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MONA OFFSHORE WIND PROJECT

Response to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons

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Image of an offshore wind farm

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Prepared for:

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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,

Term	Meaning
	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.

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).

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

Units

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

1 Response to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons

1.1 Introduction

1.1.1.1 The Applicant has responded to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons below.

2 Response to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons

Table 2.1: REP2-103 and REP2-105 - J Bradburne Price & Co on Behalf of G Lloyd Evans & Sons

Reference	Written Submission Comment	Applicant's response
REP2-103.1	We are writing on behalf of our above clients who farm at Bryn Hen and who will be severely affected by the project. By way of a background, our clients, took on the family farm as teenagers along with their Mother and over the years, through their dedication and hard work, have built up a very successful and viable dairy business. They operate a "High Health" closed herd (this means replacements are from their own herd and no stock is bought in) of 340 dairy cows together with followers. They are contracted to ARLA.	The Applicant acknowledges the submissions by J Bradburne Price & Co on behalf of G Lloyd Evans and Sons, and the information that has been provided has been useful for the Applicant to further understand the landholding and farming operation.
REP2-103.2	The proposed works would take out approximately 25.40ha of vital grazing land out of an established grazing platform year on year of 82ha. The farm business supports three livelihoods, as well as various permanent and temporary staff and local contractors.	The Applicant notes the response and would add that the proposed works are temporary in nature, and that the land within the Onshore Cable Corridor would be returned to the landowner once construction has finished.
REP2-103.3	At the outset of the project in 2022, two proposed routes were put forward to our clients. A northern route and a southern route. We had various correspondence with the project's agents, Dalcour Maclaren (DM) and informed them that we were strongly opposed to any route, especially the southern route. During a meeting in April 2023, we again told DM our concerns of the impact of the project and they noted the "meeting highlighted the severity of your clients concerns towards the project." DM were also informed that our preference would be for the project to be drilled.	The Applicant, through its appointed land agents, have been in dialogue engaging with G Lloyd Evans & Sons since early 2022. At that stage the Applicant was undertaking optioneering for the onshore cable routing and had identified two potential routes that directly impacted the landholding. Figure 1.5: Onshore Cable Route Option Locations (Section 7N and 7S) in the Site Selection BRAG Report (APP-082) shows the two onshore cable route options that were considered at this location. Table 1.3 of the same document provides the BRAG assessment for the two options. This assessment considered the use of trenchless techniques, the accommodation of a haul road, and directing open cut trenches in gaps between existing trees. The Applicant also refers to para 1.4.2.5 of APP-082 which provides the summary as to why Section 7N was discounted. The landowner raised concerns to the Applicant regarding the impact the works would have on the business and the property, and as a consequence it was agreed that the farm business consultant, Promar International, would be

Reference	Written Submission Comment	Applicant's response
		instructed to assess the potential economic impact on the farm business (as per REP2-105). During the BRAG assessment, an engineering walkover was undertaken in May 2023 at which the landowner spoke to the Applicant expressing the preference for the routing to follow a more northern route on the landholding. This information was taken into account in the site selection process but the Applicant made no commitments to the landowner regarding the site selection process, or with regard to drilling of the onshore cable route as both options were under consideration at that time .
REP2-103.4	We were informed in August 2023 that the project had chosen the southern route and were told the reasons and potential impact could be discussed in a meeting. A meeting was arranged for November 2023 and our clients again strongly informed DM that their preference was for drilling and failing that, the northern route. Although it would have a detrimental impact on their farming operation, it would be manageable.	The outcome of the BRAG assessment was the Mona Offshore Wind Project selecting the southern route as it avoided significant environmental and engineering constraints associated with the northern route (Section 7N). Although the northern route was shorter, it requires the onshore cable route to commit to trenchless techniques beneath woodland, Ancient Woodland and historic landfill. These presented significant construction and environmental risks. Section 7S is an alternative route and was identified as the Applicant's preference as it presented fewer risks and constraints. The Applicant was also aware of historic mine workings in the area, and by selecting Section 7S (the southern route) the Applicant has greater flexibility to avoid these. Historic mine works present risks to construction as there are potential voids and / or fissures in the underlying geology that create issues around ground stability, in particular for heavy plant and for trench excavations (or trenchless techniques).
REP2-103.5	The proposed southern route would decimate the viable and profitable farm business, due to the fact that this route goes through a huge part of 'grazing' land, which is imperative to the business. It was agreed with DM in November 2023 that our clients would instruct their experienced Farm Business Consultant, Mr Andrew Hawkins from Promar, to undertake an economic assessment of the impact the southern scheme would have on the farm business. A redacted copy, undertaken in December 2023, is attached, and the full assessment is available for inspection, but our clients, in the interest of confidentiality, do not wish for the assessment to be shared in the public domain.	G Lloyd Evans & Sons raised their concerns regarding the impact that the route would have on their business due to loss of grazing. G Lloyd Evans & Sons instructed a specialist external business advisor to undertake a study regarding the potential financial and stocking impacts of the works based on the Order Limits. The results of this study were shared with the Applicant and a summary of which has now been submitted to the examination [REP 2-105]. The Applicant is continuing to seek engagement with G Lloyd Evans & Sons to discuss and agree mitigation works which would minimise disturbance. This could be through the use of gated crossing points, the extent and locations of which would be agreed closer to the time of construction. This aligns with the voluntary agreement being sought and as described in section 1.6.4 of the Outline Fencing Management Plan (REP2-048). A meeting is planned on the 3rd October 2024 between G Lloyd Evans &

