

Planning Inspectorate Examination EN010137: Mona Offshore Wind

Cefn Meiriadog Community Council MNOW-ISP002

Deadline 5, 3 December 2024

Response of the Community Council to the Applicant's Change Request Application

SUMMARY

- Cefn Meiriadog Community Council objects to the Applicant's Change Request application as it applies to proposed Change 1a.
- The Council believes the Applicant's perceived need to accelerate the project timetable, with its detrimental effect on the community, derives from his own inefficiencies in planning.
- The Council finds that use of what the Applicant calls 'the Cefn road' for project-related traffic would be highly inappropriate.
- The submission explains in detail why the characteristics of the road make it wholly unsuitable for the traffic it is proposed will use it, even though the Applicant claims such traffic will be minimal.
- The Council objects most strongly to what appears to be an attempt by the Applicant to cut down hedgerows to facilitate what he claims will be a temporary requirement.

1. Cefn Meiriadog Community Council (CMCC, The Council) notes the Applicant's various Change Request Application documents published on the ExA's website up to 29/11/24 inclusive.

2. The *Mona Change Request Report F02* ('the Report'), (1.2.1.5) states: *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..... Providing the ability for those to be undertaken earlier within the construction*

programme will facilitate the timely delivery of the temporary construction access from Glascoed Road...etc.”

The Council is unable to understand why, with even the Examination stage only two-thirds completed, the Applicant suddenly finds it necessary to “reduce the overall time required for the construction programme”, to the detriment of the local community and the accepted planning process. In a project of this magnitude and duration it would be reasonable to assume that the Applicant had devoted sufficient time and resources to (1) developing a robust and reliable timeline for the project as a whole, (2) had identified the time necessary for “facilitat(ing) the timely delivery of the temporary construction access from Glascoed Road and onshore substation platform works by ensuring the necessary information has been gathered...” as part of any critical path or similar analysis undertaken, and (3) had allowed some contingency for the possibility of “any delays to the connection of the Project”.

3. The Council stated in a Deadline 4 submission that it objected to Change 1a in the Applicant’s submission. Its objection was based on the assumption that the unnamed public road from Glascoed Road (B5381) past the property Waen Meredydd to the track beside the National Grid sealing compound would be used to gain access to the area covered by 1a. The intended use of this road, with details, is confirmed in the document *Mona Change Request Report F02* published on the ExA’s web site on 18/11/24.

4. CMCC’s objection to the road’s use was based on its assessment of its complete unsuitability for use by the vehicles which the Applicant says will use it in connection with Change 1a. This unsuitability derives from the road’s (1) narrowness, (2) 90-degree and near 90-degree bends, (3) high hedges, (4) lack of passing places, (5) gradients, (6) especially difficult egress on to Glascoed Road, and (7) its use by a significant number of local residents as their most direct route to the B5381 and the surrounding area, including St Asaph, Rhyl, Denbigh and the A55.

5. Several of these factors individually render the road unsuitable for use for the purposes proposed by the Applicant. In combination they make such use likely to cause extreme inconvenience and potential danger to other other users and thus highly inappropriate.

6. Having (1) studied *Mona Change Request Report F02* (‘the Report’),

and in particular its *Appendix 1 to ANNEX 1: temporary onshore site preparation works access technical note in respect of change 1a of the change request* ('the *Appendix*'), (2) the Applicant's *Change Request: Outline Construction Traffic Management Plan F01*, published 29/11/24 ('the OCTMP') and (3) made its own in-person, on-site assessment of the route concerned, CMCC sees no reason to change its assessment of the route as being highly unsuitable.

7. In responding to individual points this submission follows the format of documents submitted by the Applicant, particularly as referred to in para. 5 above the Report, the Report's Appendix, and the OCTMP. Where points may be raised multiple times within or across these and other documents, only one reference is given.

8. It finds a failure in both the Report and its Appendix to identify the inconvenience and potential dangers referred to above, and indeed finds aspects of the findings presented in the *Appendix* to be misleading, and presented so as to understate the potential risk and inconvenience of this route being used.

9. The Council notes in passing that the use of the abbreviation 'the Cefn road' to describe the road concerned (*Appendix: 1.2.1.1*) at best displays a regrettable indifference to the community's sensibilities, and at worst would lead local residents unfamiliar with the details of the application to believe that a completely different road was being referred to. There is no road or street officially named 'Cefn Road' within Cefn Meiriadog (ref: Royal Mail, *Postal Address Book*) and, notwithstanding the convenience of its use to the Applicant, the informal term 'the Cefn road', to the extent that it is used locally at all, is used to distinguish from other roads in the area the road leading from St Asaph to the location (and beyond, to the 'Cefn' hamlet) from which the Accompanied Site Inspection to the onshore substation site began on 15 October.

