

Mona Change Request Report

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Image of an offshore wind farm



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Prepared	by:	Propar	ed for:		
Burges Salmon LLP			Offshore Wind I	_td.	



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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Application	The Application for the DCO submitted by the Applicant on 22 February 2024.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
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 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 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.
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.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description	
DCO	Development Consent Order	
EIA	Environmental Impact Assessment	
EnBW	Energie Baden-Württemberg AG	
NRW	Natural Resources Wales	
NSIP	Nationally Significant Infrastructure Project	
PDE	Project Design Envelope	
PEI	Preliminary Environmental Information	
PEIR	Preliminary Environmental Information Report	



1 MONA CHANGE REQUEST REPORT

1.1 Introduction

- 1.1.1.1 This report is the Applicant's formal request to make changes to the Mona Offshore Wind Project Development Consent Order Application (the Application) following submission to the Examining Authority (ExA) of the Applicant's Notification of Intent to submit a Change Request (AS-028) on 29 October 2024 (the Applicant's Notification).
- 1.1.1.2 The proposed changes to the Application and their rationale are set out in detail in Section 1.2. In summary, the changes are:
 - Change 1: The amendment of the proposed Order Limits to include an existing access track and parcel of land to the west of the onshore substation for temporary construction access during onshore site preparation works and construction of the onshore substation and surrounding works;
 - Change 2: The amendment and widening of the onshore substation construction access road to aid Abnormal Indivisible Load (AIL) movements, including an amendment to the proposed Order Limits and an expansion of the land to be used for temporary construction access within the Order limits;
 - Change 3: The amendment of the proposed Order Limits to include additional land adjacent to the onshore substation construction access bellmouth to accommodate a temporary construction drainage attenuation basin;
 - Change 4: The amendment and widening of the proposed Order Limits to include land needed to accommodate an area of hardstanding during the construction period to allow establishment of the permanent access road; and
 - Change 5: The amendment and widening of the permanent access road adjacent to facilitate AIL movements.
- 1.1.1.3 This Change Request has been made at the earliest opportunity in response to early design work, particularly in relation to highway accesses, as part of ongoing engagement with the local highway authority, landowners and the supply chain.
- 1.1.1.4 This report addresses step 4 of the process set out in the Planning Inspectorate's Advice Note 'Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted' (the 'PINS Change Advice Note'). As such it includes the following:
 - Section 1.2: The confirmed description and rationale for the changes requested
 - Section 1.4: Matters relating to compulsory acquisition
 - Section 1.3: Consideration of the environmental impact of the changes requested
 - Section 1.4: Approach to consultation
 - Section 1.5: Next steps and timings

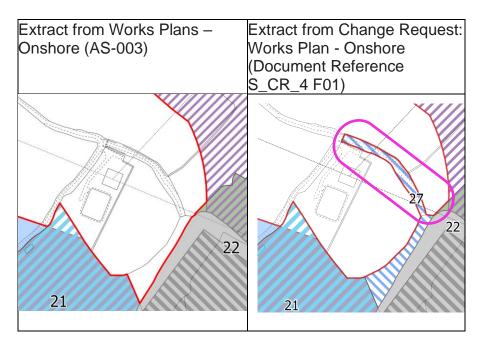


1.2 Description of and Rationale for the Proposed Changes

1.2.1 Change 1: Extension of the Order Limits to the West of the Onshore Substation

1.2.1.1 Change 1 comprises the incorporation of two new areas of land into the Order Limits which are described here as Change 1a and Change 1b.

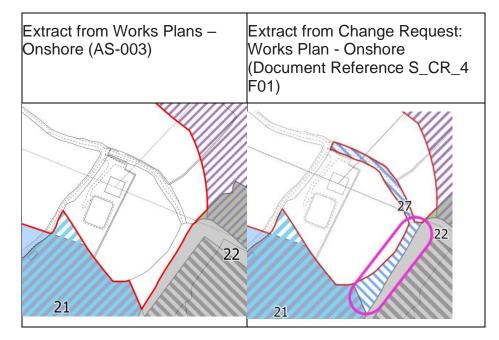
<u>Change 1a – Order Limits change to include an existing access</u> <u>track to the west of the onshore substation for temporary</u> <u>construction access during onshore site preparation works and</u> <u>construction of the onshore substation and surrounding works</u>



- 1.2.1.2 This change will result in the inclusion of a section of the existing access track at the onshore substation at grid reference SJ 01353 73277 within the Order Limits to accommodate temporary construction access.
- 1.2.1.3 This existing access track is currently being utilised by the Applicant for ongoing site survey and investigation works. This change does not involve any works or upgrades to the existing track, the track will only be used to take access to Work Nos. 21, 22 and 31 (and other works areas adjacent to Work Nos. 21, 22 and 31).



<u>Change 1b – Order Limits change to include an area to the west of</u> <u>the proposed onshore substation for temporary construction</u> <u>access during onshore site preparation works and construction of</u> <u>the onshore substation and surrounding works.</u>



- 1.2.1.4 The change results in an extension of the Order Limits from Work No. 22 to the field boundary where the existing access track (subject of Change 1a) terminates at grid reference SJ 01384 73165.
- 1.2.1.5 As shown on the Change Request: Works Plan Onshore (Document Reference S_CR_4 F01), Changes 1a and 1b will become part of Work No. 27.
- 1.2.1.6 Changes 1a and 1b will allow temporary access to the onshore substation site (including Work Nos. 21-24 and 27, 29, 32, 33, 34 and 36) for vehicles in relation to onshore site preparation works required at and around the substation, prior to the construction and availability of the new onshore substation construction access from Glascoed Road.
- 1.2.1.7 The additional area of land required for Changes 1a and 1b amounts to approximately 2611m². Whilst this land was included within the Mona PEIR Offshore Wind Project Boundary published in April 2023, it was removed prior to submission of the Application in an effort to reduce overall land take. However, as part of the ongoing early design work, it has become clear that use of this existing access track and associated land is necessary to facilitate onshore site preparation works at the substation site and to ensure these works can be delivered in a timely manner. In particular this will facilitate time-critical surveys to inform the detailed design of key elements of the onshore substation platform, land reprofiling for landscaping, and temporary and permanent access routes to be delivered from the Glascoed Road as well as other onshore site preparation works in relation to those key elements.
- 1.2.1.8 In addition, it has become clear that use of this access would reduce the need for contractors to track equipment around the onshore substation from the temporary construction compound and laydown areas (Work Nos. 23, 24 and 25) to implement the necessary works around the west and south of the onshore substation platform.



