



LLYR

LLYR FLOATING OFFSHORE WIND PROJECT

Llyr Floating Offshore Windfarm

Environmental Statement

Volume 6: Appendix 5C – Scoping Opinion Response

August 2024



Document Status

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Acronyms and abbreviations

Acronym or Abbreviation	Definition	Acronym or Abbreviation	Definition
1SD	1 Standard Deviation	MOD	Ministry of Defence
AEOSI	Adverse Effect on Site Integrity	MPA	Marine Protected Area
AIS	Automatic Identification System	MU	Management Unit
ASIDOHL	A discussion on the proposed methodology	NFFO	National Federation of Fishermen's Organisations
CEA	Cumulative Effects Assessment	nm	Nautical mile
CEFAS	Centre for Environment, Fisheries and Aquaculture Science	NPS	National Policy Statement
CEMP	Construction Environmental Management Plan	NRA	Navigation Risk Assessment
CIEEM	Chartered Institute of Ecology and Environmental Management	NRW	Natural Resources Wales
DAS	Digital Aerial Surveys	OCSW	Offshore Channel, Celtic Sea and South West England
DBA	Desk Based Analysis	PCC	Pembrokeshire County Council
Ecia	Ecological Impact Assessment	PCNPA	Pembrokeshire Coast National Park Authority
EIA	Environmental Impact Assessment	PEXA	Practice and Exercise Area
EMF	Electromagnetic Field	RIAA	Report to Inform Appropriate Assessment
EPS	European Protected Species	SAC	Special Areas of Conservation
ES	Environmental Statement	SAR	Search and Rescue
FCA	Flood Consequence Analysis	SCANS	Small Cetaceans in European Atlantic waters and the North Sea
FLOW	Floating Offshore Wind	SLVIA	Seascape, Landscape and Visual Impact Assessment
GIS	Geographic Information System	SPA	Special Protection Area
HDD	Horizontal Direct Drilling	SSSI	Site of Special Scientific Interest
HRA	Habitat Regulations Assessment	TCE	The Crown Estate
IAMMWG	Inter-Agency Marine Mammal Working Group	TWT	The Wildlife Trusts
IMO	International Maritime Organisation	UK	United Kingdom
JNCC	Joint Nature Conservation Committee	UKMPS	United Kingdom Marine Policy Statement
km	Kilometres	UXO	Unexploded Ordnance
kV	Kilovolts	VHF	Very High Frequency

Acronym or Abbreviation	Definition	Acronym or Abbreviation	Definition
LANDMAP	A Wales GIS based landscape resource	WFD	Water Framework Directive
LCRM	Land contamination risk management	WLGA	Welsh Local Government Association
LSE	Likely Significant Effects	WNMP	Welsh National Marine Plan
MCA	Maritime and Coastguard Agency	WSI	Written Scheme of Investigation
MGN	Marine Guidance Notes	WTSWW	Wildlife Trust of South and West Wales
MMMU	Marine Mammal Management Units	ZOI	Zone of Influence

Glossary of project terms

Term	Definition
The Applicant	The developer of the Project, Llŷr Floating Wind Limited.
Array	All wind turbine generators, inter array cables, mooring lines, floating sub-structures and supporting subsea infrastructure within the Array Area, as defined, when considered collectively, excluding the offshore export cable(s).
Array Area	The area within which the wind turbine generators, inter array cables, mooring lines, floating sub-structures and supporting subsea infrastructure will be located
Floventis Energy	A joint venture company between Cierco Ltd and SBM Offshore Ltd of which Llŷr Floating Wind Limited is a wholly owned subsidiary.
Landfall	The location where the offshore export cable(s) from the Array Area, as defined, are brought onshore and connected to the onshore export cables (as defined) via the transition joint bays (TJB).
Llŷr 1	The proposed Project, for which the Applicant is applying for Section 36 and Marine Licence consents. Including all offshore and onshore infrastructure and activities, and all project phases.
Marine Licence	A licence required under the Marine and Coastal Access Act 2009 for marine works which is administered by Natural Resources Wales (NRW) Marine Licensing Team (MLT) on behalf of the Welsh Ministers.
Offshore Development Area	The footprint of the offshore infrastructure and associated temporary works, comprised of the Array Area and the Offshore Export Cable Corridor, as defined, that forms the offshore boundary for the S36 Consent and Marine Licence application
Offshore Export Cable	The cable(s) that transmit electricity produced by the WTGs to landfall.

