

Tan-y-Mynydd Trout Fishery
Tan-y-Mynydd
Moelfre
Conwy
LL22 9RF

Mona Windfarm
The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Interested Party Reference: 20047795

27th September 2024

Dear Sirs

Mona Offshore Wind Farm: Follow-Up Submission on Behalf of Tan-y-Mynydd Trout Fishery

Further to our previous submission of 1st August 2024 and the issue of The Inspectorate's document ExQ1: 13 September 2024 we are pleased to provide the following updates, namely:

Q1.6.26 Alternative Route

To date The Applicant has to date not provided us with any 'signposting' to or detailed information as to why the alternative cable route to the immediate North of the fishery was rejected by them. We would appreciate being provided with this detail, ideally in a concise/consolidated pack (soft copy).

Q1.21.10 Potential Effects on Tan-y-Mynydd Trout Fishery

REP1-080.2: In para 1 of The Applicant's response we believe it incorrectly asserts that the 'northern' onshore cable route was selected. In point of fact, it is our understanding that the Southern route has been selected by The Applicant.

In para 2 The Applicant asserts that the proposed cable route location is now located at a 'considerable distance and much higher elevation (from the fishery), which places the spring it at a low risk'. We agree that the route is now at a higher elevation than the known above ground origin of the one spring. That said, The Applicant has still failed to demonstrate that the below ground catchment area and pre-emergent water flow route(s) of the spring are such that there is a 'low risk' of them being impacted by the construction works and/or permanent cable route. In our opinion this needs to be addressed.

The combined impact of these matters fails to provide us with confidence that The Applicant's responses to this point are sufficient or robust. We therefore consider the matter to still be open.

REP1-080.3: It is pleasing to note that The Applicant has noted our concerns regarding the different water sources that supply the lakes. That said, we are disappointed that The Applicant has to date failed to provide any advice as to how it proposes to provide assurance that the uncharted source(s) of the spring feeding the upper two lakes will be identified, monitored and if then necessary protected.

REP1-080.4: Since the site visit of The Applicant on 13 May 2024 we can advise that until 24 September 2024 there had been no further contact on any matter (other than an email on 18 Sept with a link to The Inspectorate's latest correspondence) from The Applicant.

With regard to The Applicant's statement at para 2, we are pleased to note the proposed broad nature of the studies and monitoring indicated by The Applicant. That said, to date there has been no further update or other communication provided by The Applicant as to the extent, detail, timing, progress, locations or any other matter in respect of its proposed investigations etc.

REP1-080.5: Para. 1 We are pleased to note that ongoing monitoring of 'originally installed' boreholes is taking place. As things stand, we are unaware of the location or detail of those boreholes or their

appropriateness to providing information relative to the underground springs that we rely upon for our lake water. We would therefore appreciate The Applicant providing us with a soft copy pack containing sufficient detail, such that we can seek appropriate advice and reassurance as to the adequacy of its proposals.

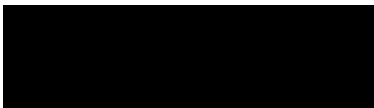
It is pleasing to note at Para 2 that 'Requirement 9 of the draft DCO' will provide for the preparation of a detailed Construction Surface Water and Drainage Management Plan. That said, the future existence of such a construction plan alone is insufficient and will not address our Points (b), (c) and (d) relative to the permanent works, the seasonality / timing of the construction works and provision of suitable legal protections.

REP1-080.6: We welcome the commitment of The Applicant to continue to engage with us to find a 'set of solutions to our concerns'. In this regard we would advise that as of 24 September 2024 a representative of The Applicant (Ellie Daikin) has now offered to hold 'Teams' update chats with us every 6 weeks until matters are fully resolved.

Q1.21.11 Suitable Legal Undertakings

Whilst we note that this question has been addressed to The Applicant. For our part, we can confirm that to date there has been no dialogue on this matter between ourselves and The Applicant. We await with interest The Applicant's response to the Inspectorate's question especially given the extent of our ongoing concerns regarding those matters outlined above. As such we reserve our position on this matter.

Yours faithfully

A black rectangular box redacting the signature of Prof. Martin Chambers.

Prof. Martin Chambers
For and on behalf of Tan-y-Mynydd Trout Fishery Ltd

Attachments:

ExQ1: 13 September 2024 page 19 of 60 and page 58 of 60
Table 2.15: REP1-080-Tan-y-Mynydd Trout Fishery Limited

