Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to Martyn and Margaret Hussey D3 Submission

Deadline: 4

Application Reference: EN010137

Document Reference: S_D4_25

Document Number: MOCNS-J3303-RPS-10376

4 November 2024

F01

Image of an offshore wind farm

www.morganandmona.com/en

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D4	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	4 Nov 2024

Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

Contents

Tables

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, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).

Term	Meaning
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.
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.

Term	Meaning
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).
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

Unit	Description
km	Kilometres
km^2	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

1 Response to Martyn and Margaret Hussey D3 Submission

1.1 Introduction

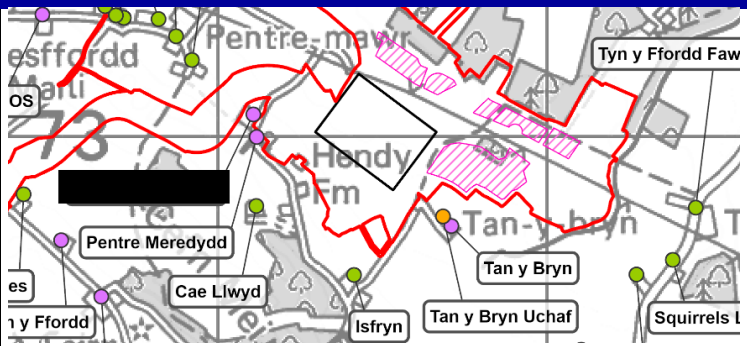
1.1.1.1 The Applicant has responded to Martyn and Margaret Hussey's Deadline 3 submission below.

2 Response To Martyn and Margaret Hussey D3 Submission

Table 2.1: REP3-110 - Martyn and Margaret Hussey

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
REP3-110.1	**Section 1.0 Noise** ***1.1 Base Line Noise*** • The applicant in responding to our representations has acknowledged increase in noise levels on the 19th September at [REDACTED], noting similar observations at other survey locations L9 to L19 stating that the necessary influences have been removed coinciding with prolonged periods of rain during this period.	The Applicant acknowledges the issue raised regarding the differences in wind speed observed by the residents of Tyddyn Meredydd during the 18th and 19th September 2023, and those measured by the Applicant at measurement location Maes Cefn (Survey location LT19) which are reported in Volume 7, Annex 9.1: Baseline Sound Survey (APP-178). The Applicant highlights that weather conditions do vary between locations, as observed from the data provided by the Interested Party at their own property and for the Met Office Rhyl weather station. However, the Applicant notes that its weather station was purposefully located at LT19 so that data on weather conditions which were likely to be experienced at noise sensitive receptors located along the inland section of the Onshore Cable Route was measured. The weather data collected by the Meteorological Office at Rhyl, which is located close to the coast, would not be representative of those experienced at these inland receptors. Further to the Applicant's response provided in REP1-086.7 [REP2-078], the Applicant can confirm that the noise levels recorded on the 18th and 19th September 2023 were not identified as the lowest representative noise levels which were used to inform the construction noise impact levels at Tyddyn Meredydd. The Applicant thus considers the approach it has taken to be appropriate and robust and the baseline sound levels reported and used to derive construction noise impacts to be suitably representative of the existing acoustic environment at Tyddyn Meredydd.
REP3-110.2	• However:- o The question we actually raised was related to the effects of wind and the fact that no high wind speeds were recorded by the applicant's weather station, whereas our own observations at the time and Meteorological Office data indicate gusty winds, not only on the 19th September but also the 18th September where similar increased noise levels are also recorded at site locations L9 to L19, therefore questioning the suitability of the weather station site used at the time or the accuracy in measuring wind conditions.	
REP3-110.3	o The use of any noise data from both the 18th September or 19th September remains dubious and leaves us still concerned about the over estimation of the base line noise levels presented.	
REP3-110.4	***1.2 Construction Noise*** • 2m Acoustic Sound barrier used in modelling predictions	The Applicant refers to the response to REP3-110.5.

