MR & KM Hussey

[redacted]

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

PINS Reference EN010137 Mona Offshore Wind Farm
Interested Party numbers MNOW-S57019 & MNOW-S57018

Deadline 5 Response 3rd December 2024

1.0 **Introduction**

1.1 General

Whilst we continue to support and understand the drive for low carbon renewable energy solutions, this should not be at any cost to communities and individuals, nor should the tag of a development having renewable energy be an automatic flag for fast tracked.
This examination process has thrown up an apparent large number of discrepancies, errata and late change submissions, may be a result of this faster process but there appears to be many unresolved issues for a number of parties, which, with the time left available, including through Christmas and New Year leaving little or no opportunity to properly scrutinise, particularly when documentations are published just ahead of deadlines with no email notifications to interested parties nor highlighted on the website front page with latest update.

1.2 Issues

Regrettably we are one of those parties that still have issues significantly affecting us that we set out in more detail, Sections 3 to 5.

2.0 Summary

The likely predicted impacts from this development, should it be granted DCO approval are and will have devastating consequences for us personally. As we have previously stated we understand that the examination will be judged on the wider community benefit but there can be little doubt, if any, that the impacts from this development will cause significant detrimental effects, through no fault of our own, to quality of life and well-being for residents like ourselves who happen to live in close proximity to the proposed onshore substation site. We are finding it difficult to summarise in just a few words but the principal impacts are associated with Noise and Visual where, each in its own terms are Substantial. Further detail/reasoning listed below which hopefully explains our concerns adequately.

3.0 Noise

3.1 Assessment

At the start of the process, in the applicants Scoping Report Environmental Impact Assessment EN010137 – 000011 table 8.11 a statement was made that:-

- Noise impacts will be assessed in accordance with BS5228-1:2009+A1 2014
- The significance of likely effects will be determined in accordance with IEMA Guidelines for Environmental Noise Impact 2014.
- DMRB LA111 will be used as a basis for traffic noise.

The applicant has subsequently changed its approach, as referenced in REP4 – 021 Outline Construction Noise and Vibration Plan, now opting for the significance of likely effects and specifications from DMRB LA111 along with Annex E from BS5228-1:2009+A1 2014.

This change in approach is despite:-

- BS5228-1:2009+A1 2014 clearly stating in how to use the document that it takes the form of guidance and recommendations. It should not be quoted as if it were a specification and particular care should be taken to ensure that claims of compliance are not misleading
- DMRB LA111 states in its introduction and background that it is applicable to the construction, operation and maintenance of highway projects. Environmental assessment provides a framework for assessing and managing noise and vibration effects associated with construction, improvement, use and maintenance of motorways and all-purpose trunk roads.

In APP-072 section 9.6.2.9 the applicant specifically refers to DMRB LA111 for significance of effect for transient construction, with all the underground cabling works classified as such. These are not what we would call highways, motorways or trunk roads and so the change to using DMRB LA111 appears highly questionable.

The reference to Annex E of BS5228-1:2009+A1 2014 used by the applicant giving examples that might be useful also stresses that *'A pragmatic approach needs to be taken when assessing the noise effects of any construction project'*

- The adoption by the applicant of LOAEL, SOAEL for assessing the significance of noise impacts is not a pragmatic approach for a quiet rural area (one size does not fit all)
- The use and enjoyment of outside space and individual curtilage is a vital element for residents like ourselves and applying LOAEL, SOAEL, to which the applicant informed us [18th November 24] assesses how external noise might impact inside the property would therefore be inappropriate.

***Point requiring clarification:-**

Do the modelled predicted noise impacts for receptors refer to the impacts outside (i.e. the curtilage) or inside the properties?

World Health Organisation (WHO) Guidelines for Community Noise states that

To protect the majority of people from being seriously annoyed during the day time, the sound on balconies, terraces and outdoor living areas should not exceed 55dB for a steady continuous noise.

To protect the majority of people from being moderately annoyed during the day time should not exceed 50dB.

