

MONA OFFSHORE WIND PROJECT

Change Request Consultation Feedback Response

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition,

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	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

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Term	Meaning
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.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).

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Term	Meaning
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.

Acronyms

Acronym	Description
AfL	Agreement for Lease
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity net gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
HVAC	High Voltage Alternating Current
IEF	Important Ecological Feature
IEMA	Institute for Environmental Management and Assessment
ISAA	Information to support the Appropriate Assessment
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NBB	Net Benefits for Biodiversity
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
OSP	Offshore Substation Platform
PDE	Project Design Envelope
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SPA	Special Protection Area
TCE	The Crown Estate
WTW	Wildlife Trust Wales
TWT	The Wildlife Trusts

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Units

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

1 RESPONSE TO CHANGE REQUEST CONSULTATION FEEDBACK

1.1 Introduction

1.1.1.1 The Applicant has responded to all feedback received on the Change Request.

1.1.1.2 Feedback was received prior to consultation start, during consultation and at Deadline 5. All feedback or written responses on the Change Request have been included within this report.

1.1.1.3 Feedback has been received from those identified in table 1.1 below.

Table 1.1: Consultation feedback received

Respondee	Identifier
Cadw	B-1
National Plant Enquiries	B-2
Welsh Water	B-3
Martyn Hussey	B-4
SP Energy Networks	B-5
Councillor Martin Barlow, Cefn Meiriadog Community Council	B-6
Cefn Meiriadog Community Council Deadline 6 submission (Response to REP5-088)	B-7
Denbighshire County Council	B-8
Cefn Meiriadog Community Council (REP4-093)	The Applicant's response is in document S_D5_3 Response to Cefn Meiriadog Community Council D4 Submission - Change Request, submitted at Deadline 5. It has been included here for completeness.

2 Response to Cadw

Table 2.1: B-1: Cadw

Ref. No.	Comment	Applicant's response
B-1.1	<p>To confirm, the proposed changes are:</p> <ol style="list-style-type: none"> 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; 	<p>The Applicant notes the response.</p>
B-1.2	<ol style="list-style-type: none"> 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; 	<p>The Applicant notes the response.</p>
B-1.3	<ol style="list-style-type: none"> 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; 	<p>The Applicant notes the response.</p>
B-1.4	<ol style="list-style-type: none"> 4.The 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. These proposals are unlikely to cause any additional impacts on the historic environment. 	<p>The Applicant thanks Cadw for its response.</p>

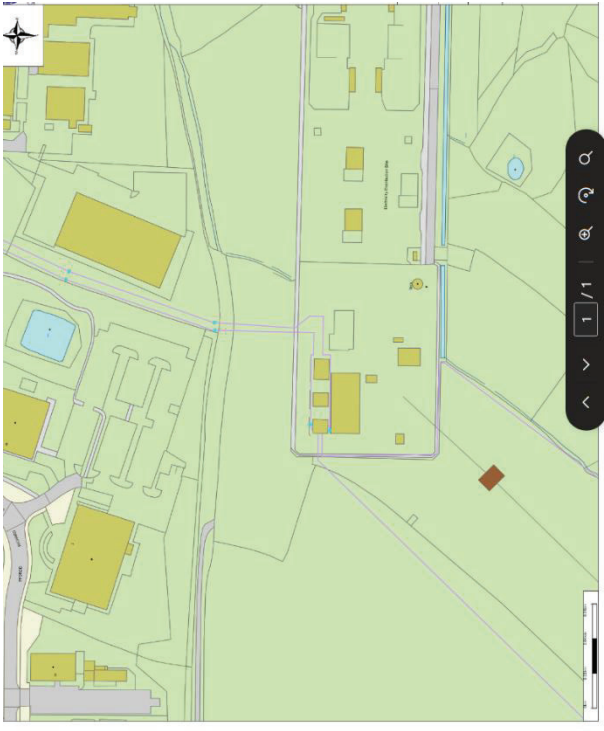
3 Response to National Plant Enquiries

Table 3.1: B-2: National Plant Enquiries

Ref. No.	Comment	Applicant's response
B-2.1	<p>Please note - We have created an electronic response for you in reply to your postal enquiry. For ALL future plant enquiry requests please email to osm.enquiries@atkinsglobal.com</p> <p>Please note that according to our records there is leased and/or third party network within your proposed works. However, because the plant is leased/third party we strongly recommend you contact all other utility providers to gather the extent of services within that area. Unfortunately, we are unable to advise who the plant is leased to or who the third party is.</p> <p>Note: Only affected parts are printed and our network is not present in the remaining areas of your proposed works.</p> <p>For all future requests please include a 12-digit grid reference and location details within the body of the actual email.</p> <p>IMPORTANT - PLEASE READ = Your Next Step?:-</p> <p>Where apparatus is affected and requires diversion, please send all the scheme related proposals that affects the Vodafone Network to c3requests@vodafone.com with a request for a 'C3 Budget Estimate'. Please ensure you include a plan showing proposed works. (A location plan is insufficient for Vodafone to provide a costing). These estimates will be provided by Vodafone directly, normally within 20 working days from receipt of your request. Please include proof of this C2 response when requesting a C3 (using the 'forward' option). Diversionary works may be necessary if the existing line of the highway/railway or its levels are altered.</p> <p>If you require a quote for new development, commercial site connections - please email your requirements and associated</p>	<p>The Applicant notes the response and can confirm those with an interest in land including utility providers were consulted and issued the consultation material regarding the change request in accordance with the Book of Reference (CR1-018). The Applicant has undertaken all reasonable steps to ensure utility interests have been identified including utility searches.</p> <p>As set out in the land rights tracker (CR1-038) the Applicant provided a draft of the default protective provisions which are included within Schedule 10, Part 2 of the draft DCO (REP5-006) on 11 March 2024 in relation to the order limits. No comments were received on these so it is presumed that Vodafone Limited will rely on the default protective provisions.</p>

