

Response to Mr and Mrs Hussey's D5 submission





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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
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.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
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.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition,



Tarres	Magning	
Term	Meaning licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).	
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 Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.	
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.	
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.	
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.	
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables will be located.	
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 Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.	
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.	
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	
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.	
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.	



Term	Meaning
Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR 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 infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
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.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
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. 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).



Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
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	
EWG	Expert Working Group	
HVAC	High Voltage Alternating Current	
IEF	Important Ecological Feature	
IEMA	Institute for Environmental Management and Assessment	
ISAA	Information to support the Appropriate Assessment	
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	
OSP	Offshore Substation Platform	
PDE	Project Design Envelope	
PEI	Preliminary Environmental Information	
PEIR	Preliminary Environmental Information Report	
POI	Point of Interconnection	
SAC	Special Area of Conservation	
SoCC	Statement of Community Consultation	
SPA	Special Protection Area	
TCE	The Crown Estate	
WTW	Wildlife Trust Wales	
TWT	The Wildlife Trusts	



Units

Unit	Description
GW	Gigawatt
km	Kilometres
km²	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles



1 Response to Mr and Mrs Hussey's D5 submission

1.1 Introduction

1.1.1.1 The Applicant has responded to Mr and Mrs Hussey's D5 submission below.



2 Response to Mr and Mrs Hussey's D5 submission

Table 2.1: REP5-125 – Mr and Mrs Hussey

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-125.1	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.	The Applicant notes the objection from Mr and Mrs Hussey but disputes that there are many unresolved issues. Statements of Common Ground with relevant statutory stakeholders have progressed well and this is reflected in the updated Statement of Commonality (REF) submitted at Deadline 6. The Applicant has made efforts to communicate directly with Mr and Mrs Hussey in relation to information provided during the Examination and what this means, and will continue those efforts. The
REP5-125.2	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.	Applicant has offered a meeting in early January to discuss Deadline 6 submissions.
REP5-125.3	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.	The Applicant has applied appropriate site selection, design and mitigation throughout the development of the Mona Offshore Wind Project but recognises that Mr and Mrs Hussey will still be impacted. The Applicant will continue its ongoing engagement outside the application and Examination process.
REP5-125.4	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:-	The Applicant disagrees that it has changed its approach to the assessment of construction noise and vibration impacts and effects from the Project, which is set out in ES Chapter 9 Noise and Vibration APP-072 and the update submitted at Deadline 5 (REP5-



Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	 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.	010). The approach set out in APP-072 and REP5-010 in relation to the assessment of construction noise is based upon nationally accepted industry guidance and has been applied to other consented Nationally Significant Infrastructure Projects. In addition, the assessment methodology applied by Applicant is a matter which is agreed with local authorities, as reported in Mona and Denbighshire County Council SoCG (REP5-053) and Mona and Conwy County Borough Council SoCG (REP5-054). The Applicant clarifies that the Outline Construction Noise and Vibration Management Plan (REP4-021), updated at Deadline 5 (REP5-040), serves a different purpose to that of APP-072 and REP5-010. The plan sets out the key measures which will be applied to manage noise and vibration during the construction of the works. The details of these measures will be developed further during the detailed design phase of the project and included in the final plan will be agreed with the relevant planning local authorities.
REP5-125.5	 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 	The Applicant confirms that the application of LOAEL and SOAEL is in line with the approach in Annex E of BS 5228-1 2009 and DMRB LA 111 to determine construction noise impacts, in accordance with the relevant industry standards and best practice approaches for assessing construction. The approach has been applied on similar consented projects such as Awel y Mor Offshore Wind Farm.





Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	[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?	The LOAEL and SOAEL impact levels refer to levels outside the property, 1m from its façade. The use of these external levels is then used to determine how health and quality of life on residents may change in accordance with the following set out in Table 1.3 in ES Volume 2 Annex 9.2 Construction Noise and Vibration Technical Report (REP5-016): "Lowest Observed Adverse Effect Level Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life. Significant Observed Adverse Effect Level The noise causes a material change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area."
REP5-125.6	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.	The Applicant acknowledges that noise levels in the garden of the property will be raised during periods of construction works. However, the application of the WHO guideline levels to external amenity areas such as gardens relate to continuous long term anonymous



Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	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	noise sources, such as transportation, and not construction noise. However, during the detailed design phase, the Applicant will prepare the final Construction Noise and Vibration Management Plan that will be approved by the relevant planning authority. The Management Plan will define the noise and vibration control measures that will be implemented to minimise construction noise impacts from its works. These measures will reduce construction noise levels experienced in the external garden areas.
REP5-125.7	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 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.	The Applicant refers to its response at Deadline 4 (REP3-110.16) in which it is stated that the methodology used does consider change in noise environment when assessing impacts. The methodology applied by the Applicant aligns with BS 5228-1:2009+A1 2014 Annex E.3 – Potential significance based on noise change. This approach has been applied on projects of similar long term duration, such as Awel y Mor Offshore Wind Farm.





Planning Inspectorate Ref. No.	Submission comment					Applicant's response		
	originally would	be used to dete s whether or no	ermine the signi	ificance of likely	effects indicate	the applicant states that The judger e), the noise impa	ment	
REP5-125.8	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.						The Applicant notes that the significance matrix is based on Design Manual for Roads and Bridges (DMRB) methodology and has been applied across other environmental topics within the Environmental	
	Sensitivity of		_	Magnitude	_			Statement.
	Receptor	No Change	Negligible	Small	Medium	Large		
	Negligible	No Change	Negligible	Negligible or Minor	Negligible or Minor	Negligible or Minor		The Applicant refers to its responses to REP5-125.4
	Low	No Change	Negligible or Minor	Negligible or Minor	Minor	Minor or Moderate		above, in which it confirms the approach adopted in in relation to the assessment of construction noise is a
	Medium	No Change	Negligible or Minor	Minor	Moderate	Moderate or Major		matter which is agreed with local authorities, as reported in Mona and Denbighshire County Council
	High	No Change	Negligible or Minor	Minor or Moderate	Moderate or Major	Major		SoCG (REP5-053) and Mona and Conwy County Borough Council SoCG (REP5-054).
	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.							
REP5-125.9	So in summary for Noise Assessment :					The Applicant notes the issues raised and refers to the responses to REP5-125.4 – REP3-125.8 above.		
	A pragmatic approach has not been carried out					the responses to REP3-125.4 – REP3-125.8 above.		
		of LOAEL, SC space and use		for internal impa	acts is not fitting	g for a rural area v	vhere	





Planning Inspectorate Ref. No.	Submission comment	Applicant's response
	 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.	
REP5-125.10	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.	The Applicant confirms that it is not possible at this stage to define the detailed measures which will implemented during construction to minimise construction noise and vibration levels. These measures will be defined during detailed design phase and set out in the final Construction Noise and Vibration Management Plan to be agreed with the relevant local authorities. For this location it is expected that the following measures will be adopted, as set out in paragraph 1.3.2 Code of Construction Practice Controls for Tyddyn Meredydd (REP5-076), specific measures which will be applied at Tyddyn Meredydd: • Temporary noise barrier, or soil bunds of the equivalent height, will be established prior to construction activities taking place • Plant will be re-positioned as far away from Tyddyn Meredydd as reasonably practicable • Plant maintenance operations will be undertaken as far away from Tyddyn Meredydd as practicable, to maximise the benefit from permitter structures, such a soil bunds or fencing
		Activities will be designed to be undertaken with any directional noise emissions pointing away from Tyddyn Meredydd where practicable





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		Residents will be informed of construction activities, including construction hours, via the Community Liaison Officer.
REP5-125.11	 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. 	The Applicant notes the points raised regarding the distances used in the modelling. The distance of approximately 400m to the temporary construction compounds and substation car park is correct. The Applicant acknowledges the varying distances presented in relation to the Onshore Substation. However, as noted in Table 1-1 of Construction Noise and Vibration Clarification Note (REP4-045), the distances to each construction activity are presented as an approximation. The Applicant also notes that the start and end points of the each of the distance quoted are likely to be different and would therefore account for variances identified.
REP5-125.12	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	The Applicant confirms that the construction noise predictions for the day time period presented in REP4-045 do not apply to the mobilisation period, The Applicant confirms that the works during mobilisation hours will be restricted to the following activities, which are set out in Requirement 14(2) of the draft DCO submitted at Deadline 5 (REP5-006): 'include personnel briefings, inspections, tool-box talks, inductions, health and safety works, deliveries excluding heavy goods vehicle movements, movement to place of work, general preparation and site maintenance work but does not include operation of heavy machinery or operation of generators or flood lights.'