See further comment on page 4 re WHO guidelines and applicants advice regarding use

The applicant recognises [APP-179 section 1.2.7.3] that 'There are no set standards for the definition of the significance of construction noise effects' but as we have pointed out in earlier submissions.

The Overarching National Policy NPS-EN-1 2023 section 5.12.6 says that the Assessment should include:

•A prediction of how the noise environment will change with the proposed development in the shorter term, such as during the construction period.
•An assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life/well-being where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas.

To this we say that the applicant's construction period at and around the onshore substation site of approximately 4 years is not what we consider not short term, noting the statement in BS5228-1:2009+A1 2014 section 6.3 c) that the longer the duration of the activities the more likely it is that noise will prove to be an issue.

Being in our [redacted] living in a quiet rural area and retired we are highly sensitive to Noise impacts, additionally we maintain that:-
'Predicted' change is not whether an internal threshold is reached but the change in ambient noise that will result, this point is further supported by:-

BS5228-1:2009+A1 2014 section 6.3 b) stating that for some large infrastructure projects that require an environmental statement to be prepared, construction noise is sometimes assessed by comparing the predicted construction noise plus ambient noise with the pre construction noise.

IEMA guidelines for Environmental Noise Impact Assessment 2014 to which the applicant stated originally would be used to determine the significance of likely effects indicates that The judgement that is required is whether or not the change in level B (after) minus A (before), the noise impact causes a noise effect.

Matrix used for Significance of effect as referenced in APP-072 appears to be selective and advantageous towards the applicant. This same matrix has been used for Visual impact assessment.

Sensitivity of Receptor	Magnitude				
	No Change	***Negligible***	***Small***	***Medium***	***Large***
Negligible	No Change	Negligible	Negligible or Minor	Negligible or Minor	Negligible or Minor
Low	No Change	Negligible or Minor	Negligible or Minor	Minor	Minor or Moderate
Medium	No Change	Negligible or Minor	Minor	Moderate	Moderate or Major
High	No Change	Negligible or Minor	Minor or Moderate	Moderate or Major	Major
Very High	No Change	Minor	Moderate or Major	Major	Major

As per comments by Natural Resources Wales (NRW)at recent hearings the use of the No Change column is unbalanced as restricts the number of Significant outcomes and although NRW comments were related to visual impacts the same comments must surely apply here. Other Nationally Significant Infrastructure projects show examples of matrices used that do not include the No Change column.

So in summary for Noise Assessment :

- •A pragmatic approach has not been carried out
- •The use of LOAEL, SOAEL guidance for internal impacts is not fitting for a rural area where outside space and use is important.
- **##** •The applicant has advised us that World Health Organisation noise guidelines for outside space and internal limits are not applicable as these refer to roads and not construction, however using that same criteria, then neither is DMRB LA111 so dependent upon the point for **clarity earlier, it appears that no assessment may have been made for noise impacts on outside space.
- •Worst case scenarios have not been demonstrated and the significance of effect matrix used appears advantageous to the applicant meaning that the significance of noise impacts have been chosen to reflect best option outcomes for the applicant.

3.2 Predicted Impacts

We acknowledge and thank the applicants response to our Deadline 3 [REP3-110] submissions, the publication along with a hard copy of Construction Noise and Vibration Clarification Note [REP4-045] and the recent meeting [18th November 2024] held to discuss the re-modelling and assumptions, however we remain concerned about the significant predicted noise impacts for those close proximity residents to the onshore substation and associated cabling connection works .

There are a lot of references to non-obligatory words in REP4-021 Outline Construction Noise and Vibration plan, words like, 'may be', 'where practical', 'where feasible', 'where reasonably practical', 'where appropriate' and 'as quickly as reasonably possible'. This provides no real obligatory undertaking and therefore allows a lot of leeway for the benefit of the applicant and the potential detriment to receptors.