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Ref. No. Comment Applicant's response

<p>B-2.2</p>	<p>plans to c3requests@vodafone.com and a budget estimate will be returned, within 10 working days of receipt</p> 
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4 Response to Welsh Water

Table 4.1: B-3: Welsh Water

Ref. No.	Comment	Applicant's response
B-3.1	<p>Grid Ref: 293196 380228 Site Address: Abergele Development: Proposed offshore wind farm comprising up to 107 wind turbine generators and associated offshore and onshore infrastructure to connect the wind turbine generators to each other and to the national grid.</p> <p>We refer to your consultation on a consultation launch notice in accordance with Statutory Consultation under section 42 of the Planning Act 2008 ('the Act') and Regulations 11 and 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. We note that this relates to a Development Consent Order for the Mona Offshore Wind Project. We have reviewed the documents available at this stage in the process and specifically the consultation received. We welcome the opportunity to comment on the proposal and would offer the following standing advice which should be taken into account within any future application:</p>	<p>The Applicant notes the response.</p>
B-3.2	<p>APPRAISAL</p> <p>Firstly, it appears the application does not propose to connect to the public sewerage system or potable water network, and therefore Dwr Cymru Welsh Water has no objections in principle. However, should circumstances change and a connection to the public sewerage system/potable water network is preferred we must be re-consulted on this application.</p>	<p>The Applicant notes the response.</p>
B-3.3	<p>Surface Water Drainage</p> <p>As part of the development falls within Wales, as of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable</p>	<p>The Applicant notes that schedule 3 paragraph 7 to the Flood and Water Management Act 2010 contains the requirement for approval, from the relevant approval body, of the SuDS prior to construction of the development. However, paragraph 7(3) contains an exemption for "work requiring development consent"</p>

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Ref. No.	Comment	Applicant's response
B-3.4	<p>Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It is therefore recommended that the developer engage in consultation with the Denbighshire Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.</p> <p>Asset Protection</p> <p>The proposed development site is crossed by public sewers and water mains. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.</p> <p>No part of any building or operational development will be permitted within 3 metres either side of the:</p> <ul style="list-style-type: none"> • 180mm combined MDPE rising main (292292.56, 378213.11). • 4" upvc watermain (294423.36, 378676.41). • 525mm foul conc sewer (294586.11, 378565.99). • 32mm MDPE watermain (294575.32, 378586.40). • 63mm MDPE watermain (94591.51, 378588.76). • 4" uPVC watermain (292147.85, 378079.10). • 3" CI watermain (291717.48, 378061.56). • 100mm uPVC foul sewer (292837.92, 378026.48). • 3" uPVC watermain (292268.71, 375532.36). • 3" CI watermain (292735.70, 374831.21). • 3" CI watermain (293622.97, 373715.42). • 3" uPVC watermain (294531.70, 373261.93). • 2" watermain (294706.33, 373295.01). • 8" abandoned raw watermain at (297383.92, 373023.15). 	<p><i>under section 31 of the Planning Act 2008</i>" (i.e. NSIPs). This is confirmed in the relevant statutory guidance under exemptions from the need for SAB approval.</p> <p>Relevant SuDS principles are secured through the DCO requirements.. Discharge of the relevant DCO Requirement requires review and approval of SuDS details by Denbighshire County Council (DCC) post-consent and before the commencement of works rather than in parallel to the application.</p> <p>The Applicant confirms that it is already engaging with DCC in their role as SAB.</p> <p>The Applicant notes the response, and refers to the bespoke Protective Provisions with Welsh Water (Dŵr Cymru Cyfyngedig) contained at Part 3 Schedule 8 of the dDCO (C1 F07).</p>

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Ref. No.	Comment	Applicant's response
	<ul style="list-style-type: none"> • 62mm MDPE watermain (297796.48, 373366.31). • 6", 8", 10", 200mm watermain (299242.88, 374048.84). • 90mm MDPE watermain (300411.23, 373355.20). • 90mm MDPE watermain (300353.37, 372785.03). • 280mm HPPE, 500mm DIEI, 500mm GRP watermain (301119.75, 373661.25). • 225mm surface water and VC foul sewers (301555.46, 373804.27). • 150mm and 225mm combined sewers (303449.45, 373816.32). • 10" CI, 280mm HPPE 5" CI, 500mm abandoned GRP, 350mm DIEI watermain (303147.85, 373829.49). • 150mm VC foul sewer (301690.85, 371603.71). • 90mm MDPE watermain (301965.38, 371258.66). • 63mm MDPE watermain (301729.89, 371103.77). • 32mm MDPE watermain (301305.51, 371212.07). 	
B-3.5	<p>We also note that the proposed site is located within the vicinity of our freehold ownership sites namely Glascoed water tank, we request that this proposal does not encroach on this site and associated infrastructure.</p>	<p>The Applicant can confirm that the change request does not encroach on the site known as Glascoed water tank.</p>
B-3.6	<p>Our strong recommendation is that your site layout takes into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. We also request an accurate location plan of the proposed pipeline so that we can assess its impacts on our infrastructure further. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.</p>	<p>The Applicant notes the response and refers to the plans submitted as part of the Change Request. The Applicant will continue to engage with Welsh Water and will share further plans and designs once they are available.</p>
B-3.7	<p>Notwithstanding the above, we respectfully reserve the right to comment further on any matters and issues arising from ongoing and future consultation, and request that an accurate location plan of the proposed infrastructure is</p>	<p>The Applicant notes the response and refers to the plans submitted as part of the Change Request. The Applicant will continue to engage with Welsh Water and will share further plans and designs once they are available.</p>