1.2.2 Change 2 – Amendment and widening of the onshore substation construction access road to aid Abnormal Indivisible Load (AIL) movements

1.2.2.1 Change 2 comprises one new area of land outside the Order limits which is described here as Change 2a and one area within the Order limits to be covered by Work No. 27 (where it previously was not) which is described as Change 2b.

<u>Change 2a - Order Limits change to widen the temporary onshore</u> <u>substation construction access road and bellmouth, which follows</u> <u>the alignment of the construction access road previously used by</u> <u>the Gwynt y Môr and Burbo Bank Extension Offshore Wind Projects</u> <u>during their construction, at grid reference SJ 01936 73552 (Work</u> <u>No. 27).</u>



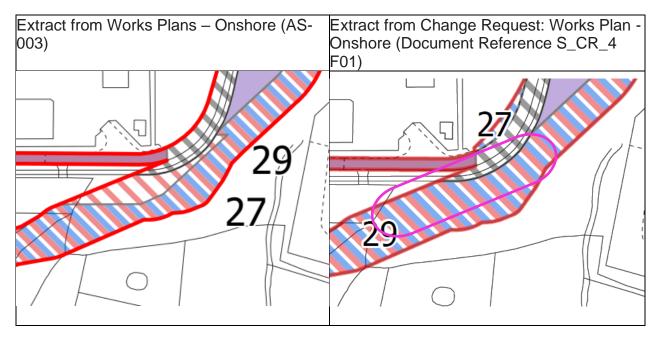
1.2.2.2 The additional area of land required outside the existing Order Limits for Change 2a amounts to approximately 1212m². Whilst this was included within the Mona PEIR Offshore Wind Project Boundary published in April 2023, the Applicant's preliminary design works indicated that this land would not be required and it was removed prior to submission of the Application in an effort to reduce overall



land take. However, as part of the Applicant's early detailed design works and investigations into the swept path for the delivery of AILs to the Mona Offshore Wind Project onshore substation, in particular the large transformers required for the substation, it has been identified that additional space at the bellmouth is required in order to make the turning into the onshore substation temporary access road safe.

1.2.2.3 It is also therefore necessary to extend the Order Limits and Work No. 27 in this area to accommodate the safe access and egress of AILs as well as to accommodate the swept path for the access through the proposed bellmouth junction.

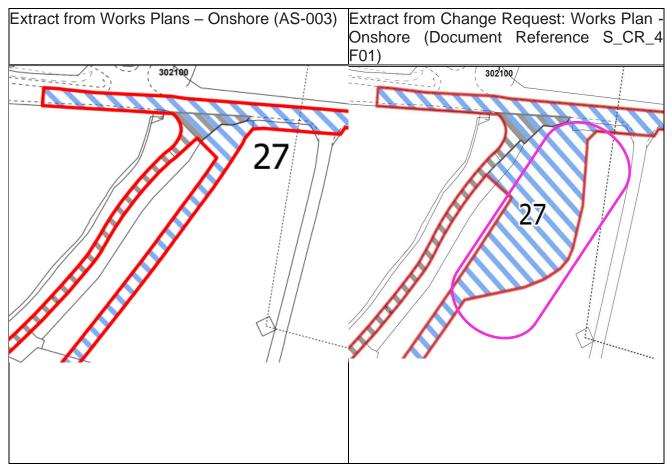
Change 2b – Amendment to Work No. 27 to widen the temporary onshore substation construction access road at grid reference SJ 01911 735518 by including a small area of additional land to the area identified for Work No. 27 (approximately 538m²) within the existing Order Limits. This land is currently identified as part of the permanent onshore substation access (Work No. 29) only.





1.2.2.4 The Applicant's preliminary design work has identified additional space is needed along the temporary construction access road in this area to facilitate the AIL's whilst ensuring adequate space for the fencing requirements outlined in the Outline Fencing Management Plan (REP2-048).

1.2.3 Change 3 – Amendment of the proposed Order Limits to include additional land adjacent to the onshore substation construction access bellmouth to accommodate a temporary construction drainage attenuation basin



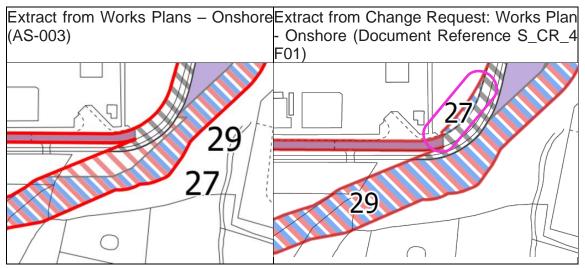
- 1.2.3.1 This change results in a widened temporary onshore substation construction access road (eastward) to accommodate an additional temporary Sustainable Urban Drainage System (SuDS) attenuation pond at the northern extent of the onshore substation construction access road.
- 1.2.3.2 The additional area of land required for Change 3 amounts to approximately 2350m². Whilst this land was included within the Mona PEIR Offshore Wind Project Boundary published in April 2023, it was not included upon submission on the basis of the preliminary designs for the onshore substation construction access road. However, the Applicant's early detailed design works for the onshore substation construction access road, including the swept path analysis outlined in Change 2 (specifically Change 2a), have identified the need for additional land take. This is in order to deliver attenuation to control the discharge of surface water during construction, in part due to the wider road outlined in Change 2a, and also from the requirement for great crested newt fencing to be deployed, likely resulting in additional drainage pathways. It is proposed to construct a temporary SuDS attenuation basin as a measure to control this additional surface water runoff. The proposed Change 3 will result in



a controlled surface water discharge into an existing drainage channel, reducing the risk of increased flooding downstream.

