Method Statement Template

This template is intended to be used in conjunction with a Band 1 Marine Licence application. Please complete each section below following the guidance provided (max 500 words per section). For any queries relating to this template please contact: marinelicensing@cyfoethnaturiolcymru.gov.uk

1. Summary

Please provide a brief summary of the application including location of the works (coordinates - lat/long, decimal degrees). For activities that cover a large area please provide coordinates of the approximate extent of works.

INTRODUCTION

The Llŷr Project holds an existing Band 1 Licence (Ref: RML 2267). This method statement therefore considers the addition of an additional survey area which is proposed to be included as part of the Llŷr Project. This additional survey area (Additional Offshore Survey Area; Figure 1) is approximately 10 km^2 and is proposed to enhance the mapping of sensitive seabed habitats, particularly reefs, in the nearshore areas and inform the final micrositing and route selection.

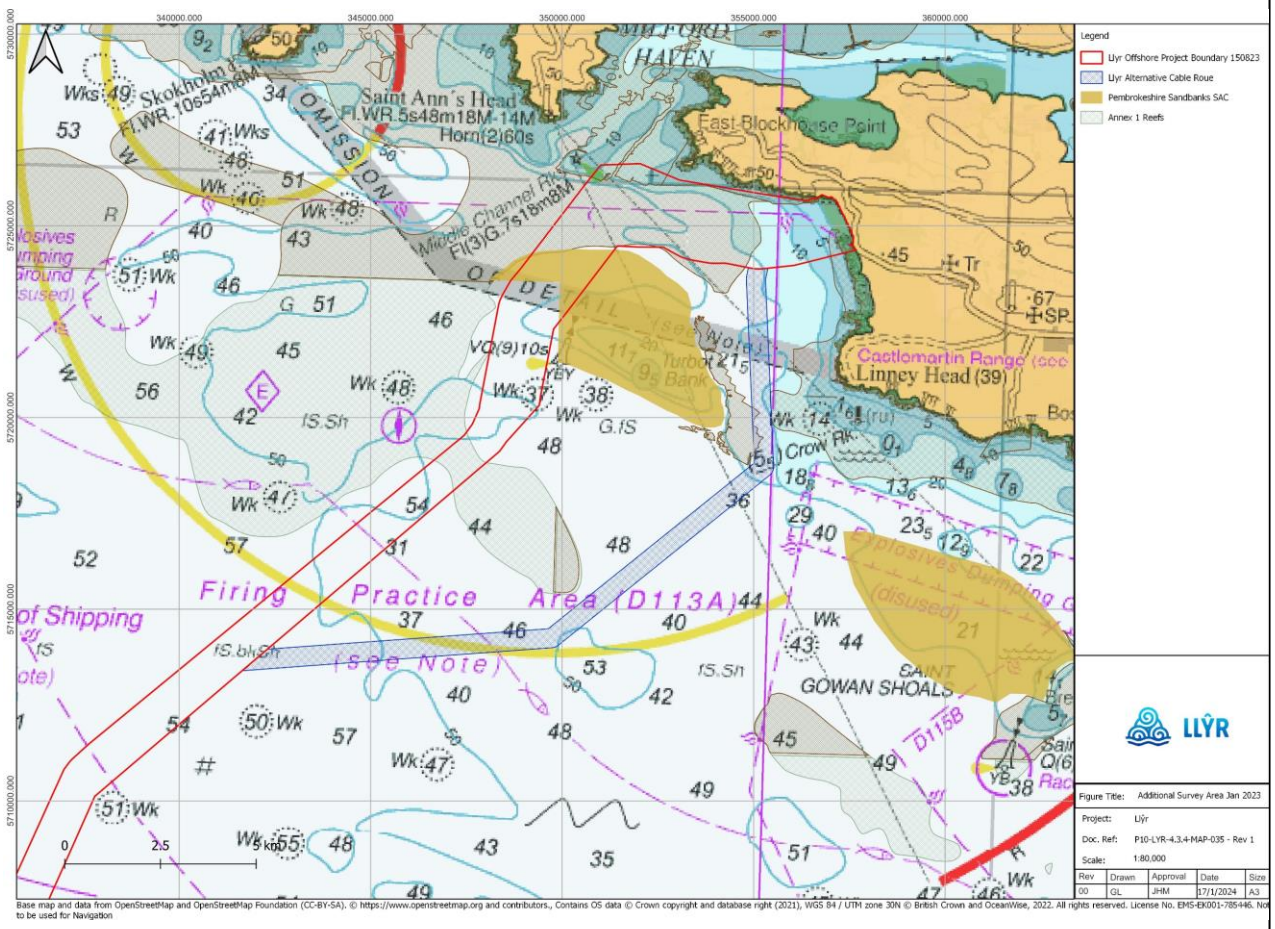
The proposed works in the Additional Offshore Survey Area include benthic ecology surveys for the nearshore area of the Llŷr offshore demonstration projects; two 100 MW sites located in the Celtic Sea approx. 27 km off the Pembrokeshire coast.