3.2.1 Distances Used in Modelling

There is a minor error in the distances presented in tables [REP4-045], Appendix 1, for Tyddyn Meredydd in relation to distance from Temporary Construction Compounds and Substation car park and access where each is stated as 400414mts, although we do believe the figure of 400mts has been used in the modelling.

Additionally we are confused by the distance stated and used in the modelling in relation to the Substation construction activities for our property.

- •REP4-045 lists 200mts as being used in the modelling.
- •APP-069 Landscape and Visual section 6.5.7.6 lists the distance as 184mts
- •During the site visit undertaken in October the corners of the substation platform were staked out, the stake at the South West corner is 177mts to our property. We understood from the site visit that these stakes represented the physical edge of the substation platform, therefore it would seem reasonable to assume that plant and equipment would need to operate outside the edges of the platform and so in reality be even closer.

3.2.2 Modelling

No predictions have been presented for the potential impacts during mobilisation hours. With proposed times of 1hour pre and post core construction hours this will mean that the mobilisation period at start of day will be during the highly sensitive night period and the mobilisation period at end of day will be in the evening period. The modelling has predicted that the impact at Tyddyn Meredydd for car parking and access to be 43dB during the period 7am to 7pm, so given that mobilisation hours includes these same activities are we correct to assume similar 43dB impact for mobilisation? It is worth noting that these predicted figures are only an average as the modelling cannot predict high and lows so impacts on sleep interruption could be even more severe.

Also worth pointing out is that IEMA Guidelines for Environmental Noise Impact 2014 section 2.4.2 refers to a field study related to aircraft noise (so not continuous) which found that noise induced awakening to be approximately 35dB.

It is therefore difficult to comprehend that the mobilisation hours will not have a significant impact with interruptions to sleep each morning for periods of 6 days a week over an approximately 4 year period, there can be no other conclusion other than that this will be highly significant and an effect on the health and wellbeing for any nearby residential receptor to the onshore substation site.

The applicant has included the predicted noise levels for Joint bays directly behind our property and the use of pumps to dewater excavations. For this particular activity it predicts a Medium impact but then reclassifies as Low due to the activity being unlikely behind our property since it is more likely to involve Trenchless construction.
The use of Trenchless can involve periods of 24hour workings but the applicant has assumed this will not be the case in relation to our property.

Neither of these approaches demonstrates worst case scenarios.

Apart from the pumps for joint bays to which the applicant has downgraded due to it being unlikely. Periods of 24 hour workings are highly likely at the substation site, including concrete pours, generators, pumps, site security etc. . Yet no 24hour construction activities have been modelled for ourselves or nearby properties to the substation and again demonstrates a lack of worst case scenario assessment.

The applicant has applied a blanket catch all assumption that resident's sensitivity is Medium but being in our [redacted] retired, at home most of the day and in a quiet rural peaceful area our sensitivity is High.
There appear to be some anomalies with the data [REP4-045 Appendices] which we would welcome clarification:

- For the establishment of Access and Temporary Construction Compounds
  Cae Llwyd has predicted noise levels of 41dB day and evenings
  Tyddyn Meredydd has predicted levels of 37dB day and evenings
  This is despite Tyddyn Meredydd reported as being 170mts closer to the activity

•The LOAEL for Tyddyn Meredydd is quoted as 42dB Evenings and weekends for several of the construction activities but is quoted as 39dB Evenings and weekends for Transition joint bays-use of dewatering pumps and Trenchless techniques compound. Clarification of why difference would be appreciated.

The construction activities for cable corridor works are classed as transient with the impacts for a particular activity part modelled and part calculated by another method. This methodology to a lay person appears strange, and has identified a few concerns for us.

•For each of the transient works calculated [refer to REP4-045 section 1.2.1.3 for method] we are in the High impact category.
•The applicant acknowledged at our recent meeting that these activities will be extremely loud and intrusive for us.
•It therefore does not seem unreasonable to ask as to what actual level of noise for these high impact category activities we can expect?
•Top soil strip and creation of soil bunds up against the red line boundary , 3.6mt away from our property boundary is one of these calculated activities and is an important element of the modelling as it has been assumed that a 10mt wide 2.5mt tall top soil barrier will act as an earth bund.

