

MONA OFFSHORE WIND PROJECT

Response to J Bradburne Price on behalf of G Lloyd Evans & Sons ExQ2 Submission

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Image of an offshore wind farm

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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,

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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.

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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).

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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

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Units

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

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1 Response to J Bradburne Price on behalf of Lloyd Evans ExQ2 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to J Bradburne Price on behalf of G Lloyd Evans ExQ2 responses below.

2 Response to J Bradburne Price on behalf of Lloyd Evans ExQ2 Submission

Table 2.1: J Bradburne Price on behalf of Lloyd Evans

Planning Inspectorate Ref. No.	Question to	ExQ2 Question	J Bradburne Price on behalf of Lloyd Evans response	Applicant's response
JBRAD.1	J Bradburne Price & Co on behalf of G Lloyd Evans and Sons	Q2.6.17 G Lloyd Evans & Sons Can you provide an update on any negotiations with the Applicant since CAH1 [EV-008]? What agreement or assurances would the Applicant need to provide to your clients to enable them to withdraw their objection to the Proposed Development? Is there anything that you want to add to your existing submissions in respect of the Applicant's Response to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons ExQ1 Responses [REP4-070].	It is confirmed that there have been no subsequent meaningful negotiations since CAH1 (EV-008). Our Clients' and the Projects position remains as previously. We have recently requested a meeting with the Applicant, who confirmed that their position is 'non negotiable', which we find disappointing. It is accepted that the opportunity for negotiations has been limited by the absence of one of the Partners to the farming business being out of the country.	It is the Applicant's preference to negotiate a voluntary agreement. Except for this issue, all other items within the Heads of Terms have been agreed.
		What agreement or assurances would the Applicant need to provide to your clients to enable them to withdraw their objection to the Proposed Development?	The project has committed to drill a minimum of 650m out of the 950m length in the location shown on the attached plan and marked "area of land subject to trenchless commitments". (Plan No. 22000496-PLN-HOT-4609.1.A"). Our clients' require, that of the 650m drill commitment, approximately 450m will be drilled in a single length from the eastern boundary in a north westerly direction throughout the "area of trenchless commitments" (Plan No. 22000496-PLN-HOT-4609.1.A"). For clarity, this has been marked on the plan between points A and B. These fields are critical to the successful operation and viability of the farm. The 'drilling option' would result in a reduction of the temporary loss of land available to my clients and, consequently, a reduction in the number of the cows they will be forced to sell. The result would be a fall in the predicted annual loss of Gross Margin and this would help to mitigate the overall impact on the farm business. Our clients are willing to maintain some flexibility over the remaining 200m length to be drilled and to work with the applicants, and we believe we could reach a voluntary agreement. A more detailed and focussed specification as to all accommodation works and other agreed mitigation works which will reduce land take and disruption to the farming business in order to mitigate the impact of the scheme upon the Farm Business.	The Applicant notes that the request for a commitment of a single 450 metre drill is on land that is occupied by G Lloyd Evans & Sons (see plot 10-179 on the Land Plan (REP1-004) and the entry in the Book of Reference (D4 F06)). The Applicant has been provided with the following list of reasons (highlighted in bold) behind the specific request to drill between two precise points of 450m, and why this area is critical to the successful operation and viability of the farming enterprise: <ol style="list-style-type: none"> Mitigate grazing platform land take – the Applicant has put forward an offer in the voluntary agreement to use trenchless techniques for 650m over a 950m stretch. The Applicant believes that this would mitigate the overall grazing platform land take more than a single 450m drill would. To prevent the forced sale of cows would be reduced (main concern) – based on previous meetings with the Lloyd Evans family, the Applicant understands its offer to reduce the overall land take would also prevent any forced sale of cows. Outside stock replacements not an option. So need for replacements will be reduced - which takes years to get back to the same level as now – this is noted and understood by the Applicant. This area is crucial to the movement of the herd on the land. – the Applicant can confirm that access will be maintained along the 'astroturf' access track the Examining Authority visited as part of the Accompanied Site Inspection as it has been excluded from the Order Limits. Two journeys a day to and from the milking parlour, which needs to be a quick and efficient turnaround to pasture – as per point 4. Cows are very much creatures of habit – this is noted and understood by the Applicant. Welfare of the cows (a prime concern), avoid stress and fertility issues as far as possible – the Applicant will work with Mr Lloyd Evans to understand and identify accommodation works that would aid with this concern.