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
	o The applicant now indicates that this is errata and the 3D modelling was updated to remove the barriers and that the construction noise impacts reflect this o However, the statement in APP-179 regarding acoustic barriers is quite unambiguous and doesn't appear to be a simple error, therefore confirmation by the applicant that all the noise impact figures presented exclude any acoustic barrier would be welcomed.	
REP3-110.5	• Noise level Predictions o In questioning actual distances used in the model for our property from each construction activity the applicant has referred us to the location of the temporary construction compounds in the vicinity of [REDACTED] as shown on drawing number 12079-0712-01 in ES Volume 7 Annex 9.2 (APP-179), whilst at the same time referring us to:- o Section 1.5.1.6 from APP-179 stating that Construction activities likely to be concentrated within one area have been modelled using 3D acoustic modelling software (SoundPLAN v8.2). The construction plant has been assumed to be situated within the temporary construction compounds and the sources have been modelled along the boundary closest to receptors to represent the maximum design scenario with an average height of 2 m above local ground level.	The Applicant acknowledges the points raised with regard to the information provided at Deadline 2 about noise level predictions at Tyddyn Meredydd [REP 1-086.12-19, REP2-078]. The Applicant has subsequently reviewed the construction noise modelling undertaken and reported in the ES [APP-072] and Annex 9.2 [APP-179]. This review has resulted in a change to some of the assumptions made in the original modelling and an updated assessment has been undertaken. These updated assumptions include adjustments to the potential location of construction activities associated with construction and installation of joint bays and trenchless techniques, which have now been modelled at locations along the Onshore Cable Corridor, including to the rear of Tyddyn Meredydd.
REP3-110.6	Below is part of the drawing number as referenced by applicant with temporary construction compounds indicated by pink cross hatched areas, the closest to [REDACTED] being top centre of this drawing by the wording Mawr	The Applicant notes that a joint bay is unlikely to be sited immediately to the rear of Tyddyn Meredydd. However, the updated assessment has included a joint bay sited within close proximity to Tyddyn Meredydd to represent a worst-case scenario.

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
	 It appears from this drawing combined with the responses made by the applicant at deadline 2 and the statements in APP-179 that in assessing the noise impacts on [REDACTED] the distance used in the modelling (which is a significant influencer) was from the nearest temporary construction compound to the boundary of our property.	The Applicant confirms that the updated modelling of joint bay construction works has assumed a realistic worst case scenario that joint bay construction works will not be undertaken at night for the purposes of the assessment, although the operation of pumps to dewater joint bay excavations are assumed to be operating 24 hours a day and this reflected in the updated assessment. Also, the updated modelling has assumed a realistic worst case scenario that no trenchless techniques works are planned to be undertaken at night for the purposes of the assessment, aside from those at landfall and in the vicinity of Gwyrch Wood. A 2.5m high earth bund along the Onshore Cable Corridor boundary has also been included within the onshore construction noise model. This is in accordance with the indicative onshore cable corridor cross-sectional layout in Appendix to Response to Hearing Action Point: Indicative onshore cable corridor crossing section and trenchless technique crossing long-section (S_D1_5.6) submitted at Deadline 1 [APP-010]. However, no other acoustic barriers have been modelled in the assessment. The Applicant refers to its response to REP1-086.8 (REP2-078) in which it was noted the 2.4m high barriers around temporary construction compounds referenced in paragraph 1.5.1.7 of ES Volume 7 Annex 9.2 (AP-072) were removed from the construction noise model. The updated assessment has been undertaken in accordance with the construction noise assessment methodology set out in Section 9.6 of Volume 3, Chapter 9 of the ES (APP-072) to determine impacts and effects which are likely to result from the revised construction noise predicted levels. The updated assessment is reported in the Construction Noise and Vibration Clarification Note (S_D4_14). and a summary of the findings reported for Tyddyn Meredydd are set out below:
REP3-110.7	o This would mean that distances used in the modelling for would be approximately 400mts which is significantly greater than:- o For e.g. o Substation construction would be <200mts o Trenchless (which the applicant indicates would be undertaken behind our property) to which they predict 39dB impact, equivalent to library conditions, where in reality the activity could actually be as close as 3.6mts from our boundary.	
REP3-110.8	o Again using trenchless as the e.g. o It is difficult to comprehend how using equipment such as Directional Drill, vibratory rig, pumps etc. in potentially such close proximity can only impact by such a relatively low noise level, actually lower than base line, suggesting that the ambient noise of the quiet area will dominate. Looking for a comparison from another Nationally Significant Project , in their noise modelling they predict a receptor 185mts away from cable installation as being impacted by 57dB.	

