

Response to National Farmers Union ExQ1 Responses

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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 National Farmers Union ExQ1 Responses

1.1 Introduction

1.1.1.1 The Applicant has responded to the National Farmers Union's response to ExQ1 below.

2 Response to National Farmers Union ExQ1 Responses

Table 2.1: REP3-102 - National Farmers Union

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	National Farmers Union response	Applicant's response
REP3-102.1	NFU Davis Meade Property Consultants The Executors of the Late Sir David Watkin	e of NPS EN-5 provide policy support for the Applicant's approach to the compulsory acquisition of land? ors of the vid Watkin	2.6.4 In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the nation's net zero goals.	No further comment from the
	Williams-Wynn. Bt. Mr & Mrs JT Owen Any AP		2.6.5 The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.	
			Answer: Paragraph 2.6.4 does state that permanent arrangements are strongly preferred over voluntary wayleaves and the Applicant is seeking permanent arrangements in this case.	
			Paragraph 2.6.5 does inform the Applicant that even though they can seek compulsory acquisition of land that this is not necessary where cables and lines are to be installed. The NFU can confirm that the Applicant is only seeking to acquire rights.	
REP3-102.2	NFU Davis Meade Property Consultants	Q1.6.17 dDCO Provisions: In respect of your concerns about rights in land that the Applicant seeks ([PDA-048] and [REP1-082] respectively), with reference to the dDCO [REP2-004], can you suggest the specific wording of amendments or additions to its provisions that would address them.	Answer: The NFU and the land agents strongly believe that no landowner should have to give rights in perpetuity if they are not required. In recent years the NFU working with land agents in different areas have agreed a term of 99 years with five offshore wind developers. The NFU and land agents acting on this project can see no difference in the schemes and therefore no reason for rights to be given in perpetuity. We understand that the rights granted by the Crown will be for a term that is considerably less than 99 years.	Powers in the Planning Act 2 compulsory purchase regime Purchase Act 1965 and Acqu is not possible for the Applica under the current compulsory
			The NFU is aware that once a DCO is granted it gives those rights in perpetuity, surely if there is only an operational 'life time' of the proposed scheme then the rights granted should be tied to this life span and this could be stated and drafted within the dDCO.	
REP3-102.3	NFU Any AP	Q1.6.19 Discharge of Water and Field Drainage: In its Response to Written Submissions made at Procedural Deadline ([REP1-011], pages 32 & 33) the Applicant addressed concerns about perceived lack of detail as to management of surface water run-off and provision for field drainage [PDA-048]. With reasoning for your conclusion, does this allay your concerns.	Answer: The NFU has seen that the Applicant has confirmed that all surface water can be managed within the Order Limits and is pleased to see the high-level principles which are set out within the Outline Construction Surface Water Drainage Plan (OCSWDP) (APP-218). Landowners will all be concerned that any surface run off from the haul road and trenches is controlled and that it does not run across the surface of the adjoining land to the nearest watercourse or cause flooding. Silt fences will be very important and must be maintained. The NFU would like further information as to how surface water will be pumped via settling tanks or ponds to remove sediments prior to discharge within the corridor. Where in the corridor is the water being discharged to? The Applicant has stated that refinement of the OCSWDP will be undertaken at detailed design in conjunction with landowners. How	The Outline Construction Sur 050) sets out the high-level p management and discharge specific location of settlemen and where the water is then of the detailed design stage and measures detailed within the Drainage Plan (REP2-050). The Applicant is pleased to re NFU on the matter, the heads agreed. The engagement about pract occupiers before and during to within the Outline Code of Co
			does this get triggered, who will speak to the landowners? The NFU has now negotiated further with the Applicant regarding wording to be included in the Heads of Terms (HoTs) to cover field drainage but HoTs are still to be finalised and signed by landowners. The Applicant has stated in its response that during	paragraph 1.6.1.9, which sets Officer (ALO) will engage on Construction Surface Water a forms part of the Outline Cod secured through the develop



ne Applicant.