One has to question where this amount of top soil is coming from since at best, it is only the top 8 to 10inches that are actually likely to be top soil and so creating top soil bunds of this size on each side of the cable corridor would appear challenging.

The applicant has explained that communication would be made with affected residents like ourselves to let us know when noisy activities will be taking place. What are we supposed to do? lock ourselves away? but this will at times be impossible due to works being undertaken at front (substation works) and rear (cabling works) of our property meaning we cannot avoid the noise within any area of our property, so is our only option to vacate our home? or perhaps the applicant will supply ear defenders?

3.2.3 Impacts

As per our previous comments, we disagree with the use of LOAEL, SOAEL to assess the significance of construction noise so below we include a more representative assessment based on some of the current predicted changes published by the applicant using IEMA Guidelines [*note we have used the higher figure for evening base level and excludes any concurrent or cumulative activity*]

Base Levels 43dB Daytime and 42dB evenings and weekends			
Activity	Overall Noise Level	Change	Impact
TJB and Joint bay excavation	51dB	+8dB day +9dB eve	Medium
TJB and Joint bay construction	54dB	+11dB day +12dB eve	High
Substation Ground works Substation Foundations Substation Fabrication	53dB	+10dB day +11dB eve	High

Of particular note is that for each of the Substation activities, even in isolation and without any other concurrent or cumulative activity, is that they are of High impact and that the activities will go on daily, 6 days a week for period of approximately 4 years. It is also worth reiterating that these are averages throughout the day and evening and so there will be likely extended , prolonged periods of very loud and intrusive impacts.

Although the applicant has stated that WHO guidelines refer to roads, it must surely be the case that sleep annoyance would be impacted by any noise source, whether that is a road or many years of construction activity so it is worth mentioning the WHO guidelines that state the critical effects of noise in a dwelling are sleep annoyance and that to avoid sleep disturbance are 30dB for a continuous noise and 45dB for a single event and that these should not be exceeded with bedroom windows open.

3.3 **Cumulative Impacts**

•To our previous deadline 1 submissions about the lack of cumulative noise impacts, the applicant has acknowledged that there will be concurrent works but that the cumulative noise level from concurrent construction activities is generally no greater than those that arise for individual works since one construction activity generally dominates the noise climate at a receptor.
•To our deadline 3 submissions the applicant again acknowledges that there will be concurrent works, particularly those associated with underground cabling and onshore substation construction, concluding that these are not expected to result in significant effects.

•The applicant also states that it has considered potential cumulative construction noise and vibration effects of the following projects:

Awel Y Mór Offshore Wind Farm
Major Development 46/3032/0159 (erection of commercial vehicle sales unit)
St Asaph Solar Farm
Major Development 31/2023/0525 (National Grid substation extension)

Whilst it is certainly true that some cumulative noise impacts have been undertaken, these appear quite selective and do not address the concurrent and cumulative impacts for close proximity residents to the onshore substation site.

- For impacts from Awel Y Mór , the cumulative impacts have been assessed for the substation construction for the property Caer Delyn, but no cumulative impacts for cabling works in and around the National Grid substation site for receptors near the National Grid substation and the applicants onshore substation site and cabling works.
- For impacts for St Asaph Solar, the cumulative impacts appear to be for the Operational phase and an assumption that during the construction phase it is unlikely that cumulative impacts will rise to significant.
- For National Grid, the cumulative impacts have been assessed for the operational phase for the property Plas Yr Esgob

This is not looking and considering worst case scenarios or indeed the likely scenarios for all receptors in close proximity to the applicant's onshore substation site and/or the connection point at the National Grid substation site.