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
REP3-110.9	o Using this methodology of distance from temporary construction compounds for modelling would significantly under estimate the true likely impacts on ourselves, bearing in mind that where the distance from the noise is halved then an increase of 6dB is likely so that it is much more likely that our true impacts will exceed threshold values consistently throughout the many years of construction.	<u>Establish Temporary Construction Compounds and Site Access Roads</u>: • Closest point of activity in construction noise model to property: 400m • Daytime construction noise level (7am-7pm): 37 dB(A) • Daytime construction noise impact: Negligible • Evening weekend construction noise level (Saturday 1pm – 7pm): 37 dB(A) • Evening/weekend construction noise impact: Negligible <u>Joint Bay Excavation</u>: • Closest point of activity in construction noise model to property: 28m • Daytime construction noise level (7am-7pm): 51dB(A) • Daytime construction noise impact: Low • Evening weekend construction noise level (Saturday 1pm – 7pm): 51dB(A) • Evening/weekend construction noise impact: Low • Nighttime construction noise level (water pump only): 45 dB(A) • Nighttime construction noise impact: Medium <u>Joint Bay Base construction</u> • Closest point of activity in construction noise model to property: 28m • Daytime construction noise level (7am-7pm): 54 dB(A) • Daytime construction noise impact: Low • Evening weekend construction noise level (Saturday 1pm – 7pm): 54 dB(A) • Evening/weekend construction noise impact: Low • Nighttime works (water pump only): 45 dB(A) • Nighttime construction noise impact: Medium
REP3-110.10	o It is little wonder therefore that predicted noise levels presented by the applicant appear so low and simply cannot be representative, accurate or a true prediction of construction noise impacts for [REDACTED] , or other receptors close to the substation site	
REP3-110.11	o The applicant often refers to temporary construction works, but due to our unique position and that we will be affected by construction activities for around 4 years (including site preparation works) then for us it is not temporary by definition. The conventional acceptance is that temporary is 3-12months although the UK government in referencing temporary work space stipulates 24months max.	

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
		Joint Bay Jointing of cables: • Closest point of activity in construction noise model to property: 28m • Daytime construction noise level (7am-7pm): 52 dB(A) • Daytime construction noise impact: Low • Evening weekend construction noise level (Saturday 1pm – 7pm) 52 dB(A) • Evening/weekend construction noise impact: Low • Nighttime works (water pump only): 45 dB(A) • Nighttime construction noise impact: Medium Joint Bay roof and backfill: • Closest point of activity in construction noise model to property: 28m • Daytime construction noise level (7am-7pm): 51 dB(A) • Daytime construction noise impact: Low • Evening weekend construction noise level (Saturday 1pm – 7pm): 51 dB(A) • Evening/weekend construction noise impact: Low • Nighttime works (water pump only): 45 dB(A) • Nighttime construction noise impact: Medium Trenchless Techniques: • Closest point of activity in construction noise model to property: 45m • Daytime construction noise level (7am-7pm): 49 dB(A) • Daytime construction noise impact: Low • Evening weekend construction noise level (Saturday 1pm – 7pm): 49 dB(A)

<table>
<tr><th>Planning Inspectorate Ref. No.</th><th>Martyn and Margaret Hussey representation</th><th>Applicant's response</th></tr>
<tr><td></td><td></td><td>• Evening/weekend construction noise impact: Low</td></tr>
<tr><td>REP3-110.12</td><td>1.3 Cumulative Impacts
In response to our question about concurrent activities, the applicant acknowledges there will be concurrent activities but that one construction activity generally dominates the noise climate and that concurrent construction activities are unlikely to result in significant effects.</td><td rowspan="3">As noted in the response in REP1-086.20 [REP2-078], the Applicant acknowledges that there will be concurrent works, particularly those associated with underground cabling and onshore substation construction, and concludes that these are not expected to result in significant effects. The full detail of why concurrent activities is not assessed to be significant is included within the response in REP1-086.20 [REP2-078],

The Applicant acknowledges the evaluations of impacts presented. However, using the operational noise impact criteria to determine construction noise impacts is not in accordance with national guidance and methodologies. As noted in REP1-086.15 [REP2-078], the Applicant confirms that the impact criteria for construction noise have been determined in accordance with the DMRB LA111 and Annex E of BS 5228-1:2009+A1:2014, as noted in paragraph 9.6.2.8 of ES Volume 3 Chapter 9 (APP-072).

The Applicant also confirms that the methodology it has applied to assess construction noise impacts, including cumulative impacts and effects is a matter which has been agreed by Denbighshire County Council and Conwy County Borough Council. These agreements are reported in S_D3_22 Mona and Denbighshire County Council SoCG (REP3-060) and S_D3_23 Mona and Conwy County Borough Council SoCG (REP3-061).</td></tr>
<tr><td>REP3-110.13</td><td>It is true that the loudest construction activity will dominate but any other construction activities undertaken at the same time will increase, although sometimes only slightly depending on the activity, the overall noise impact.</td></tr>
<tr><td>REP3-110.14</td><td>• Construction Noise Impacts
Because the applicant has chosen not to truly assess cumulative noise impacts and 'even' though we have serious concerns about the accuracy of the base line and predicted construction noise levels presented, we have used these to evaluate some activities (including some concurrent) for day and evening periods that will impact [REDACTED] against IEMA guidelines for noise impact assessment and those used by the applicant for operational noise assessment.
<table>
<tr><th colspan="4">Base Levels 43dB Daytime and 42dB evenings and weekends</th></tr>
<tr><th>Activity</th><th>Overall Noise Level</th><th>Change</th><th>Impact</th></tr>
<tr><td>Substation Fabrication</td><td>50.79dB Day
50.64dB Evening</td><td>+7.79
+8.64</td><td>Medium</td></tr>
<tr><td>Substation Foundation and Trenchless</td><td>50.93dB Day

