Awel y Môr Offshore Wind Farm

Applicant's Response to NRW MLT Request for Further Information

Marine Licence Submission 1

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Fferm Wynt Alltraeth
AWEL Y MÔR
Offshore Wind Farm

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1 Introduction

1.1 Background

1 Awel y Môr Offshore Wind Farm Limited ('the Applicant') submitted an application for a Marine Licence to the Natural Resources Wales Marine Licensing Team (NRW-MLT) (reference ORML2233) pursuant to Part 4 of the Marine and Coastal Access Act 2009 (MCAA). The application was confirmed as duly made on 20 June 2022.

2 NRW-MLT subsequently initiated a 42-day consultation with technical consultees which closed on 3 August 2022 (note: the Maritime and Coastguard Agency (MCA) were granted an extension until 10 August 2022), as well as a public consultation which closed on 17 August 2022. Comments on the Marine Licence application were subsequently provided to the Applicant for consideration, in addition to a series of questions and clarifications requested from NRW-MLT.

3 The Applicant agreed with NRW-MLT that a response to its Request for Further Information would be provided on 25 November 2022. Details of the Applicant's responses to those comments received are set out in the subsequent sections of this document.

1.2 Relationship with the Development Consent Order (DCO) Examination

4 Since AyM is classified as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, the Applicant was also required to submit an application for a Development Consent Order (DCO) which was accepted for Examination by the Planning Inspectorate (PINS) on 18 May 2022.

5 The processes to determine both the DCO and the Marine Licence are anticipated to run in parallel. Although there are areas of overlap, the two processes are separate and achieve distinct statutory purposes.

6 Both processes are active and have overlapping but distinct points at which written information is submitted. Therefore, where matters for discussion are relevant to both processes, there is the potential for submissions to be made to one process that do not completely represent the most up to date status of those discussions as relevant to the other process. This Marine Licence submission represents the most up to date status of ongoing discussions as of 25 November 2022, however NRW-MLT should be confident that the Applicant (and Interested Parties (IPs)) are still working to resolve any outstanding issues outside of this formal submission and will regularly update NRW-MLT at appropriate points in time.

7 For reference, the next DCO Examination deadline is on 16 December 2022 (Deadline 3a) following Issue-Specific Hearings (ISH) in the week commencing 5 December 2022. The most recent DCO Examination deadline was Deadline 3 on 23 November 2022. The Applicant notes that NRW(A) has provided a written submission at Deadline 3 which the Applicant will comment on at Deadline 3a.

1.3 Cross-referencing

8 For ease of referencing and to facilitate future cross-referencing, the Applicant has included references for each of the individual comments received under the consultation on this Marine Licence application.

9 To distinguish documents and comments that relate to the Marine Licence application process from the DCO Examination, the prefix 'ML-' is used, whereas documents related to the DCO Examination process follow the Examination Library referencing system created by PINS.

10 The Applicant has created a reference for each consultee response by itemising the responses into paragraphs within subheadings and giving these unique identifiers (e.g. the first comment in the introductory paragraph from the MLT is referenced as 'ML-NRW-MLT-0.1' and the first comment in the first subheading is referenced as 'ML-NRW-MLT-1.1').

1.4 Responses to the NRW-MLT Marine Licence Application Consultation Comments

11 NRW-MLT issued a letter to the Applicant dated 8 September 2022 that requested further information (reference ORML2233) in order to continue with the determination of the Marine Licence application. This was received alongside 18 consultation responses that have been responded to separately, including two responses to the public consultation (Document ML-1.2), all of which were provided formally to the Applicant by NRW-MLT.

