From:	Martin Chambers
To:	Mona Offshore Wind Project
Cc:	[redacted]@m3wind.com; Laura Leigh; Ellie Dakin; Neil Roberts
Subject:	Deadline 7: Tan-y-Mynydd Fishery response to Hypothetical Hydrgeological Risk Assessment Report (HHRA)
Date:	13 January 2025 11:00:37

Good morning inspectorate team

Further to the release of the HHRA by The Applicant's team on 20th December 2024 and my subsequent meeting to discuss the report and my observations on it on 7th January 2025 I am pleased to attach for upload to the inspectorate's portal v2 of our feedback.

The meeting held on the 7th January 2025 was with Laura Leigh (LL) and Phil Rew-Williamson (PRW) on behalf of The Applicant. In my opinion the meeting was both helpful and useful and showed a willingness on both sides to try and move things forward. The headlines out of the meeting were as follows:

1. The feedback (Document version noted as Final V2 dated 6th January 2025 - copy attached) on the HHRA, as provided by The Fishery, was generally accepted. Some detailed comments from specialists employed by The Applicant are in due course to be sent across to the fishery.
2. PRW advised that the HHRA will be further updated but that this is unlikely to complete by Deadline 7.
3. In order to establish the Baseline situation relative to the ground water supplies, PRW advised that The Applicant will be looking to start monitoring activities as soon as practical.
4. PRW advised that consultation with the Local Authority on the detail of the various management / environmental plans is unlikely to commence before July 2025, but this may be subject to change.
5. PRW gave an indicative outline of the procurement activities needing to be undertaken prior to the Detailed Design Phase commences. He also advised that the Detailed Design activities could well result in further boreholes being sunk, these would most likely be carried out on a much more targeted basis.
6. PRW advised that post consent there would be a new point of contact for the fishery, this being Mr Bruce Milne.
7. PRW advised that an Outline Monitoring Strategy will be set out by The Applicant and The Fishery involved in its agreement.
8. Relative to the points of emergence of the springs/ground water systems and any available soils information MWC agreed to look to see what further information ha can access and to provide this to The Applicant. This to include photographs of a recent water main trench excavated across the field to the immediate South of the fishery. MWC advised that along this trench line, approx 130m long and circa 1m deep, two major pockets, one of sand and one of shale were encountered.
9. PRW advised that currently The Fishery is unlikely to included by The Applicant as a Category 3 interest. However, PRW confirmed that The Fishery will be highlighted in any such plans as a specific receptor. MWC's position was to suggest that if The Applicant was so convinced that the risk to The Fishery was low then why wouldn't they include it as a Category 3 interest.
10. It was agreed that further Teams meetings would continue to be held between the parties. It was further agreed that where appropriate these would include additional meetings to deal with specific issues.

If there are any of the above points that need further clarification for the Inspectorate or if

The Applicant wishes to see the wording revisited then I would welcome direct contact by the appropriate party.

Kind Regards

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

Mona Wind Farm Project

Feedback on Hypothetical Hydrogeological Risk Assessment (HHRA)

Report Ref: S_D6_8

Document Number: MOCNS-J3303-RPS-1042

Dated 20 December 2024

Feedback Document Final V2 – 6th January 2025

Issue	Amendments	Date	Prepared By
1	First Issue	02 Jan 2025	MWC
2	Typos and grammar issues addressed	06 Jan 2025	MWC
3			
4			

