

**BODORGAN MARINE LIMITED  
ESTATE OFFICE  
BODORGAN  
ANGLESEY LL62 5LP**

The Planning Inspectorate  
monaoffshorewindproject@planninginspectorate.gov.uk

7 August 2024

Dear Sirs,

**Interested Party Reference Number 20048554: Written Representations**

These written representations are made on behalf of Interested Party 20048554 and follow this IP's initial representations made in May 2024 and the reply thereto of the Applicant. These earlier representations are set out for convenience below.

**2.6 Bodorgan Maine Limited**

**Table 2.6: RR-006 – Bodorgan Marine Limited**

Reference	Relevant Representation Comment	Applicant's response
RR-006.1	<p>Mona NSIP Representations by Bodorgan Marine Limited PART 1: Co-Location Co-location strategy matters 1. The Applicant recognises the need for an effective co-location strategy and indeed claims that an overview of the co-location strategy will be set out in the Outline Fisheries Liaison and Co-Existence Plan ('FLCP'); see 1.1.5 and 1.3.2 of the FLCP.</p> <p>2. However, the FLCP does not present a co-location strategy. What the FLCP does is present a strategy for a form of co-existence – and not co-location - in allowing business as usual scallop fishing to continue in part of the development area.</p> <p>3. Business as usual fishing is not in our opinion co-location. Indeed, the applicant's own material recognizes this reality: see ES Volume 6, Annex 6.1 Commercial Fisheries Technical Report where business as usual fishing is described as co-existence.</p> <p>4. What the applicant should have done was to have turned its mind to the meaning of co-location, in particular as that term is understood in Welsh waters. If it had done so, it would have considered CEFAS's April 2020 document entitled: "Welsh National Marine Plan: A review of the potential for co-existence of different sectors in the Welsh Marine Plan Area" ('the 2020 CEFAS Report).</p> <p>5. It is not clear that the applicant has considered the 2020 CEFAS Report as it is not listed in the Environmental Statement Chapter on Policy and Legislative background, Volume 1, Chapter 2.</p> <p>6. If the applicant had considered the 2020 CEFAS Report: its consultation activities, its mitigation strategy, and its socio-economic and other assessments would have focused on defining and delivering a strategy for realising the</p>	<p>The Applicant notes the response and understands that Bodorgan Marine Limited is a company within the mussel aquaculture industry who operates in the Menai Straights, outside the Mona Array Area and Offshore Export Cable Corridor.</p> <p>The Welsh National Marine Plan (WNMP) defines co-existence as "where multiple developments, activities or uses can exist alongside or close to each other in the same place and/or at the same time". The WNMP defines co-location as "a subset of co-existence and is where multiple developments, activities or uses co-exist in the same place by sharing the same footprint or area". The commitments secured within the Outline Fisheries Liaison and Co-existence Plan (APP-199) extend beyond "allowing business as usual scallop fishing to continue in part of the development area" (as stated by Bodorgan Marine Limited). As set out in section 1.3.6 of APP-199, in addition to identifying an area that will remain free of wind turbines and offshore substation platforms (OSPs) over an area of core scallop grounds within the Mona Array Area, termed the Scallop Mitigation Zone, the Applicant increased the spacing between infrastructure to a minimum of 1.4 km within and between rows of surface structures and made a commitment to orientating wind turbine rows roughly north – south. All of these measures are to facilitate continued access and fishing by trawlers and potters.</p> <p>The WNMP states that "the Subsea Cable sector can reduce the potential for conflict, and increase co-location and co-existence opportunities, by undertaking burial of the cable" and "Preference should be given to this method of cable installation where there is possibility of significant impact by other activities and where seabed conditions are suitable. Where burial is not achievable or desirable, alternative protection measures may be appropriate (in line with regulatory requirements and industry good practice)". To ensure safety of fishing activity and to minimise the amount of fishing grounds lost, the Applicant has made a commitment to bury all offshore cables to a target burial depth of 1 m, a maximum burial depth of 3 m and minimum depth of 0.5 m. Cable protection will only be used where the minimum target burial depth (0.5 m) cannot be achieved, for example in areas of hard ground, which will be informed by outputs from the Cable Burial Risk Assessment completed as part of the cable specification and installation plan (both of which are secured under Schedule 14, Condition 18(1)(d)(i) of the Draft DCO (APP-023). Cable protection (where required) shall be</p>