Term	Definition
Offshore Export Cable Corridor (OfECC)	The area within which the offshore export cable circuit(s) will be located, from the Array Area to the Landfall.
Onshore Development Area	The footprint of the onshore infrastructure and associated temporary works, comprised of the Onshore Export Cable Corridor and the Onshore Substation, as defined, and including new access routes and visibility splays, that forms the onshore boundary for the planning application.
Onshore Export Cable(s)	The cable(s) that transmit electricity from the landfall to the onshore substation
Onshore Export Cable Corridor (OnECC)	The area within which the onshore export cable circuit(s) will be located.
Proposed Project	All aspects of the Llŷr development (i.e. the onshore and offshore components).
Onshore Substation	Located within the Onshore Development Area, converts high voltage generated electricity into low voltage electricity that can be used for the grid and domestic consumption.
Section 36 consent	Consent to construct and operate an offshore generating station, under Section 36 (S.36) of the Electricity Act 1989. This includes deemed planning permission for onshore works.

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5C. EIA Scoping Opinion Responses

1. **Table 5C-1** provides an overview of consultation feedback received from stakeholders on the Environmental Impact Assessment (EIA) Scoping Report, setting out how the response has been addressed in the Environmental Statement (ES) and signposting to the relevant section within the ES, as appropriate.

Table 5C-1 EIA Scoping Opinion responses

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-1	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.1	General	Marine and coastal guidance produced by NRW that will provide useful information to help with your project is available here: https://naturalresources.wales/guidance-and-advice/businesssectors/marine/?lang=en	All marine and coastal guidance was used during the compilation of relevant chapters of the ES.	ES Volume 3 (Chapters 17 to 28).
NRW MLT-2	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.2	General	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.	The ES addresses the points raised in the Scoping Opinion with a summary of comments raised and how they are addressed provided in this appendix.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31). ES Volume 6 Appendix 5C: EIA Scoping Opinion Responses
NRW MLT-3	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.3	General	The EIA must be undertaken by a competent person and the ES must include a competent expert statement.	The EIA has been undertaken by competent persons with a competent expert statement provided as an appendix.	ES Volume 6 Appendix 1A: Statement of Competence.