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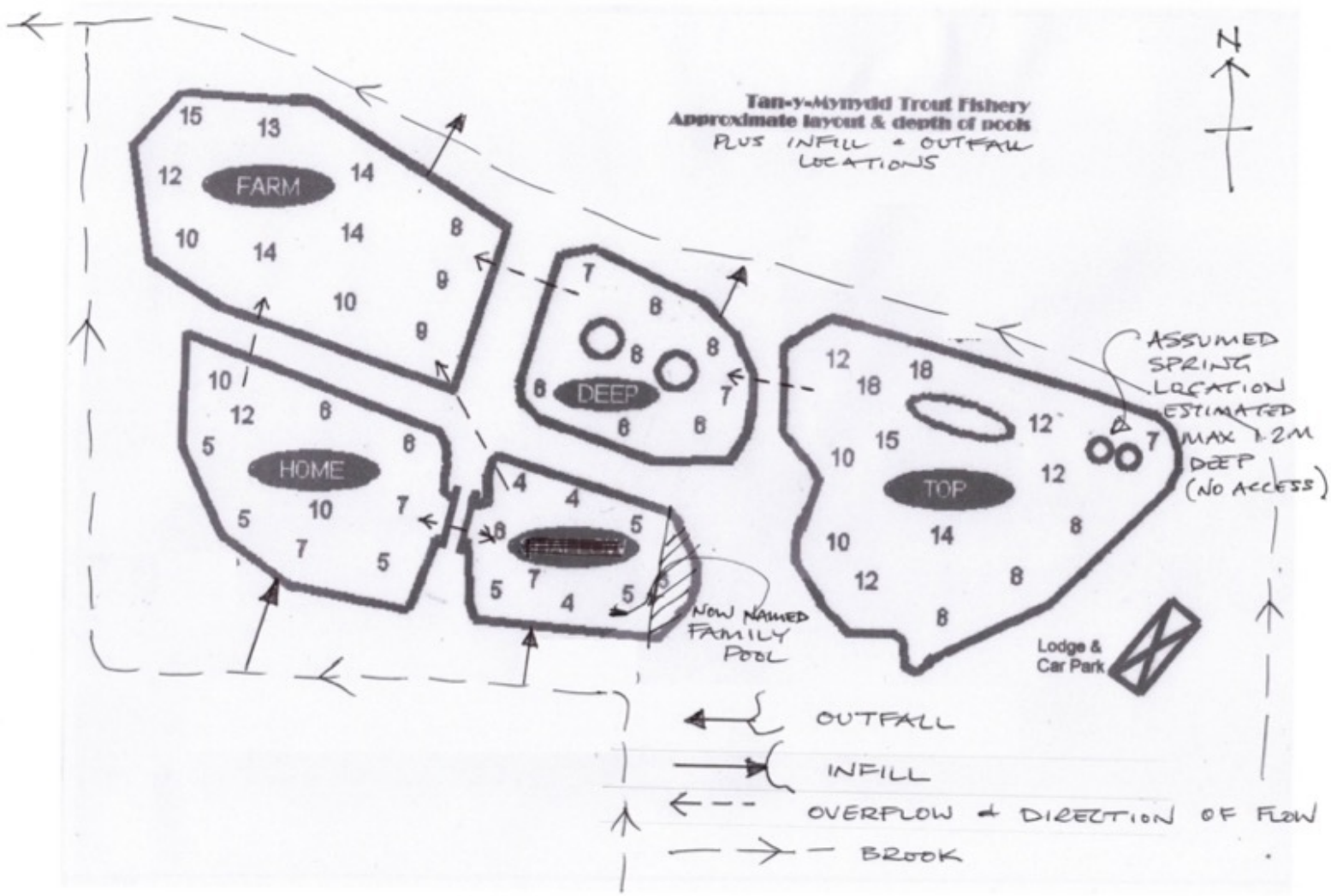
Observations on Report

Section	Page	Para	Observations / Comments	Note
Exec Summary	ii	1	Scope should include permanent works	
		Bullet 1	Measurements fail to recognise the point where spring serving brook emerges above Ground Level	
		5	Reference is to only a single spring serving the fishery. A minimum of 2 springs serve the fishery	
1. Introduction	1	1.2.1.2	Reference is only to a single spring and fails to address the permanent situation	
	2	1.2.1.4	Single spring only referenced	
	2	1.3.1.1	Report lacks any significant quantitive data, therefore any suggested findings are highly subjective. The report constantly refers to a single spring, giving rise to serious concerns over the validity of the findings	
2 Tan-y-Mynydd Trout Fishery	3	2.1.1.2	Elevation relates solely to difference between Top lake surface level and proposed cable corridor. This fails to recognise the elevation of western spring at the point where it emerges above ground	
	4	2.2.1.3	Suggested spring discharge point of 7m below water surface level on Top Pool is incorrect, more likely 1.2m max. There is no manhole access into 'wells' on Top Pool and water flow routes are incorrect.	See attached sketch with correct flow routes
	4	2.2.1.4	Assertions on internal water distribution are generally incorrect	See attached sketch with correct flow routes

TAN-Y-MYNYDD TROUT FISHERY



Observations on Report

Section	Page	Para	Observations / Comments	Note
2. Tan-y-Mynydd Trout Fishery	4	2.2.1.5	Surface level of Top Pool is incorrectly stated as 7m above original ground level. Surface level on the North side is between 0.5m (east end) and 6m (west end) above original ground level. Pool at its known deepest is not 7m but 5.5m deep (north east corner). This spring serves Top Pool, then overflows into Deep Pool and then overflows in to Farm Pool before exiting out in to brook on Northern boundary. Suggestion of Top Pool intersecting with the underlying bedrock appears, due to depth relative to original ground level to be flawed.	
		2.2.1.6	Southern boundary brook only serves three pools (Family and Home directly plus overflows in to Farm)	
		2.2.1.7	Point is noted, but report fails to recognise that the brook routed along the Northern boundary of the fishery is lower than the bottom of the pools and considerably lower than the adjacent northern land level. Therefore, we would suggest any catchment / ground water flows off this land do not actually benefit the fishery.	
3. Site Setting	6-9	General	There is no reference made in the assessment to the base level of the brook along the Northern boundary of the fishery. We would suggest that the brook bed falls from East to West at an AOD of circa 159m – 150m.	
	11	3.2.1.9	Report fails to acknowledge the importance of the elevation at which the spring serving the brook to the South and West of the fishery is situated and therefore its closeness to the proposed cable corridor.	