1.2.4 Change 4 – Amendment and widening of the proposed Order Limits to include an area of land to accommodate an area of hardstanding during the construction period to allow establishment of the permanent access road

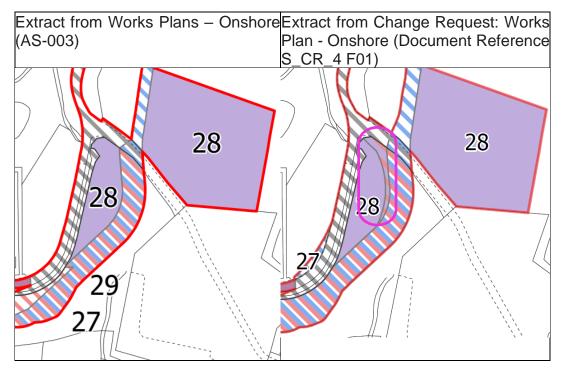
1.2.4.1 This change results in an extension of the Order Limits at grid reference SJ 01935 73551 to include the site of proposed Change 4. Proposed Change 4 will comprise a temporary area of hardstanding to be constructed immediately to the north of the existing road providing access to Bodelwyddan National Grid Substation and Gwynt y Mor Offshore Transmission Operator substation. This hardstanding will be in place during the construction period only and is necessary to facilitate the establishment of the permanent access road (Work No. 29).



- 1.2.4.2 In providing this temporary hardstanding, disruption to the users of the existing road will be reduced by removing the need to temporarily close the road for construction purposes.
- 1.2.4.3 The additional area of land required for Change 4 amounts to approximately 126m². Whilst the land required for proposed Change 4 was included within the Mona PEIR Offshore Wind Project Boundary published in April 2023, it was not included upon submission on the basis of the preliminary designs for the onshore substation area. As with the other changes set out above, the need for the extension to the Order Limits at this location has subsequently arisen as a result of the Applicant's early detailed design works and as a consequence of ongoing landowner engagement. The landowner has expressed a preference to implement the permanent access road at the furthest possible point along the alignment of the existing access road and this change is necessary to facilitate that option. For the avoidance of doubt, despite this proposed Change 4, the Applicant needs to retain the access route optionality in this area (as shown on sheet 11 of Works Plans – Onshore (AS-003)) due to the complex nature of the constraints within these areas – utilities (including a high pressure gas main), drainage infrastructure, export cables, desire for continuity of access over the existing road, amongst others. The preferred option will be selected during the detailed design process.



1.2.5 Change 5 – Amendment and widening of permanent access road adjacent to Work No. 28 to aid AIL movements



- 1.2.5.1 The swept path analysis of the access and egress of AILs to the onshore substation (undertaken as part of the early design work for the onshore substation access) has also demonstrated a need to make an amendment to Work No. 29 to increase the width of the permanent access road along the eastern route alignment. This additional area of approximately 210m² overlaps with Work No. 28 (grid reference SJ 01977 73607) for a temporary construction compound and laydown area connected with the construction of the temporary onshore substation access off Glascoed Road (Work No. 27).
- 1.2.5.2 Whilst this change does not result in an extension of the Order Limits, it does result in a change of use of this area of land from temporary to permanent to allow permanent access rights to be maintained over the widened access.

1.3 Compulsory Acquisition

- 1.3.1.1 Changes 1, 2a, 3 and 4 involve the addition of some small areas of land around the site of the onshore substation to be brought within the Order Limits and for which additional powers of temporary possession will be necessary. Change 2b also extends the area required for Work No. 27 (temporary construction access), but within the existing Order Limits and within an area already identified for permanent acquisition (as part of Work No. 29). Change 5 does not involve an extension to the Order Limits but will result in a slight increase to the area over which powers for permanent acquisition of rights are sought.
- 1.3.1.2 None of the proposed changes introduce additional landowners. Indeed, the number of Affected Persons impacted by this Change Request is very limited as all the land upon which the proposed changes are situated is owned by the Executor of the Estate of the Late David Watkin Williams-Wynn BT (otherwise referred to as the Cefn Estate) or Betty May Jones and Glyn Jones.
- 1.3.1.3 As anticipated in the Applicant's Notification, the Applicant has not been able to obtain the written consent of the relevant Affected Persons. On that basis, the



Applicant accepts that under Regulation 4 of The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 ('CA Regulations') are engaged and the procedures set out therein in regulations 5 to 19 therefore apply Changes 1 to 5. The Applicant has set out how it considers the CA Regulations can be complied with under Section 1.6 Next Steps and Timings

1.3.2 Funding of additional Compulsory Acquisition

1.3.2.1 The Funding Statement (Document Reference: S_CR_8 F01) submitted with the Application confirms that the Applicant has sufficient funds to finance the cost of the Mona Offshore Wind Project including the Change Request. As set out in the Funding Statement (Document Reference: S_CR_8 F01), there is no change in respect of the Property Cost Estimates submitted with the DCO Application (APP-026).

1.4 Environmental Impact Assessment

- 1.4.1.1 Changes 1 to 5 all fall within the existing datasets and surveyed areas used to inform the conclusions of the Environmental Statement (ES). As indicated in the Applicant's Notification, the Applicant has undertaken a review of its Environmental Impact Assessment (EIA) and the conclusions set out within the ES in relation to each of the proposed changes (Changes 1 to 5) to consider whether any of the proposed changes individually or cumulatively result in any new or different likely significant environmental effects.
- 1.4.1.2 A summary of the Applicant's review is set out in Annex 1.

1.4.2 EIA Conclusions

1.4.2.1 The overarching finding of the Applicant's review of the EIA and ES is that the proposed changes will not result in any new or different likely significant environmental effects. They therefore have no effect on the conclusions set out within the ES and no additional mitigation measures will be required as a result of the proposed changes.

1.5 Approach to Consultation

- 1.5.1.1 As set out in the Applicant's Notification, the Cefn Estate's land agents (Carter Jonas) were notified of the proposed changes by telephone on 23 October 2024 with written follow up on 24 October 2024. The agents of Betty May Jones and Glyn Jones were informed by telephone and in writing on 23 October 2024.
- 1.5.1.2 Changes 1 to 5 do not result in any changes to the ES which require the production of Supplementary Environmental Information (SEI). The Applicant does not consider therefore that it is necessary to consult on the proposed changes pursuant to The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'), noting that there is not a statutory requirement to consult on SEI pursuant to the EIA Regulations in any event. The Applicant's consultation will however be carried out in accordance with the CA Regulations and it is the Applicant's intention to provide for a 30 day consultation period rather than the minimum 28 days under the CA Regulations as per its example timetable set out in Section 1.6 below. The Applicant has also set out at Annex 2 all those who will be formally notified of the Change Request in accordance with regulation 7 and Schedule 2 of the CA Regulations. Those



persons will be directed to submit their consultation responses to the ExA (on behalf of the Secretary of State) as per Regulation 7(2) of the CA Regulations and the notice will make clear that those consultation responses will form both their relevant representation and written representation on the Change Request. As set out in the Applicant's Notification, where time remaining in Examination is limited, there is precedent for running the relevant representation and written representations period for a change request in tandem. This is also allowed for under the CA Regulations as Regulation 13 states that the Examining Authority may at any time specify the date by which written representations are to be submitted. This approach was recently taken on the Cottam Solar Project DCO.

