Planning Inspectorate Examination EN010137: Mona Offshore Wind

Cefn Meiriadog Community Council MNOW-ISP002

Deadline 4, 4 November 2024

Response of the Community Council to Issue Specific Hearing 3 (ISH3) Environmental Matters (16 October 2024):

- (1) Oral submissions put at ISH3
- (2) Hearing Action Points

(1) Oral submissions put at ISH3

- 1.1 Cefn Meiriadog Community Council (CMCC/'The Council') has previously expressed concern about the proposed inclusion in the design of the onshore substation of twelve 30-metre high lightning conductor masts, an element of the design that was excluded from the Applicant's Landscape Visual Impact Assessment (LVIA). The Council contends that such a grid of twelve masts would of necessity be one of the dominating visual features of substation's presence in the landscape, especially when experienced by those living in, working in, passing through or engaging in recreational activities in the vicinity of the site. However, while it was included in a revised LVIA, this found it made no difference to the landscape/visual impact assessment as compared with the original assessment. This conclusion CMCC finds to be counterintuitive and to defy common sense.
- 1.2 It has been noted that none of the four existing and consented large-scale substations located within Cefn Meiriadog has a grid of lightning masts of this nature.
- 1.3 The Council noted with particular interest therefore that, having alluded to the matter in similar terms to those present at the Accompanied Site Inspections the previous day, at the Hearing the Applicant's representative stated that this was only one of several possible solutions that would be considered for the final design. It was suggested that the proposal for a grid of twelve masts was the product of the 'worst-case scenario' philosophy informing the substation's initial design.
- 1.4 CMCC requests, therefore, that on the basis of the other four

substations not having needed to adopt this solution, the Applicant be required to exclude it from the substation's design.

- 1.5 The issue of working hours was discussed at ISH3 and the Applicant's request for 7am-7pm working day was restated. It is noted that this excludes an hour for mobilisation either side of the starting and finishing times, in effect making for a 6am to 8pm exposure to construction-related noise and activity for residents.
- 1.6 While the Applicant contends that 7am-7pm working is preferred by residents, and that anything less would impede their adherence to their preferred timetable, the Council has previously called for 8am-6pm working (therefore 7am-7pm including mobilisation), this being backed unanimously by an (albeit rudimentary) poll conducted on social media.
- 1.7 It was pointed out that a precedent has been set by Awel y Môr's working hours having been consented at 7am-7pm. In CMCC's view, however, this is all the more reason for Mona's working hours to be set at 8am-6pm, in order to offset the impacts of the two projects being undertaken concurrently, and the certainty that the National Grid extension construction must also run concurrently with these, since the extension is required to accommodate the additional energy generated by the Mona project.
- 1.8 CMCC requests, therefore, that for the well-being of residents, working hours be set at 8am-6pm (8am-1pm Saturdays).

(2) Hearing Action Points

- 2.1 Response to Action 15: 'With reference to NPS EN-1 para 4.3.19, is it possible that even if considered acceptable in their own right with mitigation measures in place, the various effects arising as a result of the onshore substation could add up to have a significant effect on the community or the environment either as a result of the project alone or cumulatively with other proposed developments?' ['4.3.19 The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.']
- 2.2 In its previous submissions, CMCC has stated at length and in detail the significant effects on the community and the environment which this

project will of necessity have. Its point is that locating a 65,000 sq. m. substation in a rural agricultural landscape of settled character, with the community it is home to taking its identity from that character and landscape, cannot but have a major detrimental impact on the landscape, the community, and the individual residents making up that community. This applies to both construction and operational phases, and there is little that any proposed mitigation can do to offset the sheer scale of the effect the project will have on residents' lives and the community's future.

- 2.3 Given that if consented this would be the fifth very large-scale infrastructure project, all of which are substations, in a community of 5 square miles and 359 people, the conclusion is inescapable that the effects of the project will amplify and be amplified by the visual and other impacts of the other four projects in such a small area. It is particularly to be noted that, as referred to above (1.7), the construction phase must, if consent is given, run concurrently with the construction phases of the already-consented Awel y Môr substation, and the doubling in size of the existing National Grid substation which will be required if the Mona project is indeed consented.
- 2.4 On the basis of the above, the Council restates its contention that the siting of the Mona onshore substation in the location proposed is wholly inappropriate both in itself and in relation to the other projects whose cumulative effects it will be a part of, and that the scale of its impact is such that it cannot be effectively mitigated.

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