It is almost certainly the case that concurrent and cumulative construction activities will take place in close proximity to each other, at similar times, impacting residents like ourselves, for e.g the likes of:-

- •Mona Onshore substation construction and National Grid substation extension construction.
- •Mona Onshore substation construction and underground cabling and National Grid substation extension construction.
- •Mona Onshore substation construction and underground cabling and National Grid substation extension construction and Awel y Mor underground cabling.
- •Mona Onshore substation construction and underground cabling and National Grid substation extension construction and Awel y Mor underground cabling and St Asaph Solar underground cabling.

Potentially there are many concurrent work activities associated with Mona and other large scale developments , occurring at the same time and in the same vicinity, that will impact receptors in and around the onshore substation site. For the applicant to refer to 'unlikely' significant significance is not demonstrating that realistic worst case scenarios have been fully addressed for receptors in close proximity to the onshore substation site.

4.0 **Visua**l

4.1 **Assessment**

We have consistently raised our concerns about the visual impact assessments for our particular property and the inadequacy of the visual representations and responses.

There are a number of issues that we would like to highlight.

The photographs taken from within our property boundary do not provide a true and accurate evaluation of the reality.

No representative images from our principal ground floor living space or the areas of our North Eastern curtilage offering more realistic views have been taken, instead 2 highly biased images have been presented.

Mitigation and Screening, the applicant insists that our views will be adequately screened by existing and planned mitigation.

It is very difficult to assess visual impacts based on images presented by the applicant using just a computer, this was highlighted by the site visit in October where the pegged out area of the substation platform appears closer to our property than the photomontage image taken from behind our property might suggest.

The applicant has now confirmed in its deadline 4 responses that the substation platform height towards the North West corner to be 6.13mts and later confirmed that this excludes the concrete foundations that will sit on top.
This means that the North West corner of the substation, which is the most prominent for our view, the building height above current ground levels will be approximately 22mts tall (note this excludes any lightning conductors that may or may not be built)

With building height of approximately 22mts then due to the topography of our property relative to the substation, the proposed mitigations will not screen us from clear and

obvious views of the substation from both our principal ground floor living space and our curtilage. This is highlighted by looking at Year 15 mitigation Annex 6.5 figure 4 photomontage for viewpoint 3 in REP1-015 where the tree coverage planted by the applicant is lower in height than the existing mature oak trees which are not of sufficient height to shield our view of the substation buildings.

At Issue Specific Hearing 3 the Council pointed out that viewpoints 2 and 3 remain significant at year 15 and so does not reduce the amount of harm to the extent where it becomes insignificant.
For anyone looking at viewpoint 6 [APP-157] can clearly see that this is also the case for the photomontage image of year 15 taken from behind our property.

The result is that we will have a permanent view of the substation, it will be clearly visible, our eyes will be drawn to it, a large contrast and a complete change in character.
It is also worth pointing out that site pre construction works will involve the removal of, or cut back of a number of existing trees and vegetation, and whilst this may be mitigated it will take many many years for it to mature, during which time we will be even more exposed.

It is incomprehensible to us on the applicant's insistence that our views will be adequately screened.

4.2 **Significance of effect**

We recognise that emphasis has been given to wider community and that private views are not a right, however that does not mean that they should be discredited or downplayed as they play an important role in individual's quality of life and wellbeing.

At the recent hearings as previously mentioned NRW raised concerns about the significance effects criteria matrix used, referring to the DTI guidance. Whilst this might refer to offshore wind, it does state that effects are significant if changes in views to residents, if a view out to sea for residents is considered significant then surely views to residents like ourselves who see large change (as highlighted above) then that must also be significant.

In its initial response to our questions [REP1 – 086.27]about sensitivity the applicant stated residents do not fall into the category of High, Medium or Low sensitivity receptors, although in response to our questions [REP3-110.30] the applicant indicated receptors within 1km of the cable route and substation as high sensitivity and which residents of properties would also be.

The applicant's choice of Matrix used for Significance of effect with its No Change column appears unbalanced and other Nationally Significant Projects do not appear to have used this particular matrix.