Copy to: The Mona Windfarm Team

ExQ1	Question to:	Question:
		submitted a revised Outline Soil Management Plan at Deadline 2 [REP2-054]. With reasoning for your conclusion, does this allay your concerns?
Q1.6.21	NFU Any AP	Outline code of construction In its Response to Written Submissions made at Procedural Deadline ([REP1-011], pages 31 & 32) the Applicant signposted where it has made provision for the matters raised under the heading 'Outline Code of Construction' in the NFU submission [PDA-048]. With reasoning for your conclusion, does this allay your concerns?
Q1.6.22	The Applicant	Enabling Works In your Response to Written Submissions made at Procedural Deadline ([REP1-011], page 31) you referred to possible mitigation works to reduce disturbance to farming practices; how would these be secured through the dDCO?
Q1.6.23	The Executors of the Late Sir David Watkin Williams-Wynn. Bt.	Clarification In your WR [REP1-091] you referred to other schemes where acquisition of land within your ownership was by lease; what NSIPs are you referring to?
Q1.6.24	The Executors of the Late Sir David Watkin Williams-Wynn. Bt.	Alternatives In your RR [RR-082] you refer to ' <i>other sensible alternatives</i> ' for the proposed access route. Can you show these on a map or plan?
Q1.6.25	The Executors of the Late Sir David Watkin Williams-Wynn. Bt.	Update <ul style="list-style-type: none"> To what extent does the Applicant's response ([PDA-008], pages 334-339 and [REP2-078] to the matters you raised in you RR ([RR-082] and WR [REP1-091] address your concerns? Can you provide an update on negotiations with the Applicant?
Q1.6.26	Tan-y-Mynydd Trout Fishery The Applicant	Alternative route In the WR [REP1-080] mention is made of the ' <i>alternative route to the immediate North of the fishery</i> '. With reference to the relevant documents in the Examination Library, please signpost where this was identified and considered.

ExQ1	Question to:	Question:
Q1.21.8	The Applicant	<p>Skills and Employment Plan</p> <p>Requirement 19 of the dDCO [REP2-004] provides that a Skills and Employment Plan must, following consultation with the relevant authorities, be notified to those authorities.</p> <ul style="list-style-type: none"> • Can the Applicant explain why this Requirement seeks notification of, rather than approval from, the relevant authorities, particularly in light of para 5.13.12 of NPS EN-1? • Why is R19 contingent on the commencement of 'onshore works', rather than on commencement of the authorised project? • In the interests of certainty, can '<i>substantially</i>' be deleted from R19(2)?
Q1.21.9	DCC, CCBC, IoMG and IoACC	<p>Skills and Employment Plan</p> <p>As named relevant authorities for the purposes of R19 [REP2-004], are you content that the Skills and Employment Plan would (following consultation with you) be subject to notification rather than approval? If not, provide suggested alternative wording for R19.</p>
Q1.21.10	Tan-y-Mynydd Trout Fishery Ltd	<p>Potential effects on Tan-y-Mynydd Trout Fishery</p> <ul style="list-style-type: none"> • To what extent does the Applicant's response [REP2-078], Table 2.15, to the matters you have raised in [REP1-080] address your concerns? • Provide an update on negotiations with the Applicant.
Q1.21.11	The Applicant	<p>Potential effects on Tan-y-Mynydd Trout Fishery</p> <p>How do you respond to submissions by Tan-y-Mynydd Trout Fishery Ltd [REP1-080] that the business should be provided with a suitable legal undertaking or indemnity to protect its interests in the event that the proposed onshore construction works adversely affected the water source supplying the fishery?</p>
1.22 Traffic and Transport		
Q1.22.1	The Applicant	<p>Cumulative Effects</p> <p>The Council's LIR [REP1-049] raises concern over the 1km study area being appropriate for the CEA.</p>

2.15 Tan-y-Mynydd Trout Fishery Ltd

Table 2.15: REP1-080 - Tan-y-Mynydd Trout Fishery Ltd

Reference	Written Representation Comment	Applicant's response
REP1-080.1	In general terms we have no objections to the proposed Mona offshore windfarm development or the majority of its proposed onshore route and works. Indeed we see this development as being a very positive contributor to the overall long term UK energy solution.	Thank you for providing Written Representation to the Examination of the Mona Offshore Wind Farm at Deadline 1. The Applicant acknowledges your comments and response is provided to points in turn below. The Applicant looks forward to continuing to work with Tan-y-Mynydd Trout Fishery throughout the Examination and subsequent construction of the Mona Offshore Wind Farm.
REP1-080.2	Notwithstanding the above, we do have specific concerns regarding the onshore works local to Moelfre. Those concerns, relate to the potential negative impact the cable route and construction works could have on the underground water routes that ultimately provide the fishery with both its spring and brook water feeds. The choice of preferred route to the South of the B5183 over the alternative route to immediate North of the fishery grounds does give us real cause for concern. The alternative cable route would have been at a lower altitude than the fishery as such we believe the likelihood of interference with our water supply sources would have been significantly reduced. The preferred route appears to traverse Moelfre Mountain higher than where our above ground water source emerges, therefore it is unclear how the proposed permanent cable route, and also its construction works, may impact on the springs which ultimately supply the fishery.	The impact of the Mona Offshore Wind Project on private water supply was a key consideration of the onshore site selection process for the onshore cable route (document AS-016). The northern onshore cable route option east of the Glascoed Road – Abergele Road crossroads was selected as the final onshore cable route option primarily to remove any immediate proximity to the Tan-y-Mynydd Trout Fishery. Environmental Statement - Volume 7, Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment (APP-116) provides a hydrogeological risk assessment of impact to licenced groundwater abstractions and private groundwater supply sources and proposed mitigation measures. The Onshore Cable Corridor is located up gradient of the spring that feeds the ponds at Tan-y-Mynydd Trout Fisheries, however it is located at considerable distance and at a much higher topographical elevation, which places the spring it at a low risk.
REP1-080.3	To date we have had numerous site visits from Mona surveyors and other representatives. Until recently the focus of those site visits has been more closely connected with the flora and fauna present on or using the fishery grounds. That said, the most recent site visit on Monday 13th May 2024 was wholly focused on our concerns over the natural water supplies we rely on. That visit included the Mona representatives and our owner Martin Chambers exploring the course of the brook which feeds our lower three lakes.	The Applicant notes your response.