The proposed works are collection of sediment grab samples in the nearshore subtidal region of the potential export cable routes.

The co-ordinates of the survey area are as follows (a shape file also included in the application package):

ID	WGS84 latitude and longitude (Decimal)	
	Lat	Long
1	-5.27471	51.55463
2	-5.16925	51.5614
3	-5.09348	51.60167
4	-5.09846	51.6447
5	-5.0978	51.64742
6	-5.09469	51.64718
7	-5.09037	51.64742
8	-5.09122	51.64474
9	-5.08615	51.60086
10	-5.08668	51.59952
11	-5.08741	51.59899
12	-5.16543	51.55753
13	-5.1674	51.557
14	-5.28395	51.54938

Figure 1 – Proposed Additional Offshore Survey Area*



A shapefile has been included with this application (Llyr_AltCableRoute_2711)

Summary of Work to be undertaken - Sediment Grab Samples for Benthic Ecology Analysis

Grab samples will be taken of the seabed to provide detail on the sediment itself and infauna (animals living within the substrate) which cannot be provided by the use of video and photography. There will be a maximum of 30 sample stations subject to grab sample (however, currently available information indicates it is most likely that around 10 stations will be sampled), using a grab sampler with an area sediment volume of 0.1m^2, with samples collected for analysis of particle size and fauna.

Grab samples will not be collected on hard substrates or at locations with sensitive habitats (e.g. mussel beds, *Sabellaria spinulosa* reefs or maerl beds); therefore, grab sampling will be preceded with drop-down video/camera work. Grabs will be collected at selected video/photo sites on sedimentary; data collected will therefore be complementary and allow biotope classification to include consideration of infaunal components. A sediment sub-sample will also be retained from the grab for Particle Size Analysis (PSA) with the remainder sieved for infaunal analysis. The benthic sediment sampling equipment does not generate significant levels of noise. Therefore, this technology does not require any further consideration with respect to potential injury or disturbance of protected species.

The offshore survey activities are scheduled to be undertaken sometime between 1st February 2024 and 31st May 2024. The additional survey is estimated to be completed within approximately 12 days (i.e. grab sampling and preliminary DDV) – including transit time for vessels.

The primary use for the collected data will be to characterise the site for the purposes of the EIA process.

2. Scope of works

Please provide a full description of all proposed works including:

- *Sequence of works (mobilisation, marine works, site remediation (if required))*
- *Estimated timing of works (duration, working hours, day/night, plus contingency)*
- *Plant, machinery or vessel required*
- *Estimated quantities (removals, deposits, construction materials)*

1. Sequence of works

Final sediment sampling locations shall be agreed prior to commencement of the work. The key objective will be to ensure that all of the potential surface sediment types identified during the geophysical survey are sampled adequately, and therefore locations along the cable route may not have to be every 1 km and more likely, closer to 4-5 km apart.

Analysis and reporting will be in accordance with standard European OSPAR specifications or recognised industry standards.

Care will be taken during location selection to ensure that the sample site is free from obstructions and prior to the grab deployment the sampling area must be ground truthed using a drop-down video/camera (DDV).

2. Estimated timing of works

The offshore survey activities are scheduled to be undertaken sometime between 1st February 2024 and 31st May 2024. The additional survey area is estimated to be completed within approximately 12 days (i.e. grab sampling and preliminary DDV) – including transit time for vessels.