1.5.1.3 Whilst the Applicant recognises that the PINS Change Advice Note recommends formal consultation on the proposed changes prior to submission of a change request application, the Applicant acknowledges (as was noted in the Applicant's Notification) that there is insufficient time remaining within the Examination to carry out more substantive consultation prior to submitting this Change Request, especially as time must be allowed to comply with the consultation requirements set out in the CA Regulations which are triggered by the submission of the Change Request. The changes are considered to be minor and given their specific nature and locational requirements would not be influenced by prior consultation. In addition, there are numerous examples of formal consultation on change request applications only taking place following submission of a change request application where the CA Regulations are engaged, this is even where supplementary environmental information is submitted as the EIA Regulation and CA Regulation consultations run in tandem (see for example, Sheringham and Dudgeon Extension Projects DCO).

1.6 Next Steps and Timings

- 1.6.1.1 The Applicant recognises that there is limited time remaining to accommodate the change request within the existing Examination timetable given the engagement of the CA Regulations. To assist the ExA, the Applicant included an example timetable with the Applicant's Notification to set out how it considers the change request can be accommodated before the close of Examination.
- 1.6.1.2 The Applicant further recognises that the ability to accommodate the Applicant's Change Request relies heavily upon the Examining Authority's swift acceptance of the proposed change request and its willingness to deal with the proposed change request expeditiously. In particular, the Applicant acknowledges that it is seeking the ExA's decision on the Change Request by Friday, 8 November and that the Applicant acknowledges that this only gives the Examining Authority 7 days in which to respond to the formal change request whereas Regulation 6 of the CA Regulations provides for up to 28 days. The Applicant hopes that the Examining Authority will consider itself able to meet this timeframe on the basis that the proposed changes are minor in nature, were included within the PEIR consultation boundary, do not involve and new land interests and do not result in any new or different likely significant environmental effects. Whilst Changes 1 to 4 involve additional areas of land, these are small areas in a localised area around the site of the onshore substation and no new landowners are affected. The Applicant also notes that there are examples of other projects where the relevant Examining Authority has been amenable to providing its response to a change request application in a significantly shorter period than 28 days including recently on the Byers Gill DCO, Cottam Solar Park DCO and the Sheringham and Dudgeon Extension Projects DCO.



Date	Step	Comments
Monday, 11 November 2024	1 st newspaper notice publication and notices to be issued to consultees by post (CA Regulations 7 and 8)	 Publication will be in: The Daily Post; The Guardian; and London Gazette The notice will request that relevant representations, written representations and requests to be heard at a further CA hearing on the change request are submitted before the end of the consultation period (see below).
Monday, 18 November 2024	2 nd newspaper notice publication (CA Regulation 8)	Publication will be in The Daily Post.
w/c 9 December 2024	Hearings scheduled	Whilst this falls within the consultation period, the Applicant suggests that the Examining Authority could cover the change request during one of the hearings scheduled for the w/c 9 December to provide an opportunity for interested and affected persons to make initial verbal representations and to allow the Examining Authority to raise its own initial questions on the change request.
Thursday, 19 December 2024	End of consultation period and new procedural deadline 6. (CA Regulations 10 and 13)	 Deadline for submission of: relevant representations on the change request; written representations on the change request; and early notification of any requests for an additional hearing.
Friday, 20 December 2024	Deadline 7 (currently deadline 6) - submission of Certificates of Compliance (CA Regulation 9)	This deadline will include all items currently identified for submission under deadline 6 and will also include submission of the Applicant's certificates of compliance and any initial responses to points or questions raised on the change request during the hearings that are scheduled for the week commencing 9 December.
Monday, 23 December 2024	Examining Authority issues revised timetable, notices of hearings (including providing deadline for additional affected/interested persons to request a hearing) and initial assessment of principal issues relating to the change request (CA Regulations 11 and 12)	The Applicant notes that under Regulation 11 the Examining Authority has up to 21 days to make an initial assessment of the issues. However, the Applicant hopes that, with the opportunity for the change request to be covered at the hearings during the week commencing 9 December, the Examining Authority will be in a position to expedite this step to ensure the change request can be fully examined before the close of Examination including provision of 21 days for additional affected/interested persons to provide notification of a request for an additional hearing and at least 21 days' notice of a further hearing (if it is required).
Tuesday, 31 December 2024	New procedural deadline 8	This additional deadline could be added to allow the Examining Authority to raise any further written questions on the change request.

Table 1-1: Examp	le timetable for the	examination	of the Chan	ae Request
			of the offan	ge nequest



Date	Step	Comments
Tuesday, 7 January 2025	New procedural deadline 9 (Regulation 13(4))	 This additional deadline would cover: Applicant's responses to change request relevant representations and written representations Additional affected /interested person comments on written representations on change request Applicant and additional interested/affected persons responses to Examining Authority further questions on change request.
Monday, 13 January 2025	Deadline for additional affected persons to notify Examining Authority of a request for an additional hearing in relation to the change request. (CA Regulations 15 and 16)	
Tuesday, 14 January 2025	Time reserved for additional hearing on change request, if required.	This is currently deadline 7 in the timetable. The Applicant suggests that the current deadline 7 is moved to the last day of Examination to facilitate the holding of an additional hearing if that is subsequently considered necessary by the Examining Authority.
Thursday, 16 January 2025	New Deadline 10 (currently deadline 7)	 This deadline will include all items currently identified for submission under deadline 7 and will also include: The Applicant's comments on affected /interested persons' comments on (i) written representations on the change request and (ii) responses to the Examining Authority's questions on the change request Interested/affected persons' comments on the Applicant's responses to (i) change request relevant representations and written representations: and (ii) the Examining Authority's further written questions on the change request.