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Applicant's response

Ref. No. Comment

provided. We trust the above information is helpful at this stage and we look forward to continuing our engagement on the project prior to and during the submission of an application to the Planning Inspectorate.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

5 Response to Martyn Hussey

Table 5.1: B-4: Martyn Hussey (REP5-127)

Ref. No.	Comment	Applicant's response
<p>B-4.1</p> <p>CHANGE 1</p> <p>Late Submission changes and Notifications</p> <ul style="list-style-type: none"> • Submissions <p>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.</p>	<p>The Applicant has continued to refine its proposals through detailed design and engagement with stakeholders, and this has resulted in the need for changes, the timeframe for these changes to be communicated was unavoidable.</p> <p>The Applicant took a reasonable and proportionate approach to the identification of consultees who would be consulted as part of this targeted non-statutory consultation. The Applicant identified all those with an interest in or likely to be affected by the requested changes based on the location of the onshore substation site and the surrounding area.</p> <p>A notice was placed in the Daily Post on Monday 18 November, and the Applicant wrote to all consultees directly affected – following up calls made to the relevant landowners and placed notices in the vicinity of the proposed changes. In addition, all materials were placed on the Applicant's project webpage from Tuesday 19 November.</p>	
<p>B-4.2</p> <ul style="list-style-type: none"> • Notices <p>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.</p> <p>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.</p>	<p>The Applicant placed physical notices in the areas most likely to be impacted by the proposed Changes. Notices were placed on Friday 15 November 2024 and these were regularly monitored throughout the consultation period and replaced if required.</p> <p>All documents were placed on the Applicant's webpage and information was made available within a selection of local libraries which the Applicant has used previously to share consultation materials.</p>	
<p>B-4.3</p> <ul style="list-style-type: none"> • Access and Egress from and onto Glascoed road 	<p>An assessment of road safety has been undertaken and is presented in Appendix 1 to Annex 1 of the Change Request Report (CR1-030).</p>	

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Ref. No.	Comment	Applicant's response
B-4.4	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Road unsuitable for HGV's <p>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.</p>	<p>The Applicant acknowledges there will be additional traffic movement along Glascoed Road and has committed to working with other developers and the relevant local highway authority to determine the potential need or implementation of any necessary Temporary Traffic Regulation Orders along the Glascoed Road (e.g. reduce speed limits), see the Outline Construction Traffic Management Plan (J26.13 F04) for further detail.</p> <p>The Applicant has confirmed HGV's will not be permitted to use Access AC-T1 (the access associated with Change 1a) in the Outline Construction Traffic Management Plan (J26.13 F04). The Applicant has also provided further detail of the number and types of vehicles that will be permitted to use Access AC-T1 in the Outline Construction Traffic Management Plan (J26.13 F04), and this has been agreed as acceptable with the relevant local highway authority (CR1-046)</p>
B-4.5	<ul style="list-style-type: none"> • Suitability <p>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.</p> <p>Passing points 1 & 2 - These are barely suitable for a single vehicle to pull into due to open ditches on the side and vegetation,</p> <p>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.</p> <p>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.</p>	<p>The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment of the road in terms of its geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381.</p> <p>Appendix 1 to Annex 1 of the Change Request Report (CR1-030) refers to these as 'passing locations' rather than passing places so as not to seek to define these as formal (sometimes signposted) passing places that accord with highway design standards and being constructed to any recognisable geometry or layout. Indeed, by referring to these as 'passing locations', it recognises that they are commensurate with rural single track roads of variable geometries and layout but nonetheless, provide the ability for oncoming vehicles to pass one-another.</p> <p>The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).</p>