Observations on Report

Section	Page	Para	Observations / Comments	Note
3. Site Setting	14	Table 4	Given the very limited number of boreholes sunk in the potential catchment area there is a real concern about the potential presence within the Till of significant pockets of sand each holding huge amounts of water, this should not be ignored. If present, as was discovered when the A55 below the fishery was built (but likewise was not previously identified in the ground investigations), such pockets could well be acting as interconnecting reservoirs within the catchment area. If present, along or near the cable corridor, such pockets could well be severed by the cable trenches. This could well result in major issues during construction and long term, with the cable corridor then acting as a longitudinal cut-off trench.	
			In the logs for Borehole 129 the ground water level is noted at 0.44m below the existing ground level. This would suggest that there may well be perched water tables within the Till. With the cable trenches being circa 1.80m deep and the trenchless bore(s) possible much deeper, any interaction with the cable corridor works could have severe consequences for the ground water flows feeding the fishery.	
			Serious consideration should be given to the carrying out of another series of boreholes on Moelfre Isaf along the proposed cable corridor. Such further investigative work would provide a better, albeit not absolute, degree of confidence as to the subsoils and especially sand pockets that may be encountered during the works.	

Observations on Report

Section	Page	Para	Observations / Comments	Note
3. Site Setting	14	Table 4	In the absence of further ground investigations then we would argue that the Applicant should be required to provide a detailed strategy, in any plans to be submitted to the Local Authority, for dealing with the potential for interaction between the cable corridor works and potential sand pockets.	
			In parallel, the Applicant should be required to put forward for examination by a competent geotechnical engineer employed by the Local Authority, a comprehensive mitigation plan. Certainly, if any sand pockets are encountered, then it may not be appropriate to re-use excavated materials as backfill in those areas. Rather, free draining/porous materials may need to be imported and used as backfill.	
			As previously mentioned, when the A55 was built (circa 1991) a major set of sand pockets were encountered along its route below the fishery. The inserted extract of OS map highlights the location of the works affected by the sand pockets.	

Observations on Report

Section	Page	Para	Observations / Comments	Note
3. Site Setting	17	3.3.1.9	Whilst it is interesting to note the average depth of water measured in the various boreholes. We would have expected clear reference to be made to the AOD of the water found.	
	18	3.3.1.16	The paragraph draws no distinction between the water flow paths of the 2 afore mentioned springs providing the water that serves the fishery. This should be addressed.	
		3.3.1.17	Again only 1 spring is referenced. From the positions where each spring emerges above ground it would seem reasonable to consider that each have significantly different underground paths. No discussion of these is provided.	
	18	3.4.1.1	There is no evidence to suggest that the ground water serving the spring in Top Pool is limited to that of shallow unconfined aquifer. We would suggest that the fact this spring runs all year round (albeit much weaker towards the end of a dry summer) could indicate the presence of a substantial aquifer.	
	19	3.4.1.4	The absence of ground water flow rates serving the spring is a significant weakness in the report and needs to be addressed to provide confidence in any findings or any resulting hypothesis offered	

Observations on Report

Section	Page	Para	Observations / Comments	Note
3. Site Setting	19	3.4.2.2	Top pool is not 7m deep, it is closer to 5.5m deep and served by a spring emerging at a maximum of circa 1.2m below water surface level of 160m AOD. Therefore the proffered comments appear flawed.	
		3.4.2.3	As a minimum the text fails to consider the two known springs serving the fishery with water. In addition the the spring which emerges above ground closest to the cable corridor is not given any clear discussion.	
		3.4.2.5	The failure to address both known springs is a source of concern. Similarly the potential for the cable corridor to act as a 'cut off trench' within the catchment area of the springs is not discussed. We recognise that the trenches will be backfilled with excavated material. We recognise this as good construction practice but are concerned that regardless of the quality of compaction of the backfilling it is unlikely to match the density and nature of the subsurface materials in their undisturbed form. Similarly, the report does not address the potential for interruption of the fracture network within the bedrock to be caused by the works.	
	20	3.4.2.9	Given the level of the bed of the brook running along the northern boundary of the fishery relative to the depth of the pools we find it difficult to conceive a situation where the lands to the north of the fishery actively provide any hydraulic flow back to the fishery.	

Observations on Report

Section	Page	Para	Observations / Comments	Note
3. Site Setting	21	3.4.3.2	We consider that Figure 8 is highly optimistic in its representation of the potential extent of the recharge catchment area. The area to the north of the fishery has previously been discussed and discounted. However, in addition the areas of land to the east and west of the highlighted indicative catchment area do appear more likely to serve the other water courses shown as adjacent to them and not those springs serving the fishery. We therefore consider that the highlighted area (shaded in blue within Figure 8) to be some 60% larger than might reasonably be expected to actually serve the fishery.	See attached marked up figure 8
	23	3.5.1.3	The 70m vertical separation again fails to recognise the elevation at which the spring serving the brook on the south boundary of the fishery emerges above ground.	
	24	5.5.1.4	Figure 10 is highly biased in the way that it purports to indicate the extent of the possible location of the 'highly fractured sandstone unit in the Elwy Formation (ground water bearing)'. There is no evidence provided to indicate why this formation is considered not extend to the route of the cable corridor.	See attached marked up figure 10
4. Hydrogeological Risk Assessment	25	General	Only the construction works are considered. There is no assessment of the likely permanent situation. This is a situation that becomes highly critical if the proposed construction works are carried out during the late spring and summer seasons	