1.7 Schedule of Application Documents

- 1.7.1.1 In accordance with the PINS Change Advice Note, a full list of the application documents confirming whether any revisions would be required or marking the relevant document with no change as necessary has been provided in the Schedule of Application Documents (Document Reference S_CR_13).
- 1.7.1.2 Whilst all Application documents are set out in the Schedule of Application Documents, the Applicant has listed in Table 1-2 below, for clarity, those updated documents which have been submitted with this Change Request and which will be updated and submitted (alongside other documents as required of which an indicative list has been provided in Table 1-3 below) at existing Deadline 6 on the 20 December in the event the Change Request is accepted by the Examining Authority.
- 1.7.1.3 The base documents used to prepare all of the below were the versions of those documents submitted at Deadline 3.



- 1.7.1.4 The Applicant has, for clarity, used document references with "CR" within them and document titles with "Change Request" included to be clear which documents are relevant for the change request. Please also note further comments set out below.
- 1.7.1.5 In relation to plans and again for clarity, extracts of plans have been prepared (rather than all sheets of the plans) such that only the relevant pages where changes are shown have been included. In a similar way, the Book of Reference and Land Rights Tracker have been

Mona Document Reference	Document Name	Revision No.	Comments
S_CR_3	Change Request: Location plans	F01	Only the relevant sheet has been included
S_CR_4	Change Request: Works Plan - Onshore	F01	Only the relevant sheet has been included
S_CR_5	Change Request: Land Plans	F01	Only the relevant sheet has been included
S_CR_6	Change Request: Street works and access to works plan	F01	Only the relevant sheet has been included
S_CR_7	Change Request: Book of Reference	F01	Only relevant plots have been included
S_CR_8	Change Request: Funding statement	F01	
S_CR_9	Change Request: Statement of Reasons	F01	
S_CR_10	Change Request: Land rights tracker	F01	Only relevant land interests have been included
S_CR_11	Change Request: Draft Development Consent Order (clean)	F01	Only changes related to the Change Request
	Change Request: draft Development Consent Order REP2-004 to S_CR_11 (tracked)	F01	have been included
S_CR_12	Schedule of Changes to the Change Request: Draft Development Consent Order	F01	

Table 1-2: Updated documents submitted with this Change Request Report

Table 1-3: Indicative list of other documents to be updated and submitted on 20 December

Document to be updated	Reason for update
Crown Land Plan (Onshore)	Change to the Order limits shown within the plan
Special Category Land Plan	Change to the Order limits shown within the plan
Onshore Statutory and Non-Statutory Nature Conservation Sites	Change to the Order limits shown within the plan
Onshore Historic and Scheduled Monument Sites Plan	Change to the Order limits shown within the plan



Document to be updated	Reason for update	
Tree and Hedgerow Plan	Change to the Order limits shown within the plan	
Temporary Stopping up of Public Rights of Way Plan	Change to the Order limits shown within the plan	
Water Bodies in a River Basin Management Plan	Change to the Order limits shown within the plan	
Design Principles	Change to the Order limits shown within the plan	
Outline Landscape and Ecology Management Plan	Change to the Order limits shown within the plan	
Outline Onshore Written Scheme of Investigation	Change to the Order limits shown within the plan	
Outline Code of Construction Practice	Change to the Order limits shown within the plan	
Outline Construction Traffic Management Plan	Change to the Order limits shown within the plan	
Outline Highways Access Management Plan	Change to the Order limits shown within the plan	
Outline Public Rights of Way Management Plan	Change to the Order limits shown within the plan	
Outline Operational Drainage Management Strategy	Change to the Order limits shown within the plan	
Environmental Statement and Habitats Regulations Documents	As necessary to show changes to the Order limits shown within the figures	

1.7.1.6 The Applicant has reviewed Other Consents or Licences Required (REP3-010) and confirms that the requested changes do not have any impact on securing the consents and licences listed in that document. Moreover, the Applicant does not anticipate there being any delay to securing any relevant consents or licences as a result of the Change Request.

1.8 Conclusions

- 1.8.1.1 The Applicant requests that the Examining Authority accepts this Change Request for consideration as part of the Examination.
- 1.8.1.2 The proposed changes do not give rise to any new of different likely significant effects and would not constitute a materially different application.
- 1.8.1.3 The CA Regulations are engaged but the Affected Persons impacted by Changes 1 to 5 are limited in number. Where additional areas of land are required as part of Changes 1 4, these areas are only required temporarily for onshore site preparation works and during construction. They will therefore only be subject to powers of temporary possession and not permanent acquisition of freehold land or rights.
- 1.8.1.4 Whilst the remaining time in the Examination is limited, there is sufficient time to deal with the Change Request as set out in the Applicant's example timetable. The Applicant acknowledges that this requires the Examining Authority to consider acceptance of the Change Request in a shorter period than the CA Regulations allow and to expedite other steps as set out in the timetable.



2 ANNEX 1: POTENTIAL ENVIRONMENTAL IMPACTS OF THE CHANGE REQUEST

2.1 Introduction

- 2.1.1.1 This section outlines the potential environmental impacts associated with the Change Request. The Change Request is treated as one single change for the purposes of this assessment as although there are a number of distinct elements, the nature of the changes are the same from an environmental impact assessment perspective.
- 2.1.1.2 Each sub-section below considers the ES topics submitted in support of the DCO Application. Each ES topic describes how the baseline environment may differ within the relevant land subject to the Change Request when compared to the ES and identifies the worst-case crossing scenario for each ES topic. Each topic sets out whether the Change Request may lead to new or materially different environmental impacts relative to those stated in the ES, and what mitigation might be required to avoid, reduce or offset these impacts.
- 2.1.1.3 The assessments, conclusions and methodology contained within the ES have been used as the basis of the assessments within this Annex 1. Mitigation measures set out in the DCO Application and secured through the requirements of the Draft DCO (REP2-004) will apply equally to the Change Request.
- 2.1.1.4 The Applicant highlights that in general, the proposed changes to the Order Limits and project elements changes do not significantly change the purpose, intent or impact of the original application and will have no material effect on the assessments and conclusions of the ES. The conclusions of the cumulative assessment also remain unchanged.
- 2.1.1.5 The maximum design parameters for the project remain within the original Rochdale Envelope described in the ES.
- 2.1.1.6 If the Change Request is accepted, then any individual ES chapters (and associated figures and appendices) will be updated as necessary to incorporate the information set out within this Annex 1 and will be submitted into the Examination as appropriate.

