

# MONA OFFSHORE WIND PROJECT

## Response to ExA letter dated 8 November

Application Reference: EN010137

Document Reference: S\_CR\_14

Document Number: MOCNS-J3303-JVW-10351

12 November 2024

F01



Image of an offshore wind farm

## Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission to ExA	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	12 Nov 2024

Prepared by:

**Mona Offshore Wind Ltd.**

Prepared for:

**Mona Offshore Wind Ltd.**

**12 November 2024**

The Planning Inspectorate  
National Infrastructure Directorate  
Temple Quay House, Temple Quay  
Bristol, BS1 6PN

Dear Madam / Sir,

The proposed Mona Offshore Wind Farm

**PINS Reference: EN010137**

### **Change Request Application**

We refer to your letter dated 8 November 2024 and the Change Request (details of which were submitted on 1 November 2024 and are listed as documents CR1-001 to CR1-013 in the Examination Library).

We thank the Examining Authority for responding to the Change Request promptly and for the feedback provided. We will not repeat the details of the Change Request here and instead will refer to Changes 1 to 5 as set out in the letter dated 8 November.

This letter will deal with Change 5 first, before addressing the points raised in relation to Changes 1 to 4.

### **Change 5**

It will not be possible within the timeframes allowed to obtain the consent of all Category 1 and Category 2 persons in relation to Change 5. As such, Change 5 will no longer be taken forward in the Examination. The Applicant will instead seek to obtain the necessary rights through voluntary agreements and seek a separate consent for the works through the Town and Country Planning Act 1990 processes to supplement the works consented through the development consent order. The Applicant does not see this posing any significant concerns in relation to delivery of the Project. Change Request documentation will be updated accordingly.

### **Changes 1 to 4**

#### Change 1

The Applicant notes the specific questions in the letter dated 8 November and responds to each in turn as follows:

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1. *Could the Applicant explain why the proposed change is necessary if being utilised for onshore preparation works only?*

In the first instance, the Applicant wishes to clarify the details of Changes 1a and 1b (as described in the Change Request Report (CRR) – CR1-001).

Change 1a comprises an Order Limits change to include an existing access track to the west of the onshore substation for access during onshore site preparation works only. Therefore, this access will not be used for the purposes of construction, once onshore site preparation works are complete.

Change 1b comprises an Order Limits change to include an area to the west of the proposed onshore substation for:

- temporary access during onshore site preparation works where access from the local highway network will be taken through the land included in Change 1a; and
- temporary access during construction to provide an additional means of access around the north-western corner of the onshore substation, taken from other Works areas around the onshore substation site. During this construction period, access to Change 1b will be from the construction access from Glascoed Road (via intervening Work areas).

The reason for including Change 1 within the Change Request is to ensure that temporary possession powers can be relied upon by the undertaker.

Change 1a delivers an additional access to the onshore substation site area for the onshore site preparation works period only. Use of this access will allow time-critical, and in some cases seasonally restricted, onshore site preparation works to be undertaken at the onshore substation site before the temporary construction access from Glascoed Road is in place. It is necessary to reduce the overall time required for the construction programme and reduce the likelihood of any delays to the connection of the Project. Change 1a facilitates onshore site preparation works earlier in the programme, that would otherwise be contingent on delivery of the temporary access from Glascoed Road. These onshore site preparation works include archaeological investigations, investigations for the purpose of assessing ground conditions (to establish the detailed design of the finished ground level and onshore substation platform), ecological surveys and site clearance (surveys and tree and vegetation removal). Providing the ability for those to be undertaken earlier within the construction programme will facilitate the timely delivery of the temporary construction access road and onshore substation platform works by ensuring the necessary information has been gathered to discharge the relevant Requirements and subsequently to undertake site clearance activities to prepare for the delivery of those works.

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Change 1b delivers two needs for the project:

- it connects the access for onshore site preparation works (Change 1a) to the Work areas currently included within the Order Limits, and therefore facilitates everything set out in Change 1a; and
- provides an additional area around the onshore substation excavated platform for the tracking of equipment during construction. Following early detailed design, the Applicant believes that this additional parcel of land is needed during construction to reduce the movement of tracked equipment over stored excavated material to reduce soil compaction.