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Ref. No.	Comment	Applicant's response
B-4.6	<p>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.</p> <ul style="list-style-type: none"> Vehicle usage <p>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.</p>	<p>The Applicant has confirmed HGV's (which includes heavy vehicles and large plant) will not be permitted to use Access AC-T1 (the access associated with Change 1a) in the Outline Construction Traffic Management Plan (J26.13 F04). The Applicant has also provided further detail of the number and types of vehicles that will be permitted to use Access AC-T1 in the Outline Construction Traffic Management Plan (J26.13 F04), and this has been agreed as acceptable with the relevant local highway authority (CR1-046)</p>
B-4.7	<ul style="list-style-type: none"> Road surface <p>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.</p>	<p>The Applicant has committed, through the Outline Construction Traffic Management Plan (J26.13 F04), to undertake a video survey of the B5381 to Access AC-T1 (Change Request 1a) prior to the start of onshore site preparation works. The video survey will be repeated at regular intervals during the period that the access is being used to identify any significant changes. The results will be provided to the relevant local highway authority and where it is agreed damage has resulted from the passage of vehicles associated with the onshore site preparation works, the Applicant will cover the cost of repairs.</p>
B-4.8	<ul style="list-style-type: none"> Precedent <p>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.</p>	<p>The Applicant's proposed traffic movements have been demonstrated to be <i>de minimis</i>, and therefore have been agreed with the relevant local highway authority (CR1-046). Other developers proposing to use this access would need to seek similar agreements with the relevant local highway authority to be able to use this access.</p>
B-4.9	<ul style="list-style-type: none"> Reason for Change 	<p>The Applicant notes that the Funding Statement (CR1-036) states that the Applicant is a 50/50 joint venture between bp Alternative Energy Investments</p>

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Ref. No.	Comment	Applicant's response
B-4.10	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Further point for clarification <p>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 Marii which it also identifies as an access route?</p>	<p>Limited (which is a wholly owned subsidiary of bp plc) and Energie Baden-Wurtemberg AG (EnBW).</p> <p>Both legal entities are fully committed to the development of the Mona Offshore Wind Project and, pending a decision on consent being granted, intend to progress the project as quickly as possible in line with the proposed project programme (as outlined in APP-050). Onshore site preparation works may proceed in advance of a potential Final Investment Decision so that the proposed programme can be realised.</p>
		<p>The proposed use of 'Cefn Road' is for onshore site preparation works only. The access will only be used during the onshore site preparation works by vehicles undertaking onshore site preparation activities (as defined in Part 1, Article 2 of the DCO) and will be controlled through the Outline Code of Construction Practice (J26 F05) and the associated management plans. On completion of the temporary construction access road from Glascoed Road to the Onshore Substation, vehicles will cease to use the 'Cefn Road' following notification to Denbighshire County Council. No construction vehicles will be permitted to access the Onshore Substation site via 'Cefn Road'. Further detail is available in the Outline Construction Traffic Management Plan (J26.13 F04).</p> <p>The access along 'The Old Lane' will only be used during the operation and maintenance phase, and therefore will not be used for any construction traffic. As described in paragraph 3.9.2.1 of the Project Description (APP-050) the onshore operations and maintenance requirements for the onshore export cables will involve infrequent on-site inspections and corrective maintenance activities at link box locations along the onshore export cables on foot and with light vehicles only.</p>

6 Response to SP Energy Networks

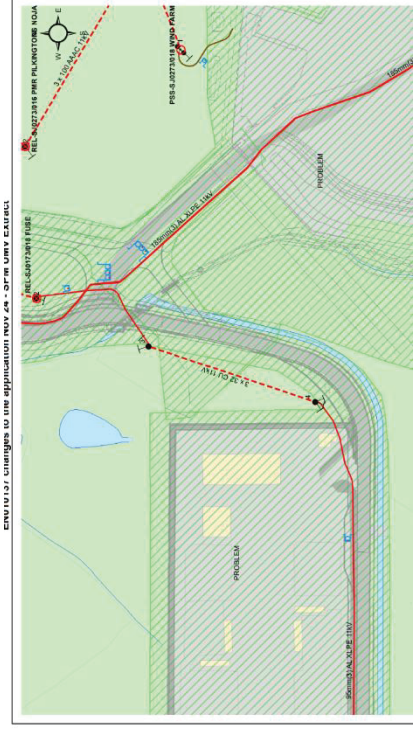
Table 6.1: B-5: SP Energy Networks (REP5-121)

Ref. No.	Comment	Applicant's response
B-5.1	<p>Thank you for the opportunity to comment on the proposed changes to the DCO application for the above project.</p> <p>I have reviewed the proposed changes and draw the applicant's attention to Change 4 potentially impacting on SPM's apparatus which is an important customer infeed to the substation itself, as shown in the photo below and on the attached map extract. SPM would appreciate the applicant explaining to SPM how any impact can be managed and until this happens, SPM is unable to confirm it has no objections to this change.</p>	<p>Any interaction with SPM's apparatus will be subject to the bespoke Protective Provisions contained at Part 4 Schedule 8 in the dDCO (C1 F07).</p> <p>The Applicant is in preliminary discussions with SPM as the District Network Operator (DNO) regarding a new electricity connection to the Mona Onshore Substation and the temporary construction compound. The area highlighted in the consultation response was contained in the feedback received by SPM in response to an initial feasibility request as to where on SPM's electricity network a suitable supply could be obtained to serve the temporary construction compound. These are preliminary discussions, and a connection agreement will need to be entered into between the Applicant and SPM for any new connection once the electrical supply requirements for the Project have been determined. The DNO will own and be responsible for any new cable or infrastructure installed to provide an electricity supply to the Applicant as a potential customer.</p>
		

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Ref. No. Comment Applicant's response

B-5.2



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7 Response To Councillor Martin Barlow, Cefn Meiriadog Community Council

Table 7.1: B-6: Cefn Meiriadog Community Council (REP5-)

