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Natural
Resources
Wales**

Ein cyf/Our ref: SC2302

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27 November 2023

Dear Steven Edwards,

SCREENING AND SCOPING OPINION UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (as amended)

Criterion Quay FLOW Development

I am writing further to your request for a screening and scoping opinion, dated 23 August 2023 and assessed as complete on 31 August 2023, made in accordance with The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("The Regulations").

The purpose of the Environmental Impact Assessment (EIA) screening procedure is to determine whether the proposed works require an Environmental Impact Assessment and submission of an Environmental Statement (ES). The purpose of the scoping procedure is to determine what information should be provided in the ES.

In reaching our Screening Opinion we have considered the proposed works against Schedule A1 and A2 of the above regulations. In reaching our scoping opinion we have had regard to the information provided in the "Criteria Quay FLOW Development EIA Screening and Scoping Report", dated 22 August 2023, and considered the requirements of Schedule 3 of the Marine Works Regulations. We have also consulted with the bodies that we consider have an interest in the project by reason of their environmental responsibilities, or local or regional competences, as required by the above regulations, and had regard to their comments.

Screening Opinion

It is our opinion that the works fall within the categories of project listed within Schedule A2, paragraph 63 of the above regulations and therefore must be considered in terms of its size,

nature and location having regard to the relevant criteria listed in Schedule 1 of the above regulations.

“paragraph. 63. Construction of harbours and port installations including fishing harbours”.

We can therefore agree with Section 1.2 of the Scoping Report that the Project will require an Environmental Impact Assessment and we consider that this decision has been reached in agreement between Milford Haven Port Authority (MHPA) and NRW Permitting Service (NRW PS), in accordance with Regulation 5 of the Marine Works Regulations.

We have come to this conclusion having considered the views of the consultation bodies alongside the criteria as set out in Schedule 1 of the regulations, and have determined, based on the information provided; that the project has the potential to have a significant effect on the environment specifically on interest features of designated nature conservation sites (including; Pembrokeshire Marine SAC, West Wales Marine SAC, the Afonydd Cleddau SAC and Milford Haven Waterway SSSI). With the potential for significant effects on, but not limited to, benthic ecology, fish and marine mammals within the Milford Haven Waterway.

Therefore, the application required for the proposed works for a marine licence under Part 4 of the Marine and Coastal Access Act 2009 (“The Act”) must be accompanied by an ES.

Scoping Opinion

This letter sets out the additional information that we consider necessary to be included and/or assessed in the ES for this Project.

Please note our scoping opinion is based on the information available to us at this time. The information provided is not a definitive list of the ES / EIA requirements and further information may be required following an application for this project, to ensure a full assessment is conducted.

This Screening and Scoping Opinion will be provided to all those bodies that were consulted and will be publicised on our website and on our Public Register.

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Scoping Opinion (SC2302)

Summary of the proposal

Milford Haven Port Authority (MHPA) are proposing to develop a deep-water berth at Criterion Quay, located at the eastern end of the Port of Milford Haven. The site includes an existing jetty, which is currently in poor condition, and an area of hardstanding. The area will be developed to support vessels associated with the offshore renewables industry (the Project). The works will include the rebuilding of the existing jetty and the area of hard standing with additional moorings and pontoons, a quay wall. It is proposed the area behind the new quay wall would be infilled with a combination of dredged material and imported rock.

Location

Criterion Quay is located entirely within the Port of Milford Haven within the Milford Haven Waterway, Pembrokeshire.

Consultation Responses Received

In considering the Scoping Report, the NRW PS consulted with various consultation bodies. The consultation bodies that responded are listed below:

- Natural Resources Wales Advisory (NRW A)
- Maritime and Coastguard Agency (MCA)
- Ministry of Defence (MoD)
- The Crown Estate (TCE)
- NATS Safeguarding

1. General comments

1.1. Marine and coastal guidance produced by NRW that may provide useful information to help with your project is available here:

<https://naturalresources.wales/guidance-and-advice/business-sectors/marine/?lang=en>

1.2. The ES submitted should demonstrate consideration of the points raised in this scoping opinion. It is recommended that a table is provided in the ES summarising the scoping opinion comments and how they are addressed in the ES.