2.2 Geology, Hydrogeology and Ground Conditions

Assumptions and Limitations

- 2.2.1.1 The relevant land subject to the Change Request comprises primarily agricultural land or existing tarmac or gravel access tracks which have been constructed in association with existing electricity infrastructure. There is considered to be a low soil or groundwater contamination risk associated with this infrastructure. The relevant land subject to the Change Request is characterised by Secondary (undifferentiated) bedrock aquifer and Principal superficial geology aquifer (Change 1, Change 2) and Secondary A superficial geology aquifer (change 3, Change 4, Change 5). There are no groundwater Source Protection Zones within the relevant land subject to the Change Request.
- 2.2.1.2 Overall, baseline features remain unchanged from those previously identified and assessed within the ES submitted in support of the DCO Application.



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- 2.2.1.3 The inclusion of additional land within the Order Limits to comprise enlarged access track extents will result in additional ground disturbance relative to that assessed in the ES. The extended Order Limits will not affect any additional receptors. Potential impacts are limited to alteration to groundwater quantity or quality as a result of accidental release or spillage of potentially polluting substances, during the construction phase or as a result of disturbance and mobilisation of existing areas of contamination associated with recent or historical land-use.
- 2.2.1.4 Mitigation measures to prevent accidental contamination of groundwater sources will be implemented as set out in the Outline CoCP (REP2-038).
- 2.2.1.5 The Change Request, therefore, do not result in any new or different likely significant environmental effects in respect of geology, hydrogeology or ground conditions.

2.3 Hydrology and Flood Risk

Assumptions and Limitations

- 2.3.1.1 The relevant land subject to the Change Request is located within the Pont Robin Cut (Bodelwyddan) catchment. The relevant land subject to the Change Request does not intersect any Ordinary Watercourses. The closest Main River is the River Elwy located approximately 1.5 km east of the relevant land subject to the Change Request at its nearest point.
- 2.3.1.2 The relevant land subject to the Change Request is located within Flood Zone 1 with a <0.1% annual probability of flooding. It has a very low risk of surface water flooding and flooding from reservoirs. There are no surface water flow paths across the relevant land subject to the Change Request.
- 2.3.1.3 Overall, baseline features remain unchanged from those identified and assessed within the ES submitted in support of the DCO Application.

- 2.3.1.4 Potential impacts remain as previously assessed, namely the impact of increased flood risk arising from additional surface water runoff, the impact of damage to existing field drainage and the impact of contaminated runoff on the quality of watercourses and the environmental objectives of the water bodies within which they are located. The Change Request will result in an increase in surface water runoff associated with the Project relative to the ES, albeit only a small increase. The presence of the Ordinary Watercourse at the relevant land subject to the Change Request (Change 1) will not result in the need for diversion and/or culverting of the watercourse as no works or upgrades to the existing track are proposed, it is simply proposed to use the track to take access. Therefore, there will be no impact on the hydromorphology of the Ordinary Watercourse.
- 2.3.1.5 The construction of the attenuation basin as part of the Change 3 will be subject to detailed design to ensure that its establishment will not result in a change in potential for increased flood risk.
- 2.3.1.6 Best practice mitigation measures to minimise the impact of the alteration to surface water flows will be implemented in accordance with the Outline CoCP



(REP2-038) and the Outline Construction Surface Water Drainage Management Plan (CSWDMP) (REP2-050).

2.3.1.7 The Change Request, therefore, does not result in any new or different likely significant environmental effects in respect of hydrology and flood risk.

2.4 Onshore Ecology

Assumptions and Limitations

- 2.4.1.1 The relevant land subject to the Change Request is not located within a statutory or non-statutory designated site for nature conservation. A suite of ecological surveys were undertaken in 2022 and 2023 to inform the PEIR and ES, which included an Extended Phase 1 Habitat Survey which covered the relevant land subject to the Change Request. The relevant land subject to the Change Request is primarily characterised by improved grassland which is generally present at these locations within the current extent of the Order Limits. Change 3 would result in the removal of an additional area of species poor hedgerow, albeit this would only be a small increase from that assessed in Environmental Statement Volume 3, Chapter 3: Onshore Ecology (APP-066).
- 2.4.1.2 Overall, baseline features remain unchanged from those identified and assessed with the ES submitted in support of the DCO Application.

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- 2.4.1.3 Potential impacts from the Change Request remain as previously assessed in the ES, particularly in respect of temporary and permanent habitat loss of hedgerows. The extended Order Limits will not affect any additional receptors or cause any different impacts to that assessed in the ES.
- 2.4.1.4 Potential ecological impacts will be minimised by the application of mitigation measures, in particular replacement woodland planting, as set out within Section 3.8 Environmental Statement Volume 3, Chapter 3: Onshore Ecology (APP-066), the Outline CoCP (REP2-038) and the Outline LEMP (REP2-034).
- 2.4.1.5 Based on existing survey data and appraisals of habitat suitability, impacts associated with the Change Request are expected to be negligible. Notwithstanding, in line with wider recommendations in the ES, a number of preconstruction surveys will be required post-consent o update the environmental baseline and inform the final management plans submitted for approval as part of the Draft DCO requirements.
- 2.4.1.6 The Change Requests, therefore, do not result in any new or different likely significant environmental effects in respect of onshore ecology.

2.5 Onshore and Intertidal Ornithology

Assumptions and Limitations

2.5.1.1 Given the location of the relevant land subject to the Change Request, this Annex 1 considers onshore ornithology only (i.e. intertidal ornithology is excluded from the assessment of the potential environmental impacts). The relevant land subject to the Change Request was included within the survey area which was assessed during the wintering and migratory bird surveys undertaken November 2022 and March 2023 and the Onshore breeding bird surveys undertaken April 2022 to July 2022 and March 2023 to July 2023 as documented



in Environmental Statement - Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067).

2.5.1.2 Overall, baseline features remain unchanged from those identified and assessed with the ES submitted in support of the DCO Application.