Ref. No.	Comment	Applicant's response
B-6.1	<p>EN10137 - Mona Offshore Wind Farm</p> <p>Notification of changes to Mona Offshore Wind Project</p> <p>1. Cefn Meiriadog Community Council (CMCC) has already stated in a submission to the Planning Inspectorate (PI) Examination for Deadline 4 that it objects to the change designated Change 1a in the document Notification of Intention to Submit a Change Request Application dated 29 October 2024, submitted by Mona to the Examination. 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, although this was not stated in the document, nor in several subsequent documents.</p>	<p>The Applicant responded to CMCC's Deadline 4 submission at Deadline 5 (REP5-056). The responses are replicated in Section 10 below.</p>
B-6.2	<p>2. The intended use of the unnamed road described above has been confirmed in subsequent documentation accepted by the PI, and details are presented in the document Mona Change Request Report F02 published on the Examining Authority's web site on 18/11/24.</p>	
B-6.3	<p>3. CMCC's objection to the use of the unnamed public road was based on its assessment of the road's complete unsuitability for use by the vehicles which Mona say will use it in connection with site preparation work, etc, associated with Change 1a. This unsuitability derives from the road's (1) narrowness, (2) 90 degree bends, (3) high hedges, (4) lack of passing places, (5) gradients, (6) 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.</p>	<p>The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updated have been agreed as suitable by the relevant local highway authority (CR1-046).</p>
B-6.4	<p>4. Having (1) studied Mona Change Request Report F02, and in particular its Appendix 1 to ANNEX 1: temporary</p>	

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Ref. No.	Comment	Applicant's response
B-6.5	<p>onshore site preparation works access technical note in respect of change 1a of the change request, and (2) made another in-person, on-site assessment of the route concerned, CMCC sees no reason to change its assessment of the route as being highly unsuitable. It finds aspects of the findings presented in the Appendix to be misleading, and that the information presented understates the potential risk and inconvenience of this route being used.</p>	<p>The Applicant has responded to CMCC Deadline 5 submission in Section 8 below.</p>

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8 Response to Cefn Meiriadog Community Council

8.1.1.1 The below response was received at Deadline 5 in REP5-088 Deadline 5 Submission - Response to the Applicant's Change Request Application

Table 8.1: B-7: Cefn Meiriadog Community Council (REP5-088)

Planning Inspectorate Ref. No.	Submission comment	Applicant's response
REP5-088 B-7.1	<p>SUMMARY</p> <ul style="list-style-type: none"> 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. <p>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.</p>	<p>The Applicant notes the summary and provides a detailed response to the points in the detailed comments that follow.</p>
B-7.2	<p>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.</p>	<p>The Applicant notes the response.</p>
B-7.3	<p>2. The <i>Mona Change Request Report F02</i> ('the Report'), (1.2.1.5) states: <i>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.</i>"</p>	<p>The Applicant has continued to refine its proposals through detailed design and engagement with stakeholders, and this has resulted in the need for changes, the timeframe for these changes to be communicated was a consequence of this ongoing design work.</p>

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	<p><i>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".</i></p>	
B-7.4	<p>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 <i>Mona Change Request Report F02</i> published on the ExA's web site on 18/11/24.</p>	<p>The Applicant notes the response.</p>
B-7.5	<p>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.</p>	<p>The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment of the road in terms of its geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381.</p> <p>The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).</p>
B-7.6	<p>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 users and thus highly inappropriate.</p>	
B-7.7	<p>6. Having (1) studied <i>Mona Change Request Report F02</i> ('the Report'), and in particular its <i>Appendix 1 to ANNEX 1: temporary onshore site preparation works access technical note in respect of change 1a of the change request</i> ('the Appendix'), (2) the Applicant's <i>Change Request: Outline Construction Traffic Management Plan F01</i>, published 29/11/24 ('the OCTMP') and (3) made its own in-person, on-site</p>	

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	assessment of the route concerned, CMCC sees no reason to change its assessment of the route as being highly unsuitable.	
B-7.8	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.	The Applicant notes the response.
B-7.9	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 <i>Appendix</i> to be misleading, and presented so as to understate the potential risk and inconvenience of this route being used.	The Applicant notes the response and has provided a detailed response to the detailed comments below.
B-7.10	9. The Council notes in passing that the use of the abbreviation 'the Cefn road' to describe the road concerned (<i>Appendix: 1.2.1.1</i>) 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, <i>Postal Address Book</i>) 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.	The Applicant notes the response and refers to paragraph 1.2.1.1 of Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which acknowledges that the road is unnamed. When preparing transport related reports that refer to roads, it is necessary to ensure the reader is clear on which road is being referred to. When a road is unnamed it is therefore common for transport related reports to describe that road and then assign a name to it for the purposes of that report only so that the reader has clarity when reference is made to that road. This is particularly important when there are multiple roads that are unnamed, however, even when there is only one road that is unnamed, it is good practice for transport related reports to assign that road a name for the purposes of that report only. By describing that road and then assigning 'the Cefn Road' to it within paragraph 1.2.1.1 of Appendix 1 to Annex 1 of the Change Request Report (CR1-030), this ensures the reader has clarity on the road being referred to rather than referring to it as 'the unnamed road' which itself could be confused for other unnamed roads in the local area. The Applicant recognises that there is no road or street officially named 'the Cefn Road' and thus by assigning that name ensures that the reader has clarity on the road being described.
B-7.11	10. The Appendix (1.2.1.2) states: <i>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.</i> 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 Applicant notes the response and refers to paragraph 1.2.2.1 of Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which acknowledges that the road provides access to other rural single track roads around Cefn Meiriadog and thus acknowledges

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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

the surroundings and the local residents therein. Appendix 1 to Annex 1 of the Change Request Report (CR1-030) as a whole sets the context of the 'Cefn Road' from which assessment is made therein, part of which includes the references in paragraph 1.2.1.2.