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	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 confirms that a construction noise limit of 45 dB LAeq, 1hr will be applied to mobilisation activities undertaken during the start-up period of 0600 and 0700. A construction noise limit of 55 dB LAeq, 1hr will be applied to mobilisation activities undertaken during the hours of 1900 and 2000. These limits have been included within the Outline Construction Noise Management Plan submitted at Deadline 6 (J26.3 F05).
		The Applicant notes the reference to the aviation field study and awakenings. However, this study is specific to research carried out to identify the long term impact of aviation noise and is not relevant to construction noise.
REP5-125.13	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.	As noted in Table 1-1 of the Construction Noise and Vibration Clarification Note, the updated construction noise modelling included a joint bay behind Tyddyn Meredydd to reflect the worst case by presuming that joint bays will be situated close to residential dwellings along the Onshore Cable Corridor route. However, trenchless techniques works will be required to the rear of the property to facilitate the crossing of an
	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.	existing utility and therefore, in reality, a joint bay will not be present in the same location. The trenchless techniques work required in this location is considered as non-complex and unlikely to require 24 hour working. This updated assumption is described in Table 1-1 of REP4-045 and is also reflected in the Maximum Design Scenario presented in Table 9-22 of Chapter 9 Noise and Vibration submitted at Deadline 5 (REP5-010)
REP5-125.14	The applicant has applied a blanket catch all assumption that resident's sensitivity is Medium but being in our retired, at home most of the day and in a quiet rural peaceful area our sensitivity is High.	The Applicant refers to the response to REP1-086.23 at Deadline 2 (REP2-078). The response confirmed that the sensitivity of a receptor is defined based on the use (e.g. residential, commercial etc) and that the





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		location, setting, and existing acoustic environment of the receptor are accounted for in the derivation of the impact magnitude criteria from the baseline sound survey data.
		The Applicant refers to its responses to REP5-125.4, 5, 7 and 8 above, in which it confirms the approach adopted in in relation to the assessment of construction noise is a matter which is agreed with local authorities, as reported in Mona and Denbighshire County Council SoCG (REP5-053) and Mona and Conwy County Borough Council SoCG (REP5-054) and that its approach is in line with adopted best practice which has been approved on projects of a similar nature, such as Awel y Mor.
REP5-125.15	 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 Applicant confirms that the impacts reported in REP4-045 for the Access and Temporary Construction Compounds at Cae Llwyd and Tyddyn Meredydd are correct. The distances reported in Table 1-1 of REP4-045 for this activity are those to the nearest Temporary Construction Compound, as shown on Figure 1-4 in Construction Noise and Vibration Technical Note (REP5-016). However, construction plant is likely to be sited across the wider substation area during the compound set up activity. Therefore, the construction noise modelling has reflected this by placing construction plant across the wider substation area in order to predict the worst case construction impact. This approach has resulted in construction noise predictions reported at Cae Llwyd from this activity being greater than that at Tyddyn Meredydd, due to the more proximate construction activities. The Applicant confirms that the evening/weekend LOAEL criteria is 42 dB(A) for all activities and this is reflected in the updated tables presented in Annex 9.2



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		Construction Noise and Vibration Technical Note (REP5-016).
Reported REP5- 125.16	 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 	The Applicant acknowledges that Tyddyn Meredydd is likely to experience high impacts, equivalent to average daytime construction noise levels exceeding 65 dB(A) during short term transient works, preparation and removal of the haul road and trenching works. However, measures to minimise construction noise levels from such works will be defined during detailed design phase and will be set out in the final Construction Noise and Vibration Management Plan to be agreed with the relevant local authorities. This will include the design of earth bunds or barriers of equivalent height to minimise construction noise from activities along the Onshore Cable Corridor.
REP5-125.17	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?	The Applicant will continue its communications with local residents during the construction period to keep them informed of potentially noisy activities. Its measures will be implemented via the Communications Management Plan (REP2-046) and will implement best practicable means to minimise noise and vibration impacts via the Outline Construction Noise and Vibration Management Plan (REP5-040).
REP5-125.18	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	The Applicant refers to its responses to REP5-125.4, 5, 7 and 8 above, in which it confirms the approach adopted in in relation to the assessment of construction noise is a matter which is agreed with