10. The Appendix (1.2.1.2) states: *Change Request Access AC-T1 provides access onto the Cefn road that is currently used for access to the surrounding agricultural fields and agricultural units.* It fails to state that it is also used daily by a significant number of local residents from properties including Pentre Mawr, Pentre Mawr Bach, the Ysguborau flats, Tyddyn Meredydd and others, to access the B5381 at Glascoed Road. If the intention was to convey the impression that it is used by large farm vehicles with trailers, it should be noted that almost all of the

land on either side of the road belongs to the same farm, so that only short movements and movements across adjoining fields are normally necessary.

11. The key factor in CMCC's objection to Change 1a is the nature of the road concerned and the hazards and inconvenience its use for the purposes proposed would pose to other road users, in particular local residents. Paragraph 3 above refers to the road's narrowness, 90-degree and near 90-degree bends, high hedges, lack of passing places, gradients, and difficult egress on to Glascoed Road. It hopes to show below the importance of these characteristics of the road, and the misleading nature of the Applicant's assessment of them, or indeed the failure to assess them at all.

12. It is accepted that HGVs will not use the road. However the Applicant's statements regarding the nature of the vehicles using the road and the frequency of their use of it is not sufficient to remove the Council's objection to Change 1a. In the Appendix 1.3.1.2 it is stated that "The largest type of vehicle that would utilise Change Request Access AC-T1 for the duration of the site preparation works are light vehicles, vans or 4x4 vehicles with relevant machinery being carried on trailers. An example vehicle is shown on Figure 3 below". Phrasing employing terms such as "type" and "example" does not provide reassurance that the full picture has been provided, particularly in this case where we find it is "with relevant machinery being carried on trailers". The Figure 3 cited shows a 4x4 and trailer combination with an overall length of 12.99 metres. This is a significant overall length in relation to the bends and passing places which would have to be negotiated with oncoming traffic likely. Further, while 1.2.2.4 states "Swept path analyses of a 4x4 and trailer travelling along the Cefn road between the Cefn road and Change Request Access AC-T1... show no overrunning of the edge of carriageway", this is frankly difficult to take at face value given the shortcoming elsewhere in the analysis. Considering the challenges (discussed below) presented by the bends and gradients, and the limitations of the passing places, it is important to understand the absolute maximum lengths and widths of vehicle-and-trailer combinations that might be used, and also, it should be added, of weights of machinery or loads (e.g. of cleared trees) that might be carried due to fact that the extreme limitations of the passing places frequently lead to the soft verges around them being driven upon to effect a passing of vehicles.

13. Similarly, as regards frequency of usage, statements such as “It is likely that this access will be used intermittently over a period of approximately 12 months.” (Appendix 1.3.1.1), “It is not expected that the onshore site preparation works would generate vehicle movements along the Cefn road every day”, (1.3.1.3) and “...traffic movements will be de minimis...” (1.3.1.3) cannot inspire the confidence that they would be adhered to. It is noted that the Applicant has not included a line for usage of this road in the OCTMP 1.4.2.8 Figure 1.1 *Mona Offshore Wind Farm peak daily construction flows*. While it is obviously understood that this refers to the construction period proper and it is stated that Change Request Access AC-T1 would only be used for the site preparation period, a table of a similar nature would enable a clearer picture to be grasped. It is also noted that no amendments have been made to the OCTMP’s *Appendix C. Traffic and transport study area and highway network overview*, or to *Appendix D. Staff access movements plan*, to indicate any possible use of the road.

14. It should be clear from the photographs provided to illustrate the points below that the road is not suitable for vehicle-trailer combinations 13 metres in length and possibly longer, with heavy machinery being carried, due to their inability to reverse around ninety degree bends and into short and infrequent passing places when faced with oncoming traffic, likewise to negotiate gradients and bends in icy conditions. It should be noted that this road is not gritted in winter no matter how severe the conditions.

15. **Bends.** As shown using the Applicant’s own illustration (Figure 1 in the Appendix, with additions as explained herein), the road runs for approximately 1.25 kms from its junction with B5381 Glascoed Road to the changed access AC-T1 requested by the Applicant (red circles). The initial approximately 0.25 kms and final approximately 0.35 kms are straight or relatively straight and without junctions. However the intervening approximately 0.65 kms (blue markers) contains four ninety-degree bends and two additional sharp bends, only one of which, at the first blue marker, has any form of visibility splay. All the rest are bounded by hedges, with in some cases high banks.