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-4	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.4	General	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.	Environmental assessments have been coordinated in accordance with the EIA process. HRA and WFD assessments have been conducted separate to the EIA process and are provided in appendices.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31). ES Volume 6 Appendix 8D and 8E. ES Volume 6 Appendix 10C and 10D.
NRW MLT-5	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.5	General	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.	The ES presents the necessary evidence on potential environmental impacts and appropriate mitigation measures within the technical chapters.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-6	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.6	General	<p>The ES must include:</p> <ul style="list-style-type: none"> • 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. 	<p>The ES includes a NTS, relevant mapping, description of the likely significant effects, description of the assessment methodology, description of mitigation measures, and description of significant adverse effects.</p>	<p>Non-Technical Summary</p> <p>Volume 5 Figures</p> <p>Volume 1 Chapter 5: EIA Approach and Methodology</p> <p>Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).</p> <p>Volume 4 Chapter 32: Residual Effects</p>
NRW MLT-7	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.7	General	<p>The ES must consider any potential transboundary impacts where appropriate.</p>	<p>The transboundary impacts of the proposed Project were assessed for receptors in all chapters of the ES.</p>	<p>Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-8	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.8	General	Early engagement with relevant stakeholders is encouraged. You are able to obtain further advice from NRW TE through the NRW Discretionary Advice Service, please see here: https://naturalresources.wales/guidance-and-advice/businesssectors/planning-and-development/advice-for-developers/our-service-to-developers/ (NRW 5/7/22).	NRW TE has been engaged with through the consenting and EIA process.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-9	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.9	General	We would encourage you to engage with the appropriate SNCBs for advice on nature conservation matters within their specific statutory responsibilities: JNCC for offshore (beyond 12nm) and NRW TE for territorial limit (onshore to 12nm).	Both the JNCC and NRW TE have been consulted for all relevant chapters of the ES.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-10	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.10	General	We request that clarification is provided in all future documentation as to whether potential impacts will occur within territorial or offshore waters (within or beyond 12nm) . This should include the provision of the 12nm boundary on all maps produced to support the application.	Clarification has been provided in the ES as to whether potential impacts will occur within territorial or offshore waters. The 12nm shapefile has now been included as appropriate to ES mapping.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-11	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.11	General	The UK left the EU on 31 January 2020 – all legal obligations relating to compliance with environmental licences/permits and legislation will continue to apply. NRW on behalf of Welsh Ministers will continue to issue licenses in line with our current practice	Legal obligations relating to compliance with environmental licences/permits and legislation follow the UK's exit of the EU have been adhered to.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-12	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.12	General	You must ensure that reference is made to and consideration of compliance with the UK Marine Policy Statement and the Welsh National Marine Plan and its associated policies within the submitted ES, alongside any further regional planning documentation. The published Welsh National Marine Plan (WNMP) can be found here: https://gov.wales/welsh-national-marine-plan-document . Implementation guidance for the Welsh National Marine Plan can also be found here: https://gov.wales/welsh-national-marine-plan-implementation-guidance .	Reference is made to the UK Marine Policy Statement and the Welsh National Marine Plan and its associated policies within the submitted ES, alongside any further regional planning documentation. These have been considered within all relevant chapters of the ES.	ES Volume 3 (Chapters 17 to 28)
NRW MLT-13	Natural Resources Wales Marine	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.13	General	The use of the title “Likely Significant Effects” in the report is confusing. Potential impact pathways to be considered in the EIA seem to be	ES chapters do not use the term 'Likely Significant Effects'. The use of 'Likely Significant Effects' has only been used	Technical chapters within the ES Volumes 2 to 4 (Chapters 7

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Licensing Team			confused with the term likely significant effect which has significant meaning in the HRA process.	when describing denoting significance within the HRA.	to 31). ES Volume 6 Appendix 8D and 8E
NRW MLT-14	Natural Resources Wales Marine Licensing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.14	General	NRW TE would encourage you to use the NRW guidance that has previously been provided to inform project-level considerations and assessments (included in NRW TE email of 30 March 2022).	NRW guidance noted in the NRW TE email of 30 March 2022 has been followed to inform project-level considerations and assessments.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-15	Natural Resources Wales Marine Licensing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.15	General	NRW TE advises you to ensure all permits/consents/licences relevant to the proposed project are secured. Upon receipt of detailed survey information, NRW TE will be able to provide advice on the risk of the proposal to protected species, and whether any European Protected Species (EPS) licences are required.	NRW has been engaged throughout consenting process regarding EPS licenses. Survey information and assessments for terrestrial ecological receptors is provided within the ES.	ES Volume 2 Chapter 8: Terrestrial Ecology ES Volume 3 Chapter 19 to 22 ES Volume 6 Appendix 8B: Preliminary Ecological Appraisal