The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment of the road in terms of its geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381.

The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).

The Applicant has confirmed HGV's (which includes heavy vehicles and large plant) will not be permitted to use Access AC-T1 (the access associated with Change 1a) in the Outline Construction Traffic Management Plan (J26.13 F04). The Applicant has also provided further detail of the number and types of vehicles that will be permitted to use Access AC-T1 in the Outline Construction Traffic Management Plan (J26.13 F04), and this has been agreed as acceptable with the relevant local highway authority (CR1-046)

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	<p>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.</p> <p>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 <i>Mona Offshore Wind Farm peak daily construction flows</i>. 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 <i>Appendix C. Traffic and transport study area and highway network overview</i>, or to <i>Appendix D. Staff access movements plan</i>, to indicate any possible use of the road.</p>	<p>The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a) and to also include a table setting out details on predicted vehicle movements generated. These updates have been agreed as suitable by the relevant local highway authority (CR1-046).</p> <p>Appendix C and D of the Outline Construction Traffic Management Plan (J26.13 F04) relate to construction vehicle movements and thus it is not appropriate to update these given that the 'Cefn Road' would not be utilised during the construction period, only for onshore site preparation works.</p>
<p>B-7.15</p>	<p>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. <u>It should be noted that this road is not gritted in winter no matter how severe the conditions.</u></p>	<p>The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment of the road in terms of its geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381.</p> <p>The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).</p>
<p>B-7.16</p>	<p>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 ninetydegree bends and two</p>	<p>The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment of the road in terms of its geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381.</p>

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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.

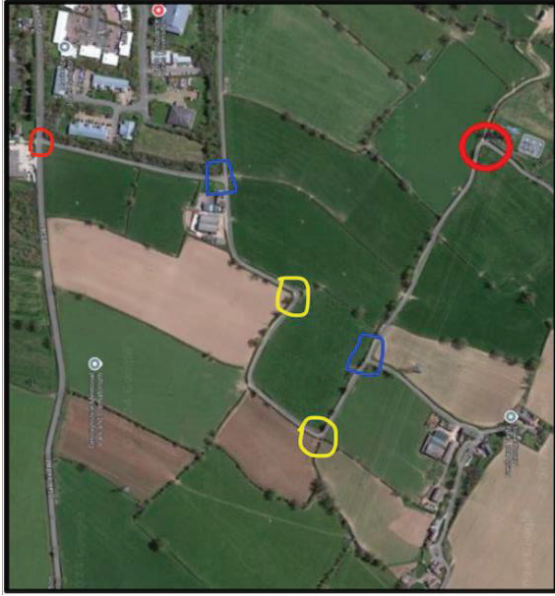


Figure 1: Existing Access Junction Location

The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).

B-7.17

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.

The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment of the road in terms of its geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381.

Appendix 1 to Annex 1 of the Change Request Report (CR1-030) refers to these as 'passing locations' rather than passing places so as not to seek to define these as formal (sometimes signposted) passing places that accord with highway design standards and being constructed to any recognisable geometry or layout. Indeed, by referring to these as 'passing locations', it recognises that they are commensurate with rural single track roads of variable geometries and layout but nonetheless, provide the ability for oncoming vehicles



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)

to pass one-another, as is depicted from the photographs contained within the response.

The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).

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“Passing Point 1”



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“Passing Point 2”



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"Passing Points 3 and 4"




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	<p data-bbox="311 1713 343 1937">"Passing Point 5"</p> 	
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	<p data-bbox="303 1702 343 1948">"Passing Point 6"</p> 	
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	<p data-bbox="311 929 343 1937">"Passing Point 7"</p> 	

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“Passing Point 8”



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"Passing Point 9"



B-7.18

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 northeasterly direction into the junction marked with the lower of the two blue markers, also has a very notable gradient and is known to present a particular hazard in icy and muddy conditions.

The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment of the road in terms of its geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381.

The Applicant has considered gradients along the 'Cefn Road' using professional judgement and indeed were not considered to be of a significance to be referenced within Appendix 1 to Annex 1 of the Change Request Report (CR1-030). It is not clear how the response has measured gradients with such accuracy as such accuracy would typically require a topographical survey of the road to be undertaken. Notwithstanding, an analysis of the 'Cefn Road' using professional judgement within Appendix 1 to Annex 1 of the Change Request Report (CR1-030) did not identify gradients to be of a significance that required further consideration.

The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).

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	<p>Gradients - general views</p> 	

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



B-7.19

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

The Applicant notes the response and refers to Appendix 1 to Annex 1 of the Change Request Report (CR1-030) which provides an assessment in terms of road geometries, layout, passing locations, vehicle movements and road safety and did not identify any current road safety issues along the road or at its junction with the B5381. The Applicant has updated the Outline Construction Traffic Management Plan (J26.13 F04) to include additional measures to

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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.



ensure the safe use of the B5381 to Access AC-T1 (Change Request 1a).

