

**The Planning Inspectorate**

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**Date:** 30 September 2024

Dear Sirs,

## **Application by Mona Offshore Wind Limited for Mona Offshore Wind Farm**

We act for The Executors of the Late Sir David Watkin Williams-Wynn. Bt. Please find below our client's replies to the Examining Authorities written questions and requests for information.

<b>Question</b>	<b>Reply</b>
<b>Q1.1.3</b>	<p>Page 173 merely states that the Applicant will engage with the HSE, and that HSC is likely to be required. The Landowner does not see how that addresses our concerns. The Landowner is also unsure how "signposting" could be considered sufficient to address concerns of this nature.</p> <p>No evidence has been provided to support the Applicant's claim. Nor is it clear, from what has been provided, to what extent has the Applicant considered other NCIPS in the vicinity and the cumulative impact this will have.</p> <p>In respect of the baseline, the Applicant has not addressed whether expert surveys been carried out to evidence the current fields and taken a model exercise to consider the potential uplift if fields</p> <p>In terms of the BAT, the Applicant has not addressed what the proposed techniques are and how they will mitigate the issues and concerns raised. In addition how will they address any future developments which may exacerbate the status quo.</p>



	<p>The presence of the Substations and Converter Station could lead to private development loss as the EMF levels will have been reached. This prevent future Estate opportunities which is a significant impact.</p> <p>The cable route is HVDC and when spaced several meters apart, a rise in EMF and EMI is caused. The Landowner has seen no demonstration as to how the Applicant will be below the reference levels of people throughout the route on the Estate. Will any post construction and commissioning EMF and EMI testing be carried out to verify the fields as presented in the assessment / design to ensure compliance to the guidelines will be adhered to, and can the Landowner have sight of these proposals.</p>
<b>Q1.6.16</b>	<p>The Applicant has not fully explained the change in approach as there is clear evidence which supports a leasehold acquisition of the site (this has been accepted on other schemes). Nor have they specifically explained why a freehold approach is absolutely required in this instance.</p>
<b>Q1.6.23</b>	<p>There are three existing NSIP substations, which are all located on the same landowners property. All three, are occupied by way of separate leasehold arrangements, on differing commercial terms. The leaseholders being National Grid, Gwynt y Mor (RWE), and Dong Energy (now Orsted) are located approximately 500 to 800 meters from the Applicant's preferred site location. Further more National Grid as part of the wider RWE Awel y Mor development have agreed to the existing 400kv substation extension on a lease to match the existing even though a DCO is to be progressed. Therefore there is no reason why acquisition of the freehold is necessary in this instance.</p>
<b>Q1.6.24</b>	<p>The proposed operational land take completely dissects this Estate and tenanted holdings impacting contiguity. Alternative accesses (plan to follow), could be obtained from the North making use of the existing NCIP infrastructure or the South, and there are alternative locations which would be preferable to the Landowner for the site as a whole (which would have considerably less overall impact). The Applicant has failed to actively address and consider in dialogue with the Landowner any of the alternative routes.</p> <p>One site (site1) lies to the east of the proposed location and has direct access to the highway, lies on the extremities of the Estate and has significantly less impact on the Estate and its tenants. According to the BP reports has the same characteristics save the National Grid proximity.</p>
<b>Q1.6.25</b>	<p>The Applicant's response does not accurately reflect progress to date. The Applicant has never precisely outlined what they propose to deliver and how they intend to secure it. The meetings had between the Applicant and Landowner have always been in the context of access to land (and not the</p>

eventual acquisition). The Landowner has never been supplied with any indicative designs, or were led to believe they had any input at all. Efforts were made early to understand the land take, but responses were received on the basis the Applicant's agent did not have the information required. Initial communications, from the Applicant, related to survey notices and it was not until later down the line that any information about what land and rights the Applicant sought, was provided.

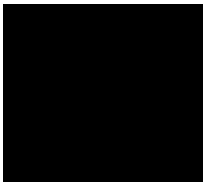
The Applicant has not specifically addressed the access route point, their response focuses solely on the site selection. We have provided sites in response to the question above which will be more suitable and will have less of an impact on the Estate.

Regarding the impact of the electromagnetic fields, the Applicant has not demonstrated how they will comply with internationally recognised guidance. Nor have they confirmed what action, process and technical and protective measures will be implemented (and what stage this will happen). The Landowner would request that the Applicant provides reports of monitoring post completion. As well as details on how and what recourse will be taken for failure to comply with guidelines.

The response to our comments on how the non-contiguous nature of the substation affects the deer population is not sufficient and does not demonstrate how the deer population will or can be protected.

In terms of the negotiations, the Landowner has been seeking to arrange a meeting with the Applicant since August and have been unable to find suitable dates so far. However, they are hopeful that an initial date may be fixed for October.

Yours sincerely



**Ella Jones**  
Associate