50.79dB Evening</td><td>+7.93

+8.79</td><td>Medium</td></tr>
<tr><td>Substation Foundation and car park construction traffic</td><td>52.52dB Day

52.42dB Evening</td><td>+9.52

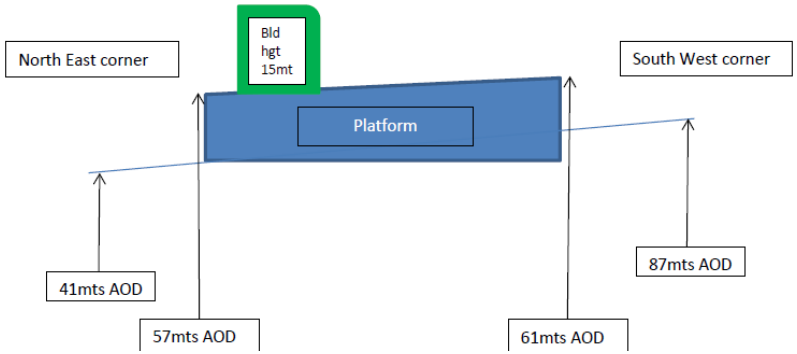
+10.42</td><td>High</td></tr>
</table></td></tr>
</table>

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation				Applicant's response
	Substation Fabrication and construction traffic	53db Day 52.91 Evening	+10 +10.91	High	
REP3-110.15	It should also be noted that these figures do not include any cumulative construction works that will be taking place by Awel y Mór, National Grid, or any of the other projects, i.e. Mares interconnector, St Asaph Solar, IPG solar etc., all in and around the same vicinity in relatively close proximity to our property. It should also be noted that more realistic and accurate noise impacts would push all impacts into High category.				As noted in the Applicant's response to REP1-086.21 [REP2-078], the potential cumulative effects with construction activities associated with other proposed developments have been assessed. This assessment is reported in Sections 9.10 and 9.11 of ES Volume 3, Chapter 9 [APP-072]. The assessment 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's Solar Farm • Major Development 31/2023/0525 (Extension to the existing Bodelwyddan electricity substation) The outcome of the cumulative construction noise and vibration assessment identified minor adverse significance which are not significant in EIA terms. The Applicant has not considered the MARES Connect project as insufficient information was publicly available prior to the Mona Offshore Wind Project DCO submission. However, if further information becomes available for the proposal before the Mona Offshore Wind Project receives Development Consent, the Applicant will review the information and provide any update needed to the CEA.

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
		The Applicant also confirms that the methodology it has applied to assess the effects from the project cumulatively with other projects, is a matter which has been agreed by Denbighshire County Council and Conwy County Borough Council. These agreements are reported in S_D3_22 Mona and Denbighshire County Council SoCG (REP3-060) and S_D3_23 Mona and Conwy County Borough Council SoCG (REP3-061).
REP3-110.16	***1.3 Assessment Criteria*** The applicant has used threshold values only from BS 5228-1 2009+A1:2014 for construction noise impacts citing this is the industry standard and that this approach has been used on other Nationally Significant Projects like Awel y Mòr Wind farm, whilst at the same time stating in APP-179 section 1.2.7.3 that " There are no set standards for the definition of the significance of construction noise effects".	The Applicant acknowledges the comments made regarding the assessment criteria used, particularly in relation to change being a determinant of the significance of an effect. The Applicant confirms that the assessment criteria adopted in the assessment does consider change in the setting of the Lowest Observed Adverse Effect Level (LOAEL), this being the level at which adverse impacts are likely to occur. The LOAEL is set at the existing ambient noise level experienced at a residential property. Should a construction activity result in a construction noise level equal to the existing ambient noise level, then a 3 dB increase in ambient noise level at the property will result. Such an increase is generally accepted to be the lowest perceptible to the human ear and hence considered likely to result in an adverse effect. The Applicant notes the comment made regarding the approach to assessment of construction noise impacts and the use of radial diagrams. As noted in paragraph 9.9.5.2, the Applicant has adopted two methodologies to determine potential noise impacts, depending on whether the activity is concentrated within a single area or spread along sections of the Onshore Cable Corridor. The construction noise impacts associated with works are concentrated within one area have been predicted using 3D acoustic modelling. These impacts are presented as construction noise levels and impacts at individual properties. As noted in its response to REP3-110.5-11 above, an update to the 3D construction noise modelling has been undertaken and an updated construction noise assessment of these works presented in the Construction Noise and Vibration Clarification Note (S_D4_14).
REP3-110.17	However:- • There is guidance on construction noise within the Overarching National Policy Statement NPS –EN – 1 2023 section 5.12.6 stating that assessment should include o a prediction of how the noise environment will change with the proposed development in the shorter term, such as during the construction period o 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	
REP3-110.18	'Predicted change' is not whether a threshold is reached but the change in ambient noise levels, further supported by:- • BS5228-1 2009+A1:2014 Annex E3.1 where it states that " An alternative and / or additional method to determine potential significance of construction noise levels is to consider the change in ambient noise level with the construction noise"	
REP3-110.19	• The applicant has also referred to IEMA Guidelines for Environmental noise Impact Assessment version 1.2 Nov 2014, which states that:-	

