

From: [Carl Davies](#)
To: [AwelyMor](#)
Subject: Carl Davies Response
Date: 24 October 2022 23:11:35

Dear Sir / Madam,

I am writing to follow up my verbal representation last month and your written request for further information. You requested responses on two issues. My responses are unfortunately very brief. The weather, vessel maintenance and crewing difficulties have limited the time I have available to respond to you.

Question 18.8: Commercial Operations - Please provide more detail in respect of your concern raised in your relevant representation [RR-060] on the effect that the Proposed Development would have on your commercial operations.

The impacts that I expect will occur are as I explained at the hearing. From the moment that piling of the foundations takes place I predict that commercial fish and shellfish catches will fall over a wide area extending well beyond the windfarm footprint. This view is based on my experience, and those of my colleagues during the installation of the Gwynt y Mor, Rhyl Flats, North Hoyle, Burbo Bank and Burbo Bank extensions over the past 15 years. This area covered by this impact is likely to exceed the loss of access to the windfarm area and cable corridor, during the construction phase by a large amount. Finfish species are directly affected by pile driving either fleeing or not feeding and our shellfish catches will be affected by displacement effects (then increased competition with other fishermen) due directly to construction within the array and cable corridor and increased steaming times due to exclusion zones.

Once the foundations are installed I expect that over a period of several years there will be a gradual recovery for some species, but perhaps not for others. For my lobster fishing business I hope that the lost opportunities during the construction phase may be offset by new fishing opportunities on the scour protection installed around some of the turbine bases. However my experience from Gwynt y Mor has been that the benefits of the windfarm's presence are marginal and take time to occur.

I have raised these issues at many meetings, and feel that they have been largely dismissed. I understand that I have limited data to back up my concerns – this is because I am busy trying to earn a living from the sea. This was a full time job even before attending meetings and responding to consultations about windfarms became a necessary task. In response to my concerns I know the developer has presented information about noise studies that claim to show that fish and shellfish are not affected by piling noise over the area that my colleagues and I have seen; and also sampling work that claims to show that there has been no effect of windfarms on fish or shellfish populations. Although I have stated many times that there are holes in their data, I don't have evidence of my own to prove these beyond doubt. Germany has specific legislation governing maximum levels of noise from piling, levels which the PIER states will occur 16 miles away from source. Bubble curtains are used to mitigate noise yet in the UK there is no such legislation when I asked RWE representatives in a meeting.

Question 19.18: Charter Angling - Are you satisfied the issues raised during consultation have been captured in table 2-2 in the Charter Angling Baseline Report [APP-118]? If not, please explain reasons and provide evidence justification.

The issues that were raised in the consultation are listed in Table 2-2 (they are largely a very good record of what was said by myself and colleagues and credit must be given to Poseidon for that report however the responses in the EA are not satisfactory. To give examples

Underwater noise – the issue raised is reported correctly, but the responses sweep it under a carpet of words and cross-references. The simple fact is that the impact of underwater noise on charter angling is much more significant and felt further away from the noise source than all the studies suggest. The impact on my business is not just about disturbance to fish – it is about loss of confidence in my clients that they will catch any fish. Charter angling trips are a leisure activity, and people simply won't come if they don't think that they are going to have a good day out. From the moment that piling starts, bookings will cease. In Chapter 12.11 para 139 recreational anglers are described as 'low vulnerability'. This is simply not the case and all the representations from charter skippers from all along the North Wales and North West England coast have simply been ignored, there is no other way to describe this complete dismissal of representations from individuals, many of which have been working across the North Wales coast for 30-40 years. (Also para 141 states that "compensation strategy only if significant impacts on fleets are realised during various construction phases" but by this time it will be too late, we are all fully aware of what is going to happen.

Vibration – as above – the evidence of our eyes and those of our clients is that even post-construction the windfarms have some kind of effect (whether due to vibration, electro-magnetic fields, or some other effect) on fishing in the area. We might be wrong about the mechanism, but that is not the point – we have seen the effect.

Traffic Separation – we saw a similar "don't blame us, it's the MCA" response to the same issue for Gwynt y Mor. This is not, to be honest, a response that reflects well on the developer. The simple fact is that if Gwynt y Mor hadn't been built, there would have been no TSS, and now that Awel y Mor is proposed it is likely to be extended. It's wrong to blame the MCA for this, and it will impact our businesses. It would reflect better on the operator if they were to shoulder the responsibility for this.

Running costs and survival of businesses – see the comments above. It may be the case that operations can in principle continue within the windfarm area, but that is no use to us if catches are adversely affected and our clients have lost faith in the area.

A key point that has been omitted here is one that I raised during the public consultation meeting with the operator and their consultants last year. They had made the point that the effect of the windfarm on the water column and seabed disturbance through disruption of tidal flows was equivalent to that of a big storm (I forget now if this was a one in ten year storm, it was something like that). The point that I made was that a one in ten year storm happens once every ten years. The tide comes in and out twice a day. So the effect of the windfarm on the seabed and water column is to make an occasional dramatic event into a regular twice-daily routine.

In the "other marine users and activities chapter" page 66 reference is made to Tub Gurnard in the McCarthy papers a and b 2018 yet only one paper is cited and this references grey gurnard which is not the species that we specifically recorded a decline in during windfarm construction, notably Gwynt y Mor. Reference is then made to an inshore fishery for Gurnard increasing in recent years which again is simply not true. Trawling activity (for finfish) on the North Wales coast has been at its lowest level over the last 10 years for decades and is now confined to occasional Belgian and English

beamers trawling outside the 12 mile limit for short periods in the mid Irish Sea. They target Dover sole. Increased landings of Gurnard, in the Irish Sea, over the last few years is more likely to be attributed to a recording anomaly, as in the promotion of Gurnard as a good eating fish by celebrity chefs over recent years, so it is sold legitimately on the market for a reasonable price rather than sold for cash as pot bait as it has been generally in the past.

You cannot make up things to put in an important document like this but I'm afraid in this case this is what has happened, and the worrying part about it is are there other areas in this ES that this has happened.

In the open floor hearing my statement was responded to. One response was concerning my reference to tailoring scour protection to encourage an array of species, including lobster to help mitigate effects on the fishery but the response was that they would be worried about introducing new species to the area, I hardly think that a lobster is a new species in the Irish Sea! Another answer was about cumulative effects of future windfarms like Morgan Mona and Cobra being built in tandem or one after another but the response was basically that each build doesn't have to take into account future developments, well if this is the case the planning rules are not now fit for purpose. Maybe they were for small farms like North Hoyle, Rhyl Flats and Burbo 1. Also the baseline is taken as the present not before any windfarms were built and this is also not right.

Overall, I still have grave concerns about the impact of the proposal on my business. I feel rather out-gunned in this process by a developer who can commission a consultant to write long reports in response to my concerns, and that I hardly have time to read between fishing trips and vessel maintenance, let alone refute and respond to. I hope you can bear this in mind when considering this very brief response.

I am keen to remain on good terms with the wind farm operators, since we are all sharing the same patch of the sea and need to find a way to get along. I think there could be win win mitigation for all if we tailor design rock armour with extensions at bases and cable protection coupled with a lobster hatchery ashore, similar to Holderness on the east coast. In the grand scheme of things this would be a small cost and could provide future jobs ashore with a hatchery also being a potential tourist attraction.

However I still fear for the future of my business and those of my colleagues, and more importantly what the impacts of multiple construction events, across vast swathes of a largely enclosed shallow coastal sea, will have on the whole ecosystem present within that sea.

Thank you for your attention.

Best Regards,

Carl Davies