12 The Applicant's responses to the comments and questions in this letter are set out in the table below.

2 Applicant's Response to the Marine Licence Team's Comments

2.1 Natural Resources Wales (Marine Licence Team) (ML-NRW(MLT))

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
ML-NRW-MLT-0.1	Awel y Môr Offshore Wind Farm Limited applied to Natural Resources Wales (NRW) for a Marine Licence under the Marine and Coastal Access Act 2009 to build and operate the Awel y Môr offshore wind farm located off the north Wales coast in the Irish Sea adjacent to the operational Gwynt y Môr Wind Farm.	This is noted by the Applicant. Responses are provided to the points raised in the rows below.
ML-NRW-MLT-0.2	In accordance with Part 4, Chapter 1, Regulation 67 (4) of the Marine and Coastal Access Act 2009, NRW require further information to continue with the determination of this application.	
ML-NRW-MLT-0.3	The consultation responses received during determination have been shared with you and you will note a number of concerns which should be addressed and/or clarified. It is strongly recommended that you review and look to respond accordingly to the points raised by the various consultees.	
ML-NRW-MLT-0.4	Specific attention is given to a number of clarification points, of which many will need to be addressed before the marine licence process progresses further. However, please note that this list is not exhaustive and reference should be made to all the consultee comments. A clear signposting document or matrix should be provided showing how requested information has been provided and each consultee comment has been considered and/or addressed.	
ML-NRW-MLT-0.5	It is strongly recommended that further engagement is sought with relevant consultees as you look to address comments made. We are aware further documents such as Statements of Common Ground may be produced through the Development Order Consent process which is running parallel to the Marine Licence application. Where these are produced on matters within the Marine Licensable Area we would strongly recommend that these are also submitted to us in support of your marine licence application.	The Applicant has continued to engage with many of the respondents and organisations who responded to the Marine Licence consultation. It is noted that many of these are also Interested Parties (IPs) in the DCO Examination (including the NRW Advisory Team (NRW(A))). Statements of Common Ground (SoCGs) that have been progressed with numerous organisations are available to view on the project page of the National Infrastructure Planning Website, and the Applicant is happy to provide final SoCGs to NRW-MLT once signed and counter-signed by the relevant IP and the Applicant. For the purposes of this submission, the most recent versions of progressed SoCGs have been provided to NRW-MLT (Documents ML-1.27, ML-1.28, ML-1.29, ML-1.31, ML-1.32 and ML.1.33 of the Applicant's Marine Licence Submission 1), however it should be

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
		noted that these are live documents and so represent the status of discussions a point in time prior to DCO Examination Deadline 3 (23 November 2022).
ML-NRW-MLT-1.1	As raised by NRW (A) and Cefas, clarification is required surrounding the proposed disposal location for dredge arising from the export cable corridor as this may require designation of an additional disposal site. The disposal site characterisation report appears to concentrate on disposal of dredge arising from within the array area itself (including 1,532,615m3 of dredge arising from the export cable that falls within the array area). Clarity is required surrounding the disposal of any dredge arising from the Export Cable Corridor, ES chapter 1 Offshore Project Description details this to be 6,281,000m^3.	At this stage, the Applicant has sought a Marine Licence for the disposal of dredged material in the array area only but assessed disposal of dredged material in the offshore ECC and the GyM interlink area in the ES as a worst-case scenario following the design envelope approach. Should it be determined in the detailed design phase post-consent that disposal of dredged material is required in those areas, these would be supported by a separate Marine Licence application at that time.
ML-NRW-MLT-1.2	Following consideration of representation made by Cefas we consider further clarification is required in relation to the Sediment Sample Analysis presented within the Disposal Site Characterisation Report: - Confirmation that the inshore area will only be subject to trenching. Further sampling may be required if dredging will be needed in the inshore area. - Name of the laboratory undertaking the trace metal analysis. If the laboratory does not appear on NRW approved list for those determinants, the analysis method will need to be provided. - The analysis results need to be presented in NRW Sediment Sampling Template Form, and should include the results of cadmium and mercury to two decimal places. - If Naphthalalene data is available, this should be provided for completeness.	The Applicant has provided a response to the comments from Cefas in Section 2.12 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. In summary: - The Applicant has only sought to licence disposal of dredged material within the array at this stage. Post-consent, when construction methods are finalised following pre-construction surveys in the detailed design phase, the Applicant will apply for a separate Marine Licence to dispose of dredged material within the offshore ECC and/or the GyM interlink area if required; - Trace metal analysis was carried out by Fugro and the Applicant has provided method statements for the analyses which are compiled in Document ML-1.11 of the Applicant's Marine Licence Submission 1; - The Applicant has completed the NRW Permitting Services template in Document ML-1.12 of the Applicant's Marine Licence Submission 1; and - The sampling regime, including the spread of contaminants requiring analysis, were agreed with NRW(A) via the Evidence Plan process and did not include Napthalene.
ML-NRW-MLT-2.1	Chamber of Shipping expressed concerns to statements raised within the ES surrounding impact of allision and vessel drift. We would ask that you review Chamber of Shipping comment and provide a response.	The Applicant has provided comments on the Chamber of Shipping (CoS) response in Section 2.9 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant is also engaging with CoS separately in relation to the DCO Examination and is seeking to agree a SoCG.
ML-NRW-MLT-2.2	Chamber of Shipping have expressed concerns surrounding the placement of an isolated structure within the "Other Infrastructure Zone". We note that the ES details that the met mast may be placed within the array area or the 'Other	As set out in paragraph 1.8.8 of the Offshore Project Description (Document reference 6.2.1), meteorological information will to be collected in order to refine the detailed design of the array and/or

