

# MONA OFFSHORE WIND PROJECT

## Response to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons ExQ1 Responses

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Image of an offshore wind farm

**MONA OFFSHORE WIND PROJECT**

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**MONA OFFSHORE WIND PROJECT**

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**Contents**

**RESPONSE TO J BRADBURNE PRICE & CO ON BEHALF OF G LLOYD EVANS & SONS EXQ1 RESPONSES..... 1**

**1 RESPONSE TO J BRADBURNE PRICE & CO ON BEHALF OF G LLOYD EVANS & SONS EXQ1 RESPONSES..... 1**

1.1 Introduction ..... 1

**2 RESPONSE TO J BRADBURNE PRICE & CO ON BEHALF OF G LLOYD EVANS & SONS ..... 2**

**Tables**

Table 2.1: REP3-099 - J Bradburne Price & Co on behalf of G Lloyd Evans & Sons..... 2

## MONA OFFSHORE WIND PROJECT

### 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,

## MONA OFFSHORE WIND PROJECT

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.

## MONA OFFSHORE WIND PROJECT

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).



## MONA OFFSHORE WIND PROJECT

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
CA	Compulsory Acquisition
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

## MONA OFFSHORE WIND PROJECT

Acronym	Description
TWT	The Wildlife Trusts

## Units

Unit	Description
GW	Gigawatt
km	Kilometres
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles



# **1 Response to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons ExQ1 Responses**

## **1.1 Introduction**

1.1.1.1 The Applicant has responded to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons ExQ1 Responses below.

## 2 Response To J Bradburne Price & Co on Behalf of G Lloyd Evans & Sons

Table 2.1: REP3-099 - J Bradburne Price & Co on behalf of G Lloyd Evans & Sons

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	J Bradburne Price & Co on behalf of G Lloyd Evans & Sons response	Applicant's response
REP3-099.1	G Lloyd Evans & Sons H L & R.JL Evans	Q1.6.5 BoR: Does the farm subject of your written submission [REP2-103] comprise only land in the BoR [REP2008], and shown on the Land Plan (Onshore) [REP1-004], that is registered to Robert John Lloyd Evans? If not, please list the Plot Nos. that are comprised within the holding and/or annotate an extract from the relevant Land Plan(s).	Please see attached plan highlighting the extent of the land that is owned/farmed by R J L Evans and H L Evans (shaded pink on the plan).	The Applicant notes the response and would like to clarify with reference to the Book of Reference [REP3-006] and Land Plan (Onshore) [AS-005] that R J L Evans and H L Evans are the freehold owners of plots 09-169 through to 09-178 inclusive.  The Applicant understands that R J L Evans and H L Evans are the agricultural tenant of plot 10-179.
REP3-099.2	NFU Davis Meade Property Consultants G Lloyd Evans & Sons Any APs	Q1.12.8 Effect on farm holdings: At Section 7.8.3 of ES Chapter 7 (Vol 3) [APP-070] the Applicant assesses the significance of the Proposed Development's effects on farm holdings during each of its phases having taken account of measures adopted in respect of Farm Holdings in Table 7.24 thereof. Giving reasons for your conclusions, do you agree with its assessment?	<p>1.0 The assessment of the impact of the scheme on farm holdings, and specifically the farm holding/business of G. Lloyd Evans &amp; Sons, is not agreed. They do not accept that the "magnitude of impact" (temporary) is "low". (7.8.3.3) and do not recognise the comments in Para 7.8.3.2 "discussions with the occupiers (of the dairy enterprises) and their agents are progressing to identify suitable accommodation measures to be implemented to ensure that the enterprise continues to operate effectively during the construction period".</p> <p>1.1 The measures adopted in Table 7.2.4 "measures adopted as part of the Mona Off Shore Wind Project" are insufficient to mitigate the severe impact the scheme will have upon the dairy enterprise of G. Lloyd Evans &amp; Sons.</p> <p>1.1.1 Whilst the measures referred to therein address some practical day to day issues (dependent upon final detailing and specification) they do not address or are capable of addressing the fundamental loss of 25.40 hectares of land and the resulting forced sale of circa 105 cows with a predicted annual loss of Gross Margin of £147,105 (one hundred and forty seven thousand one hundred and five pounds). (Gross margin = gross output less variable costs).</p> <p>1.1.2 Analysis of the contents of the Code of Construction Practice (Table 7.2.4 Farm Holdings left hand column) do not address the loss of land and the associated financial losses (see report prepared by A Hawkins Promar REP2- I 05), but only individual issues, the aggregate of which cannot alleviate the issues arising from the loss of land and the severing of the farm holding.</p> <p>1.2 A fundamental issue being the unavailability of additional land to replace the land occupied within the "Working Area".</p> <p>2.0 The impact of the farm business is not only limited to the consequences of the temporary loss of land (potentially 1 to 5 years Para 7.8.3.2) the severing of the farm holding will amongst other difficulties cause:-</p> <p>2.1 Severe restrictions on movement of stock to and from the dairy unit (4 journeys a day)</p> <p>2.2 Severe restrictions on farm machinery movement</p> <p>2.3 The use of umbilical cord spreading of slurry.</p> <p>2.4 Complying with NVZ (Nitrate Vulnerable Zone) Regulations.</p> <p>2.5 The impact (which cannot be understated) of large machinery working in close proximity to livestock to include reduced yield, stress, fertility issues, movement issues and general well being.</p>	<p>The assessment of the impacts on farm holdings as "low" is based on the criteria provided in Table 7.18. of the Environmental Statement - Volume 3, Chapter 7: Land use and recreation (APP-070). The identification of low magnitude does not imply that there are no impacts on farm holdings. Rather, this states that there would be "a discernible change in attributes, quality or vulnerability, or alteration to one (maybe more) key characteristics, features or elements (e.g. amendment to access or acquisition of land resulting in changes to the operating conditions that do not compromise overall viability of agricultural holdings)."</p> <p>With the implementation of appropriate measures, as agreed through continuing discussion, it has been assessed that the construction would not compromise the overall viability of the holding. As outlined below, the discussions have been progressing to agree the most appropriate measures to be implemented to ensure that farming operations can continue effectively during the construction period.</p> <p>As set out in the response to the ExA first written questions (reference Q1.6.28, REP3-062), Figure 1.5: Onshore Cable Route Option Locations (Section 7N and 7S) in the Site Selection BRAG Report (APP-082), this figure shows the two onshore cable route options that were considered at this location. Table 1.3 of the Site Selection BRAG Report 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 paragraph 1.4.2.5 of APP-082, which provides the summary on why Section 7N was discounted which includes the constraints with the Ancient Woodland and historic land fill. To overcome these constraints would include complex trenchless techniques and haul road solution.</p> <p>The Applicant through its appointed land Agent Dalcour Maclaren has been engaging with the Lloyd Evans Family throughout the development consent order process, and has met with Messrs. Lloyd Evans on an increasing frequency over the past 10 months to understand the impact the project proposals have on the business, and how mitigation measures may assist in reducing the impact through the use of accommodation works, programme management, soil management plans, along with the compensation provisions available.</p> <p>As stated at the CA hearing, the Applicant hopes that a voluntary agreement can be reached soon with Messrs. Lloyd Evans, and continue to work up those more detailed plans which look to minimise the severed land and land taken out of the grazing</p>