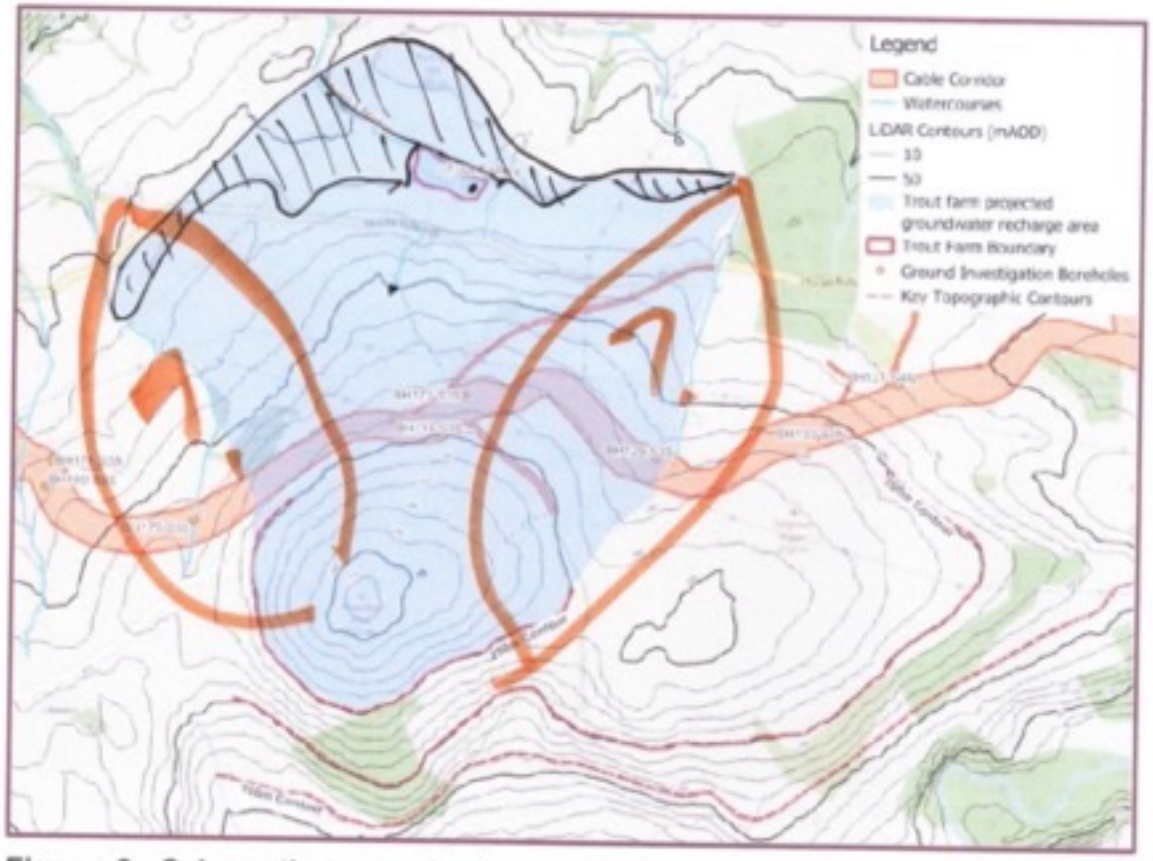


Figure 8: Schematic groundwater recharge catchment area, showing the Onshore Cable Corridor and the Tan-y-Mynydd Trout Fishery