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-16	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.16	General	<p>PC NPA reminds you that policy SOC_06 Designated landscapes (WNMP) requires proposals to demonstrate how potential impacts on the purposes and special qualities for which National Parks have been designated have been taken into consideration. These should, in order of preference:</p> <ul style="list-style-type: none"> • avoid adverse impacts on designated landscapes; and/or • minimise impacts where they cannot be avoided; and/or • mitigate impacts where they cannot be minimised. The policy also states that opportunities to enhance designated landscapes are encouraged. Special qualities of Pembrokeshire Coast National Park include seascape, landscape, biodiversity, tranquillity, and wildness. Were the development to proceed, Pembrokeshire Coast National Park Authority would anticipate that there would be residual adverse impacts, in which case mitigation would be required. 	The ES has demonstrates how potential impacts on the purposes and special qualities of PCNP have been considered in accordance with policy SOC_06. The ES identifies potential enhancements and mitigation measures, where possible.	<p>ES Volume 2 Chapter 7: Landscape and Visual</p> <p>ES Volume 3 Chapter 23: Seascape, Landscape and Visual</p> <p>ES Volume 6 Appendixes 7B and 23C</p>

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NRW MLT-17	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 0.17	General	Concerns have been raised within the wider floating wind industry as to how the issue of wet storage areas is considered within the EIA (The fourth element of floating wind consents - PES - Power & Energy Solution). Fully constructed floating turbines or those awaiting/needing service could require storage adjacent to the coast or in port areas before being towed out to site (expected to be done in batches during good weather conditions). These wet storage areas will need to be adequately assessed in terms of impacts on birds, visual impacts, navigational risks, etc. Moreover, since there are currently no ports with the capacity for constructing and servicing these types of turbines, these might be floated from/to far away increasing the risk of spreading INNS, collision, and transboundary impacts. These risks should be considered, if necessary, in the EIA process.	The impact of wet storage areas in relevant chapters of the ES.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-18	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.1	Introduction	No comments were received on this topic.	Noted.	n/a

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-19	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.2	Regulatory and Planning Policy Context	No comments were received on this topic.	Noted.	n/a
NRW MLT-20	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.3	Site Selection	No comments were received on this topic.	Noted.	n/a
NRW MLT-21	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.4	Description of the Project	We would encourage you to engage early with relevant stakeholders to identify locations of minimal impact to decide on the export cable route and grid connection.	Engagement with relevant stakeholders has taken place to identify locations of minimal impact for the export cable route and grid connection.	ES Volume 1 Chapter 3: Alternatives ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 1 Chapter 6: Consultations and Stakeholder Engagement