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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	

local authorities, as reported in Mona and Denbighshire County Council SoCG (REP5-053) and Mona and Conwy County Borough Council SoCG (REP5-054) and that its approach is in line with adopted best practice which has been approved on projects of a similar nature, such as Awel y Mor.

Also, as noted in its response to REP5-125.6, the Applicant notes that the application of WHO Guidelines are applicable to continuous long term noise sources, such as those from transportation and not to construction noise.

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.

REP5-125.19

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

The Applicant has applied a proportionate approach to its cumulative construction noise assessment, focussing on the closest common residential receptors to the projects considered. By doing so, the Applicant considers that the worst case cumulative impact and effect of each project has been assessed and presented in its assessment findings presented in ES Chapter 9 Noise and Vibration (APP-072) and its update submitted at Deadline 5 (REP5-010).



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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 Mor 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 Mor, 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.

The Applicant refers to the most recent Statements of Common Ground with Denbighshire County Council and Conwy County Borough Council, which confirm that the methodology that the Applicant has applied to assess construction noise impacts, including cumulative impacts and effects is a matter which has been agreed. These agreements are reported in Mona and Denbighshire County Council SoCG (REP5-053) and Mona and Conwy County Borough Council SoCG (REP5-054).





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	 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.	
REP5-125.20	4.1 Assessment	Photography:
	We have consistently raised our concerns about the visual impact assessments for our particular property and the inadequacy of the visual representations and responses.	The Applicant considers that the photographs taken from the property presents an accurate representation
	There are a number of issues that we would like to highlight.	of the views from that location. In its response to point
	The photographs taken from within our property boundary do not provide a true and accurate evaluation of the reality.	REP3-110-22 (REP4-056)) the Applicant explained that it was not possible for the surveyor to enter the property during the landscape survey due to lone
	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.	working policies. However, whilst photographs were not taken from the ground floor living space, the Applicant notes that fieldwork was undertaken to
	Mitigation and Screening, the applicant insists that our views will be adequately screened by existing and planned mitigation.	establish potential views and the impacts on these views were noted in the assessment (presented in
	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.	Volume 3, Chapter 6: Landscape and Visual Resources (APP-069). Mitigation and Screening
	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.	The Applicant acknowledges that the full height of the Onshore Substation will not be screened in views from Tyddyn Meredydd. Rather, the combination of earthmodelling, woodland planting and the reinforcement and management of existing hedgerows to a taller height will provide screening of the lower structures
	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	within the Onshore Substation platform and soften the impact of the built structures within Mona Onshore Substation. As the planting matures, the impacts will



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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.

be reduced further and by Year 15 the Applicant considers that effect will not be significant.

Photomontages

The Photomontages have been produced in accordance with Visualisation Type 3 from the Landscape Institute (2019) Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals. The landform was modelled using high accuracy site topographic survey data as well as 1 metre resolution pointcloud surface data. The use of 1 metre resolution surface data increases the accuracy of the photomontages. Camera viewpoints are then aligned using hundreds of locators from the high-resolution data. An illustrative model was produced in the proposed location and site elevation. Outputs with the proposed scheme and the locators allow for a high level of confidence in the accuracy of the photomontage.

Landscape screening

The visualisations have been undertaken without any growth or change in management assumed in the existing vegetation and without any advanced planting. A simple change in management of the hedgerows either side of the minor roads would assist in screening views. This could happen in advance of any works being undertaken.

Representative viewpoint 6 is to the east of the substation on a minor road, adjacent to Ty'n-y-ffordd-fawr.

The visualisations do not include any trees that would be removed as part of the development of the Mona Onshore Substation.