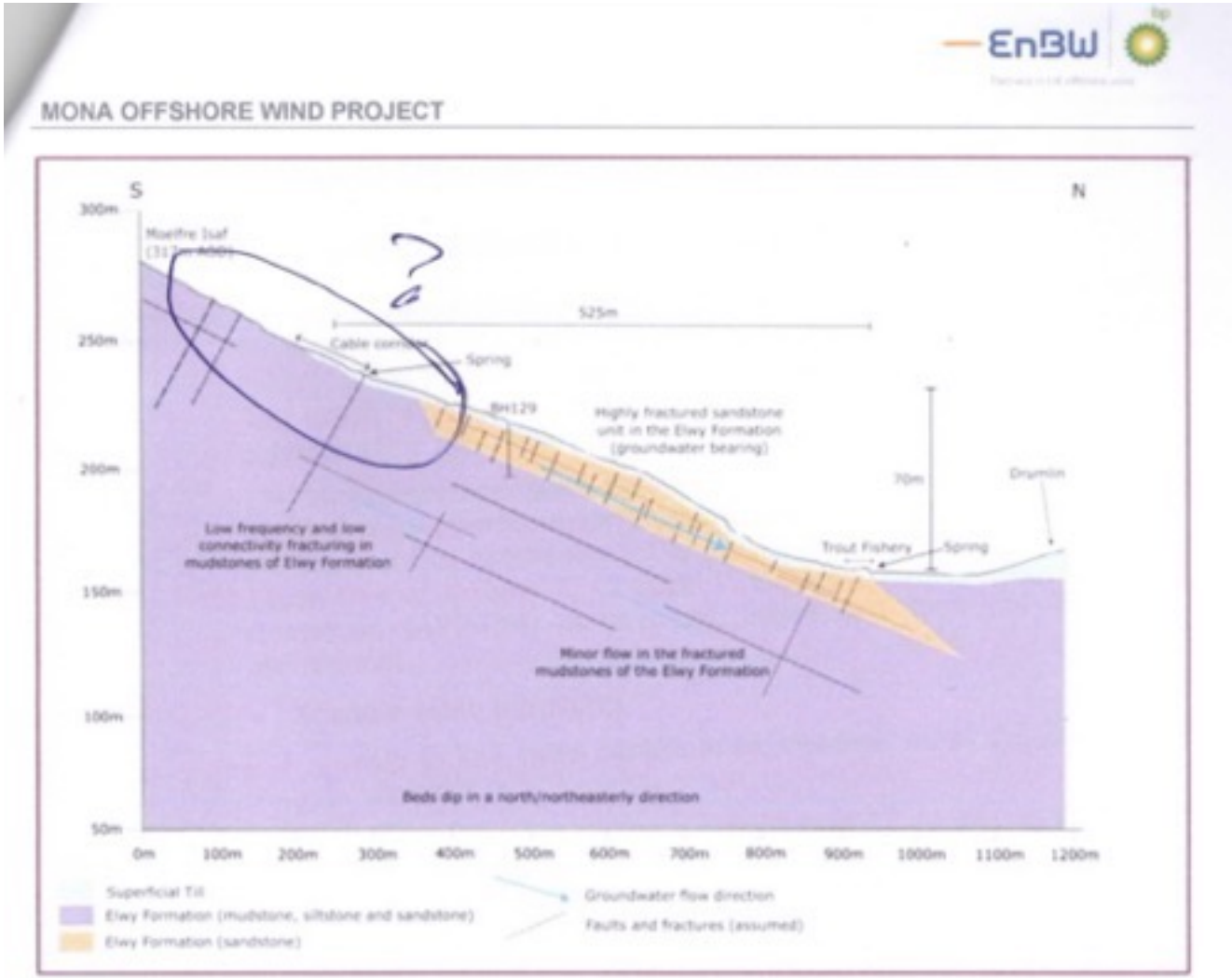


Figure 10: Conceptual Hydrogeological Model 2 – highly fractured sandstone or mudstone units in the Elwy Formation

Observations on Report

Section	Page	Para	Observations / Comments	Note
4. Hydrogeological Risk Assessment	26	4.1.1.2	It is unclear if the trenchless HDD technique results in a single 1.4m diameter bore that will then contain all four cables, or if a bore is needed per cable? In either case further details are required relative to the expected depth (both below ground level and AOD) of the bore(s) proposed and any additional excavations (planned area and depth) required to accommodate both the transitions from trenches to bore and the entry and exit of the boring machine(s).	
		4.1.1.3	Figure 11 would suggest that there are two crossings which have the potential to significantly impact on the water catchment area serving the fishery, namely C2 and C3. Further details should be provided for these two crossings.	
	27	4.2.1.1	The section is silent as regards any consideration of 'permanent ground water flows'. This should be addressed for both trenched and trenchless solutions.	
		4.3.1.2	At para 1 the term 'two endmember HCMs' is used. Please advise what this actually refers to. In order to accord with the matrix provided at Table 7 (page 30) a heading 'Likely' should be added to the 'likelihood' list provided.	
	28	Table 6	Given the lack of evidence to eliminate any concerns over the possible presence of major sand pockets we suggest the rate/flow 'consequence ratings' should be rerated to at least Severe	

Observations on Report

Section	Page	Para	Observations / Comments	Note
4. Hydrogeological Risk Assessment	30-33	General	Given that the factual information provided in the early part of the report is in many respects fundamentally flawed or just plain incorrect it is difficult to accept that the proposed ratings aren't equally flawed or in the very least highly optimistic. Therefore, we consider this section should be revisited once the fundmentals of the report have been agreed.	
	33	4.4.1.14	Given the fractured nature of the strata that it is expected the trenchless bores will be driven through, we would have expected serious consideration to have been given to the potential for grout loss (in to fissures or voids etc.) and avoidance measures to be employed. We recognise that this point is briefly touched on in 4.4.1.17. However, it does appear to be seriously played down therein.	
5. Risk Management Measures	34	5.1.1.1	We are concerned by the absence of any meaningful reference to a monitoring strategy. Similarly, we are concerned by the absence of a willingness by the Applicant to commit to undertaking Baseline data collection prior to starting Detailed Designs. An additional concern is the absence of any plan for long term data collection across the various seasons. We believe this data collection should not be delayed until 'prior to the start of construction'.	
		5.1.1.2	Whilst we are happy for the Applicant to propose how it can access and monitor the spring located in Top Pool we are concerned that it still believes there is a manhole and cover on it, there is not.	

Observations on Report

Section	Page	Para	Observations / Comments	Note
5. Risk Management Measures	34	5.1.1.3	The term a 'period of baseline data collection' is completely open to interpretation and serves no useful purpose in moving matters forward. This 'period' should be clearly defined and time lined together with the provision of a detailed plan of all proposed activities. It most certainly should be commenced well before the Detailed Design phase begins and should continue for as long as is necessary i.e. until the works have been completed and two full winters of post construction records taken.	
6. Summary	35	6.1.1.2	Whilst we accept that a 'risk assessment' relative to construction activities has been undertaken, that assessment would appear, for various reasons highlighted earlier, to be fatally flawed and in need of a revisit. We are seriously disappointed that the location of the borehole sites have not been reconsidered with a view to enhancing the quality of information upon which this risk assessment could be based. This is a matter that should also be revisited.	
		6.1.1.3	Again reference is made to a single spring. This has led to a fundamentally flawed set of results being arrived at in this report.	
		6.1.1.5	We have outlined earlier why the potential for the springs to recharge from the lands to the north is flawed.	