2008 apply the longstanding ne legislation through the Compulsory quisition of Land Act 1981 (s125 PA). It icant to seek rights for a term of years bry acquisition legislation.

Surface Water Drainage Plan (REP2-I principles of surface water Je within the Project's Order Limits. The ent tanks/ponds and information on how n discharged, will be determined during and will be in compliance with the he Outline Construction Surface Water

o report following the response from the ads of terms templates have been

actical matters with landowners and g the construction process is covered Construction Practice (J26 F03) ets out that the Agricultural Liaison on these matters. The Outline er and Drainage Management Plan ode of Construction Practice which is opment consent order.

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	National Farmers Union response	Applicant's response
			detailed design, the Applicant will ensure a full pre and post construction drainage plan is created in conjunction with the affected parties to ensure field drainage systems are maintained during and reinstated post works as set out in the Outline Construction Surface Water Drainage Plan (APP-218). The OCSWDP does state at 1.6.2.1 pre-construction drainage will be installed but does not state how landowners or occupiers will be informed of the pre-construction drainage plan. How will this be undertaken and this needs to be stated in paragraph 1.6.2.1. Paragraph 1.10.1.1 does state that any drainage impacted will be reinstated and the NFU is pleased to see what has been stated but again would like clarification as to how landowners and occupiers are to be consulted on the drainage and who will be making contact with landowners and occupiers to carry this out.	
REP3-102.4	NFU Any AP	Q1.6.20 Soil management and reinstatement: In its Response to Written Submissions made at Procedural Deadline ([REP1-011], pages 32 & 33) the Applicant addressed concerns about soil management and reinstatement [PDA-048] and it also submitted a revised Outline Soil Management Plan at Deadline 2 [REP2- 054]. With reasoning for your conclusion, does this allay your concerns?	so that when the soil is reinstated and aftercare provisions are to	Within the Outline Soil Manage provisions setting out that fur- undertaken to identify the dist Project. This soil survey will in each individual landholding. T pit information, together with identification of soil resources SMP. This data will be available to the landowner Liaison Officer as the point of occupiers. The mapping of so according to soil characteristi landowner boundaries. Howe mapping of the soil boundaries visible within the overall soils detailed Soil Management Pla- to the relevant landowners.
REP3-102.5	NFU Any AP	Q1.6.21 Outline code of construction: In its Response to Written Submissions made at Procedural Deadline ([REP1-011], pages 31 & 32) the Applicant signposted where it has made provision for the matters raised under the heading 'Outline Code of Construction' in the NFU submission [PDA-048]. With reasoning for your conclusion, does this allay your concerns	 Answer: 1) Agricultural Liaison Officer: the NFU is pleased to see what has been identified under the heading of Agricultural Liaison officer in the OSMP but would have still liked further roles and obligations to have been highlighted so that both the ALO and the landowners and occupiers are clear as to exactly what will be undertaken during the construction of the project. The NFU has agreed the wording below on many DCO schemes for underground cables: Agricultural Liaison Officer (ALO): The ALO will be appointed by the Grantee prior to the commencement of the cable installation works and will be the prime contact for ongoing engagement about practical matters with landowners, occupiers and their agents before and during the construction process. There may be more than one ALO if required. The ALO (or their company) will be contactable within the core working hours during the construction phase by landowners, occupiers and their agents and will provide 24-hour team or company contact details for use in the event of emergency. Post-construction the ALO will remain appointed for up to one year in order to manage remediation issues. The ALO will have responsibility for liaising with landowners, occupiers and their agents, including the following examples: 	The commitment for an ALO of Construction Practice (J26 construction, during construct within this outline plan, along such as the Outline Soil Mana and responsibilities of the ALU and works taking place on a p of the role are currently set of requirement to define the role The Applicant has included m Construction Practice (J26 FC with landowners and occupie supplies that may be interrup Conversations with the ALO of matters such as diversion of p can be maintained or diverted in accordance with the hierarc



agement Plan (REP2-054) there are urther soil survey work would be listribution of soil types within the I include individual observations within The detailed soil auger boring and soil th the mapping of the soil types and ces would be included within the detailed ilable with the detailed SMP and would ners through liaison with the Agricultural of contact for the landowners and soil types would be undertaken stics, rather than within field or wever, the location of soils data and ries across landholdings would be ils mapping produced as part of the Plan and if requested would be provided

O is contained within the Outline Code 26 F03). The role of the ALO preuction and post construction are listed ng with more detail in other outline plans anagement Plan (REP2-054). The roles ALO are site specific to the conditions a particular landholding. The principles out and therefore there is no ole further within the outline plans.