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
	o It applies to all stages of development, from construction through to operation and that it applies to Nationally Significant Infrastructure projects o With section 7.10 stating that "The judgement that is required is whether or not the change in level B(after) minus A(before) i.e. the noise impact causes a noise effect"	An alternative approach has been used to assess the impacts associated with transient construction activities along the Onshore Cable Corridor which include the following as set out in Paragraph 9.9.5.4 in Chapter 9 of the ES [APP-072]: • Site preparation • Fencing • Topsoil strip • Haul road construction • Trench excavation and duct installation • Trench backfill • Trench route and topsoil reinstatement • Haul road removal. A calculation of the noise impacts resulting from these activities has been undertaken at various distances from the boundary of the Mona Onshore Cable Corridor and, subsequently, analysis of the number of residential receptors where a significant impact is predicted has been undertaken. The distances at which impacts occur from these activities are presented as radial diagrams in Figures 1.27 to 1.34 of Volume 7 Annex 9.2 of the ES (APP-179).
REP3-110.20	Finally, we have looked at random other Nationally Significant Projects as to how they have assessed construction noise impacts and found that the approach taken by Mona is not the norm, instead, other projects have used radial effects diagrams of noise bands around the construction site to show and assess the noise impacts.	
REP3-110.21	***1.4 Noise Summary*** As a result of all of the above we consider a failing by the applicant to truly and accurately assess noise impacts and we therefore conclude and reaffirm that in relation to noise impacts, that at a minimum our:- o Magnitude to be adverse and Moderate to Substantive o Sensitivity to be Medium to High o So that overall impact is Substantial.	The Applicant refers to its response to REP3-110.5-11 above regarding the construction noise impacts predicted at Tyddyn Meredydd from individual construction and cumulative activities. The Applicant notes that assessment outcomes reported in Volume 3 Chapter 9 of the ES [APP-072] reported that negligible to low impacts were predicted to occur from construction works associated with the Mona

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
		Offshore Project and thus considered not considered to result in significant adverse effects at the property. An updated assessment reported in the Construction Noise and Vibration Clarification Note (S_D4_14) identifies that negligible to medium impacts are predicted due to construction works at the Tyddyn Meredydd. However, the Applicant concludes that these revised predicted impacts are not likely to result in significant adverse effects. The Applicant confirms that the sensitivities identified are correct, with Tyddyn Meredydd deemed to be of medium sensitivity during the daytime and high sensitivity at night-time, as outlined in section 9.9 of Volume 3 Chapter 9 of the ES (APP-072).
REP3-110.22	**Section 2.0 Visual** In our concerns regarding views from our property as not accurately reflecting the true impact and our offer at the time to take more representative images (which were declined). The applicant states that it is not usual to take views from inside residential properties, it may not be usual but having been offered, it would have been a more accurate representative viewpoint than those presented . The applicant did take photographs from within the curtilage of our property but actively chose to only take views from the South West corner, completely ignoring our principal ground floor view and the North Eastern curtilage where we often sit outside, both of which offer more realistic and relevant views for us of the proposed substation.	The Applicant notes the comments, however due to lone working protocols, it was not possible for the surveyor to enter the property at the time of the visit. Landscape and Visual Assessment and Residential Visual Amenity Assessments are two separate assessments. *"An LVIA should consider the views from local communities focussing on the way that a community currently experiences views from public locations such as streets and open spaces and how these will change" ..."Views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. However, it may be helpful for an LVIA to comment on changes to views that will be experienced from groups of properties, or in some cases individual properties, if these changes are likely to be significant."* (Landscape Institute Technical Guidance Note 2024, LITGN-2024-01, Section 6(1)). The LVIA considers the effects from the closest individual properties at paragraph 6.5.7.4 *et seq* of Volume 7, Chapter 6: Landscape and Visual Resources (APP-069).
REP3-110.23	In our question about worst case scenario and substation platform height we acknowledge our error in the anticipated platform height referenced in APP-189 of 57mts to 61mts as being AOD (above ordinance datum)	The Applicant confirms that the finished ground level of the onshore substation platform will be between 57 and 61 m Above Ordnance Datum (AOD) paragraph 3.4.2.1 of the Design Principles (REP2-026).