3. Plant, machinery or vessels required

Vessels will be mobilised as required from an agreed mobilisation port depending on the Contractor. As noted above, the type and number of vessels required to complete the works will vary depending on parameters such as weather and water depth.

The contractors that will be employed to undertake the surveys have not been selected yet, and therefore exact details of the vessels to be used are not available. It is expected the survey will be undertaken by a single vessel and no more than two. The vessels detailed in the table below will be of a similar type and size that could be deployed and have been used as proxy vessels for the purposes of the Protected Species and Protected Sites Risk Assessment. The vessels detailed go up to the maximum size that could be provided by the contractors, thereby providing the worst-case scenario and offering maximum flexibility in the survey procurement process.

Example Vessels to be used during the survey programme

Example vessel / vehicle	Description
Surveys	
Multi-purpose vessel – both geophysical and geotechnical survey	Multi-purpose vessel which will typically have diesel-electric propulsion and a specially designed hull. Vessel will be suitable for geophysical and geotechnical survey operations up to 1000m water depth. Typical length is expected to be 54 m, beam 12.5m, deck area is 250 m^2 and the draught 3 m.
Nearshore environmental vessel	A nearshore environmental vessel will be designed for survey operations in shallow to medium water depths.

4. Estimated quantities

Up to 30 sample stations (most likely 10 stations) of 0.1 m^2 and samples collected will be suitable for PSA and faunal analysis. The sample volume will be a maximum of around 20 L and so the total sample volume across all samples will not exceed 4 cubic metres.

3. Access and working areas

Please provide details of access to the site and working areas. This should include:

- *Attached map of the access/egress route and working areas (annotated aerial image and/or OS map)*
- *Predicted plant/vehicle movements*
- *Storage areas for plant, equipment and materials (if required)*
- *Risks to navigation*

An admiralty map showing Additional Offshore Survey Area boundary is provided as an attachment to this application.

Vessel presence is expected for up to 12 days – including transit time for vessels.

No storage areas for plant, equipment and/or materials necessary for the proposed works.

Floventis have carried out consultation with the RCAHMW, Trinity House, the MCA and the Milford Haven Port Authority – notes of the consultation are provided as an attachment to this application.

The proposed works pose the following risks to navigation:

- Impacts on vessel navigation routes;
- Interference of project vessels with commercial and recreational vessels;
- Impacts to navigational safety;
- Collision risk with other marine users, passing vessels and project devices and infrastructure.

To avoid navigational risk, the following measures will be followed (as per MCA correspondence):

- All relevant maritime safety legislation is followed.
- Issue local notifications to marine users, including fisherman's organisations, relevant authorities and other local stakeholders, to ensure that they are made fully aware of the activity at least five days before commencement.
- HM Coastguard is notified in advance via zone26@hmcg.gov.uk

To de-conflict with live firing exercises taking place within the Firing Practice Areas, careful management and co-ordination with Castlemartin Firing range will be undertaken (as per Milford Haven Port Authority correspondence).

Prior to the activity being undertaken, appropriate Notices to Mariners (NtM's) will be issued a minimum of 5 days prior to mobilisation through Kingfisher by the appointed contractor and the vessel crew and survey team will, at all times, be mindful of any fishing interests during the survey activity, particularly fixed gear and where appropriate, put in place measures to minimise and/or avoid interaction.

4. Environmental mitigation

Please list appropriate mitigation measures to minimise impacts on the marine environment these may include:

- *Pollution prevention and control procedure (guidance available at: http://www.netregs.org.uk/media/1304/gpp-5-works-and-maintenance-in-or-near-water.pdf)*
- *Spill response kits*
- *Minimise plant traffic*
- *Designated access and egress routes*
- *Storage of materials (fuel, chemicals, construction waste)*
- *Biosecurity (guidance available at http://www.snh.gov.uk/docs/A1294630.pdf)*

Note: To assist you, the following mitigation statements will be used as conditions within the licence. By signing this method statement you will be agreeing to adhere to these restrictions. If you are unable to do this, the application will not qualify as Band 1.