I measures within the Outline Code of F03) which facilities the conversations biers regarding their private water upted as a direct result of the works. O on site will ensure that practical of private water supplies for livestock ted during the works to continue supply archy set out.

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	Natio	onal Farmers Union response	Applicant's response
			i.	Coordinating remaining drainage surveys and sharing pre and post construction drainage schemes with landowners or occupiers in advance for their consideration;	
			ii.	Coordinating the provision of a detailed pre-construction condition survey (where necessary pre-application, accounting for surveys undertaken pre-application) to include a soil survey as detailed in (ii) Pre-Construction Soil Statement and Pre-Entry Schedule of Condition above;	
			iii.	Advising on risks relating to the translocation of soil diseases, where necessary, and ensuring appropriate protective provisions are implemented;	
			iv.	Arranging quarterly meetings with landowners, occupier or their respective agent representatives, where considered necessary;	
			v.	Undertaking pre-construction liaison with affected parties to minimise disruption, where possible, to existing farming regimes and timings of activities (which will include endeavouring to keep the Grantor informed at least 3 months in advance (where practicable) of the Grantee's intention to take entry in order to commence the cable installation works);	
			vi.	Undertaking site inspections during construction to monitor working practices and ensure landowners' and occupiers' reasonable requirements are fulfilled;	
			vii.	Discussing and agreeing reinstatement measures following completion of the works;	
			viii.	Ensuring landowners and occupiers are consulted in respect of requirements to field entrances and accesses across the construction strip, in particular to severed land parcels.	
			ix.	Discussing the location, grouping, and marking of inspection chambers with the Grantor and Occupier.	
			2)Agric followi	cultural Water Supplies: The Code of Construction states the ng:	
			Water	Supplies	
			landow confirm any co establi	8 Discussions with Dŵr Cymru/Welsh Water and wners will be undertaken at the detailed design stage to in the location of public and private water supplies. Prior to instruction activities, utility surveys will be undertaken to sh if any infrastructure is present prior to any intrusive work undertaken.	
			Cymru the wa	.9 Works to be undertaken within proximity to Dŵr /Welsh Water assets will be designed in accordance with ter authority's design standards and will require to be yed by Dŵr Cymru/Welsh Water prior to the commencement ks.	
			discus as so r	FU believes that it is absolutely essential that the Applicant ses with landowners locations of water supplies especially many livestock farms are going to be affected by the uction works.	
				FU would like to see the following wording included in the code of construction:	



Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	National Farmers Union response	Applicant's response
			Water Supply: If an existing piped mains or private water supply that serves and is located upon the Landowner's Property is directly interrupted on a temporary basis by the construction works for the installation of the Cables, then the Applicant shall (subject to it being requested to do so by the Landowner or the Occupier (as applicable)) and where it is reasonable, proportionate and reasonably practicable to do so, provide or procure an alternative supply to the Landowner or the Occupier (as applicable). Where it is not reasonable, reasonably practicable or proportionate for the Applicant to provide or procure an alternative water supply the Applicant shall reimburse the fair, reasonable and proper costs incurred by the Landowner or Occupier in procuring their own alternative water supply during the period of such interruption in accordance with the Compensation provisions.	
			Where an existing piped private water supply that serves and is located upon the Landowner's Property is directly interrupted on permanent basis by the construction works for the installation of the Cables the Applicant shall either provide or procure an alternative permanent water supply or where it is not reasonable, proportionate and reasonably practicable to do so pay the Landowner or an Occupier's (as applicable) fair, reasonable and proper costs incurred in procuring a permanent means of an alternative supply of water in accordance with the Compensation provisions. This wording has been agreed on many DCO schemes for underground cables and included within the outline Code of	
REP3-102.6	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?	Construction. The NFU believes that impacts on the livestock farms and in particular the dairy farms will need to be addressed with specific accommodation works and not enough has been done to reach an agreement on what is required so that farming enterprises can be maintained through the construction period. In particular one of the dairy farms which will be very badly impacted has been in discussions with the Applicant for a length of the cables to be direct drilled so that the construction of open cut trenching will not impact the dairy enterprise. This still has not been agreed and signed off. Just agreeing accommodation works will not be enough to reduce the impact on this particular dairy farm. The impacts to some of the farms is likely to be more permanent than has been stated in paragraph 7.8.3.2 and the viability of the dairy farms will be impacted contrary to what is stated that if the implementation of measures identified in table 7.24 are implemented this would not affect the overall viability. As an example, the dairy farm affected by the proposed substation site might have around a 1/5th of the land used for the dairy enterprise lost to the proposed project (with a significant proportion permanently). No in-depth discussions have taken place to date to attend to what measures will be put forward to assist with addressing such a loss of land and resource to the dairy enterprise. The farm business will also have land impacted by the proposed Awel y Mor scheme, and associated works needed to divert a Gas pipeline by Wales & West Utilities. This is a cumulative impact on the farm business, and this has not been addressed. Please refer to the submission submitted by Davis	Dalcour Maclaren on behalf of with landowners, occupiers a application and examination p Project with initial contact dat The Applicant through its app (DM) have been engaging wi the Development Consent Pr Messrs. Lloyd Evans on an ir impact the project proposals mitigation measures may ass will continue to discuss mitiga accommodation works, progr management plans, along wi available as set out in the ma look to minimise the severed platform during the works the business which has been the It is hoped that a voluntary ag can be agreed soon following October as it is understood th heads of terms save for these that agreement.



If of the Applicant have had meetings s and their agents throughout the pre on phase of the Mona Offshore Wind dating back to March 2022.

appointed land Agent Dalcour Maclaren with the Lloyd Evans Family throughout Process. The Project has met with the n increasing frequency to understand the als may have on their business and what assist in reducing the impact. The Project tigation measures such as ogramme management, soil

with the compensation provisions management plans submitted, which ed land and land taken out of the grazing therefore lessening the impact on the he main area of objection.

agreement with Messrs. Lloyd Evans ing the most recent meeting on 14th d there are no further comments on the ese practical matters which sit outside of

Planning Inspectorate Ref. No.	Question is addressed to	ExA Question	National Farmers Union response	Applicant's response
			 Meade Property Consultants for the affected party, registration Id no:20048007. Paragraph 7.8.3.3. highlights the implementation of appropriate mitigation measures but these have not been agreed and as stated above it is actually going to require direct drilling of the cables along specific locations to reduce the impacts of construction. It cannot be stated that the magnitude of the temporary impact on the operation of farm holdings is assessed as low. Please refer to the submission for G Lloyd Evans & Sons, Bryn Hen by J Bradburne Price & Co. 	Dalcour Maclaren on behalf o dialog with the dairy farm beir agent throughout the pre-app site selection and the intrusive As voluntary discussions and o freeholder of the land have no considered appropriate to disc tenant given the position of the the appointed agent for the Ce of the Applicant, is seeking to agent. It would be the intentior on the tenant and mitigation m impact such loss of land may b would have been inappropriate landlord, as ultimately they are seeking the rights directly.



If of the Applicant have been in ongoing being referenced and their appointed pplication stage of the project including sive works campaign.

nd engagement with the Cefn Estate as not progressed, it had not been discuss this matter in detail with the the Estate. Following recent dialog with Cefn Estate, Dalcour Maclaren on behalf to meet with Mr Owen and his appointed ation of the Applicant to discuss impacts in methods and strategies to minimise the ay have on their farming business. It riate to do this without the consent of their are the party from whom the Applicant is