1.3. The EIA must be undertaken by a competent person and the ES must include a competent expert statement.

- 1.4. Where possible, other environmental assessments should be coordinated with the EIA process. However, it is important to note that the Habitats Regulations Assessment (HRA) and Water Framework Directive assessment (WFD), and any other assessment, are separate processes to the EIA.
- 1.5. Throughout the ES robust evidence should be presented so that the potential environmental impacts can be properly understood and evaluated; and appropriate measures identified to avoid, reduce or where necessary compensate for those impacts.
- 1.6. The ES must include:
- A Non-Technical Summary (NTS);
 - A chart or map identifying where the activity will be carried out;
 - A description of the likely significant effects of the project, whether direct, indirect, secondary, cumulative, transboundary, short-term, medium-term, long-term, permanent, temporary, positive and negative;
 - A description of the methods used to make the assessment of the significant effects and difficulties encountered in compiling the information and uncertainties involved;
 - A description of measures to avoid, prevent, reduce or offset identified significant adverse effects and proposed monitoring arrangements; &
 - A description of the expected significant adverse effects of the project on the environment resulting from the vulnerability of the project to risks of major accidents or disasters.
- 1.7. The ES must consider any potential transboundary impacts where appropriate.
- 1.8. Early engagement with relevant stakeholders is encouraged. You are able to obtain further advice from NRW A through the NRW Discretionary Advice Service, please see here: <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/>
- 1.9. You must ensure that reference is made to and consideration of compliance with the UK Marine Policy Statement and the Welsh National Marine Plan (WNMP) and its associated policies within the submitted ES, alongside any further regional planning documentation. The published Welsh National Marine Plan can be found here: [Welsh National Marine Plan: document | GOV.WALES](https://gov.wales/welsh-national-marine-plan-implementation-guidance). Implementation guidance for the Welsh National Marine Plan can also be found here: <https://gov.wales/welsh-national-marine-plan-implementation-guidance>.
- 1.10. NRW PS generally agree with the topics that the report has scoped into the EIA. We have provided specific comment below. Where no comment has been provided the assessment should be carried out as detailed within the Scoping Report.

- 1.11. Likewise, unless otherwise specified below NRW PS generally agree with the list of factors scoped out of the EIA as detailed in Table 6.1, Section 6 (Summary of Scoping Assessment) of the Scoping Report. However please refer to the detail comment below.
- 1.12. NRW PS strongly recommend that you engage with relevant technical stakeholder as you develop the detailed assessment methodology to inform the ES.

2. Policy and legislation

- 2.1. Please ensure that all relevant legislation is identified in this chapter of the ES. As it stands some policies are identified within the Scoping Report chapter with other relevant legislation cited within Appendix A1.
- 2.2. NRW PS are required to take its decision in accordance with the appropriate marine policy documents unless relevant considerations indicate otherwise. The WNMP sets out the Welsh Government's policies for the Welsh marine area in connection with its sustainable development. A WNMP Signposting document has been provided with this opinion and can also be downloaded via this link: [copy-of-wnmp-signposting-doc-1.xlsx \(live.com\)](#), the document can be used to set out how the project has considered each policy of the WNMP.
- 2.3. Section 2.2. of the Scoping Report notes that the new berth will contribute to wider flood defence works in the area. Consideration should be given to the relevant Shoreline Management Plan and Policy Unit for the area of planned work.
- 2.4. In making its decision, NRW PS are required to take all reasonable steps to meet its published well-being objectives, which are designed to maximise NRW's contribution to achieving each of the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015. NRW PS must have enough information within the ES to ensure it acts in accordance with these principles of sustainable development.

3. Project description

- 3.1. NRW PS require a sufficient Project Design Envelope (PDE) to allow significant of impacts to be adequately assessed and this must be presented within the assessment. NRW PS recognise as detailed in section 2.1 of the Report that the proposed development is at an early concept design stage; however, no dimensions are provided for the proposed crane (likely to be one of the biggest in the world, as detailed in section 2.3 of the Scoping Report), the component parts for the wind turbine generators (WTG), nor the assembled WTGs. The dimensions of these structures are particularly relevant to allow the adequate assessment of the likely significant effects of the Project on certain topics e.g. landscape and visual effects and therefore we expect the Environmental Statement (ES) to include confirmation of these dimensions, or a reasonable worst case scenario. Similarly, the duration for the assembly of WTGs and the length of time for which they may remain in port is not clear. These timeframes will also influence the assessment of landscape and visual effects and should be provided in the ES.