In particular, this includes a commitment for a temporary reduced speed restriction along the B5381 which will lower vehicle speeds, lower the visibility requirements for the egress from the 'Cefn Road' onto the B5381 to a level commensurate with vehicle speeds and assist with general road safety (due to reduced vehicle speeds). These updates have been agreed as suitable by the relevant local highway authority (CR1-046).

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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.

B-7.20

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.

The Applicant notes the response and confirms that the Outline Construction Traffic Management Plan (J26.13 F04) states that these are examples extracted from The Traffic Signs Manual, Chapter 8, Part 1, Traffic Safety Measures and Signs for Road Works and Temporary Situations (Department for Transport/Welsh Government/Transport Scotland/Department for Infrastructure, 2009), that the extracts are generic in nature and that they are not designed to be specific to any particular location or circumstance but within that document. The signs that are ultimately installed would be bilingual in accordance with legislation, however, including bilingual wording on the small icons contained on Figures 1.1 to 1.8 of the Outline Construction Traffic Management Plan (J26.13 F04) would render those figures illegible due to their small sizing. Thus,

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		<p>depicting these as generic in nature and monolingual ensures that the figures are legible and that the reader can decipher their content, meaning and intended purpose.</p>
<p>B-7.21</p>	<p>20. Finally but importantly, CMCC notes with very great concern paragraph 1.3.2.2 of the Appendix: <i>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.</i></p> <p>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 <i>de minimis</i>, and which it would appear has been brought about by the ineffectiveness of the Applicant’s own long-term planning.</p>	<p>Figure 4 of Appendix 1 to Annex 1 of the Change Request Report (CR1-030) contains a drawing of the requisite visibility splays and confirms that the hedgerow does not obstruct these and the visibility splays can be provided without any requirement to remove hedgerow. Thus there is no requirement to remove any hedgerow in this regard.</p>

9 Response to Denbighshire County Council

Table 9.1: B-8: Denbighshire County Council

Ref. No.	Comment	Applicant's response
B-8.1	<p>I writing in relation to the Change 1(a and b): The amendment of the proposed Order limits to include an existing access track for temporary construction access during onshore site preparation works and a 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. This involves the inclusion of two new plots of land (plots 11-197a and 11-197b) which would be subject to powers of temporary possession only.</p> <p>As Highway Authority we have had no consultation on this to my knowledge.</p> <p>I have the following concerns in relation to the following on a road which according to our records is adopted highway.</p> <ul style="list-style-type: none"> • The junction visibility. • The carriageway width. • The condition of the road. • The drainage/ditches. • The vehicle numbers and size proposed to use this road <p>Sorry for the lack of in depth information, but my time in responding has been limited, I would welcome a meeting to discuss the proposed use of this Highway and any further information you may have.</p>	<p>The Applicant met with Denbighshire County Council on 12 December 2024 to discuss the consultation response. The Outline Construction Traffic Management Plan (J26.13 F04) was subsequently updated and issued to Denbighshire County Council. Denbighshire County Council have confirmed to the Examining Authority that suitable controls regarding Access AC-T1 will be secured through the Outline Construction Traffic Management Plan (J26.13 F04) and that the matters raised in this consultation response have been addressed.</p> <p>Denbighshire County Council confirmed that the updates made by the Applicant were satisfactory (CR1-046).</p>

10 Response to Cefn Meiriadog Community Council D4 Submission - Change Request

10.1.1.1 The below is a direct copy of what was submitted at Deadline 5 in document S_D5_3 Response to Cefn Meiriadog Community Council Deadline 4 submission – Comments on Proposed Change Request (REP5-056)

Table 10.1: REP4-093 - Cefn Meiriadog Community Council

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP4-093.1	Cefn Meiriadog Community Council (CMCC) notes the Applicant's Notification of Intention to Submit a Change Request Application dated 29 October 2024 (Document Reference: S_CR_1/Document Number: MOCNS-J3303-JVW-10404). ('The Notification').	The Applicant can confirm that access to Change 1a would be located along the unnamed road between Glascoed Road and the existing track.
REP4-093.2	The Community Council expresses its serious concern over the change described in the Notification as 'Change 1a': i.e. Order Limits change to include an existing access track 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.	Road safety analysis has been undertaken of the road between Glascoed Road and the Change 1a. That analysis concludes that there are no current road safety issues along the road or at its junction with Glascoed Road. Further information is available in Appendix 1 to Annex 1 of the Change Request Report (S_CR_2 F02).
REP4-093.3	CMCC's concern is based on the assumption that from Glascoed Road the access track referred to will be itself be accessed via the minor road to the south of Glascoed Road and immediately to the west of the western edge of St Asaph Business Park.	
REP4-093.4	If this assumption is correct, the Council objects strongly to this proposed change. If the assumption is incorrect, and the access track would be reached by other means, then the objection does not apply.	
REP4-093.5	Even by the standards of Cefn Meiriadog's minor roads, beyond the property Waen Meredydd (situated on the first bend after leaving Glascoed Road), the road concerned presents particular difficulties for those using it. It is narrow with only one passing place; it has four right-angle bends	