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- 2.5.1.3 Potential impacts from the Change Request remain as previously assessed in the ES, particularly in respect of the potential impact of temporary and permanent habitat loss as well as the potential impact of habitat disturbance.
- 2.5.1.4 Potential ecological impacts will be minimised by the application of mitigation measures, in particular replacement woodland planting, as set out within Section 4.8 Environmental Statement Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-067), the Outline CoCP (REP2-038) and the Outline LEMP (REP2-034).
- 2.5.1.5 Based on existing survey data and appraisals of habitat suitability, impacts associated with the Change Request are expected to be negligible. Notwithstanding, in line with wider recommendations in the ES, a number of preconstruction surveys will be required post-consent to update the environmental baseline and inform the final management plans submitted for approval as part of the Draft DCO requirements.
- 2.5.1.6 The Change Request, therefore, does not result in any new or different likely significant environmental effects in respect of onshore and intertidal ornithology.

2.6 Historic Environment

Assumptions and Limitations

- 2.6.1.1 There are no Scheduled Monuments or Listed Buildings within the relevant land subject to the Change Request, and it is not located within a Conservation Area or Registered Park and Garden. The closest historic environment receptors remain largely as per those identified in Environmental Statement Volume 3, Chapter 5: Historic environment (APP-068) given that the Change Request is minor in extent.
- 2.6.1.2 Overall, baseline features remain unchanged from those identified and assessed within the ES submitted in support of the DCO Application.

- 2.6.1.3 Potential impacts on historic environment receptors remain as previously assessed, namely loss of, or harm to, buried archaeological remains. Indirect (setting) impacts on designated assets within the surrounding area are not anticipated due to the temporary nature of construction activities and no permanent above ground infrastructure of any height at this location during operation. These impacts will be mitigated prior to and during construction, as informed by pre-construction archaeological mitigation excavations (where identified to be required), of the Project secured through the Outline Onshore Written Scheme of Investigation (REP2-036),
- 2.6.1.4 The Change Request, therefore, does not result in any new or different likely significant environmental effects in respect of historic environment.



2.7 Landscape and Visual Resources

Assumptions and Limitations

- 2.7.1.1 The relevant land subject to the Change Request does not lie within any nationally designated/defined landscapes or any other local landscape designations; there is no change to the susceptibility, value or sensitivity of the landscape within the revised extents of the Order Limits from what has already been identified and assessed in Environmental Statement Volume 3, Chapter 6: Landscape and visual resources (APP-069). It is judged that the baseline study, set out in APP-069 remains valid.
- 2.7.1.2 Overall, baseline features remain unchanged from those identified and assessed with the ES submitted in support of the DCO Application.

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- 2.7.1.3 Impacts on landscape and visual receptors arising from the Change Request would follow those already assessed in Environmental Statement Volume 3, Chapter 6: Landscape and visual resources (APP-069) and therefore remain short-term, temporary and reversible i.e., landscape features would be reinstated following completion of construction activities.
- 2.7.1.4 There are no new above ground features being proposed in respect of the Change Request and the additional land incorporated in the Order limits is minimal. Therefore, any additional impact on landscape and visual resources as a result of the Change Request are largely in respect of the construction and decommissioning phases and would be short-term, temporary and reversible.
- 2.7.1.5 Mitigation secured through the Outline LEMP (REP2-034) and the Design Principles (REP2-026) will apply to ensure that the design and mitigation intent is realised as described in the Environmental Statement - Volume 3, Chapter 6: Landscape and visual resources.
- 2.7.1.6 The Change Requests, therefore, do not result in any new or different likely significant environmental effects in respect of landscape and visual resources.

2.8 Land Use and Recreation

Assumptions and Limitations

- 2.8.1.1 The relevant land subject to the Change Request comprises primarily agricultural land or existing tarmac or gravel access tracks which have been constructed in association with existing electricity infrastructure.
- 2.8.1.2 The relevant land subject to the Change Request is located on Grade 3b agricultural land or existing access tracks. Bridleway 208/32 crosses the primary construction access to the Onshore Substation and footpath 208/16 routes south along the western boundary of this access. The impact on Bridleway 208/32 and footpath 208/16 are unchanged compared with what as assessed within the ES. Overall, land use remains unchanged from that identified and assessed within the ES submitted in support of the DCO Application.



- 2.8.1.3 Potential impacts of the Change Request remain the same as previously assessed in Environmental Statement Volume 3, Chapter 7: Land use and recreation (APP-070), namely temporary disruption to agricultural land and soils, impact to the operation of farm holdings. The Change Request (Change 1) will avoid vehicles tracking over agricultural land to undertake site preparation activities, and therefore, reduce potential damage to soils.
- 2.8.1.4 The extended Order Limits result in a minor increase in temporary land take however, it will not affect any additional receptors or cause any different impacts to that assessed in the ES. Best practice mitigation measures to minimise impacts to agricultural soils and businesses, and recreational receptors during construction will be implemented, as outlined in Table 7.24 Environmental Statement - Volume 3, Chapter 7: Land use and recreation (APP-070), the Outline CoCP (REP2-038) and the Outline Soil Management Plan (APP-220). Collaboration with the landowners at the relevant land subject to the Change Request will be ongoing in relation to access, soil management and cable routing, to minimise impacts to the agricultural land and business.
- 2.8.1.5 The Change Request, therefore, does not result in any new or different likely significant environmental effects in respect of land use and recreation.

2.9 Traffic and Transport

Assumptions and Limitations

2.9.1.1 The assessment of traffic and transport impacts within Environmental Statement - Volume 3, Chapter 8: Traffic and Transport (APP-071) was informed by assessing the forecast change in traffic flows relative to the baseline traffic conditions. The traffic and transport baseline traffic conditions would remain unchanged under the Change Request from those assessed within the ES submitted in support of the DCO Application.

- 2.9.1.2 Change 1 will be used only for onshore site preparation works including preconstruction surveys and site clearance. It is likely that this access will be used intermittently over a period of approximately twelve months. On days that the access is used the number of traffic movements will be de-minimis..
- 2.9.1.3 The vehicles using this existing access for the onshore site preparation works are expected to be 4x4 with trailers and swept path analyses have shown these travelling between the B5381 Glascoed Road and the existing access junction satisfactorily with no overrun of the edge of carriageway.
- 2.9.1.4 There would be no change to the peak traffic demand and the assessments of these within the Environmental Statement Volume 3, Chapter 8: Traffic and Transport (APP-071). An assessment of access and road safety has been completed and concluded that there are no road safety concerns with the proposed use of the existing access track on the basis that the Change Request would be subject to the same controls already applied through the Draft DCO and mitigation set out in the Outline Construction Traffic Management Plan (REP2-064).
- 2.9.1.5 In relation to Changes 2-5 the amended Order Limits would not materially increase vehicle movements and therefore, there would be no material change to peak traffic demand forecasts and any changes could be contained within the assessed worst case.