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
	Infrastructure Zone'. Please provide reasoning why the MetMast may be placed outside the array area.	optimise performance during the operational phase of AyM. This data collection may be achieved using either a meteorological mast or a floating LiDAR buoy, both of which are included in the project's design envelope. The met mast (or FLiDAR) may be located outside the array area in the Other Infrastructure Zone (which is illustrated in Figure 1 of the Offshore Project Description chapter of the ES (Document reference 6.2.1) in order to be on the windward side of the array, to allow measurements to be taken from the prevailing wind direction without being affected by the array itself. Meteorological measurements taken from a device located within the array would be affected by wake effects from the turbines and therefore would not present accurate measurements of the ambient conditions at site. Following publication of, and statutory consultation on, the Preliminary Environmental Information Report (PEIR), extensive assessment and further consultation was undertaken with regard to the 'Other Infrastructure Zone' where a Met Mast could be sited. This area was reduced in size for the Application, removing the potential for an isolated structure in the north-west corner closest to the shipping lane. The Navigation Risk Assessment (Document reference 6.4.9.1) has subsequently confirmed that the risked posed by the Met Mast is tolerable with mitigation through modifications to the Other Infrastructure Zone and the commitment to consultation with Trinity House post consent to agree its location, lighting and marking (Condition 19 of the Marine Licence Principles (Document ML-1.14 of the Applicant's Marine Licence Submission 1).
ML-NRW-MLT-2.3	The Marine and Coastguard Agency (MCA) have suggested a number of mitigations that should be included in any Marine Licence determined. Should you have any comment on the mitigation proposed within the MCA consultation response please provide this.	The Applicant has provided comment on the MCA response in Section 2.16 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant is also engaging with MCA separately in relation to the DCO Examination and is developing a SoCG (A current version of which is provided as Document ML-1.33 of the Applicant's Marine Licence Submission 1).
ML-NRW-MLT-2.4	Provision for Safety Zones are detailed within the Schedule of Mitigation as being secured through a Marine Licence. Designation of Safety Zones are outside the remit of the Marine Licence and discussion should be held with the	This is noted by the Applicant, who confirms that a Safety Zone Statement was submitted with the DCO Application (available on the project page of the National Infrastructure Planning website at APP-297)

