


**From:**   
**To:** [Hynet CO2 Pipeline](#)  
**Subject:** HYNET - DCO – representation at DL4. Reference ID: 20034037  
**Date:** 19 June 2023 13:18:11  
**Attachments:** [image372941.png](#)  
[image603681.png](#)  
[image304538.png](#)  
[image867375.png](#)  
[image965759.png](#)  
[image381046.png](#)  
[image576986.png](#)  
[image187442.jpg](#)  
[image987774.png](#)  
[image720336.png](#)  
[image138301.png](#)  
[image196216.png](#)  
[image009973.png](#)  
[image807295.png](#)  
[image760829.png](#)  
[image569187.png](#)  
[image190036.png](#)  
[image913810.jpg](#)  
**Importance:** High

---

**By email**

Hynet CO2 Pipeline [hynetco2pipeline@planninginspectorate.gov.uk](mailto:hynetco2pipeline@planninginspectorate.gov.uk)

Dear Sir/ Madam

**HyNet carbon dioxide pipeline – DCO – representation at DL4. Reference ID: 20034037**

1. We represent the interests of Messrs E & J Williams, and write further to the oral representations made during the oral hearing on Wednesday 7 June 2023

**Mitigation land**

2. The proposal sets out the requirement for approximately 10 acres of Messrs Williams land holding at Magazine Lane, Ewloe to be used for permanent environmental mitigation. The proposal dissects two fields extending to circa 20 acres which effectively renders the balance of the two fields unsuitable for future agricultural purposes.
3. The proposal removes circa 20 acres from agricultural production. The land is considered to be a first-class block of agricultural land being generally level, fertile, arranged in four conveniently sized field enclosures, capable of growing good yields of both arable and grass crops with good access onto Magazine lane.
4. The loss of such land will effectively render the remaining two fields as an unviable unit in view of the distance (12 miles) which Messrs Williams have to travel from their main holding in Mold to farm this land.
5. It should be noted that this area of the project already has a significant area of land proposed for environmental mitigation, namely in the vicinity of the nearby Alltami Brook and therefore it is felt that additional environmental mitigation on prime agricultural land is unnecessary and unjustified.
6. The proposal to include the aforementioned land for mitigation was never discussed with Messrs Williams prior to the DCO being submitted and no opportunity has since been provided to discuss alternative locations away from the land in Magazine Lane.

**NVZ Compliance**

7. The land in Magazine Land provides an important block of additional land to support the main dairy holding in Mold and in particular enables additional land capacity for the spreading of slurry from the dairy herd. At present, regulations, namely The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (as amended) limit the amount of slurry that can be spread with a threshold of 190kg/Ha. That is already expected to be lowered to 170kg/Ha.
8. Any loss of land not only reduces the number of animals that can be kept on the holding but there also needs to be a sufficient area of land on which to spread the resultant slurry. With the expected lowering of the Nitrogen limit, this issue becomes more pressing. A loss of slurry spreading capacity will effectively render the holding non-compliant and exposed to prosecution. To reduce the risk of non-compliance there will be a requirement to reduce stock numbers which will have a negative knock-on effect to business turnover and ultimately farm profitability.

Yours faithfully