- 3.2. The submitted ES should also clarify in full the timescales for all Project stages and, therefore, ensure that the timeline being assessed is clear. For certain topics, the duration of the assembled WTGs in port will influence the assessment of significance for certain receptors e.g. Landscape and visual.

4. Hydrodynamic and sedimentary regime

- 4.1. NRW PS agree that effects on hydrodynamics and sedimentary regime must be assessed within the ES. NRW A are generally in agreement with the proposed approach of using a model to inform the understanding of potential effects of the Project on the hydrodynamic regime and dispersal of sediments.
- 4.2. NRW A advise that the zone of influence caused by the suspended sediment plumes be determined by the maximum distance that the plume generated by the dredge and disposal activities can travel over a tidal cycle. The maximum spring tidal excursion should be used to inform the SSC plume extent which will vary in extent depending on locality e.g. whether within the Milford Haven Waterway or outside the estuary in the coastal environment.
- 4.3. NRW PS consider that the assessment must consider the impacts of the works at both the project development area within Milford Haven Port and at the location of the disposal site, during both the construction and operation phase. NRW A, reiterate that the assessment of SSC plume dispersion and re-deposition must be carried out for both the construction and operational phases within Milford Haven and in the coastal waters at the location of the disposal site.
- 4.4. The suitability of the offshore disposal site should be considered in relation to its carrying capacity and the type of sediment proposed for disposal. NRW PS request that further sediment data and geotechnical data is required and should be presented on the quantity and type of sediment that will be dredged and disposed of to ensure that the offshore disposal sites are suitable. Dredge and disposal sediment model simulations should also be considered in-combination with ongoing dredge and disposal activities currently being conducted in the Haven and attention given to ensuring that the carrying capacity of the offshore disposal site is not exceeded.

5. Marine water and sediment quality

- 5.1. NRW PS agree that effects on marine water and sediment quality must be assessed within the ES. We welcome that a marine geotechnical and geo-environmental investigation will be undertaken to characterise the physical and chemical nature of the sediments affected by the proposed development. NRW A recommend that core samples (undertaken as part of this investigation) should also be taken in the vicinity of the proposed dredge areas in order to determine the sediment types and associated quantities of the sub surface sediment that will be dredged and subsequently disposed.
- 5.2. Section 2.2 of the Scoping Report details that the area behind the quay wall would be infilled with a combination of material won during dredging and imported rock.

The ES should make clear the volume of dredged material proposed to be used as infill.

- 5.3. NRW PS would like to advise you of NRW's position statement with regards to using dredged material for land reclamation available from [Natural Resources Wales / Managing sediment: marine coastal and estuarine](#).
- 5.4. NRW A recommend that information from the Physical Processes assessment is also utilised within the marine water and sediment quality assessment to support the assessment of turbidity.
- 5.5. NRW PS are content, following advice from NRW A, that the Milford Haven Inner will be the focus for the WFD assessment, with upstream and downstream water bodies being brought in if non-temporary effects are found in the Milford Haven Inner.

6. Marine Benthic ecology

- 6.1. NRW PS are generally satisfied with the proposed approach taken for the assessment of benthic ecology and agree with the potential effects during the construction and operation stage identified in the Scoping Report (section 5.3.2 and 5.3.3).
- 6.2. In addition to those impacts identified, NRW PS request the inclusion of impact assessments for accidental pollution events and the potential disturbance of benthic communities from all dredging activities (and not limited to blasting as proposed within the Scoping Report).
- 6.3. Additionally, an assessment of smothering of benthic communities as a result of the deposition of suspended sediment during dredging and disposal must be scoped in for the operational phase should maintenance dredging be required for the Project.
- 6.4. NRW A have advised there are a number of highly invasive species present in Milford Haven such as the slipper limpet, *Crepidula fornicata*. Furthermore, please note the carpet sea squirt *Didemnum vexillum* has been recently (2023) confirmed to be present in Milford Haven and as such, extra vigilance should be applied.

7. Fish and shellfish resources

- 7.1. NRW PS agree that the Scoping Report identifies the key impact pathways of the development on fish and shellfish resource within the Scoping Report (section 5.4.2 and 5.4.3).
- 7.2. NRW A recommend that fish are assessed by species within the Environmental Statement to ensure the importance/value, sensitivity and magnitude criteria reflects species-specific biological traits and appropriate population scales.
- 7.3. Impacts on fish features of the Afonydd Cleddau SAC should be included as these species may be migrating through the Milford Haven Waterway and so would interact with the Project. Effects on the fish quality element of the Milford Haven Inner and Outer transitional water bodies should also be considered.