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
	relevant authorities. We would recommend that you discuss any proposed safety zones with the MCA.	covering the Applicant's approach to safety zones, which will be applied for post-consent with required supporting evidence.
ML-NRW-MLT-3.1	Significant Concerns have been raised by NRW(A) in relation to impacts of the works on Seascape and Landscape. Although the Environmental Statement acknowledges that the proposed work will have a significant adverse effect on the Isle of Anglesey AONB and Snowdonia National Park in a number of instances NRW(A) disagree with the extent of the effect predicted and consider that the significance has been underestimated. NRW (A) consider that the degree of harm to nationally designated landscapes is substantial. Please review detailed comments provided by NRW (A) on this matter and provide a response. We would encourage you to liaise with NRW (A) to seek points of agreement and mitigation where possible, and provide justification for the approach taken where there is a disagreement that cannot be resolved.	The Applicant has reviewed and provided detailed responses to the comments from NRW(A) in Section 2.2 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant is also engaging with NRW(A) extensively on these matters via the DCO Examination, including the development of a SLVIA-specific SoCG. For completeness, the Applicant has provided its responses to the NRW(A) Written Representation submitted to the DCO Examination at Document ML-1.25 of the Applicant's Marine Licence Submission 1, as well as the most recent iteration of the SLVIA SoCG (Document ML-1.27 of the Applicant's Marine Licence Submission 1).
ML-NRW-MLT-3.2	Following comments raised by the Anglesey County Council clarification is required surrounding the proposed Lighting Management Plan within the DCO and any lighting requirement that will be required for navigational safety. Please confirm the relationship of the Lighting Management Plan detailed proposed to be captured within the DCO and the Navigation Risk Assessment proposed for the Marine Licence.	The Applicant has provided comments on the consultation response from the Isle of Anglesey County Council in Section 2.4 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. In summary, the Applicant has proposed the inclusion of a Lighting and Marking Plan to be included in any Marine Licence granted, which would include details ensuring that lighting is in accordance with the relevant industry guidance and as advised by stakeholders including the MCA and the Civil Aviation Authority (CAA) (see Condition 46 of the Marine Licence Principles (Document ML-1.14 of the Applicant's Marine Licence Submission 1)).
ML-NRW-MLT-3.3	Please confirm whether discussion surrounding compensation in relation to seascape has taken place with Anglesey County Council. Please also confirm how it is proposed that compensation for seascape and landscape impacts are to be secured, based on the Mitigation Schedule it would be our understanding that the intention is that compensation in relation to Seascape and Landscape would be secured within the DCO.	The Applicant confirms that it is engaging with relevant interested parties, including the Isle of Anglesey County Council, to understand the basis for, and structure of, a possible landscape enhancement scheme.
ML-NRW-MLT-4.1	JNCC and NRW (A) note that evidence of displacement on Red-throated divers is not consistent with what has been observed in other areas of Liverpool Bay SPA, as well as other areas of the UK and Europe. Validation monitoring has been requested as detailed within the response of JNCC and NRW(A). Please provide any comment you have to make in relation to this request.	The Applicant has provided comments on the responses to JNCC and NRW(A) in Sections 2.13 and 2.2 respectively of Document ML-1.2 of the Applicant's Marine Licence Submission 1 in relation to these requests. The Applicant considers that ornithology monitoring would be secured as part of a Project Environmental Management Plan (PEMP under

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
		Condition 34 of the Marine Licence Principles (Document ML-1.14 of the Applicant's Marine Licence Submission 1)).
ML-NRW-MLT-4.2	A number of points of clarification or further information to support calculations used within the assessment has been requested by the JNCC and should be provided, these include: ▲ Annual displacement matrices for Manx Shearwater for both the array and the array areas plus 2km buffer. ▲ Clarification how the relative harvest values which were used within the PVA tool have been calculated. In addition as part of the Population Viability Analysis graphs of population size over the years of impact, counterfactual of growth rate and counter factual of population size including confidence interval should be presented. ▲ Clarification to how vessel numbers and movement has been calculated. ▲ Full apportioning calculation for all SPAs and designated features.	The Applicant has provided comments on the response from JNCC in Section 2.13 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant has also provided a clarification note addressing the comments from JNCC specifically in Document ML-1.3 of the Applicant's Marine Licence Submission 1.
ML-NRW-MLT-4.4	The RSPB have raised a number of concerns surrounding the assessment, we ask that you review the consultation response and provide a response or further information to address concerns raised. These concerns include but are not limited to: ▲ the assessment of impact of displacement on Red Throated Divers; ▲ the need for improved baseline survey methodology; ▲ the need to scope in the collision risk for Manx shearwater; ▲ the inaccurate avoidance rates used in gannet collision risk modelling particularly in breeding season, and ▲ the need for consideration of the Highly Pathogenic Avian Influenza.	The Applicant has provided comments on the response from RSPB in Section 2.5 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant is also actively engaging with RSPB separately via the DCO Examination, including the progression of a SoCG.
ML-NRW-MLT-4.5	Further assessment is required on the potential impact of the project on breeding seabird features of the Pen-y-Gogarth / Great Orme's Head SSSI. NRW (A) do not consider the current assessment to be sufficient for features of this site including the Common Guillemot, Razorbill and Black-legged Kittiwake. Further consideration surrounding the displacement on auks and collision risk mortality on kittiwakes is required, see further comment within NRW (A) response.	The Applicant has provided comments on the response from NRW(A) in Section 2.2 of Document ML-1.2 of the Applicant's Marine Licence Submission 1, in addition to a revised assessment of the impacts to Pen y Gogarth / Great Orme's Head SSSI in Document ML-1.4 of the Applicant's Marine Licence Submission 1. A previous version of this document was provided to NRW(A) at Deadline 2 of the DCO Examination, who subsequently provided further comment via email correspondence on 16 November 2022. The Applicant hopes that the revised document adequately addresses the further queries from NRW(A) and is happy to discuss further if necessary.