Reference	Written Submission Comment	Applicant's response
		Sons and their agent J Bradburne Price & Co, and the Applicant and their agent, Dalcour Maclaren.
REP2-103.6	The report highlights that the southern route would have dire consequences. Our clients would see a huge loss of their grazing land available and as a result, an estimated 105 milking cows out of 340 would need to be sold. The summer housing of the herd is not an option as their milk purchaser would not accept this due to the milk contract and management rules. Without their current ARLA contract, profit would immediately decrease as they would be unlikely to achieve their current milk price elsewhere. In addition to the above, it should be noted that these cows are bred for producing milk from grazed grass and this is their advantage over other breed types. In the event our clients did sell 105 cows, it is highly likely they would be sold at less than their worth to our clients. Farmers using this type of system generally breed their own replacements and therefore the market is not strong for this type of cow. Additionally, due to the fact they operate a high health herd, they could not simply purchase cows to restock and build up numbers after the completion of the scheme. It would be necessary to breed their own replacements and this would take at least 3 years. Our clients have invested heavily in the farm over the last 9 years to secure viability and future proof the business for the next generation. They would also expect a return on this investment and feel that this is now in jeopardy.	The Applicant notes the response, and refers to the statutory framework for assessing compensation, which aims to compensate a landowner for any losses suffered. These matters are outside the scope of the examination. During construction, the Applicant will appoint an Agricultural Liaison Officer (ALO) to engage with landowners and occupiers to discuss practical matters on site so that farming operations can continue as far as reasonably practicable during construction works. The ALO is secured through the Outline Code of Construction Practice (REP2-038, paragraphs 1.6.1.9 and 1.6.1.10).

Reference	Written Submission Comment	Applicant's response
REP2-103.7	Following various correspondence with DM, a further meeting was held on 7th February 2024. In this meeting, it was confirmed to us that our preferred northern route was not an option and the southern route had been chosen. It was confirmed DM would not share the full BRAGG report with us to show the reasons the northern route could not be used, but they would share relevant bits relating to our clients land. We have still never received this. It was agreed we would commission an independent review (at our own cost) to ensure the reasons were valid.	The Applicant did not share the full Site Selection BRAG Report at the meeting on 7 February 2024, as the document had not been published however the full report is included in the application documentation and published on the Planning Inspectorate's website on the 21 March 2024 under document reference APP-082.
REP2-103.8	Despite the above, it seemed that DM had become sympathetic to our clients plight and they confirmed they wanted to work together with our clients to mitigate the impact. They unexpectedly raised with us the possibility that a large length of cable (covering most of the land affected) could be installed using direct drilling "HDD." However, we were informed that they the project could not commit to HDD until they had carried out intrusive surveys. Our clients agreed to this immediately.	The Onshore Crossing Schedule (REP-007) outlines several obstacles on this landholding that the Applicant has committed to cross using trenchless techniques definitively or has the flexibility to cross with either trenched or trenchless techniques. In a meeting on 7 February 2024, the Applicant's land agents, Dalcour Maclaren, suggested that various sections of trenchless crossings could be combined into one longer trenchless section. The Applicant understood this to be the section between crossing references 196 to 225 (REP-007), at around 375 metres in length rather than the entire landholding of 2,000 metres. Section 7N (referred to as 'the northern route' above) was of particular concern to the Applicant as it was an area of historical mine workings and is one of the reasons why the Order Limits were widened in this location to accommodate for uncertainty in the underlying geology associated with ground stability (Plot 09-175 as shown on the Land Plan (AS-005)). The Applicant had been conducting ground investigations across the onshore cable route but at that time had been unable to agree survey access with the landowner. Due to the uncertainty of the ground conditions, it was explained that without having any survey data it would be impossible for the Applicant to determine the onshore cable installation technique. The landowner agreed to the ground investigation works which were scheduled around their agricultural operations. The results of the survey data that has been undertaken to date, along with future surveys, will contribute to the detailed design of each crossing and confirm which crossing technique can be used where trenching or trenchless has been identified. This will be the case for the crossing of the area of potential historic mining works, air shaft and mine shaft (crossing references 212, 213 and 214 respectively) where the Applicant needs to retain flexibility in the direction, alignment and depth