- ✓ All equipment, temporary structures, access tracks, waste and/or debris associated with the works will be removed on completion of the works.
- ✓ Bunding, storage facilities and spill kits will be employed to contain and prevent the release of fuel, oils and chemicals associated with the plant, refuelling and construction equipment into the marine environment.
- ✓ Plant, vehicles and machinery will not be refuelled on the foreshore.
- ✓ Coatings and treatments will be suitable for use in the marine environment and are used in accordance with best environmental practice.
- ✓ All equipment, materials, machinery and PPE used will be in a clean condition prior to their arrival on site, and upon removal from site, to minimise risk of introducing non-native species into the marine environment.
- ✓ In the event of removal of any sensitive species or habitat designated by NRW under Schedule 7 of the Environment (Wales) Act 2016, no further removals will occur at that location or within 20m of that location.

Please list your bespoke mitigations here:

- NtM's will be issued through the Kingfisher service prior to commencement of works.
- Care shall be taken to ensure that the Additional Offshore Survey Area is free from obstructions and prior to the grab deployment, the sampling area will be ground truthed using a drop-down video (DDV).
- NRW guidance will be incorporated into the final survey including the following guidance documents:
  - Natural Resources Wales. (2019). GN030d Benthic habitat assessment guidance for marine developments and activities: A guide to characterising and monitoring *Sabellaria* reefs. Natural Resources Wales, Bangor; and
  - Natural Resources Wales. 2019. GN030c Benthic habitat assessment guidance for marine developments and activities: A guide to characterising and monitoring horse mussel *Modiolus modiolus* reefs. Natural Resources Wales, Bangor.
- Potential sensitive habitats identified during the survey will be investigated using high-resolution video or stills photography and the extent of any habitats or features identified will be mapped. All sediment types identified by the geophysical data acquisition will be ground-truthed during the habitat assessment survey.

- Any potential features of cultural/heritage importance (e.g. wrecks) will be investigated. Consideration

will be given to the location of known wrecks within/adjacent to the additional survey area off Freshwater West, which are well charted/located by the UKHO.

- To avoid navigational risk, the following measures will be followed (as per MCA correspondence):
  - All relevant maritime safety legislation is followed.
  - Issue local notifications to marine users, including fisherman's organisations, relevant authorities and other local stakeholders, to ensure that they are made fully aware of the activity at least five days before commencement.
  - HM Coastguard is notified in advance via zone26@hmcg.gov.uk

- Liaison with Castlemartin Firing Range prior to works commencing will be undertaken to de-conflict any live firing exercises.

5. Additional Information

Please list any additional information that may help with the application:

- *Consents/permissions required*
- *List of plans or drawings attached to method statement*
- *Emergency procedures*
- *Contact details*

Applications for the following consents/permissions have been submitted:

- Seabed survey license (SSL) amendment to The Crown Estate (TCE) for an additional survey area December in 2023 (Ref: FLOW_LLYR_02) which is being considered at the moment..

The following attachments are also provided as part of this application for the Llŷr survey Marine License application:

- Llŷr Floating Offshore Wind Project – MCA Consultation
- Llŷr Floating Offshore Wind Project – Trinity House Consultation
- Llŷr Floating Offshore Wind Project – Feedback from RCAHMW
- Llŷr Floating Offshore Wind Project – Feedback from the Milford Haven Port Authority
- The Llŷr Floating Offshore Wind Additional Offshore Survey Area Map
- The Llŷr Floating Offshore Wind Additional Offshore Survey Area GIS shapefiles

Mitigation measures proposed by MCA, Trinity House and RCAHMW will be followed.

Emergency Procedures

- The contracted survey company crew will be assigned emergency duties and muster points stipulated on the vessels muster list.
- The contracted survey company will issue a survey specific Emergency Response Plan that will be reviewed and approved by Floventis prior to mobilisation.
- All crew will receive a safety induction within 24 hours of arrival onboard.
- Regular muster drills shall be undertaken during operations and in port. Safety drills shall be programmed to ensure practice in a variety of potential emergency response procedures.

Additional Contact Details

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6. Customer details

Signature: Jay Hilton-Miller

Digitally signed by Jay Hilton-Miller
Date: 2024.01.18 11:40:56 -05'00'

Full name: Jay Hilton-Miller

Organisation name (where appropriate): Cierco Energy

Contact email: jay.hilton-miller@ciercoenergy.com

Contact phone number: + 44 (0) 7568 114449