- 7.4. NRW A have advised that a list of receptor species is defined in the ES considering the available data and species present which are of conservation, commercial or recreational importance in the Milford Haven. The list of receptor species must include species which are designated features of nearby SACs, and also species listed under Section 7 of the Environment (Wales) Act 2016 and Schedule 5 of the Wildlife and Countryside Act 1981. Notably, seahorse species (*Hippocampus hippocampus* and *Hippocampus guttulatus*) are known to be present in the Milford Haven Waterway but have not been mentioned within the Scoping Report.
- 7.5. Specific consideration should also be given to the nature of the habitat lost due to the capital and maintenance dredging and disposal, and its suitability for key fish species of the Milford Haven fish community, such as sandeels, herring and gobies.
- 7.6. NRW A have also advised that timing restrictions are likely to be required for in-water percussive piling activities during key estuarine migration periods for diadromous fish and spawning periods for marine species such as herring.
- 7.7. NRW A consider that the proposed works are likely to have a significant effect on diadromous fish features of the Pembrokeshire Marine SAC and Afonydd Cleddau SAC from the impact pathways identified within the Scoping Report. In addition, NRW A consider that the proposed works are likely to have a significant effect on the Pembrokeshire Marine SAC Estuaries and Large Shallow Inlets and Bays features due to the potential effect of the proposed works on the fish community of the Milford Haven Waterway and the resultant potential effect on the structure and function of the Estuaries and Large Shallow Inlets and Bays features. Therefore NRW A consider an appropriate assessment is required under the Conservation of Habitats and Species Regulations 2017 for these features.

8. Marine mammals

- 8.1. NRW PS agree that effects of the proposed development on Marine Mammals are scoped into the assessment and generally agree with the key impact pathways of the development on marine mammals identified within the Scoping Report (section 5.5.2 and 5.4.3). In addition to those impacts already identified, impacts as a result of Accidental pollution events on marine mammals must also be scoped into the assessment.
- 8.2. NRW A welcomes the inclusion of harbour porpoise, bottlenose dolphin and common dolphin, minke whale, Risso's dolphin and grey seal for assessment as they do occur in this licence area, along with the close proximity to the Pembrokeshire Marine SAC and West Wales Marine SAC for which grey seal and harbour porpoise, respectively, are features.
- 8.3. We would direct you to NRW's current position on assessing impacts on marine mammals to the Welsh Marine Mammal Management Units (MMMU) level. This is outlined in NRW's position on the use of MMMU for screening and assessment in HRAs for SACs with marine mammal features (available from [PS0006 MMMUs in HRA Position statement May22 \(naturalresources.wales\)](#)). Please see further details in NRW A response attached to this opinion.

8.4.NRW A welcomes the inclusion of site-specific underwater noise modelling undertaken for a number of potential construction activities, to determine the potential for both auditory injury and disturbance to marine mammal species.

8.5.NRW A recommend the inclusion of best practice piling mitigation measure for marine mammals as per 'JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise, August 2010' (available via [Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise \(jncc.gov.uk\)](https://jncc.gov.uk/statutory-nature-conservation-agency-protocol-for-minimising-the-risk-of-injury-to-marine-mammals-from-piling-noise)).

9. Ornithology

9.1.NRW PS agree that effects of the proposed development on Ornithology are scoped into the assessment and agree with the key impact pathways of the development on ornithology identified within the Scoping Report (section 5.6.2 and 5.6.3).

9.2.NRW A welcome the use of WeBS data for waders and waterfowl to support monitoring work which may be undertaken and have advised that the 'Marine Atlas' data for seabirds is now publicly available.

10. Commercial fisheries

10.1. No specific comments were received on Commercial Fisheries. The ES should include an assessment of the impacts as set out in the Scoping Report.

11. Terrestrial ecology

11.1. NRW PS agree that effects of the proposed development on Terrestrial ecology are scoped into the assessment and agree with the key impact pathways of the development on terrestrial features identified within the Scoping Report (section 5.8.2 and 5.8.3). We agree as detailed in section 5.8.4 that a further habitat survey will be required to determine the likelihood of protected species being present and affected by the proposal.

