

MONA CHANGE REQUEST
APPLICATION REFERENCE: EN010137
IP NO MNOW-S57018

CHANGE 1

Late Submission changes and Notifications

- *Submissions*

Late documentation published in waves and very close to deadline 5 leaves people little time to respond and the lack of notifications about any new documentation does not help matters.

- *Notices*

These changes are centred around the onshore substation site on the outskirts of St Asaph, to access the relevant documents free of charge then the applicant identifies both Llandudno library or Rhyl library. It would be much more appropriate to allow access to the relevant documentation at St Asaph library, something that has been lacking throughout this entire process.

Whilst the applicant has put up notices along the access road from Glascoed Road (the applicant refers to this lane as 'Cefn Road') to Change 1 access track, there has been quite a large number in this area from the applicant, National Grid and Awel Y Môr, which as ever with more and more notices people become desensitised and so engagement is getting less and less.

- *Access and Egress from and onto Glascoed road*

The access from Glascoed road is a narrow single track lane and a blind corner meaning it is potentially dangerous. This is particularly so for vehicles with trailers when egressing onto Glascoed road as you need to be virtually in the middle of Glascoed road to see properly. Whilst the applicant indicates there have been no collisions, the Crematorium being so close and the increase in traffic from Awel Y Môr, combined with the applicant's traffic will only increase risks.

- *Road unsuitable for HGV's*

Signage onto Cefn road highlights that it is not suitable for HGV's. I understand that the applicant states that it will not be used for HGV's but 43feet long vehicles and trailers with unspecified weight could equally be argued that the road is unsuitable.

- *Suitability*

The applicant has indicated that there are 9 passing places along 'Cefn Road' but many of those, whilst on desktop swept path analysis might appear suitable are not in practice.

Passing points 1 & 2 - These are barely suitable for a single vehicle to pull into due to open ditches on the side and vegetation,

Passing point 6 – This particular part of the lane becomes very muddy and wet during winter months and any periods of wet weather meaning that unless the passing vehicle was also a 4x4 it would not be able to pass.

Passing point 7 – This is on a blind sharp 90° bend and in order for the applicants potential 43feet long vehicle and trailer to get around the bend it will have to use all the road (and more) leaving no space for any vehicle to pass. There are also 3 other blind bends along this road providing additional safety concerns for other road users.

Passing point 9 – Gateways with open ditch on one side, again during winter and periods of wet weather, only useable by 4x4's to pass.

- *Vehicle usage*

The applicant indicates that this access would be used by light vehicles, vehicles pulling trailers and that it is for site preparation works only, the likes of further archaeological studies for e.g. To this I can only say that the most recent studies carried out by the applicant using this access route involved a 11.5tonne track mounted rig in June, the equipment having to be offloaded along the road as the vehicle transporting it was too large to access the field. and 2 large tracked mounted excavators in September which had to be offloaded on Glascoed road and then themselves driven up 'Cefn Road'. This does not give me confidence that the applicants 'expected' use will not involve further heavy and large plant.

- *Road surface*

I don't believe it is any coincidence that the road from passing point 8 onwards has required a relatively large number of potholes to be repaired this year. We do get some potholes along this road from time to time but the numbers have increased since the applicant (and others) have been using this route for site survey and investigations.

- *Precedent*

If this change request utilising 'Cefn Road' to and from Glascoed road is granted then this will set a yardstick for other survey, investigations and activity. National Grid are also likely to aim to use this road, along with IGP, possibly Mares, St Asaph solar etc. turning what currently is a very quiet single, narrow track lane used by horse riders, joggers, walkers and local traffic into a construction highway.

- *Reason for Change*

The main reason for this change is given that it is necessary to reduce the overall time required for the construction programme. This is difficult to quantify since the timescales presented by the applicant still remain the same as before the change request.

Could the applicant clarify as to whether it is the intention (if permitted) to start these site preparation works ahead of any final Investment decision due 2026/7 as it would seem strange, given the current business climate and BP's recent change to its approach to renewable energy to commence removal of hedgerows, cutting down trees etc. until any final decision is made.

- *Further point for clarification*

Although not part of this particular change request, if it were permitted then does the applicant plan to use 'Cefn Road' for access/egress to the Bridle path (Old Lane) in Groesfford Marli which it also identifies as an access route?