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-22	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.5	Description of the Project	The PCC LPA highlights that the number of projects that would all involve the delivery west-east cable routes (within a relatively wide “development corridor”) across the Angle Peninsula and significant infrastructure near Pembroke Power Station (sub or converter stations for each project) would result in an extended impact timeframe during construction. The PCC encourage you to work with these other projects to minimise the combined duration of these works.	Cumulative effects have been assessed as part of the ES, including all additional developments identified through the EIA Scoping process. An updated methodology and scope for the cumulative effects assessment are set out in ES. Recommended projects have been added to the CEA long list for consideration as part of each cumulative effects assessments, undertaken in the different topic chapters.	ES Volume 1 Chapter 5: EIA Approach and Methodology Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31). Volume 6 Appendix 5A: Cumulative Effects Approach
NRW MLT-23	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.6	Description of the Project	JNCC note that in Section 4.2.5 Electricity Export Cable it states that there will be “up to two 132 kV cables per project”. Section 4.2.5 then goes on to state that “the two cables for the projects will be laid in separate trenches with a cable separation of around 50m”. It is unclear to JNCC whether this applies to a scenario where each project requires one or two 132 kV cables. We would request clarity on this matter.	The Project includes two 132 kV offshore export cables. Further descriptions and engineering parameters and of the offshore export cable is provided in the ES.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-24	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.7	Description of the Project	JNCC encourages you to minimise the amount of scour/rock protection required, acknowledging that the quantities are still unknown. The introduction of hard substrate into a mainly sedimentary environment is undesirable although it is not necessarily considered as having a significant impact in this point. JNCC note that the long-term effect of the introduction of substratum into naturally sandy or muddy seabed is not fully understood at present and should be carefully considered by the regulators. Where stabilisation material cannot be avoided, JNCC recommend using a more targeted placement method e.g., fall pipe vessel rather than using vessel side discharge methods.	Further descriptions and engineering parameters and of the offshore export cable is provided in the ES.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-25	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.8	Description of the Project	<p>In conjunction with the information to be gathered on the proposed offshore array and export cable corridor through survey work, JNCC highlight that it would be helpful to have details on the following technical aspects relating to the installation and operation of the Project:</p> <ul style="list-style-type: none"> • Footprint of area affected by laying of the export cables; • Footprint of area affected by export cable protection; • Footprint of area affected by inter-array electrical cables; • Footprint of area affected by inter-array cable protection; • Estimation of electromagnetic fields (EMF) potentially arising from cables both at exterior of cables and at surface of seabed above buried cables; • Footprint of area affected by placement of drag embedment anchors; • Footprint of area affected by mooring lines; • Duration and rate of cable-laying; 	Detailed information regarding the Project footprint, durations, and number and types of vessels are included in the ES. EMF effects have been considered in Chapter 10 of the ES.	<p>ES Volume 1 Chapter 4: Description of the Proposed Project</p> <p>ES Volume 3 Chapter 10: Fish and Shellfish Ecology</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> • Number and types of vessels to be used in cable-laying operations; • Routes of vessels for cable works. 		
NRW MLT-26	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.9	Description of the Project	JNCC note that route clearance activities (Section 4.4.1.2) may include pre-sweeping of sandwaves and advise that modification/removal of sandwaves would result in temporary disturbance of the seabed and changes to patterns of sediment transport resulting in morphological change. JNCC would also like to highlight that any disturbed sediment resulting from these activities should be retained within the same sediment system.	Localised sandwave levelling may be required to ensure sufficiently deep burial of cables under the present-day position of larger bedforms, to reduce the risk of future cable exposure and so the potential requirement for cable protection to be installed. The potential impact of sandwave levelling on the local sediment transport environment, including the estimated timescale for sandwave recovery, is assessed.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-27	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.10	Description of the Project	JNCC indicates that any material disturbed through cable installation activities (section 4.4.1.4) such as ploughing or trenching should be maintained within the same sediment system, for example depositing the disturbed sediment up stream of the trenches to encourage natural backfill.	Localised sandwave levelling may be required to ensure sufficiently deep burial of cables under the present-day position of larger bedforms, to reduce the risk of future cable exposure and so the potential requirement for cable protection to be installed. The potential impact of sandwave levelling on the local sediment transport environment, including the estimated timescale for sandwave recovery, is assessed.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 3 Chapter 17: Physical Processes
NRW MLT-28	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.11	Description of the Project	NRW PS strongly advise that you engage early with SNCBs to review and refine the export cable route corridor and landfall options (4.2 and 4.3), to avoid and mitigate environmental impacts, through a clear site selection process. Of particular concern is the potential for the cable route to interact with sensitive features (Annex 1 habitats) of the Pembrokeshire Marine Special Area of Conservation (SAC). Clarity is required as to whether alternative cable routes have been considered as part of the process.	The potential for the cable route to interact with sensitive features of the Pembroke Marine SAC has been considered. The final cable route and alternatives are provided in the ES.	ES Volume 1 Chapter 3: Alternatives ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-29	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.12	Description of the Project	NRW TE advise that in addition to the key guidance materials cited, you also consider NRW's advice note for offshore cabling in assessment processes ("Sensitivity of marine ecology receptors to cabling activities in Wales" https://www.marinedataexchange.co.uk/details/1710/2019-natural-resources-wales-sensitivity-of-marine-ecology-receptors-to-cabling-activities-in-wales/summary). NRW TE recommends that The Crown Estate's Cable Route Protocol (https://www.thecrownestate.co.uk/media/3994/the-crown-estate-cableroute-identification-leasing-guidelines.pdf) is also referenced and considered as well as considerations highlighted within the relevant National Policy Statements (see point 3.1).	NRW's advice for offshore cabling has been considered in the ES.	ES Volume 1 Chapter 5: EIA Approach and Methodology Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-30	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.13	Description of the Project	NRW TE strongly encourage use of HDD where possible for the cable installation at landfall as the least environmentally damaging option, given the potential environmental impacts of trenching on conservation features.	The proposed Project is committed to the use of trenchless techniques at landfall.	ES Volume 1 Chapter 4: Description of the Proposed Project