SHORE WIND PROJECT

Reference	Written Representation Comment	Applicant's response
REP1-080.4	<p>The other two lakes being fed off another underground spring the source and route of which are unknown to us.</p> <p>In summary our concerns are as follows:</p> <ol style="list-style-type: none"> 1. The potential for the construction works to cause the source of the brook and spring that feed the fishery being either interrupted or worse still permanently disrupted. 2. The potential for the water sources supplying the brook feeding the fishery to be permanently cutoff / diverted elsewhere by the cable routes. 3. The potential for the underground spring(s) that feed the top lakes at the fishery to be disturbed or re-routed by either the construction activities or the permanent works. 	<p>The Applicant has engaged with Tan-y-Mynydd Trout Fisheries post submission of the DCO as noted in the Applicant's response to Relevant Representations (PDA-008). An initial site visit has been undertaken to understand the hydrology and hydrogeology of Tan-y-Mynydd Trout Fisheries the site. The Applicant will continue its discussions with the trout farm to identify the appropriate mitigation e.g. monitoring.</p> <p>The mitigation will be informed by a review of geological information and hydrogeological monitoring obtained from engineering site investigation locations in the vicinity of Tan-y-Mynydd Trout Fisheries which will refine the conceptual understanding of the local hydrological and hydrogeological regime.</p>
REP1-080.5	<p>Therefore, given the uncertainty over the sources and underground routes of the various water supplies that we rely upon we would suggest that a number of further activities and/or undertakings must be put in place by Mona to protect the long term interests of the fishery, namely we would offer the following suggestions:</p> <ol style="list-style-type: none"> a. A comprehensive set of detailed investigations and surveys of the underground formations and water course be specified and implemented. There should be a minimum of a full year's monitoring undertaken. This would assist in identifying any weaknesses or vulnerability in any identified water courses. b. An avoidance/mitigation strategy for the impact of both the permanent works and construction works across Moelfre Mountain should be put in place and suitable monitoring of compliance must accompany it. c. It may be that carrying out the construction works on Moelfre Mountain during the winter months would provide more obvious and potentially immediate indications of any interference with thesewater courses. Certainly our concerns would be exacerbated were those works to be carried out in the summer months, when the water course flows are at their weakest. d. In addition to the above we believe that the fishery should 	<p>Following the meeting between with the fisheries and the Applicant on 13 May 2024, it was agreed that monitoring of the boreholes which had been installed along the order limits in early 2024 would continue to be monitored to obtain further data regarding the water levels in the area. This monitoring is currently ongoing and engagement with the fisheries will continue to identify the most appropriate mitigation based on the findings.</p> <p>The Outline Construction Surface Water and Drainage Management Plan (APP-218) secures temporary measures to control water runoff from the construction compounds and work areas at Section 1.6.4. Furthermore, measures to control the programming of certain works to reduce flood risk and the risk of water pollution are also set out in Section 1.6.3. The preparation of a detailed Construction Surface Water and Drainage Management Plan to be in accordance with the principles contained within the Outline Plan are secured under Requirement 9 of the draft Development Consent Order.</p>

OFFSHORE WIND PROJECT

Reference	Written Representation Comment	Applicant's response
	<p>be provided with a suitable legal undertaking/indemnity such that if any water source/course supplying the fishery is adversely affected by or following the cabling works/routes then Mona will make suitable financial reparations to the fishery or alternatively purchase the fishery lands</p>	
<p>REP1-080.6</p>	<p>As we advised at the start of this submission we are very supportive of the great good that will be achieved by the construction of the Mona windfarm. As such we remain willing and keen to work with the Mona team to find a set of solutions to our concerns. Should the inspectorate wish to carry out a site visit of the fishery grounds, we would be most pleased to accommodate its representatives.</p>	<p>It is welcome that the Tan-y-Mynydd Trout Fishery is supportive of the Mona Offshore Wind Farm Project. The Applicant looks forward to continued engagement with the Tan-y-Mynydd Trout Fishery as the Project progresses.</p>