Figure 1: Existing Access Junction Location

16. **Passing Places.** The availability of passing places on a road of this nature is critical. The Appendix (1.2.2.3) states that there are “approximately nine”, as per the Applicant’s own Figure 2 reproduced here.

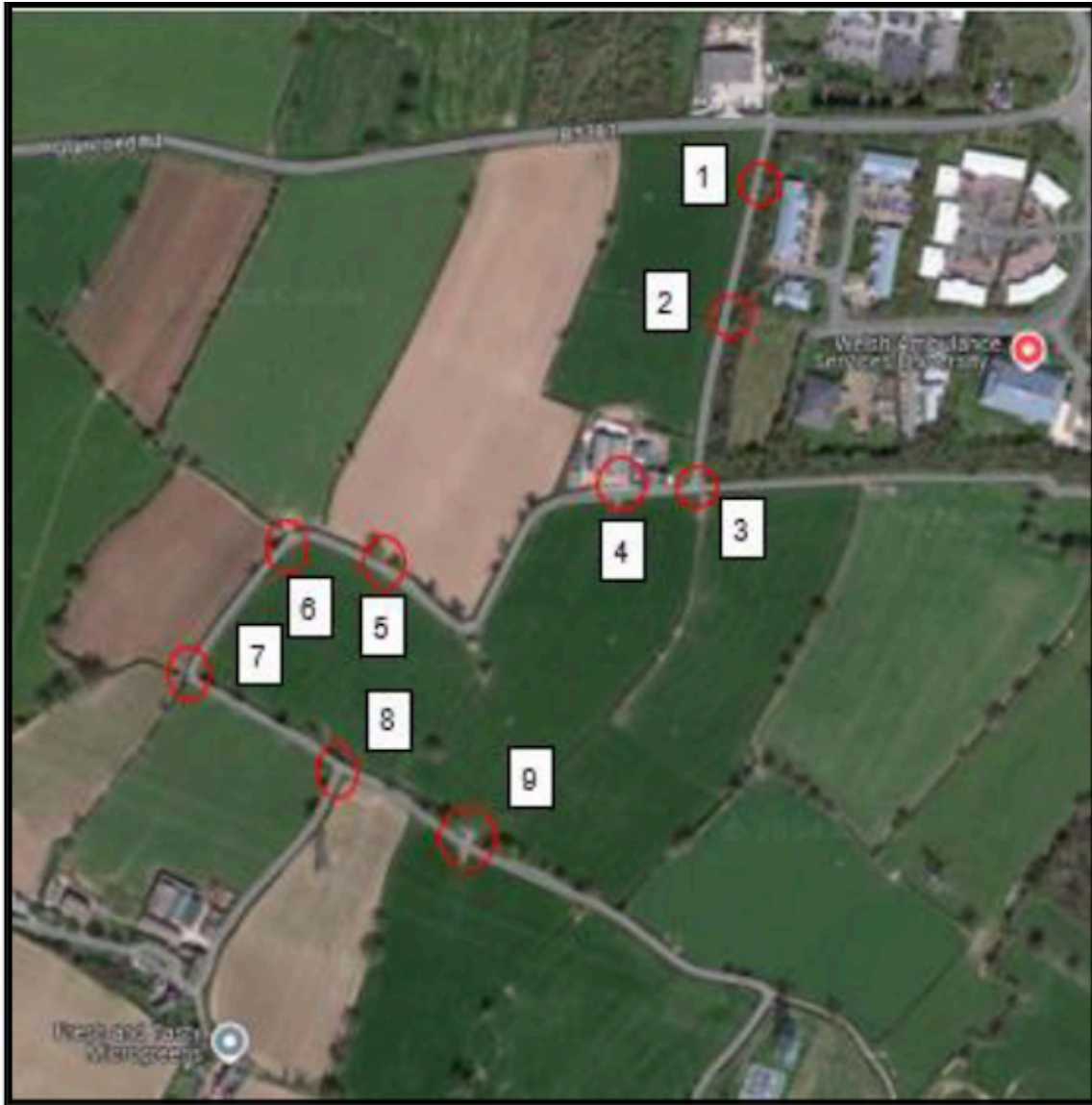


Figure 2: Passing Locations

As is shown below, this is grossly misleading, and it can only be assumed that it was produced from a desk-top exercise rather than any site visit or familiarity with the actual road itself. It will be noted that only three of the “Passing Points” identified by the Applicant are within that section of road where the ninety-degree bends have to be negotiated, and one of these (“Passing Point 7”) cannot realistically be taken into consideration. Below are photographs of each of the nine locations shown in the Applicant’s Figure 2. It hardly seems necessary to further point out the limitations of these “Passing Points”, but perhaps 7 and 9 merit particular attention. (It is acknowledged that these photographs were taken in particularly inclement weather conditions due to the necessity to meet the ExA’s Deadline 5)