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
ML-NRW-MLT-5	Post construction monitoring of secondary scour has been proposed by NRW (A) please provide any comment you have to make in relation to this request.	The Applicant has provided comments on the response from NRW(A) in Section 2.2 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant has discussed this matter with NRW(A) via the DCO Examination and SoCG. It has since been agreed that the Applicant will undertake monitoring of secondary scour for the purposes of asset protection as part of the post-construction monitoring described by Condition 34 of the Marine Licence Principles (Document ML-1.14 of the Applicant's Marine Licence Submission 1) and it is understood that NRW is content with this approach, provided that this is appropriately secured.
ML-NRW-MLT-6.1	Following advice received from NRW (A) we request that conclusion made in relation to sediment bound contaminants within Volume 2 chapter 3 of the ES should be looking at referring to CEFAS action levels.	The Applicant has provided comments on the response from NRW(A) in Section 2.2 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant has discussed this matter with NRW(A) via the DCO Examination and has provided a clarification note which addresses these queries (Document ML-1.7 of the Applicant's Marine Licence Submission 1). It is understood that these matters are now agreed.
ML-NRW-MLT-6.2	NRW (A) disagree with the approach to assessing phytoplankton and dissolved oxygen which focusses on nutrient content rather than light limitation and suspended sediments. Consideration of impact on phytoplankton due to increased turbidity and dissolved oxygen as a result of suspended sediment should be provided. This should also be considered in the context of the WFD assessment.	
ML-NRW-MLT-7	NRW (A) have a number of comments relating the cumulative assessment in relation to fish population. Further information is required to demonstrate how cumulative impact to fish populations over multiple spawning seasons from underwater noise associated with construction of offshore wind farm projects has been considered.	The Applicant has provided comments on the response from NRW(A) in Section 2.2 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant has provided a Cumulative Effects Assessment Clarification Note (Document ML-1.24 of the Applicant's Marine Licence Submission 1) in response. It is understood that NRW(A) has further queries on this submission and the Applicant will work with NRW(A) to address concerns.
ML-NRW-MLT-8	NRW (A) consider the assessment of impact of underwater noise on marine mammal such as auditory injury and associated disturbance to be insufficient. NRW (A) have provided detailed advice with their consultation response on how they consider the assessment could be improved and remodelled. Issues raised and which need to be considered include but are not limited too; • Analysis of PTS and disturbance	The Applicant has provided comments on the response from NRW(A) in Section 2.2 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. The Applicant has since provided a Marine Mammal Clarification Note (Document ML-1.8 of the Applicant's Marine Licence Submission 1) to

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
	▲ Proposal for modelling cumulative PTS to be included within the MMMP ▲ Incorporation of mitigation to avoid impact on marine mammals through collision risk in the proposed Vessel Traffic Management Plan We would encourage you to discuss this issue with NRW (A) and where possible provide an agreed updated assessment or response to the comments raised.	NRW(A) on this matter and it is understood that this area of discussion is now agreed.
ML-NRW-MLT-9	An assessment of air quality has been undertaken. However as detailed by NRW (A) it is unclear whether vessels will operate in the proximity to sensitive coastal onshore habitats, we request that you provide additional information to demonstrate that there will not be significant impacts from marine vessel emission on sensitive habitats.	The Applicant has provided a Vessel Emissions Clarification Note (Document ML-1.9 of the Applicant's Marine Licence Submission 1) in response to this query and is happy to discuss any further queries with NRW(A) on this matter.
ML-NRW-MLT-10.1	We note within the schedule of mitigation that a Decommissioning Plan is proposed within the DCO and Marine Licence. Please could you explain whether there is a difference between the Offshore Decommissioning Plan proposed within Schedule 2 Article 3 (20) of the DCO and that proposed to be included within the Marine Licence.	Requirement 21 of the draft DCO (PINS reference REP2-014) and Condition 40 of the Marine Licence Principles (Document ML-1.14 of the Applicant's Marine Licence Submission 1) provide that the decommissioning of the offshore aspects of the development should be in accordance with a Decommissioning Programme approved under Part 2, Chapter 3 of the Energy Act 2004. This is a legal requirement and a standard DCO requirement and ML condition for offshore wind projects.
ML-NRW-MLT-10.2	Additionally please confirm whether it is proposed that work in the intertidal area will be covered within the Offshore decommission plan or onshore.	The works in the intertidal area are included as part of the 'Onshore Works' within the draft DCO and therefore the relevant DCO requirements, which includes decommissioning require approval from Denbyshire Councty Council as the local planning authority. The Applicant anticipates that, as is standard practice, DCC will consult with NRW in the discharge of this requirement in so far as it relates to the intertidal area.
ML-NRW-MLT-11.1	The Isle of Man Government provided a consultation response where concerns have been raised surrounding the consideration of Ornithology, Marine Mammals and Commercial Fisheries within their jurisdiction. There are concerns surrounding the potential impact on mobile features which are of importance to designated sites within the Isle of Man territorial limits. As these sites are not European Designated sites, their assessment will not be included in the HRA. Furthermore, confirmation has also been requested of whether the Fisheries Liaison Plan will consider and engage with fishing vessels from the Isle of Man.	The Applicant has provided comments on the response from the Isle of Man (IoM) Government in Section 2.15 of Document ML-1.2 of the Applicant's Marine Licence Submission 1. It is noted that the Applicant is also actively engaging with IoM Government via the DCO Examination, including the progression of a SoCG. The Applicant has provided a bespoke assessment of Manx ornithological features in Document ML-1.5 of the Applicant's Marine