Reference	Relevant Representation Comment	Applicant's response
	<p>potential of the most promising form of co-location with offshore wind energy. This is widely and authoritatively recognised to be the co-location of mussel aquaculture and offshore wind energy. The 2020 CEFAS document: the meaning of co-location in Welsh waters</p> <p>7. The 2020 CEFAS Report confirms that co-location is not the same thing as co-existence. Co-location is narrower and more specific. This is in contrast with the applicant's definition of co-location in the FLCP at 1.3.1.1.</p> <p>8. The 2020 CEFAS Report does not treat the interaction of offshore wind energy and fishing as co-location. Rather, its focus is on aquaculture as a co-location activity and it includes a specific chapter heading examining the co-location of aquaculture and offshore wind energy.</p> <p>9. Extracts from the 2020 CEFAS Report confirm the potential of aquaculture to be the most promising form of co-location.</p>	<p>designed to minimise snagging hazards as far as possible, for example by minimising height above seabed, smooth and shallower profiles, grade used for rock placement, type of rock (e.g. smoother edges) (as secured within APP-199).</p> <p>As stated above and as set out in section 1.3.6 of APP-199, the Applicant has made significant commitments in the design of the project to allow continued fishing activity within the Mona Array Area and Offshore Export Cable Corridor. These commitments made by the Applicant correspond with the WNMP's definition of co-location, i.e. "multiple developments, activities or uses co-exist in the same place by sharing the same footprint or area" (ECON_01: Sustainable economic growth, Paragraph: 98). These design commitments are not restrictive to gear types and other techniques can be used to target new species which may enhance the fishing industry.</p> <p>While the Applicant did not make specific reference to the 2020 Cefas Report, the 2020 Cefas report specifically quotes and defines the co-existence and co-location and references key guidance that are set out within the WNMP.</p> <p>While the Applicant notes the response, Volume 6, Annex 6.1 Commercial fisheries technical report (APP-097) does not describe or define co-existence as "business as usual fishing". The Applicant did not specifically define co-existence or co-location in paragraph 1.3.1.1, but rather states in the Outline Fisheries Liaison and Co-existence Plan (APP-199) that "The Applicant regards co-existence and co-location as the joint presence of both industries working together within the Mona Array Area and believes that co-existence and co-location between Mona Offshore Wind Project and commercial fisheries stakeholders can be achieved through the design of the project and ongoing transparent communications".</p> <p>While the Applicant did not specifically define co-location, APP-058 and APP-199 has been developed with reference to key guidance outlined within the WNMP. Policy SAF_01 specifically speaks to not impacting on established activities, and in paragraph 242 it states that "promoting the co-existence of compatible activities and supporting the avoidance or mitigation of conflicts between users wherever possible".</p> <p>The Applicant did not identify and are not aware of any existing aquaculture industries that overlap with the Mona Array Area and Offshore Export Cable Corridor (as shown on Figure 1.6 of Volume 5, Annex 5.1: Cumulative effects screening matrix (APP-084)), which would benefit from co-location. Official landings data which included, Landing statistics by ICES Rectangle for United Kingdom (UK) and Isle of Man vessels (all vessel sizes), MMO Landings statistics</p>

This IP's further Written Representations are set out below:

1. By way of introduction to this IP:
  - a. Bodorgan Marine is a relatively new entity established, among other purposes, to take advantage of the potential for offshore aquaculture in the waters of North Wales.
  - b. Its founder, Sir George W. Meyrick Bt., Is a former Chancellor of Bangor University and a significant Anglesey littoral landowner.
2. The essence of these Written Representations: the Applicant has not discharged and is failing to discharge its statutory and policy obligations in relation to how it addresses fisheries/mitigation activities, and in particular co-location, consultation and the enhancement of fisheries in Welsh waters.
3. Brief details of where the Applicant has gone wrong:
  - a. The Applicant has misunderstood the meaning of co-location as this term is understood in Welsh waters. The Parties disagree on this point.
  - b. The Applicant has given no thought to the potential for new forms of fishing and certainly has given no thought to the potential of co-located aquaculture which is recognised to be the form of co-location with greatest potential. The Parties appear to agree on this point.
  - c. The Applicant has not consulted with the well-established North Wales aquaculture industry. The Parties agree on this point.

- d. The Applicant's mitigation proposals have not been designed to enhance fisheries. What the Applicant's mitigation proposals, rather, do is take steps to preserve part of the status quo. The Parties appear to disagree on this point.
4. As a first and essential step we urge the Applicant to make contact with the North Wales aquaculture community and engage in proper consultation. We suggest that Professor Lewis Levay of Bangor University and Mr. James Wilson of DeepDock would be appropriate representatives of the North Wales aquaculture industry.
5. We ask PINS to add the 2020 CEFAS Report "*Welsh National Marine Plan: A review of the potential for co-existence of different sectors in the Welsh Marine Plan Area*", , to the document library. We understand that the Applicant has no objections to this proposal.

Yours faithfully,

**Bodorgan Marine Limited**