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
REP3-110.24	However this does not really answer the question as to worst case scenario being used in visualisations, since the applicant states that the AOD of the proposed substation site is currently 87mts at highest point and 41mts at lowest point	The Design Principles (REP2-026) states in paragraph 2.1.1.4 that "the high point of the site is approximately 87 m AOD in the south with a low point approximatively 46 m AOD in the northwest corner." In this case, the "site" refers to the wider onshore substation area which includes both the onshore substation platform (Work No. 22) and the surrounding areas identified for temporary construction compounds, accesses, landscaping and ecological and environmental works (Work Nos. 23 to 36). The high points of 87 m are located on the southern boundaries of both Work No. 33 and 34. The low point is located in Work No. 23. The onshore substation visualisations model a platform within Work No. 22 with a finished ground level of between 57 and 61 m AOD, with the onshore substation buildings (with a maximum height of 15 m) sitting on the platform.
REP3-110.25	If the existing land is 41mts AOD at lowest point towards North Eastern corner and the platform slopes from 61mts to 57mts for hydrological reasons (drainage) and the lower height of the platform is assumed to be towards the North Eastern corner as indicative drawings show and information given to land users then:-  	As stated above in REP3-110.24, the existing ground level low point of 41 m AOD is not located within the onshore substation platform itself, but rather to the area located north, within Work No 23. The existing ground level low point within Work No. 22 (the onshore substation platform) is approximately 54 m AOD. The Applicant has provided indicative onshore substation cross-section figures (S_D4_25.1) to illustrate this. The information presented on the onshore substation cross-sections has been derived from LiDAR and topographical survey data and early construction feasibility work undertaken by the Applicant. The finished ground level of the onshore substation platform is anticipated to be between 57 and 61 m AOD. The onshore substation buildings will be built on top of this, with a maximum height of 15 m. The lightning masts will also be built on top of the platform. The visualisations have been produced using these maximum design scenario parameters. To aid the Interested Party's understanding, the Applicant has provided below approximate differences between finished ground level and existing ground level (mAOD) at the four corners of the onshore substation platform. Please note that these figures are indicative:

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
REP3-110.26	With the substation being built towards the North Eastern lower ground area and if platform height is anticipated as being 57mts AOD at its lowest end then the visualisations which the applicant reaffirms as being the realistic worst case scenario simply cannot be accurate showing only a platform height of <= 1mt but is more realistically likely to be around 10mts.This would mean that the height of the buildings would be more like 25mts above current ground levels and Lightning conductors would be more like 40mts above current ground levels.	NE corner = 1.90 (fill) NW corner = 6.13 (fill) SW corner = -3.65 (cut) SE corner = -4.00 (cut) The visualisations have been produced using these indicative finished ground levels (mAOD).
REP3-110.27	The applicant therefore needs to be more open and transparent in its estimations of platform height and reassess the visual impacts based on real worst case scenario.	
REP3-110.28	In response to our comments about true and accurate visual comparisons years 1 and years 15 where the applicant has directly compared worst case, year 1 with best case, year 15, the applicant has said that this is usual. We have looked at other Nationally Significant Projects (again at random) to find that this is not necessarily the norm where other projects have in fact shown both direct summer and winter comparisons , in line with Landscape Institute guidelines, with a number of examples also showing year 0 (current view) comparison. In this case the applicant has declined to do so and we remain concerned about the selective and biased visualisations in favour of the applicant and the way they have been presented.	Existing winter and summer views are shown one above the other in Volume 7, Annex 6.3: Visual baseline technical report of the Environmental Statement (APP-155). Photomontages are shown in Volume 7, Annex 6.5: Landscape visualisations Parts 1 to 3 (APP-157 to APP-159). Each visualisation is shown in winter Year 1 and Summer Year 15. In addition, the Applicant has provided winter Year 15 Photomontages at Deadline 3 (REP3-071) for representative viewpoints 2 and 3, following a request from the ExA at Issue Specific Hearing 2.
REP3-110.29	When questioned about winter visualisations at ISH2 and in the applicants response at deadline 2 they refer to the 'twigginess' of the woodland planting providing a substantial screening. This reference to twigginess is a totally subjective opinion and the visualisations presented (although not showing the twigginess) appear to show woodlands over grounds where the applicants underground cabling will be situated and under existing overhead electricity lines, both of which are clearly areas where woodland would not be planted, we therefore do not accept this totally grey area of subjectivity by the applicant.	With reference to twigginess/ the ability of deciduous trees to provide screening even in winter, after they have lost their leaves - The screening provided by multiple layers of trees in winter is clearly seen in the winter photographs and winter visualisations. The Applicant believes that the depth of planting proposed at the Onshore Substation will achieve the same screening effect. This view is supported by NRW. The Illustrative landscape and Ecology Strategy Plan is Figure 1.4 of the Outline LEMP (REP2-035). The final LEMP and detail of the landscape mitigation proposals will be agreed with Denbighshire County Council and secured by a Requirement of the DCO.