“Passing Point 1”



“Passing Point 2”



“Passing Points 3 and 4”



“Passing Point 5”



“Passing Point 6”



“Passing Point 7”



“Passing Point 8”



“Passing Point 9”



17. **Gradients.** The bends marked with added yellow markers in the Applicant’s Figure 1 reproduced above present particular difficulties in icy conditions, since they both are at the start of notable (approximately 10-12%) gradients, falling in a north-easterly direction to the next bend along. With regard to the yellow-marked bend to the left in the Figure, the actual bend itself has a gradient of approximately 15-18%, making it a particular hazard. Rather remarkably, this bend is actually identified as Passing Point 7. On the subject of gradients, the road running in a north-easterly direction into the junction marked with the lower of the two blue markers, also has a very notable gradients and is known to present a particular hazard in icy and muddy conditions.

Gradients - general views



Gradients - on bends (photograph on right shows “Passing Point 7”)





18. Egress on to B5381 Glascoed Road

CMCC regards with some alarm the Appendix's paragraphs 1.2.3.1 and 1.2.3.2, concluding that "there is no evidence of any existing highway safety issues along the Cefn road or at its junction with the B5381 Glascoed Road", since it does not reflect the daily lived reality experienced by those emerging from the road and turning right onto the B5381 Glascoed Road in order to travel to St Asaph, Rhyl, Denbigh, the A55 and other destinations, and might be regarded by some familiar with the road as somewhat irresponsible. The difficulties come from two main factors, the fact that high speeds are common on the (unrestricted) B5381 on the long descent to St Asaph Business Park, and that in the westerly direction from the junction, the B5381 bends to the left gently but sufficiently to obscure long, clear views of traffic travelling eastwards. Visibility and speeds are such that it is always strictly necessary to come to a complete halt at the junction before pulling out on to the B5381, and then doing so in just an ordinary family car requires extreme caution and carries a distinct perception of risk. The time taken for a 4x4 & trailer combination 13 metres long, and with a heavy load on the trailer, to pull

out onto the B5381, would make it extremely vulnerable to vehicles travelling east at speed along the B5381, and needless to say, would make those vehicles extremely vulnerable also. It is difficult to show in photographs the challenges presented by this junction, but those below attempt to do so.








It is noted that in the OCTMP 1.4.2.8 Table 1.1 *Mona Offshore Wind Farm peak daily construction flows* (also referred to above in paragraph 13) shows the Mona-related traffic flows along the B5381 Glascoed Road between Engine Hill and Ffordd William Morgan (Link 19) , therefore past the junction under discussion, as Total Vehicles 261, Heavy vehicles 101. Again, this obviously relates to peak daily construction flows, but nevertheless it is a quite eye-opening indication of the significantly-increased volume of traffic that will be brought by the Mona project and will be an unwelcome additional challenge to members of the community using the junction to go about their daily business.

19. Purely in passing CMCC notes that in the OCTMP Figures 1.1 to 1.8, i.e. the depictions of road signage, all the road signs are monolingual. It is perfectly well understood that these are purely indicative examples and are, as the Applicant states, “generic in nature”. Nevertheless, similarly to the point made in paragraph 9 above, they display a regrettable lack of awareness of sensibilities within the community in which they are proposing to work for a long period and on which they will

be having a very major, albeit sadly detrimental, effect.

20. Finally but importantly, CMCC notes with very great concern paragraph 1.3.2.2 of the Appendix: *The requisite visibility splay requirements of 2.4 m x 43 m for 30 mph vehicle speeds in line with guidance set out in Manual for Streets 2 (The Chartered Institute of Highways and Transportation, 2010) are achievable in both directions from the Junction. These visibility splays are shown on Figure 4.*

It is assumed that “are achievable” in this context means that the desired visibility displays can be met if the hedges are removed. If so, CMCC finds it almost inconceivable and completely unacceptable that some 100m of hedgerow can be destroyed for a situation which the Applicant says will last a year at most and in which it is claimed that vehicle movements will be *de minimis*, and which it would appear has been brought about by the ineffectiveness of the Applicant’s own long-term planning.


Cefn Meiriadog Community Council
3 December 2024