Observations on Report

Section	Page	Para	Observations / Comments	Note
6 Summary	36	6.1.1.9	The continued 'borrowing' of water from the spring fed brook on the southern boundary is fundamental to the existence of 60% of the fishery pools. It is not 'optional' as the report appears to be suggesting.	
		6.1.1.11	Again, the Applicant shows what is at best a flawed understanding of the ground water supplies servicing the fishery. Protection of the ground water supplying the head of the brook which travels along the south and then west boundaries of the site is key to the existence of the fishery.	
	37	6.1.1.12	Again, we see a lack of commitment on the part of the Applicant to obtaining good quality data before it commences the project's Detailed Design phase.	
		6.1.1.13	A finalised, or at least significantly well developed 'monitoring plan' needs to be in place to help inform the Detailed Design of the works. Furthermore, to assist the Local Authority to be assured that any Construction or Surface (and Ground) Water plans are of suitable depth and quality to demonstrate that either no harm will come to the fishery ground water supplies. In addition, if any harm is caused, then a suitable (and agreed) replacement water strategy needs to be provided by the Applicant i.e. a borehole installed and suitable abstraction licence obtained. We do of course recognise that this may require the Applicant to undertake further and early investigations on the fishery.	

Observations on Report

Section	Page	Para	Observations / Comments	Note
6 Summary	37	6.1.1.14	Again, the Applicant does not appear to have reconised the importance of the early collection of high quality data to inform the Detailed Designs. Having access to such data should be a positive aid to the mitigation of costs and risks for its project and the fishery.	
		6.1.1.15	The commitments outlined here are in our view far too late in the delivery process and their timing, along with proposed scope, need to be revisited prior to the start of detailed design, not the start of construction.	

Summarised View of the Fishery

1	The current assessment of 'low risk' is based on very limited factual data and therefore relies upon a lot of assumptions and interpretation. We consider the 'low risk' rating to be unreasonably optimistic.
2	The 'factual' information offered by the Applicant, as relating to the fishery contains a significant number of flaws. Many of those flaws appear to be influencing the 'low risk' rating.
3	Anecdotal evidence from former Resident Engineer on the construction of the A55 local to the fishery (2.5km away), highlights why we have very serious concerns relating to the potential for major sand pockets to be present within or adjacent to the proposed cable corridor across Moelfre Isaf. The absence of a comprehensive set of boreholes in the suggested recharge catchment area is therefore a real concern.
4	The absence of any significant and meaningful ground water monitoring strategy and timetable is of great concern.
5	The proposal to delay any further investigative and monitoring works until after the Detailed Design stage is a real source of concern. Further and detailed investigative geotechnical works would assist with improving the management of ground water risks and provide better information for the various plans to be produced before the works are allowed to commence on site.

From: Martin Chambers
To: Mona Offshore Wind Project
Cc: Laura Leigh; Ellie Dakin; Neil Roberts [redacted]@m3wind.com
Subject: Re: Deadline 7: Tan-y-Mynydd Fishery response to Hypothetical Hydrgeological Risk Assessment Report (HHRA)
Date: 14 January 2025 13:58:02
Attachments: [redacted]

Good afternoon Inspectorate Team

Following receipt of The Applicants headline comments on our feedback document v2 dated 6th January 2025 we have added in to those comments our own response to them (RED text inserted in the table below).

Due to time pressures, I have to apologise for having to send those comments, in parallel, to both the Inspectorate and the Applicant. Clearly, the Applicant may have an alternative view to the comments we have raised. In such a case(s) we endeavour to address and resolve any difference through our ongoing series of meetings.

I confirm that I am content for this email and enclosed updated table to be uploaded to the Inquiry Portal.

Kind Regards

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

On 14 Jan 2025, at 09:59, Philip Rew Williamson (Contractor) [redacted]@m3wind.com> wrote:

Dear Martin,

Many thanks for sending your email to PINS. I don't see any need to correct any of the statements made.

Please accept my apologies for the delay in responding to the HRA. Hopefully you can appreciate that we are very busy at the moment. Hopefully I am sending feedback through to you in time to either re-submit or amend your submissions / closing statement.

There is obviously a lot of information in your comments but I have focussed on feeding back corrections / incorrect interpretation. There are additional clarifications that could be sent across to aid your understanding, but these would likely be addressed in the monitoring strategy that will be eventually provided for your review. All responses would be collated there.

Let me know if you would like sight of those, although it would turn it into a very long email.