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
REP3-110.30	Finally, we cannot accept the logic that our sensitivity to visual impacts would only become significant if we drive several miles away and view the development from afar, it cannot be justified in our minds that an occasional or infrequent visitor to the Clwydian range be more significant than we are seeing the views day in day out. This stance cannot be fair.	The Landscape and Visual Impact Assessment has assessed the potential effects experienced by high sensitivity receptors (which residents of properties would also be) within 1 km of the cable route and substation, including users of the public footpath 105/6 to the west of Tyddyn Meredydd, which is accessed by a field gate immediately to the south of that property (onshore VP3) (Figures 5 and 6 of APP-157). The significance of effects at this viewpoint is major adverse at winter Year 1 and significant, reducing to moderate adverse and not significant at summer Year 15. Only people walking a National Trail within a nationally designated landscape are considered to have a very high sensitivity, e/g/ Offa's Dyke Path National Trail within the Clwydian Range and Dee Valley National Landscape.
REP3-110.31	We have significant concerns with the manner that the applicant has sought to address noise and visual impacts, not just for ourselves but also the wider community being selective in their judgements and not truly or accurately assessing the impacts (Please refer to sections 1.0 and 2.0 below for further detail).	The Applicant notes these comments and has provided detailed responses in sections to the individual points above.
REP3-110.32	We have been clear and open with the applicant from the onset that it is not the operational side nor the fully screened/mitigated substation that is our main concern, it is the period of 4 years or so where we will be exposed to substantial and significant adverse impacts on our daily lives, due to the noise and construction activities on a daily basis, 6 days a week, with no respite having substantial and significant adverse impacts on our quality of life.	The Applicant notes these comments.
REP3-110.33	As a consequence we have little or no confidence in the information presented by the applicant and cannot trust as to how individuals in unique positions, such as ourselves, can expect anything other than a simple acknowledgement of our plight, with the applicant being prepared to sacrifice our wellbeing and life changing impacts simply for the profitability of BP/EnBw and its agents.	
REP3-110.34	This approach adopted by the applicant is causing us continued angst and dominating our lives it is morally and ethically unjust, particularly given that	

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
	the true cost to the applicant of doing the right thing by us is a pittance of the projected budget.	
REP3-110.35	**Section 3.0 Engagement** During the early stages of this project the active positive engagement by the applicant was fully appreciated, visiting us at our property on numerous occasions, responding to any queries and questions promptly. The applicant expressed a desire to act differently compared to other developments by not just adhering to the letter of the law, instead treating people fairly and prepared to do the right thing. We have noticed now the proposed development is at the examination stage we have been directed to formally raise our concerns with yourselves as examiners rather than simply get clarifications by corresponding with the applicant direct.	The Applicant welcomes that the proactive engagement previously undertaken was appreciated. The early outreach efforts were intended to introduce the respondents to the project and to its senior representatives, recognising the concerns raised and opening lines of communication. During the Examination phase, the Applicant has had due regard to the statutory process and by channelling all communications through the Examination has ensured a transparent approach, with any information or responses given being publicly available to other stakeholders and participants in the DCO process. As explained in the Applicant's response to REP3-110.5 to REP3-110.11 above, it has reviewed the construction noise modelling previously undertaken and reported, resulting in an updated assessment. The Applicant recognises that this is detailed information, and would thus like to extend the residents of Tyddyn Meredydd the offer of a meeting with project representatives – including the technical specialists responsible for the noise modelling activity – to explain the results, demonstrate how they were calculated and answer any questions arising from the information. The Applicant will contact the residents directly to make this offer and will seek to meet at a mutually convenient time, ahead of Deadline 5.
REP3-110.36	We did attempt to get clarification following deadline 2 responses to the issue of construction during the hours of darkness to which we emailed the applicant on 12th August asking:- *"I note your response listed in Errata Sheet S_PD_1 F02 for document ref APP-069 table 6.2 in relation to that 'during the construction phase no work will be undertaken during the hours of darkness' and the response that ' The text should be deleted as the potential impacts of working during hours of darkness has been included in the assessment'* *I would be grateful if you could indicate where and in which document I can find this particular assessment as to potential impacts of working during hours of darkness.*	The Applicant confirms receipt of the email quoted, and that a response was sent from the project mailbox (info@monaoffshorewind.com) on 28 August 2024: *"Dear Mr Hussey,* *Thank you for your enquiry about working during the hours of darkness.* *We're aware that you posed a similar question as part of the Written Representations aspect of the ongoing Examination. We have therefore provided a formal Applicant's response to your representation on this matter as part of that process.*