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	J Bradburne Price & Co on behalf of G Lloyd Evans & Sons response	Applicant's response
			<p>2.6 The day to day stress and pressures upon the business and the personnel of farming within these circumstances.</p> <p>3.0 There will be significant financial losses arising from the issues referred to in Paras 2.0 - 2.5 (and other currently unforeseen issues) which are in addition to the direct financial losses arising from the loss of land and forced sale of cows.</p> <p>3.1 These losses will prevail beyond the construction period due to the inability to buy in replacement stock due to the closed herd policy.</p> <p><b>CONCLUSION</b></p> <p>4.0 The Farming Business G. Lloyd Evans &amp; Son is an efficient, modern, viable and financially sound business which has benefitted from substantial investment over recent years. The suggested route puts the business under significant strain that even in the best of times can be a turbulent business requiring long term investment and planning. The conclusions of Paras 7.8.3 nor the contents of Table 7.2.4 address this.</p> <p>4.1 The issues can be mitigated by the direct drilling of the cables through the holding as has previously been communicated or the adoption of a "northern route" the latter which was dismissed without providing evidence.</p> <p>4.2 Reference should be made to further commentary provided by J. Bradburne Price &amp; Co. representations dated 27th August 2024 (REP2-103) and the Report of A. Hawkins of Promar (REP2-105).</p> <p>4.3 The applicants have failed in attempting to mitigate the impact of the scheme and to avoid putting a severe strain on the financial viability of a long established business. We would respectfully suggest that it would be inappropriate and inequitable to grant a DCO to the applicants in such circumstances.</p>	<p>platform during the works and therefore lessening the impact on the business which has been the main area of concern. It is understood there are no further comments from the Land Agent on the heads of terms save for these practical matters which sit outside of that agreement.</p> <p>It is normal and commonplace in projects of this scale that there are some impacts on normal farming practices. These are typically able to be mitigated by agreeing accommodation works provisions ahead of entry for works. Typical accommodation works include but are not limited to, fenceline plans, crossing points, movement of water supplies and troughs for livestock, programme management to work around seasonal requirements, along with other site specific management plans. The Applicant can also clarify that access along the astroturf track (which was visited as part of the Accompanied Site Inspection) will be maintained throughout construction as this has been excluded from the Order Limits. The Applicant continues to discuss the principle detail of these options with the Messrs. Evans and their representatives and these conversations are at an advanced stage.</p> <p>As set out above, although land will be severed during construction, there will be the opportunity for crossing points to allow for continued farming operations including the spreading of slurry on land outside of the Order Limits. Once the final fence line design plan is known, there may be the need to discuss further other accommodation works to accommodate restrictions that apply due to Nitrate Vulnerable Zone designations.</p>