11.2. NRW A advise that a seasonal bat activity survey using static bat detectors should be carried out, noting that nearby developments have confirmed flight lines for a number of species of Greater and Lesser Horseshoe bats. Should bats be identified they should be considered in respect of the relevant SAC where these species are features. In addition NRW A recommend that trees are subject to a bat assessment via a preliminary ground level roost assessment, with further surveys required if potential for supporting bats are identified. We would strongly recommend that you engage with NRW A as you develop the detailed survey and assessment methodology.

11.3. NRW A advise that an updated otter survey is required to inform the EIA. Should evidence be found, an assessment of the potential impact of the scheme on otter breeding sites and/or resting places as appropriate and on their ability to commute through the site should be carried out.

11.4. Should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium and long term together

with any mitigation and compensation measures proposed to offset the impacts identified.

- 11.5. NRW A advise that where the potential for significant impacts on protected species is identified, a Conservation Plan should be prepared for the relevant species and included as an Annex to the ES.
- 11.6. Where the survey identifies relevant species, NRW A advise that the EIA sets out measures to ensure that flight corridors for bats, or movement routes for otter are unaffected by artificial light.
- 11.7. We advise that where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW further details are available on the species licensing webpage (<https://naturalresources.wales/permits-and-permissions/species-licensing/?lang=en>). Where this is the case, the ES should include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).
- 11.8. We would recommend that you engage with NRW A and the Local Authority Ecologist to ensure that regional and local biodiversity issues are adequately considered within the Environmental Assessment; in particular, those habitats and species listed in the relevant Local Biodiversity Action Plan, and are considered important for the conservation of biological diversity in Wales.
- 11.9. Additionally, NRW PS would expect relevant organisations to be contacted for biological information and records relevant to the site and its surrounds. These may include the relevant Local Records Centre and any local ecological interest groups (e.g. bat groups, mammal groups).

12. Commercial and recreational navigation

- 12.1. NRW PS agree that effects of the proposed development on Commercial and Recreational Navigation are scoped into the assessment and agree with the key impact pathways of the development on terrestrial features identified within the Scoping report (section 5.9.2 and 5.9.3).
- 12.2. The MCA have confirmed the site falls within the jurisdiction of a Statutory Harbour Authority, in this case MHPA, who are therefore responsible for maintaining the safety of navigation.
- 12.3. MCA would like to ensure that the applicant is aware of the Port Marine Safety Code (PMSC) and its Guide to Good Practice. In particular (from section 7-conservancy) that a harbour authority has a duty to conserve the harbour so it is fit for use as a port and the duty of reasonable care to ensure that the harbour is in a suitable condition to allow a vessel to use it safely.
- 12.4. The MCA welcomes the inclusion of a navigational study to inform the effects of increased vessel traffic with the assessment and would expect the Navigational Risk Assessment (NRA) to be undertaken in accordance to the Port Marine Safety Code and its associated Guide to Good Practice. The NRA should then be used to

inform the assessment of significance for each impact pathway identified for the Project.

12.5. In line with advice from the MCA, NRW PS would not expect any impact pathways to be scoped out of the impact assessment with regards to shipping and navigation pending the outcome of the NRA.

12.6. To ensure local stakeholder input, the MCA have recommended a hazard identification workshop to be held to bring together relevant navigational stakeholders for the area to discuss the potential impacts on navigational safety. Decisions relating to further controls should be agreed in consultation with other interested parties to determine whether the ALARP status has been met for each risk within the NRA.

13. Traffic and Transport

13.1. No specific comments were received on Traffic and Transport. The ES should include an assessment of the impacts as set out in the Scoping Report.

14. Noise and vibration

14.1. No comments were received from consultees in relation to airborne noise and vibration and we have no comment to make on this section of the Report. The ES should however include an assessment of impacts on airborne noise and vibration, as set out in the Scoping Report.

15. Air quality

15.1. NRW PS agree that effects of the proposed development on Air quality are scoped into the assessment and generally agree with the key impact pathways of the development identified within the Scoping Report (section 5.12.2 and 5.9.3).

15.2. NRW A are generally in agreement with the proposed approach for the works and impacts scoped in to the assessment. However, for ecological receptors, the published guidance in relation to screening distances for habitat site should be followed.