Planning Inspectorate Ref. No.	Question to	ExQ2 Question	J Bradburne Price on behalf of Lloyd Evans response	Applicant's response
				<p>8. Reduced impact on the farming operations i.e. machinery movement, slurry spreading, labour - based on previous meetings with the Lloyd Evans family the Applicant understands its offer to reduce the overall land take would also reduce impact on the farming operations.</p> <p>9. Drilling option causes the least disruption – the Applicant has offered to drill 650m out of the 950m initially requested.</p> <p>10. Cows out grazed most of the year round – the Applicant is hopeful that the drilling proposed will allow this to continue where possible.</p> <p>11. Rich pasture important for both yield and quality of milk – the Applicant notes the importance of quality in animal feed and will work with the land interest to address the compensation matters.</p> <p>From the Applicant's perspective, the only issues on this list that are specific and relevant to the 450-metre section are points 4 and 5.</p> <p>The CAH2 hearing summary (S_D6_5) details the reasons why the Applicant is not in a position to accept this commitment. However, as stated at paragraph 26 of the CAH2 hearing summary, although the Applicant is currently unable to make the specific commitment requested, it may be case that it can drill this specific section once detailed design has been completed. The Applicant will inform G Lloyd Evans & Sons as soon as this detailed design is available to aid in farm planning and loss mitigation.</p> <p>If it not possible for the Applicant to drill the section requested, the Applicant is committed to working with G Lloyd Evans & Sons and will where possible, and to minimise disruption through the accommodation and mitigation works set out in the Outline Code of Construction Practice (J26 F05).</p> <p>Any losses that cannot be mitigated are compensatable under the Compensation Code. G Lloyd Evans & Sons would be able to make a claim for disturbance, including temporary and permanent loss of profits, and under the principle of equivalence, the party should be left no better or worse off than before the scheme.</p> <p>In the Applicant's latest update to the Onshore Crossing Schedule at Deadline 5 (REP5-013), the Applicant updated the crossing technique for Mapping ID's 226 and 227, which lie within the 450-metre area referenced above, from trenched only to trenched or trenchless. This provides the Applicant with the ability to cross these obstacles using trenchless techniques as part of any voluntary agreement reached with G Lloyd Evans & Sons.</p>
		<p>Is there anything that you want to add to your existing submissions in respect of the Applicant's Response to J Bradburne Price & Co on behalf of G Lloyd Evans & Sons ExQ1 Responses [REP4-070].</p>	<p>The clients' submissions remain and have not been satisfactorily answered by the applicants' response.</p> <p>The clients' assessment of the impact of the scheme does not concur with the Applicants that it is a "low" assessment. Our clients also do not agree with the Applicants conclusion that it does not compromise the overall viability of the holding. There is no evidence as to how this is determined other than reliance on the overriding vagueness of the criteria in Table 7.18 of the Environmental Statement Volume 3 – Chapter 7:- land use and recreation.</p> <p>The clients have reservations as to the Applicants' grasp and understanding of their business and the day-to-day farming operations undertaken. This is coupled with a lack of understanding of the clients' comments in Para 1.1.2 of J Bradburne Price's representations and that the individual undertakings provided in the Code of Construction Practice do not collectively alleviate the concerns.</p> <p>The clients do not accept that the "conversations" over attempts to mitigate the scheme are at an advanced stage. It is accepted that significant progress has</p>	<p>The assessment of impacts on farm businesses (as set out in Volume 3, Chapter 7: Land Use and Recreation (APP-070) is based on information that was publicly available and information that was disclosed by the landowners or occupiers to the agents acting on behalf of the Applicant through their land referencing work, and discussions with individual landowners and interested parties.</p> <p>This included: 1. Data on the extent of individual land holdings as far as it was disclosed. 2. Information on the nature of farming arrangements including land ownership, farming tenancies, licences or informal agreements. 3. Information on the nature and operation of the individual farming businesses affected.</p> <p>During the meetings with the landowners and occupiers, provision of potential mitigation measures was discussed for the individual holdings that would assist with the continuing operation of those holdings, and mitigate any impact during the construction and reinstatement phases of the development.</p> <p>The assessment of the effect of the Project on farm holdings takes into account the implementation of appropriate mitigation measures to avoid or</p>

Planning Inspectorate Ref. No.	Question to	ExQ2 Question	J Bradburne Price on behalf of Lloyd Evans response	Applicant's response
			<p>been made, but agreement on the final details is still outstanding. And this is the crucial element of our clients' concern.</p> <p>It is unreasonable to expect the clients to withdraw their limited statutory rights to object to such a major medium term disruption to their Farming Business based only upon vague and unspecified assurances.</p>	<p>reduce impacts on individual farm holdings, as far as practicable, during the construction and operational phases of the Project. These are set out in the Outline Code of Construction Practice (J26 F05), including the provisions of an Agricultural Liaison Officer whose role will be a contact with the relevant landowner and occupier to discuss mitigation and practical matters to mitigate losses and reduce disturbance where possible.</p>