2. *Paragraph 1.2.13 of the CRR states that it would be used to take access for Work Nos. 21, 22, 23 and 31. However, Paragraph 1.2.1.6 states that it would be used for temporary access to Work Nos. 21-24, 27, 29, 32, 33 and 26. Can the Applicant clarify which Work Nos it is seeking access for?*

Change 1a will allow access to the area of Change 1b during onshore site preparation activities. Paragraph 1.2.1.3 states that access will be taken to other work areas adjacent. To clarify, those are Work Nos. 21, 22 and 33. Further access can then be gained to other Works areas around the onshore substation.

The same point regarding access to other Works areas at the onshore substation is relevant for Change 1b during the period of construction.

3. *The CRR states that the access would be used for onshore preparation works only such as time critical surveys. Paragraph 1.2.1.8 then states 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. Can the Applicant confirm what is meant by paragraph 1.2.1.8?*

As set out above, Change 1a would be for onshore site preparation works only, and Change 1b would be for onshore site preparation works and construction. The statement in Paragraph 1.2.1.8 of the CRR therefore only refers to the area of Change 1b.

4. *Is proposed Change 1 solely for onshore preparation works and can the Applicant confirm that it would not be used during construction? How would the Applicant propose securing this in the DCO?*

See point 5 below.

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5. *Section 2.9 states that this would only be used for 12 months and only by 4x4 vehicles and that daily movements would be de minimis. How would the Applicant propose securing this in the DCO?*

As set out above, Change 1 will comprise two new areas of land to be incorporated into the Order Limits.

Change 1a will be for onshore site preparation works only. As set out in Annex 1 of REP1-012 this is estimated to be approximately 12 months.

Change 1b would be for the period of onshore site preparation works and the period of construction.

The Applicant believes that the Examining Authority would like to understand how the traffic movements associated with the use of Change 1a can be suitably controlled. The Applicant will therefore prepare an updated outline Construction Traffic Management Plan to accompany the Change Request materials (to be called the Change Request: Outline Construction Traffic Management Plan). This Change Request: Outline Construction Traffic Management Plan will specify:

- the types of vehicles which can use the access to be taken through Change 1a;
- provision to agree (with the local planning authority - in this case Denbighshire County Council) a route for contractors delivering onshore site preparation works at the onshore substation using the access at Change 1a, and clarity that Change 1a won't be used for construction access; and
- an obligation to notify the local planning authority at the relevant point that the use of Change 1a is no longer required.

A further update will be made to Schedule 7 of the Change Request: Draft Development Consent Order (CR1-010) to specify that plot 11-197b (which relates to Change 1a) will be for the purposes of onshore site preparation works only.

#### Non-Statutory Consultation for Changes 1 to 4

The Applicant notes the Examining Authority's proposed approach to consultation on the Changes and confirms agreement with this approach.

The Applicant intends to adhere to the following consultation timeline:

- Friday 15 November: All hard copies to be provided to consultees, arriving from Saturday 16 November and all materials to also be sent by email to consultees. Site notices to be placed.
- Monday 18 November: Consultees to be contacted where confirmation of receipt of consultation materials has not been given and materials subsequently provided as required. Notification of consultation to be placed in the Daily Post.

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- Tuesday 3 December:
    - All consultation responses to be received by 5pm on 3 December.
    - Change Request Consultation Report to be provided to the Examining Authority, covering the points set out in the Examining Authorities letter dated 8 November, for Deadline 5.

Any consultation responses received after 5pm on 3 December will be provided to the Examining Authority at an agreed time following Deadline 5.

### **Next Steps**

The Applicant intends to proceed on the basis that Changes 1 to 4 will form the basis for the Change Request. Should the Examining Authority have further comments on this approach, the Applicant would be very grateful for a swift response in order to meet the publication deadline of the local newspaper.

The Applicant will update the Change Request Report in line with the above comments and make available the Change Request: Outline Construction Traffic Management Plan and Change Request: Draft Development Consent Order (along with the tracked version and the Change Request: Schedule of Changes) to consultees on the Mona website alongside all Change Request documentation and we will explain the position in the accompanying letter.

Yours faithfully,

A large black rectangular redaction box covering the signature of Paul Carter.

Paul Carter  
Mona Consents Lead