The Applicant does not state that the proposals would be fully screened, rather, as the landscape proposals





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		become established, the effects would be mitigated and their significance would reduce.
REP5-125.21	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.	Significance of effect matrix The significance of effect matrix used in the SVIA and the LVIA is the same as that used in the other onshore chapters. It is based on the Design Manual for Roads and Bridges (DMRB). Significance of effects The Applicant clarifies that the assessment presented in Volume 3, Chapter 6: Landscape and Visual Resources (APP-069) does not state that there would be no significant effects. However, it is only private views from residential properties that would experience a degree of harm over and above substantial that are considered in the planning system. No properties have such an adverse effect. The views experienced by high sensitivity visual receptors using the public right of way that passes to the south and east of Tyddyn Meredydd (representative viewpoint 3) are the equivalent or more adverse (as they are more open and elevated) than those from this property. Walkers would experience significant adverse effects on the existing views in Year 1 and it the same would be expected at similar locations. At lower elevations less of the Onshore Substation would be seen, as the existing hedgerow/hedgebank assists in partly screening the substation site, particularly for those receptors close to the hedgerow/hedgebank.

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REP5-125.22	 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? 	The Applicant submitted a lighting clarification note at Deadline 4 (REP4-043) that describes how the assessment has considered potential visual impacts from construction task lighting.
REP5-125.23	This is asked in particular relation to residential receptors. 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.	The Applicant notes the comments and refers to its response provided above and in the Construction Noise and Vibration Note (REP4-045).
REP5-125.24	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	The Applicant's assessment conclusions are presented in Volume 3, Chapter 6: Landscape and Visual Resources (APP-069) and the closest representative viewpoints are VP2 and VP3.
REP5-125.25	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.	The Applicant will manage construction noise and vibration through the implementation of measures within the final Construction Noise and Vibration Management Plan that will be approved by the relevant planning authority. The final plan will be in accordance with the Outline Construction Noise and Vibration Management Plan (J26.3 F05).
REP5-125.26	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	The Applicant notes that localised acoustic screening, including earth bunds, will be provided along the Onshore Cable Corridor in the vicinity of the property.



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	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.	This acoustic screening will also provide visual screening of construction activities.
REP5-125.27	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.	The construction and operation of the onshore substation will not require the permanent diversion of any public rights of way and no areas of public open space will be affected (see Volume 3, Chapter 7: Land Use and Recreation (APP-070)).
REP5-125.28	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.	The Applicant has confirmed in its Lighting Clarification Note (REP4-043) that the majority of construction activity will be undertaken in natural light conditions wherever reasonably practicable. Task-related flood lighting may be required where there is insufficient light to continue safely and effectively or where night time working is required. The Applicant confirms that security lighting will be required at temporary construction compounds; the security lighting will be activated by motion sensors wherever reasonably practicable and will be designed in accordance with the Outline Artificial Light Emissions Plan (REP2-058).
REP5-125.29	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 which the construction activities in particular are likely to aggravate.	The Applicant has assessed potential impacts on human health in Volume 4, Chapter 4: Human Health (APP-078).
REP5-125.30	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.	In the event that there is a depreciation in the value of the property due to the physical factors caused by the use of the proposed development (which are defined as noise, vibration, smell, fumes, smoke, artificial light and discharge onto the land of any soil or liquid substance) Mr and Mrs Hussey would be entitled to claim under Part 1 of the Land Compensation Act 1973. This provides a channel for property owners who do not have land taken for the purpose of the



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		project to claim compensation for the diminution in property value as a result of the use of the Mona Offshore Wind project.
REP5-125.31	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.	The Applicant has assessed cumulative effects of other projects in the topic chapters of the Environmental Statement. In its response to REP4-096.5 at Deadline 5 the Applicant has confirmed it will explore opportunities with other developers in the area around the Onshore Substation to provide additional landscaping within Work No. 25 (identified on the Works Plan – Onshore (AS-003)).
REP5-125.32	 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? 	The Applicant notes the comments from Mr and Mrs Hussey and is not placed to comment on behalf of National Grid or Welsh Government. A review of the relevant policy and legislative context for the Mona Offshore Wind Project is contained within Chapter 2 of the Environmental Statement (APP-049) which provides a summary of the policy and legislative context for the Mona Offshore Wind Project, with reference to climate change and renewable energy legislation and policy; and the consenting process, including details of the Planning Act 2008 and associated planning policy.