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
ML-NRW-MLT-11.2	Please provide a response to the comments raised, signposting within the response where relevant consideration has taken place within the Environmental Statement.	Licence Submission 1, which has already been provided directly to IoM Government. The Applicant can confirm that Manx fishing vessels have been considered in the application, including consultation with the Manx Fish Producers Organisation (MFPO) on the Fisheries Liaison and Co-Existence Plan (Document ML-1.21 of the Applicant's Marine Licence Submission 1).
ML-NRW-MLT-12	Representation was received from Janet Finch Saunders MS on a range of issues including archaeology and commercial Fisheries. I would ask that the letter is reviewed and response provided to comments made. In reference to point 5 of the letter, chapter 7 Marine Mammals of the ES has now been shared so no action is required on this point.	The Applicant has provided comments on the response to Janet Finch-Saunders in Section 2.17 of Document ML-1.2 of the Applicant's Marine Licence Submission 1.
ML-NRW-MLT-13.1	Further information is required surrounding cable laying under the Clwyd Estuary. The Clwyd Estuary is tidal and therefore as detailed under section 67 of the Marine and Coastal Act a marine licence is required for construction and deposits both in and under the seabed. We are aware that detail surrounding the works at the Clwyd has been considered and provided as part of the project Environmental Statement. Please provide additional detail surrounding the cable laying works at the Clwyd Estuary which are seaward of Mean High Water Springs (MHWS), this should include: ▲ description of works seaward of MHWS; ▲ signposting to relevant section of the ES and supporting documents; ▲ map showing location of the works seaward of MHWS; ▲ co-ordinates of the works seaward of MHWS; ▲ confirmation of depth of the construction and installation underground; ▲ confirmation whether the entry and exit sites (pits) will be landward of MHWS, and ▲ confirmation whether the detailed construction method statement associated with the cable works at the Clwyd will be captured within the DCO and if so the need to signpost to relevant condition.	The Applicant has provided a supplementary Marine Licence Application Form for the Clwyd Estuary crossing (Document ML-1.13 of the Applicant's Marine Licence Submission 1) which provides this requested information. A map showing the location of these works is provided in Document ML-1.36 of the Applicant's Marine Licence Submission 1, and co-ordinates of the works seaward of MHWS are provided in Document ML-1.35 of the Applicant's Marine Licence Submission 1.
ML-NRW-MLT-13.2	To ensure all relevant information is provided we would suggest that you provide information within an application form which can form an addendum to the form already submitted.	