Reference	Written Submission Comment	Applicant's response
		of the installation techniques used in this location, as well as the understanding of risk to plant and operatives, until the detailed design has been undertaken.
REP2-103.9	Given HDD would greatly reduce the impact of the scheme on our clients, they were agreeable to exploring this method of installation and would be amenable to working with DM on this basis. The impact this would have on their business would be far less than the proposed open trench, as we had told DM numerous times. Several months later, our clients were very upset and disappointed when an email was received on 21st August and told us the devastating news that the project is not in a position to commit to HDD on their land (c.2000m). The email cited economic reasons and the fact that a contractor has not yet been appointed. We therefore feel misled by DM agents who implied in our meeting in February that subject to the results of intrusive surveys and one potential 'engineering constraint', it should be possible to drill. To now be told at this late stage that they cannot commit to drilling for 'economic' reasons and the fact that a contractor is not yet on board, (which would have been known at the time of the earlier meetings) is not acceptable.	The Applicant has already committed to using trenchless techniques at certain locations within the landholding where obstacles have been identified like roads, farm tracks and utility crossings to minimise the disturbance to the affected party. Details of these locations can be found in the Onshore Crossing Schedule (REP1-007). The Applicant is of the view that the request for a Horizontal Direct Drill underneath the full extent of their landholding, at circa 2,000 metres in length, would not reduce the overall land take required, but would significantly increase the engineering risk to the project. If a drill of this length was even technically possible at this location, it would require multiple large working areas to be utilised to facilitate its construction, to include the drilling rig and equipment, welfare facilities and the drill entry and exit pits. By way of comparison, the maximum design parameters for the landfall trenchless cable installation (Table 3.27 of the Project Description (APP-050)) has the maximum drill length of the cable ducts at 1,400 metres, with a maximum 200 x 150 metre working area (30,000m²), which does not account for the area required at the drill exit pit. A longer drill will require larger working areas. Furthermore, a working corridor and haul road would still need to be established through the landholding and maintained throughout the construction period to provide vehicular access from the temporary construction areas to and through the onshore cable corridor, to accommodate a potential Joint Bay or Joint Bays, and in the case of certain trenchless techniques, access in the event of a potential bentonite frack out. It is also likely that a complex drill of this nature could take a longer period of time to undertake compared to a trenched option, which could prolong the construction period and potential disturbance to the landowner. For the reasons outlined above, the Applicant cannot commit to drilling the entire length of the landholding, but as the project progresses through detailed design, the Applicant remains committed to working with G Lloyd Evans & Sons to mitigate the potential impact on their holding.

Reference	Written Submission Comment	Applicant's response
REP2-103.10	Bearing in mind the above, in our opinion and due to the catastrophic impact of the southern route if it is trenched, we feel that the entire length on our clients land should be direct drilled.	The Applicant notes the response and remains committed to working with the affected party with a view to reaching a voluntary agreement and working together to minimise any disruption that may occur to the farming business during construction.
REP2-103.11	We would welcome an inspection to show you the farm, so that you can understand the affect the southern option will have if trenched and therefore why this project should be taken forward using HOD.	The property has been included in the latest draft Accompanied Site Inspection agenda [EV-006].
REP2-105.1	**Re: Calculation for Mona Offshore Wind,** Enclosed is the gross margin for the milking cows year ending March 24 which taken from the trading profit and loss year ending March 24. The calculations are for the impact of the proposed route of the power cables over the land at Bryn Hen farm Route A. **Herd Size 340 Head** The land area which the milking herd will be unable to access totals 25.40 ha The established grazing platform year on year is 82ha which has all of the infrastructure of cow tracks and water troughs in place, the stocking rate on this platform from March to November is 340 head. There is no alternative to graze other grassland as non exists and the milk buyer would not accept summer housing due to the milk contract and management rules. The herd at Bryn Hen are bred for producing milk from grazed grass and this is their advantage over other breed types. The 25.40ha loss would equate to 31% of the grazing land and 105 milking cows. The business would not consider purchasing cows after the project was completed it is on herd health criteria a closed	The Applicant notes the response and can confirm it has been provided a copy of the report written by Andrew Hawkins of Promar International. The Applicant appreciates the impact that the construction of the project may have on the farming business and is committed to working with G Lloyd Evans & Sons to mitigate the temporary effects of the construction activities on their farming business as far as possible.

Reference	Written Submission Comment	Applicant's response
	herd and has been for over ten years. The replacement of these cows would take 3 years in the planning and rearing. **Walking Distance** The existing herd would have to be walked to other rassland some distance awa which would require extra man hours to take and bring back. There will be an effect on milk yield walking the cows longer distance. **Impact on day to day** The impact of the proposed route on the farming operations with cows walking alongside working machines and the day to day running of the farm would be highly stressful for Huw and John and should not be underestimated. There would be a need for crossover points fully secure and available 24 hours. What would be the effect on herd health and fertility which is crucial and is an unknown quantity but would have to measured and quantified. Herd fertility has a significant impact on profitability. The Route A has running through the fields the main water supply to all troughs to the furthest point, off cuts from the main to numerous field troughs, an electric cable running through field SH9972 9281. The following is the alternative route and its effect on the herd. **Route B** Route B through fields SH9973 0343 SH9973 4537 SH99738127 SH99739728 SDJ0073 3714	

Reference	Written Submission Comment	Applicant's response
	The estimated land loss is 12.48ha or 15.21% of the grazing platform which is 52 cows. There would be no increase in walking time. The impact of route B on the day to day herd and farm management would be significantly less as the cows would not have to approach the working site and night time grazing would not be lost and it would not affect the day to day running of the farm. Yours sincerely,	