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NRW MLT-31	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.14	Description of the Project	It is NRW TE's position that in the absence of understanding future environmental conditions, all decommissioning options are considered (section 4.4.2); including the complete removal of installed infrastructure. This includes not only the buried cable, but all cable protection measures employed over the course of the project. We endorse Natural England's advice on scour and cable protection (http://nepubprod.appspot.com/publication/5938793965420544) which recommends that for future projects requiring scour protection, developers consider solutions that produce minimal to no negative environmental impact to the seabed, and therefore can remain in place at the end of the project as evidence suggests this is the most cost effective and sustainable approach.	Decommissioning has been included where appropriate in the technical chapters within the ES.	ES Volume 1 Chapter 4: Description of the Proposed Project Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-32	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.15	Description of the Project	NRW TE advice that the ES should consider the maximum number of cable repairs (section 4.4.3.2) predicted to occur during the operation of the project as the worst-case scenario (Rochdale Envelope) to	A worst-case scenario assessment for the the maximum number of cable repairs expected during operation has been included in the ES.	ES Volume 1 Chapter 4: Description of the Proposed Project Technical

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				assess the potential impacts. This should include the potential for cable protection to be required following cable repairs.		chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-33	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.16	EIA Approach and Methodology	NRW recommend determining the landfall site and cable route before submission in order to inform the proposal further. We acknowledge the use of the Rochdale Envelope to assess worst case scenario but seek to encourage you to define the project as much as it is possible to avoid unnecessary delays.	The landfall site and cable route have been determined and assessed within the ES.	ES Volume 1 Chapter 4: Description of the Proposed Project Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-34	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.17	EIA Approach and Methodology	There is a requirement to assess the potential transboundary impacts on another country within the European Economic Area. The potential for transboundary impacts will need to be considered within project-level assessments.	Transboundary effects on other countries within the European Economic Area have been scoped in for marine mammals.	ES Volume 1 Chapter 5: EIA Approach and Methodology ES Volume 3 Chapter 21: Marine Mammals
NRW MLT-35	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.18	EIA Approach and Methodology	NRW TE generally agree with value/sensitivity and magnitude criteria applied on Table 5-1 to 5-4, however, the value/sensitivity category should be refined according to the level of protection of the feature, for example, under The	The value/sensitivity categories have been refined according to the protection of features in the ES.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Conservation of Habitats and Species Regulations 2017, Environment (Wales) Act 2016, or OSPAR Convention.		
NRW MLT-36	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.19	EIA Approach and Methodology	NRW TE points out that the Zone of Influence (Zoi) must be defined based on robust evidence and any protected site (HRA) or water body (WFD) where there are (a) direct effects (e.g. host the export cable corridor) or (b) there is a pathway for effect (e.g. biotic or migratory routes) must be adequately considered.	A suitable Zoi for each assessment has been defined within the ES, and relevant appendix for the HRA and WFD assessments. These take into account direct effects and potential pathways for effects.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31). ES Volume 6 Appendix 8D and 8E ES Volume 6 Appendix 10C and 10D
NRW MLT-37	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.20	EIA Approach and Methodology	In terms of mitigation, NRW TE points out that the proper process for consideration of mitigation in the context of the WFD, is to scope any potential effects in to the detailed assessment stage and then consider mitigation, once the impacts have been adequately defined.	The WFD assessment within the ES has been undertaken in line with published guidance.	ES Volume 6 Appendix 10B and 10C
NRW MLT-38	Natural Resources Wales Marine	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.21	Approach to the Environmental Statement	It is noted that in the scoping report 'Water Quality' is split by marine works and terrestrial works. NRW TE advise that in compiling the ES, marine	A separate chapter has been added to the ES for marine water and sediment quality.	ES Volume 3 Chapter 18: Marine Water