Report Section	Page	Paragraph	Observations / Comments	APPLICANT / RPS RESPONSE
3		3.4.1.1	There is no evidence to suggest that the ground water serving the spring in Top Pool is limited to that of shallow unconfined aquifer. We would suggest that the fact this spring runs all year round (albeit much weaker towards the end of a dry summer) could indicate the presence of a substantial aquifer. Applicant/RPS comments are noted. Clearly further investigations are needed to ascertain the actual rather than hypothetical situation.	The fact the flow from the Top Pool spring does reflect normal seasonality is more indicative of a shallow, unconfined aquifer system as opposed to a confined aquifer concealed by till (as mapped by BGS). This supports the conclusion that the Top Pool spring is fed by an unusually extensive , hallow fractured aquifer that may be recharged, in part, by leakage through more granular till.
3		3.4.2.2	Top pool is not 7m deep, it is closer to 5.5m deep and served by a spring emerging at circa 1.2m below water surface level of 160m AOD. Therefore the proffered comments appear flawed. The Applicant/RPS response still appears to be misunderstanding the spring location/depth in Top Pool. I did not indicate that the spring emerges at a depth of 5m. Rather my suggestion is that based on the spring's location it would appear to emerge at AOD 158.80 i.e. 1.20m below the surface level of the pool. The fact that the pool is 5.5m deep (in its North West corner) is simply to note that following spring water entering the pool it then under gravity fills the remainder of the pool because its base is lower than 158.80 AOD.	We accept that the actual depth to the spring may in fact be lower (5m as you indicate) however this does not alter our basic assessment of the hydrogeology of this spring. To provide a sufficient groundwater catchment area to support perennial flow at the spring we maintain that the fractured bedrock underlying the TYM fishery is the most likely aquifer supporting that discharge, although as we state at several points in the report we also believe vertical recharge through and from the overlying till is likely to contribute flow within that fractured bedrock aquifer system where its is more granular in nature. We accept that the points of connection with the Northern Brook shown of Figure 2 are incorrect. However, the fact that the overflow from top pond is direct to deep pond alone is a welcome simplification for the hydrogeology the top pond. A shallow depth for the spring does not change the conclusion that that a shallow, highly fractured bedrock aquifer remains most likely source of groundwater discharged at the spring in Top Pool.
3	21	3.4.3.2	We consider that Figure 8 is highly optimistic in its representation of the potential extent of the recharge catchment area. The area to the north of the fishery has previously been discussed and discounted. However, the areas to the east and west of the highlighted indicative catchment area do appear more likely to serve the other water courses shown as adjacent to them and not those springs serving the fishery. We therefore consider that the highlighted area (shaded in blue within Figure 8) to be some 60% larger than might reasonably be expected to actually serve the fishery. For clarity, we would suggest that even the reduced catchment area we offered in our feedback is actually supporting a minimum of 2 if not 3 springs. 1 spring directly feeds Top Pool, a second spring appears to feed the brook that emerges in the South East corner of the fishery lands and a third spring emerges higher up the mountain and then feeds the brook which runs North until it intersects with the fishery's Southern boundary and then turns West. This brook feeds Family, Home and	We agree that the catchment area as presented is schematic, nor are we saying this entire catchment area **IS** contributing to flow at the spring at Top Pool. Rather, it highlights a 'total area' that could potentially support the spring at the TYM fishery based on simplifying assumptions most notably shallow flow and topography. However, it is known that flow paths in fractured aquifers do not necessarily follow topography and can be oblique thereto. It is also noted that the observations summarised in table 4 and presented in Hydrogeological Conceptual Model 2 suggest the highly fractured shallow bedrock aquifer that may supporting the spring appears in the eastern section of the cable corridor. The catchment area would therefore extend further eastward than shown, toward the unconfined area around second peak at Talgrwn Mawr immediately east of Moelfre Isaf.

			ultimately Farm pools.	
3	24	3.5.1.4	Figure 10 is highly biased in the way that it purports to indicate the possible location of the 'highly fractured sandstone unit in the Elwy Formation (ground water bearing)'. There is no evidence provided to indicate why this formation does not extend to the route of the cable corridor. I think we are agreeing with each other, in that there is no borehole evidence to confirm whether the fractured sandstone stops below the proposed cable corridor or extends through it. If our use of the term 'bias' offends we apologise. That said, we do not believe there is currently any evidence to support the work produced and detailed in the HRA.	We do not agree with the assertion of bias given that the risk assessment presented in Appendix D and summarised in section 4 does consider the shallow highly fractured sandstone aquifer extending up to the cable route corridor in the east (as seen in the eastern logs / photographs). This extent of the unit shown in Figure 10 simply reflects the fact this cross section was produced early on in the development of the HRA.
4	25	General	Only the construction works are considered. There is no assessment of the likely permanent situation. This is a situation that becomes highly critical if the proposed construction works are carried out during the late spring and summer seasons We will agree to differ on this point. Our ppint about seasonality is we believe key to what observations are able to be made. Clearly, further monitoring and investigation works will assist in moving this point forward.	Permanent effects have been considered in terms of barriers to flow in the detailed risk assessment in Appendix B.
4	27	4.2.1.1	The section is silent as regards any consideration of 'permanent ground water flows'. This should be addressed for both trenched and trenchless solutions. We accept that there may be an element of semantics at play here. For our part we would prefer to see greater clarity in the report wording, such that there is no room for confusion when it comes to the use of the term 'construction activities' as per para one line 3 of item 4.2.1.1	The potential long-term reduction in groundwater flow due to completed installation of permanent ducting has been considered for trenchless drilling. This effect has not beenassessed for shallow cable trenching due to the depth of the trenches relative to measured groundwater levels.
4	30-33	General	Given that the factual information provided in the early part of the report is in many respects fundamentally flawed or just plain incorrect it is difficult to accept that the proposed ratings aren't equally flawed or in the very least highly optimistic. Therefore, we consider this section should be revisited once the fundmentals of the report have been agreed. We totally agree with the Applicant in that the Risk Assessment (RA) will not eliminate the risk itself. We see the RA as a tool which should result in appropriate levels of management actions and responses being physically put in place to mitigate risks. It is for this reason that we are extremely concerned to make sure that the appropriate rating is reached thereby ensuring the correct degree of gravitas is attached to those follow up actions and responses that need to be put in place.	We do not agree that the risk assessment is fundamentally flawed but accept that the risk assessment has focussed on the risk to the spring in Top Pool. As discussed, we have requested further information about the 2 other springs referred to. It is important to note that the risk assessment that does not eliminate risk in itself. Rather, it is designed to provide to the Applicant with an assessment of the risk that their proposed construction activities are likely to represent to key sensitive receptors given the geological and hydrogeological understanding of the system.
4	33	4.4.1.14	Given the fractured nature of the strata that it is expected the trenchless bores will be driven through, we would have expected serious consideration would have been given to the potential for grout loss and avoidance measures. We recognize that this point is briefly touched on in 4.4.1.17. However, it does appear to be seriously played down therein. We note the Applicant's response. However, we would point out that based on personal experience, the severe negative impacts that grout loss can have if not either prevented or at least constantly monitored and then minimised. We therefore consider the point worthy of significantly greater emphasis in the HRA.	The loss of grout and/or drilling fluids is explicitly considered in the hydrogeological risk assessment references 3.2.2. The full risk assessment is presented in Appendix D. The text in section 4.4 (results of assessment) is a summary of the detailed risk assessment provided in Appendix D.