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	<p>between its starting point and the access track referred to; it has high hedges; and it has a significant gradient over a portion between two of the right-angle bends. In normal conditions visibility is poor due to the bends and high hedges, while in icy conditions the bends and gradient represent significant hazards. There is poor visibility at the junction with Glascoed Road, making access to Glascoed Road from the minor road difficult and somewhat hazardous.</p>
REP4-093.6	<p>Notwithstanding the difficulties it presents, the road is used by numbers of Cefn Meiriadog residents as the shortest and quickest access to Glascoed Road and St Asaph.</p>
REP4-093.7	<p>The Notification states that "use of this existing access track and associated land is necessary to facilitate onshore site preparation works and for those works to be delivered in a timely manner, in particular 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...".</p>
REP4-093.8	<p>From its long familiarity with the road and the residents using it, CMCC strongly believes that the use described is inappropriate, in particular the implication (e.g. "land reprofiling for landscaping") that it will be used by large vehicles.</p>
REP4-093.9	<p>It is also noted that the Notification states that the access track will be used not just for site preparation but during construction also, implying that the minor road could if necessary be used during the construction phase, even if the principal access to the access track for the construction phase has by that time been constructed elsewhere.</p>
REP4-093.10	<p>The Council believes therefore that, if its assumption is correct and the minor road in question will be used for access, it will be a completely inappropriate use of a public</p>

The Change Request Report (S_CR_2 F02) has been updated to provide clarification on Change 1a. The Applicant can confirm that the access will only be used during the onshore site preparation works period. 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).

The Outline Construction Traffic Management Plan has been updated to accompany the Change Request (S_CR_15). This document confirms that "Only light vehicles, vans, 4x4 vehicles with trailers associated with the onshore site preparation works will be permitted to use access AC-T1 shown on the Change Request: Street Works and Access to Works Plan (Change 1a). No HGVs will be permitted to use Change Request Access AC-T1." In addition, the following commitments are made:

- On completion of the temporary construction access road from Glascoed Road to the Onshore Substation, vehicles will cease to use Change Request Access AC-T1 following notification to Denbighshire County Council.
- No construction vehicles will be permitted to access the Onshore Substation site through Change Request Access AC-T1.

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	<p>road and will impact negatively on the community. It disagrees strongly with the Applicant's assertion in the Notification that "...none of Changes 1 – 5 will result in any new or different likely significant environmental effects. Overall, therefore the Applicant does not consider that the proposed changes would result in a materially new or materially different impacts and they are capable of being accepted as an in-Examination change to the Application".</p>	
<p>REP4-093.11</p>	<p>It is to be regretted that the Applicant did not feel able to give a preliminary indication of the proposed changes to the Inspectors at the time of the Accompanied Site Inspections on 15 October. While CMCC is unaware which route was actually taken, the most direct route from the penultimate site inspection (NG connection point) to the final one (Mr & Ms Hussey's residence) is along precisely this minor road, giving the Inspectors an opportunity to be actively aware of the nature of the road in relation to the proposed Change 1a in the notification. Taken as a whole the proposed changes in the Notification seem to represent a considerable amount of preparatory work and one would assume that the proposed changes' conception and development work were already in progress by the time of the Accompanied Site Inspections.</p>	<p>The Applicant submitted details of the proposed changes into the examination at the earliest possible point.</p>
<p>REP4-093.additional text 1</p>	<p>MH: know if you have seen latest document (Attached)from Mona in that they want to use the track by the national grid pylon connection compound for access during onshore substation site prep and construction. They also want to make a few other changes to access from Glascoed road but the use of the track by connection compound concerns me In order to get to this track then they will (presumably) use the existing road from Glascoed road up past Waen Meredydd and along which whilst this has been used for survey people/vehicles etc it is not suitable for daily use and</p>	<p>The Applicant assumes these notes have been included in error and has not provided a response.</p>

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	<p>heavy equipment which they will undoubtedly need since they are talking of activities like land reprofiling, they say that they will also use the access track during construction and not just site prep.</p> <p>Whilst full detail is not included it is unacceptable in my view so welcome any thoughts on suitability from Council view point, also if they get this then its also likely in my view that NG amongst others would also start to look at this access route</p>
<p>REP4-093. additional text 2</p>	<p>MH: Think more info will be out tomorrow but my initial comment is disappointment that no mention when we visited the site the other week, cant believe they werent aware then which would have given opportunity for examiners to see full picture- it feels like some wool has been pulled over everyone eyes.</p> <p>Notification of Intention to Submit a Change Request Application of 29/10/2024</p> <p>and none of Changes 1 – 5 will result in any new or different likely significant environmental effects. Overall, therefore the Applicant does not consider that the proposed changes would result in a materially new or materially different impacts and they are capable of being accepted as an in Examination change to the Application</p>
<p>REP4-093. additional text 3</p>	<p>Issue Specific Hearing 3 (ISH3): Environmental Matters Hearing Action Points</p> <p>With reference to NPS EN-1 para 4.3.19, is it possible that even if considered acceptable in their own right with mitigation measures in place, the various effects arising as a result of the onshore substation could add up to have a significant effect on the community or the environment either as a result of the project alone or cumulatively with other proposed developments?</p>

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REP4-093. additional text 4	4.3.19 The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	