, extent and scale of the cumulative development.

Reference	Written Submission Comment	Applicant's response
	topography, on some days the road noise of the A55 can be audible from significantly greater distances than 1 km."	
REP2-094.7	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 VLIA. 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.	The Applicant confirms that up to 12 lightning masts measuring up to 30m high were included within the maximum design scenario used to assess the landscape and visual impacts of the Mona Offshore Wind Project (see Table 6.19 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069)). An indicative design of the lightning masts was added to the landscape visualisations of the onshore substation submitted at Deadline 2 (REP2-084). The Applicant noted in its response at Deadline 2 that the need for, number and location of the lightning masts will be determined during detailed design. The Applicant also confirmed that the visualisations (REP2-084) did not change the assessment of the significance of landscape effects presented in Volume 3, Chapter 6: Landscape and Visual Resources (APP-069) as the assessment of significance took account of all of the proposed onshore substation structures as a whole.
REP2-094.8	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	The Applicant notes CMCC's concerns regarding impacts to the community, particularly those relating to cumulative visual impacts. It has taken steps during the design process to group the Mona Onshore Substation buildings with existing electrical infrastructure and the St Asaph Business Park, taking into account constraints, to minimise the overall cumulative effects on the landscape. The Mona Onshore Substation is located within a treed landscape and the design has aimed to retain existing trees where possible. The landscape design includes tree and hedgerow planting that will increase the overall number of trees and improve connectivity of habitats, The Applicant considers that the existing screening and the mitigation planting proposed as part of the Mona Offshore Wind Project will limit the extent of the cumulative effects. To demonstrate the limited extent of the cumulative impacts, the Applicant has prepared updated visualisations from representative viewpoints to include the Awel y Mor Onshore Substation and the National Grid substation extension (S_D3_16.1 and S_D3.16.2 Landscape and Visual Resources – Cumulative Visualisations Part 1 & 2). These cumulative projects were considered in the assessment of cumulative impacts within Volume 3, Chapter 6: Landscape and Visual (APP-069).

Reference	Written Submission Comment	Applicant's response
	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.	The Applicant notes that the LVIA has considered different types of cumulative visual impact (see paragraph 6.13.3.10 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069). In addition to views from representative viewpoints, the assessment also considers sequential views as observers travel along minor roads. This ensures that dynamic as well as static impacts from the onshore substation have been assessed. For example, the assessment of people travelling along public rights of way and local roads (paragraphs 6.11.1.22 to 6.11.1.33 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069).
REP2-094.9	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.	The Applicant has also prepared an update to the cumulative effects screening matrix (APP-084) to capture new cumulative developments or new substantial information that has been submitted data into the public domain since the submission of the DCO application for the Mona Offshore Wind Project. The updated screening matrix (which forms part of the Review of Cumulative Effects Assessment (S_D3_18)) includes IGP Solar's Battery Storage Facility. However, the Applicant notes that no information on the proposal is available in the public domain and it is not possible to consider the potential cumulative effects in the absence of this information. The other developments include applications for an apartment building and the creation of the nature reserve and wetland area. The NGET application for the extension of the Bodelwyddan substation had not been submitted at the time of writing. The updated visualisations and cumulative screening matrix are included in the Applicant's submissions at Deadline 3 (S_D3_16.1, S_D3.16.2 and F5_5.1 F02). The Applicant notes that the landscape mitigation measures proposed for the Mona Onshore Substation (as presented Figure 6.5 and described in section 6.8 of Volume 3, Chapter 6: Landscape and Visual Resources (APP-069), the Outline LEMP (REP2-034) and the Design Principles (REP2-026) will mitigate against significant cumulative effects with other projects thereby resulting in limited change to the receiving landscape such that energy infrastructure would not become a defining characteristic. The Applicant has given consideration to the Welsh Government's policies related to the well-being of communities (see the Planning Statement (APP-186). The Application refers to PPW11, however in its submission at the Procedural Deadline (PDA-036) the Applicant confirms that changes in PPW12 are broadly limited to Chapter 6 and these updates had been taken into account in the application. The Applicant has responded to the Design Commission for Wales's point regarding strategic coordination (ref RR.014.15 in PDA-008). The Applicant notes
REP2-094.10	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	

Reference	Written Submission Comment	Applicant's response
	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.	that it has engaged with DCC during the application process to discuss an integrated landscape approach to mitigation. The Applicant has followed a structured site selection process for the location of the Onshore Substation (Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-016). The Applicant explained the process in its response REP1.046.8 in REP2-086.
REP2-094.11	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".	The Applicant notes the response.