15.3. If generators are to be used as a power source during the Operational Phase of the Project then NRW A have recommended that a quantitative assessment in-line with current guidance should be carried out, in addition, consideration should be given to the Medium Combustion Plant (MCP) regulations and whether they are relevant in this specific case.

16. Archaeology and cultural heritage

16.1. NRW PS are in agreement with the proposed approach for archaeology and cultural heritage. NRW PS also advise that the significance of the maritime heritage of the Milford Haven Waterway is recognised in its registration as a landscape of outstanding historic importance in Wales. NRW PS are also in agreement that the ongoing consultation with Cadw, Royal Commission for Ancient and Historic

Monuments Wales (RCAHMW) and Dyfed Archaeology Trust to inform the surveys, methodologies and assessment is required.

17. Landscape/seascape

- 17.1. NRW PS disagree that visual receptors alone should be scoped in to the ES, following advice received from NRW A we consider that at this stage it is not possible to scope out impacts on landscape and seascape receptors. There is a potential for impacts from the Project on the landscape/seascape character and visual amenity of the Pembrokeshire Coast National Park (PCNP). At its closest point, the site is 2.5km from the PCNP. Although outside of the PCNP, the site is located on and alongside the Dyfrffordd Aberdaugleddau (Milford Haven Waterway) which forms the setting to parts of the PCNP. The statutory duty to have regard to National Park purposes applies in relation to all activities affecting National Parks, whether those activities lie within, or in the setting of, the designated areas. Additionally at this stage, detailed information on the dimensions of the Project have not been provided, NRW A anticipate that the development may be used to assemble WTGs with a maximum tip height of 270m. This is the height of WTGs for the consented Erebus floating offshore wind turbine development. NRW A advised that due to the scale of the WTG structures, their visual impact will be distinct from existing port activities and they have the potential to impact on both visual receptors (people) and the character of the local and wider landscape/seascape. Considering the above, NRW PS conclude that at this stage it is not possible to scope out impacts on landscape and seascape.
- 17.2. NRW PS would request a precise study area is identified for the Landscape and Visual Impact Assessment (LVIA). We would direct you to NRW Guidance Note 46 (available via [Natural Resources Wales / Using LANDMAP in Landscape and Visual Impact Assessments GN46](#) which includes guidance on identifying study areas. The LVIA study area should be documented on all supporting plans and/or Figures within the ES.
- 17.3. The Scoping Report lists locations at which the proposed development will likely be visible (5.14.1). NRW A consider that a zone of theoretical visibility analysis (ZTV) should be prepared to confirm the extent of visibility for different aspects of the proposed development and whether they will be visible from within the PCNP. ZTVs should be prepared for the proposed crane and separately for the maximum anticipated height of assembled WTGs. The ZTVs should inform the identification of the study area for the LVIA.

18. Socio-economics

- 18.1. No specific comments were received on socio-economics. The ES should include an assessment of the impacts as set out in the Scoping Report.

19. Cumulative impacts and in-combination effects

19.1. The ES must include an assessment of cumulative and in-combination effects.

19.2. NRW PS note the intention to initially consider all topics within the cumulative effects assessment (CEA) and for the approach and scope to be agreed with NRW in advance. NRW A advise that during the operational phase of the development, assembled turbines may have a temporary cumulative impact in combination with existing wind turbine developments surrounding the Milford Haven Waterway. These existing developments and any in planning or consented should be identified as part of CEA scoping.

19.3. THE CEA should also take into consideration all the nature conservation receptor specific comments.

19.4. Additionally, the following data sources may provide useful information on other projects for the CEA:

- The Nationally Significant Infrastructure Projects register:
<https://infrastructure.planninginspectorate.gov.uk/projects/register-of-applications/>
- The Developments of National Significance Register:
<http://gov.wales/docs/desh/publications/180312-dns-register-en.pdf>
- Planning Policy e.g. Local Development Plans, Transport Plans (National and Local) and National Policy Statements.
- An up to date list of marine licensable developments can be found at the following link:
<http://lle.gov.wales/catalogue/item/MarineLicences>

Yours sincerely

Seran Davies

Marine Licensing Team
Natural Resources Wales

Approved by:



Dr. Emmer Litt - Marine Licensing Team Leader

Natural Resources Wales

Cc: All Consultation Bodies