

MONA OFFSHORE WIND PROJECT

Response to National Farmers' Union D6 Submission

Deadline: 7

Application Reference: EN010137

Document Reference: S_D7_20

Document Number: MOCNS-J3303-DMC-10551

14 January 2025

F01



Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D7	Dalcour Maclaren	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	14 Jan 2025

Prepared by:

Dalcour Maclaren

Prepared for:

Mona Offshore Wind Ltd.

MONA OFFSHORE WIND PROJECT

Contents

1	RESPONSE TO NATIONAL FARMERS' UNION D6 SUBMISSION	1
1.1	Introduction	1
2	RESPONSE TO NATIONAL FARMERS' UNION D6 SUBMISSION	2

Tables

Table 2.1:	REP6-146 National Farmers Union	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
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

MONA OFFSHORE WIND PROJECT

Units

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

1 Response to National Farmers' Union D6 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to the National Farmers' Union's Deadline 6 response below.

2 Response to National Farmers' Union D6 Submission

Table 2.1: REP6-146 National Farmers Union

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-146.1	<p>Following on from the written submission submitted to you on the 6th December by Susie Griffiths of J Bradburne Price, the information given by Huw Evans at the Compulsory Acquisition Hearing 2 on the 11th December 2024 and issues raised by Louise Staples of the NFU we would like to highlight the following:</p> <p>1. After evidence given at the hearing which confirms that there are two long sections of the under-ground cable lengths within the whole scheme to be direct drilled and that these lengths are guaranteed, we see no reason why the requested length of 450m through the grazing platform land at Bryn Hen cannot be guaranteed. We believe the only reason is financial and this is why the Applicant is not prepared to guarantee the length in the specific area requested. We believe the Applicant is not taking into consideration the main impact to the dairy herd which will take considerable years to rebuild or the financial impact to the Bryn Hen farming enterprise. Paying compensation will not enable the dairy cows to stay on the holding, the Applicant needs to realise that this is not an arable farm where compensation can be paid for loss of crop/ contract and where the following year the crop is resown and the contract fulfilled.</p>	<p>The Applicant explained at the Compulsory Acquisition Hearing 2 (CAH2) (REP6-084) hearing and in its Deadline 6 submission (REP6-125) why it is unable to undertake the single drill of 450m being requested.</p> <p>The Applicant fully understands the concern that by taking more land away from the diary enterprise creates the possibility that dairy cows would need to be sold as they could not be sustained. That is why the Applicant has put forward an offer to specifically address this issue which is detailed in the Applicant's Summary of Oral Submissions for CAH2 (REP6-084) and its Deadline 6 submission (REP6-125). The Applicant is prepared to deliver sections of trenched and trenchless installation over a particular area with the overall aim being to reduce the land take and impact to the farming business, which the Applicant understands is the key issue. As the Applicant stated in in Deadline 6 response (REP6-125), no substantive reason has been provided as to why this particular 450 metre section of land needs to be crossed using trenchless techniques.</p> <p>It has also been raised in earlier submissions by the Applicant that one long drill does not necessarily mean that the land take and disturbance to the landowner would be reduced. A long drill requires large working areas to be established to accommodate drilling equipment, welfare facilities and associated infrastructure. A long drill would also take longer compared to a trenched option, which for certain areas would prolong the construction period and when the land could be handed back to the landowner. For the avoidance of doubt, a haul road is required through the area of the requested drill during the construction phase of the project in any design scenario to ensure the movement of plant and equipment through the onshore cable corridor.</p>
REP6-146.2	<p>2. As stated by Huw Evans at the hearing they are prepared to work with the Applicant and be flexible on the direct drill if at the time of construction there was an area that could not be direct drilled for a good engineering reason.</p>	<p>The Applicant welcomes the engagement from Mr. Evans and his agent. The Applicant refers to its response above at REP6-146.1 and would add that the Applicant is already committed to use trenchless techniques as indicated in the Onshore Crossing Schedule (REP5-012).</p>

MONA OFFSHORE WIND PROJECT

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-146.3	3. An email has today, 20th December been sent to the Applicant requesting a meeting to discuss this further and see how this could be agreed in the voluntary Heads of Terms. It is disappointing that the Applicant has not been in contact with either the NFU, J Bradburne Price or G Lloyd Evans & Sons to request a meeting as was suggested at the hearing.	The Applicant can confirm a response was sent to the email from Ms. Louise Staples by the Applicant's agents on the 24 th December 2024. The Applicant remains hopeful that its offer to mitigate the overall land take and financial impact can be accepted and a voluntary agreement reached.
REP6-146.4	4. The NFU believes that the Applicant is now not trying to negotiate on a parallel basis with formal processes and the failure to conduct such negotiations is now depriving the landowners of the benefit that an agreement on the 450m being direct drilled could bring to completely change the impact of the scheme to the dairy enterprise and the farm business. Direct drilling the 450m in the specific location requested can achieve a completely different outcome for the farm business.	The Applicant has negotiated over the last 9 months a full set of agreed Heads of Terms with the landowner and the NFU with the exception of this one issue. The Applicant explained at CAH2 (REP6-084) and in its Deadline 6 submission (REP6-125) why it is unable to undertake the single drill being requested. The 'completely different outcome' has not been quantified or compared against the offer put forward by the Applicant. Any financial loss suffered by the dairy enterprise is a compensatable matter through the provisions of the Draft DCO in respect of the use of the relevant powers. Under the principle of equivalence which applies to compensation of this kind, the affected party should be left no better or worse off as it was before the scheme.
REP6-146.5	5. The NFU and the land agent acting believe that a compelling case cannot be made by the Applicant to open trench the area of land in question rather than direct drill and so as it stands a Development Consent Order should not be granted.	The Applicant's Compulsory Acquisition Hearing 2 Summary of Oral Submissions (REP4-033) and Statement of Reasons (D3 F04) sets out the Applicant's justification for seeking powers of compulsory acquisition and confirms that a compelling case exists in the public interest which justifies the making of the DCO with those powers.
REP6-146.6	6. The Applicant needs to agree wording in either the voluntary Heads of Terms or wording needs to be included within the DCO that confirms that the 450m section in question will be direct drilled except if there is a engineering reason that means direct drilling is not possible and how this will be communicated by contractors during construction to still minimise any area that has to be open trench.	The Applicant refers to its responses above and remains committed to agreeing a voluntary agreement for the land rights sought.
REP6-146.7	7. This difference should be highlighted as an outstanding matter within the Lands Tracker.	The Applicants notes the response and can confirm the reference to outstanding matters are referenced within the Land Rights Tracker (S_PD_5 F09).