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
	Please advise"	*As we're sure you'll appreciate, it's important we don't duplicate our responses where questions are being posed directly to us, as well as being raised via the Examination.* *Our response to this query will therefore be available shortly, following the closure of Deadline 2, which was Tuesday 27 August.* *Many thanks* *The Mona Offshore Wind Project team"*
REP3-110.37	To date we have had no response at all to our query and the desire to act differently and treating people fairly, doing the right thing morally and ethically has not materialised.	
REP3-110.38	We get the feeling that because we are individuals and not a company or statutory body then they can adopt a cavalier attitude, provide political type answers that don't necessarily answer our questions, referring to Awel y Môr (perhaps influenced by the fact that lead members and other representatives were actively involved in the Awel y Môr scheme), however this development is not an extension of that project and is irrelevant	The Applicant is committed to communicating with all stakeholders – and, equally, to responding to representations made through the DCO process – in a consistent manner regardless of their category or status, and respects each stakeholder equally. The Applicant is unaware of having erroneously referred to Awel y Môr in stakeholder communications but is happy to discuss the matter further should the respondent choose to provide more detail on this point. As noted above in its response to REP3-110.35, the Applicant will offer the respondents a meeting to discuss the results of updated assessments and will discuss this point during that meeting too if more information can be provided in advance.
REP3-110.39	**That through no fault of our own and being in this regrettable and unenviable position, the only right, fit and proper option is to recommend that the applicant purchases our property as part of this scheme should the development be granted Development Consent Order.**	The Applicant notes the comment directed at the Examining Authority.
REP3-110.40	**Section 4.0 In summary** We find it incomprehensible and illogical that anyone can honestly state that this project will not have major and significant detrimental adverse effects on ourselves. Our concerns raised at deadline 1 remain almost entirely unchanged as a result of the applicant's responses namely: The continued concern over our baseline noise levels.	The Applicant acknowledges these concerns and refers to its responses to REP3-110 above.

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
	Our experiences of disturbance to date where occasional works have been undertaken in close proximity. The highly questionable construction noise impact assessments The long construction hours with 3 ½ to 4 years prolonged exposure 6 days a week, which with current working hours proposed (including mobilisation) equates to disturbances of 75% of our waking time. That being retired we will have no respite and no escape That the area is a quiet environment where any construction noise will be noticeable, disruptive and a substantive effect. That one of us suffers with [REDACTED] That we will need to change our behaviour. That there will be periods of 24 hour working in close proximity to our property. That the applicant proposes to use trenchless techniques (higher noise levels and potential for 24 hour workings) in close proximity to our property. The real lack of cumulative and concurrent noise assessments and the unique position of our property within the construction zones. The types of heavy duty industrial construction equipment that will be used in close proximity: CAT 360 excavators/Rock breakers/Concrete munchers/ Piling/Hammers/HDD etc. That we will suffer noise level increase, disturbance and significant effects over our current ambient noise for periods >10 or more working days in any 15 consecutive days and >40 days in any 6 consecutive months. The failure to accurately assess our visual impacts. That our health linked to the levels of residential amenity we enjoy will be significantly affected. That this development would negatively impact our property value. The detrimental impacts on our quality of life and wellbeing. The clear and obvious cumulative impacts.	

Planning Inspectorate Ref. No.	Martyn and Margaret Hussey representation	Applicant's response
REP3-110.41	We continue to firmly believe that no amount of mitigation can adequately protect and shield us from the significant detrimental impacts that this development will cause, have little or no faith in the applicant doing the honest and right thing, therefore: **We again ask that if yourselves as Planning Inspectors cannot reject this application then in line with;** BS5228-1:2009+A1:2014 That if noise levels generated by site activities for residential properties result in disturbance and interference with activities or sleep for a significant extent of time e.g. in excess of 6 months, then there might be advantages in offering permanent rehousing BP Project Consultation Brochure summer 2022 where project director Richard Haydock stated "Committed to making sure we deliver it in a way that works for people that live and work in the areas that these projects are located" BP Code of conduct – Core principles setting out standards for how to do the right thing Wanting to help improve people's lives Committed to doing the right thing when engaging with communities Wanting to be a trusted neighbour Putting themselves in other people's shoes	The Applicant acknowledges these concerns and refers to the detailed responses above.