- 2.9.1.6 Mitigation measures set out within Environmental Statement Volume 3, Chapter 8: Traffic and Transport (APP-071) and included within the Outline Construction Traffic Management Plan (CTMP) (REP2-064) will be implemented to ensure that the construction traffic parameters (e.g., traffic numbers and routes) assessed within the ES are managed and not exceeded.
- 2.9.1.7 The Change Request, therefore, does not result in any new or different likely significant environmental effects in respect of traffic and transport.

2.10 Noise and Vibration

Assumptions and Limitations

2.10.1.1 The closest noise sensitive receptors to the relevant land subject to the Change Request remain consistent with those identified in Environmental Statement -Volume 3, Chapter 9: Noise and Vibration (APP-072) with only negligible decrease in the distance between the Order Limits and the closest noise sensitive receptors. This baseline remains unchanged from that identified and assessed within the ES submitted in support of the DCO Application.

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- 2.10.1.2 Potential impacts remain the same as previously assessed, namely annoyance related impacts caused by noise generated by construction works, vehicles and plant. The Change Request will not result in any new or different impacts from what was assessed in the Environmental Statement Volume 3, Chapter 9: Noise and Vibration (APP-072).
- 2.10.1.3 There will be no material change to the number of construction traffic movements compared to that assessed in the ES (see paragraphs 2.10.1.2 to 2.10.1.7 above), so the road traffic noise impacts will be no worse than those assessed in the ES.
- 2.10.1.4 Potential noise and vibration impacts will be controlled by the application of mitigation measures set out within Section 9.8 of Environmental Statement Volume 3, Chapter 9: Noise and Vibration (APP-072), the Outline CoCP (REP2-038) and the Outline Construction Noise and Vibration Management Plan (REP2-044).
- 2.10.1.5 The Change Request, therefore, does not result in any new or different likely significant environmental effects in respect of noise and vibration.

2.11 Air Quality

Assumptions and Limitations

- 2.11.1.1 There are no designated Air Quality Management Area's (AQMAs) within the relevant land subject to the Change Request. There are also no designated AQMAs within the air quality study area indicating that air quality falls below the relevant objectives and limit values for the main air pollutants.
- 2.11.1.2 Background pollutant concentrations of NO2, PM10 and PM2.5 at the relevant land subject to the Change Request and across the study area considered in Environmental Statement Volume 3, Chapter 10: Air quality (APP-073) is below the air quality limit value as set out in the UKs Air Quality Standards Regulations 2010.



2.11.1.3 This baseline remains unchanged from that identified and assessed within the ES submitted in support of the DCO Application.

Environmental Appraisal

- 2.11.1.4 Potential impacts of the Change Request remain the same as previously assessed within the Environmental Statement Volume 3, Chapter 10: Air quality (APP-073), namely nuisance impacts caused by dust emissions from construction works, vehicles and plant. The Change Request will not affect any additional receptors or cause any different impacts to that assessed in the ES. There will be no material change to the number of construction traffic movements compared to that assessed in the ES.
- 2.11.1.5 As detailed in Section 10.7 of Environmental Statement Volume 3, Chapter 10: Air quality (APP-073), air pollution and dust generation would be appropriately controlled by the application of best practice mitigation measures set out within the Outline Dust Management Plan (APP-214) and the Outline CoCP (REP2-038).
- 2.11.1.6 The Change Requests, therefore, do not result in any new or different likely significant environmental effects in respect of air quality.

2.12 Other Environmental Topics

- 2.12.1.1 Due to the scale and nature of the Change Request, the following topics are unlikely to affect, or be affected by the Change Request, and so it is considered appropriate that these are scoped out of the considerations for this Annex 1:
 - Climate change;
 - Socio Economics;
 - Human Health; ; and
 - Transboundary effects
- 2.12.1.2 In addition, due to the distance of the relevant land subject to the Change Request from the coast, no offshore topics will be affected.
- 2.12.1.3 Finally, as there the changes do not introduce any new environmental receptors or additional impacts on previously identified receptors, there are no cumulative impacts which differ from those assessed in the ES nor are there any interrelated effects which differ from those assessed in the ES.

2.13 Conclusions

- 2.13.1.1 The Change Request represents a minor change to the development previously assessed in the DCO Application, comprising small extensions to the Order Limits and changes to the works areas. These changes do not introduce any new environmental receptors or additional impacts on previously identified receptors. Furthermore, all works associated with the Change Request will be undertaken in strict accordance with the environmental and construction management measures outlined within the wider DCO Application, as secured by the draft DCO (REP2-004).
- 2.13.1.2 This Annex 1 therefore demonstrates that the Change Request will not lead to any materially new or different environmental impacts to those previously assessed and reported within the ES. It is therefore concluded that the mitigation



measures secured by the draft DCO (REP2-004) are sufficient to appropriately manage any potential impacts from the Change Request.



3 ANNEX 2

Table 3-4: List of parties to be formally notified of the Change Request in accordance with regulation 7 and Schedule 2 of the CA Regulations

Land Interests
Arthur Elwy Morris Owen
Betty May Jones
Burbo Extension Limited
Burbo Extension Ltd
Diamond Transmission Partners BBE Limited
ESP Electricity Limited
Glyn Jones
Gwynt Y Mor Offshore Wind Farm Limited
Gwynt Y Mor OFTO PLC
National Grid Electricity Transmission PLC
Openreach
Richard Thomas Owen Williams
Robert Bryn Davies
SP Manweb
The Executor of the Estate of the Late David Watkin Williams-Wynn BT
Timothy Michael Bell
Vodafone
Welsh water



Other Interested Parties Cadw Cyngor Cymuned Cefn Meiriadog/Cefn Meiriadog Community Council Natural Resources Wales Heneb Cyngor Sir Ddinbych/Denbighshire County Council Mr and Mrs Hussey