Hopefully this is of use to you. Please let me (or Ellie / Laura) know if you wish to discuss this or any other matter prior to submission of the monitoring strategy proposal for your review.

Kind regards, Phil

Philip Rew Williamson
Mona Onshore Consents Lead
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From: Martin Chambers <[redacted]@icloud.com>
Sent: 13 January 2025 11:00
To: Mona Offshore Wind Project <MonaOffshoreWindProject@planninginspectorate.gov.uk>
Cc: Philip Rew Williamson (Contractor) [redacted]@m3wind.com>; Laura Leigh [redacted]@dalcourmaclaren.com>; Ellie Dakin [redacted]@Dalcourmaclaren.com>; Neil Roberts [redacted]@tan-y-mynydd.co.uk>
Subject: Deadline 7: Tan-y-Mynydd Fishery response to Hypothetical Hydrgeological Risk Assessment Report (HHRA)

Good morning inspectorate team

Further to the release of the HHRA by The Applicant's team on 20th December 2024 and my subsequent meeting to discuss the report and my observations on it on 7th January 2025 I am pleased to attach for upload to the inspectorate's portal v2 of our feedback.

The meeting held on the 7th January 2025 was with Laura Leigh (LL) and Phil Rew-Williamson (PRW) on behalf of The Applicant. In my opinion the meeting was both helpful and useful and showed a willingness on both sides to try and move things forward. The headlines out of the meeting were as follows:

1. The feedback (Document version noted as Final V2 dated 6th January 2025 - copy attached) on the HHRA, as provided by The Fishery, was generally accepted. Some detailed comments from specialists employed by The Applicant are in due course to be sent across to the fishery.
2. PRW advised that the HHRA will be further updated but that this is unlikely to complete by Deadline 7.
3. In order to establish the Baseline situation relative to the ground water supplies, PRW advised that The Applicant will be looking to start monitoring activities as soon as practical.
4. PRW advised that consultation with the Local Authority on the detail of the various management / environmental plans is unlikely to commence before July 2025, but this may be subject to change.
5. PRW gave an indicative outline of the procurement activities needing to be undertaken prior to the Detailed Design Phase commences. He also advised that the Detailed Design activities could well result in further boreholes being sunk, these would most likely be carried out on a much more targeted basis.
6. PRW advised that post consent there would be a new point of contact for the fishery, this being Mr Bruce Milne.
7. PRW advised that an Outline Monitoring Strategy will be set out by The Applicant and The Fishery involved in its agreement.
8. Relative to the points of emergence of the springs/ground water systems and any available soils information MWC agreed to look to see what further information ha can access and to provide this to The Applicant. This to include photographs of a recent water main trench excavated across the field to the immediate South of the fishery. MWC advised that along this trench line, approx 130m long and circa 1m deep, two major pockets, one of sand and one of shale were encountered.
9. PRW advised that currently The Fishery is unlikely to included by The Applicant as a Category 3 interest. However, PRW confirmed that The Fishery will be highlighted in any such plans as a specific receptor. MWC's position was to suggest that if The Applicant was so convinced that the risk to The Fishery was low then why wouldn't they include it as a Category 3 interest.
10. It was agreed that further Teams meetings would continue to be held between the parties. It was further agreed that where appropriate these would include additional meetings to deal with specific issues.

If there are any of the above points that need further clarification for the Inspectorate or if The Applicant wishes to see the wording revisited then I would welcome direct contact by the appropriate party.

Kind Regards

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