

**The Planning Inspectorate**

**Your Ref:** EN010137

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**Date:** 07 October 2024

Dear Sirs

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

**Interested Party's Name:** The Executors of the Late Sir David Watkin Williams- Wynn. Bt.

**Interested Party's Unique Reference Number:** 20048429

We act for The Executors of the Late Sir David Watkin Williams- Wynn. Bt.

We wish to attend the Issue Specific 3 Hearing (ISH3: Environmental Matters) on 16 October 2024. Our client's representatives Edward Sample and Darryl Spittle will attend the hearing in person and Lucy Tebbutt and Selina Wakeham will attend virtually. Matthew Evans and Ella Jones from Forsters LLP will be attending virtually. A list of the points we wish to make are set out below:

Agenda Point 4a (Alternatives including clarification on the choice of onshore substation location)

- There are alternative locations for both the substation and the access route. Neither seemed to have been properly considered by the Applicant, despite the alternatives having considerably less overall impact on the Estate.
  - o Access - could be obtained from the North making use of the existing NCIP infrastructure or the South.
  - o Substation – Site 1 lies to the East of the proposed location and has direct access to the highway; it lies on the extremities of the Estate and has significantly less impact on the Estate and its tenants. According to the BP reports it has the same characteristics save the National Grid proximity.

Agenda Point 4c (The effects, including cumulative effects, of the proposed Onshore Substation site during construction and operation)



- The information provided to date has not been sufficient in demonstrating that the substation will have no or little visual impacts on the Estate. The Applicant has not provided or discussed the detail design, of the substation, with the Estate, nor have they provided much information in the supporting documents. The documents which they have provided (the Landscape Visualisations document forming part of the Environmental Statement with Examination Library reference F7.6.5) are limited but do show that the substation will have significant visual impacts. It would be beneficial to see the impact of the substation when the trees are not in leaf and from other angles. An example location being from the historic St Mary's Church in winter or further up the hill on Cefn Farm Bryn and we would encourage the Inspector to visit these locations themselves as part of the site visit. The modelling also does not take account for changing pylon positions and the National Grid Expansion. There is a need for holistic planning, and this fails in that regard.
- The substation is core and non-contiguous, thus further breaking up the Estate. As a result, this will reduce the Estate's ability to keep the deer population in check which in turn will have an impact on the wider estate management.

The parties mentioned above also wish to attend the Compulsory Acquisition Hearing 1 (CAH1) on 17 and 18 October (all parties to attend virtually). A list of the points we wish to make are set out below:

Agenda Point 5 (Site-specific representations by Aps)

- The Land sought is high quality agricultural land that is irreplaceable. The loss of land will adversely impact the Estate's ability to be sustainable in terms of agriculture, as well as the amenity and visual impact this will have on the Estate and its well-established tenants and the community it supports. Part of the land is also important and historic woodland and substantially on 3 of the Estate residential properties.
- The Applicant seeks to acquire the freehold interest in the land. The Estate has been impacted by numerous applications of this kind in recent years. In previous matters it has been accepted that the acquisition of leasehold interests is sufficient. There has been no justification from the Applicant as to why acquiring the leasehold interest is not sufficient other than it is not their preferred option. It certainly is the preferred option of the Estate.
- The Applicant has failed to comply with the National Policy Statement for Electricity Networks Infrastructure (EN-5) – please refer to section 2.6.

*"2.6.1 In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must: i. own the land on, over, or under which the relevant activity is to take place; or ii. hold sufficient rights over or interests in that land (typically in the form of an easement); or 10 An applicant should also consider principles outlined in EN-3 section 2.8 where relevant to offshore network. National Policy Statement for Electricity Networks Infrastructure (EN-5) 14 iii. have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave). 2.6.2 Where the applicant does*

*not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work”.*

Please confirm receipt of our submissions and the details for attending the hearings. If you require any further information, please feel free to contact us.

Attendees contact details:

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Yours faithfully

[REDACTED]

Forsters LLP