4.3 **Working during the Hours of Darkness**

In our REP 3 submission we highlighted the failure to respond to our email related to construction during the hours of darkness. The applicant responded that a reply had been sent, however for reasons unknown we didn't receive the response and so our question remains for clarification.

- Where can we find the assessments of the potential visual impacts of working during the hours of darkness?

This is asked in particular relation to residential receptors.

5.0 **Conclusion and Additional Impacts**

5.1 ***Noise***

We maintain our Magnitude to be adverse, Moderate to Substantive.
our Sensitivity to be High
and therefore our overall impact to be Substantial.

5.2 ***Visual***

We maintain our Magnitude to be adverse, Medium to High
our Sensitivity to be High
and therefore our overall impact to be Major (Significant)

Whilst we consider Noise and Visual impacts to have the most significant impact on us, there are other negative factors associated with this proposed/planned development that further add to the adverse impact on our quality of life, wellbeing and tranquillity.

5.3 ***Change In behaviour***

This development will be very disruptive with periods of very loud intrusive noise that will require us to keep doors and windows shut, restrict the use of our outside space and high likelihood of sleep pattern interruption. Being at home throughout most days, we will have little or no respite from 6am to 8pm 6 days a week for a period of approximately 4 years and this excludes periods of 24hour workings that will be necessary at the onshore substation site.

5.4 ***Privacy***

Our property is located within a rural aspect surrounded by open countryside. The construction activities behind, alongside and front of our property, combined with the likely plant and equipment movements below and behind our property (using access AC-Q1, AC-Q2) to and from temporary construction compounds to other works along the cable corridor will result in a significant loss of privacy and diminish our right to enjoy our home peacefully.

5.5 ***Open Space – Leisure and Play***

Whilst open space is not necessarily a given right, we do currently enjoy access over the lands earmarked for the onshore substation and simply adds another adverse impact to our quality of life and wellbeing.

5.6 ***Light Pollution***

Throughout the construction period there will be 24hour security lighting that will be visible from our property, also during the winter months when daylight hours are short, lighting from plant and equipment will be required for construction. The results of this will be a negative impact on our residential amenity.

5.7 ***Personal Health***

It must be undeniable that the impacts from this development, both during construction and operation phases will have a detrimental impact on our quality of life and wellbeing. Unfortunately, one of us suffers from [redacted] which the construction activities in particular are likely to aggravate.

5.8 ***Property Value***

There can be no doubt that the value of our property has been negatively affected and will remain negatively affected even after construction.

5.9 ***Cumulative Impacts***

Whilst this development is being assessed on what has been approved or has formally submitted planning applications, it is reasonable to presuppose that other large scale developments already in the pipeline will also impact residents in the vicinity of the onshore substation site. The likes of Mares, IGP solar, National Grid overhead line works between Bodelwyddan and Pentir for e.g and 2030 onwards, Scotland to North Wales interconnector, SSE renewables and Lightsource BP Solar Battery storage, all of which only adds to the foreboding for the community of Cefn Meiriadog.

5.10 ***Well-being of the people and community in Cefn Meiriadog***

- Planning Policy Wales 11' Chapter 2 paragraph 2.8 highlights that planning decisions must seek to promote sustainable development and support the well-being of people and communities across Wales.
- It goes on further to say that a presumption is made in favour of sustainable development and seeks to ensure social, economic and environmental issues are balanced and integrated.

Fine words, but words only, far from supporting the well-being of the people in Cefn Meiriadog, or from ensuring environmental issues are balanced and integrated, this development, due to its large scale and industrialisation of green and open countryside, combined with the necessary National Grid expansion plans, will adversely affect the well-being and destroy the rural community for ever.

These comments are not just aimed at the Mona offshore development application but National Grid PLC and the Welsh government who between them appear single-minded and obsessed in the total industrialisation of the rural community in Cefn Meiriadog who can honestly say that they have already accepted more than their fair share of energy schemes.

In simple terms, when is enough enough?
Where is the justness?