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
ML-NRW-MLT-14.1	There are inconsistencies and uncertainty surrounding mitigation proposed within the Marine Principle Document and the Schedule of Mitigation. For example, a Scour Protection Management Plan is proposed within the ES and detailed to be captured within the Marine Licence within the Schedule of Mitigation, however within the Marine Principle Document it details that a Scour Protection Management Plan is "not anticipated to be needed given minimal scour predictions."	The Applicant has provided the most recent revisions of the Schedule of Mitigation and the Marine Licence Principles in Documents ML-1.16 and ML-1.14 of the Applicant's Marine Licence Submission 1, respectively.
ML-NRW-MLT-14.2	Additionally a Vessel Traffic Management Plan is proposed within ES Volume 2 Chapter 4 Offshore Ornithology however this Plan does not appear within either the Principles Document or Schedule of Mitigation.	The Schedule of Mitigation and the Marine Licence Principles (Documents ML-1.16 and ML-1.14 of the Applicant's Marine Licence Submission 1, respectively) have been updated to include reference to a Vessel Traffic Management Plan (Condition 34 of the Marine Licence Principles document (Document ML-1.14 of the Applicant's Marine Licence Submission 1)).
ML-NRW-MLT-14.3	There are also discrepancies within the naming of the plans between the Principle Document and the Schedule of Mitigation.	The Applicant has provided the most recent revisions of the Schedule of Mitigation and the Marine Licence Principles in Documents ML-1.16 and ML-1.14 of the Applicant's Marine Licence Submission 1, respectively.
ML-NRW-MLT-14.4	We request clarification to the discrepancies highlighted above. We request that you review the schedule of mitigation and Marine Licence Principles document, these need to be consistent and contain all planned mitigation and plans proposed to be captured within the Marine Licence which are detailed in the ES. We also request that naming of plans is consistent across both documents.	
ML-NRW-MLT-14.5	For documents which cover both the marine and terrestrial area, such as the Written Scheme of Investigation, it would be useful to understand whether it is proposed that a single document is developed, or whether separate documents will be produced for the marine and terrestrial aspects of the proposal. Where separate documents are being proposed, please confirm whether the intertidal is proposed to be captured within the offshore or onshore document presenting reasoning for the approach taken.	There will be separate schemes prepared for the marine and terrestrial area to discharge the marine licence condition(s) and DCO requirement. The outline offshore written scheme of investigation (Document reference 8.3) explains at paragraph 2.2.1 that it covers the offshore elements of the project to mean low water springs and that the intertidal area is included within the onshore WSI (PINS reference APP-147). As is standard practice it is, however, expected that Denbighshire County Council as the local planning authority will consult with NRW on the approval of schemes within the intertidal area.
ML-NRW-MLT-15	The Marine Licence Principles documents sets out the licences activities that are being requested under each of the proposed licences (generating, transmission and GyM interlink); however, the design parameters provided cover the project	The Applicant is considering this request and how it could best be set out within the Marine Licences to ensure that there is clarity regarding the adherence of the various elements of the project to the overall design

REFERENCE	MLT COMMENT	APPLICANT'S RESPONSE
	as whole (page 11- 13). As 3 licences are being sought, we request that 3 separate licence parameters are provided for each licence. For example, Parameters for Marine Licence 1 (generating asset) should include the relevant parameters for Wind turbines and the array cables, while these will not be required within Marine Licence 2 (transmission asset). Relevant volumes for each proposed licence should also be provided rather than a combined total (such as length of cable and volume of cable protection).	parameters identified and assessed within the environmental statement. A further update will be provided in the Applicant's next update to NRW-MLT.
ML-NRW-MLT-16	We bring to your attention comment provided by BEIS who remind you of obligations under Section 105 of the Energy Act (2004) to have a BEIS-approved decommissioning programme and for BEIS to hold a Financial Security Sum to avoid taxpayer-funded decommissioning. Please contact OREIDecomissioning@beis.gov.uk to engage further.	This is noted by the Applicant, who has provided comment on the response from BEIS in Section 2.14 of Document ML-1.2 of the Applicant's Marine Licence Submission 1.
ML-NRW-MLT-17	A number of comments related to the draft Written Scheme of Investigation have been provided by the Royal Commission on The Ancient and Historical Monuments of Wales (RCAHMW) which will need to be addressed in any final WSI.	The Applicant has provided comment on the response from RCAHMW in Section 2.8 of Document ML-1.2 of the Applicant's Marine Licence Submission 1.
ML-NRW-MLT-18	The NFFO have provided a number of comments that should be considered as part of the liaising with relevant local industry representatives as you develop a Fisheries Liaison Plan.	The Applicant has provided comment on the response from NFFO in Section 2.11 of Document ML-1.2 of the Applicant's Marine Licence Submission 1.

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AWEL Y MÔR
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