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Licensing Team			water quality falls under its own section.		and Sediment Quality
NRW MLT-39	Natural Resources Wales Marine Licensing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.22	Approach to the Environmental Statement	Clarity is sought with respect to how the WFD Assessment will be provided as part of the wider EIA package. Section 5.4.3 states that there will be a stand-alone WFD assessment; however, this is not included within the proposed structure of the ES (Section 6.1). Furthermore, WFD is discussed within Chapter 19, but not within the relevant elements Chapter 20 or 21. Since no scoping information specific to WFD has been provided, NRW TE advise that, where relevant, all potential impact pathways identified as part of the EIA process are transposed into the WFD Assessment. This assessment will need to be made in terms of potential project effects on the WFD quality elements at a water-body level and to identify potential pathways for effect between elements also (e.g., hydrodynamic changes may affect biological elements).	An onshore and offshore WFD assessment has been provided as appendices and incorporate all impacts on the various WFD quality elements. This includes fish, invasive species, water quality, morphology impacts on designated sites.	ES Volume 6 Appendix 10B and 10C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-40	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.23	Approach to the Environmental Statement	The RCAHMW indicates that the separation of the marine (Chapter 24) and intertidal zone (Chapter 9) is understandable from a purely geographical definition of the marine baseline lying at the low-water mark. However, the nature of the archaeological material likely to be located between high and low water has more in common with marine archaeology, than terrestrial archaeology. For the purpose of the EIA/ES, we would therefore recommend combining the intertidal elements with the marine elements, to give coverage from high water out, and leaving the terrestrial coverage (Chapter 9) to be purely concerned with historic assets above the high water mark.	The study area for the marine archaeology chapter (and all marine archaeological assessments undertaken in support of the Project) encompasses everything seaward of mean high water at the landfall location.	ES Volume 3 Chapter 24: Marine Archaeology
NRW MLT-41	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.24	Approach to the Environmental Statement	NRW TE advise that a revised structure for the ES is considered, as the structure as currently proposed is not considered facilitative to the reader. NRW TE are happy to work with you on this.	The ES has been appropriately restructured.	ES Volume 1 to 6

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-42	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.25	Approach to the Environmental Statement	Currently, insufficient information has been provided to assess the risk of the proposal against the protected site features (Section 6.4). Sufficient information will need to be provided at the point of submission. As reference of requirements, NRW TE highlights best practice included in NRW's species licensing website.	Chapter 8: Ecology and Biodiversity assesses impacts on protected species and has consulted NRW's species licensing website.	ES Volume 2 Chapter 8: Ecology and Biodiversity
NRW MLT-43	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.26	Approach to the Environmental Statement	NRW TE considers that by satisfying the requirements regarding the SACs, under the HRA, it is likely the requirements for the SSSIs will also be met. However, NRW TE refer you to NRW's Development works within sites of special scientific interest page on the website (https://naturalresources.wales/guidance-andadvice/business-sectors/planning-and-development/advice-fordevelopers/development-works-within-sites-of-special-scientific-interest/?lang=en).	Chapter 8: Ecology and Biodiversity assesses impacts on protected sites, including SACs and SSSIs.	ES Volume 2 Chapter 8: Ecology and Biodiversity ES Volume 6 Appendix 8D and 8E
NRW MLT-44	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 1.27	Approach to the Environmental Statement	NRW TE welcome the use of a Construction Environmental Management Plan (CEMP) and request the opportunity to review the document once produced. However,	The CEMP will include consideration of the GPP5. An outline version will be submitted with the planning application.	ES Volume 6 Appendix 4A: OCEMP

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				NRW TE advise you to refer to relevant Guidance for Pollution Prevention, including GPP5 Works and Maintenance in or near water.		
NRW MLT-45	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.1	Terrestrial	<p>NRW TE indicates that their advice is limited to the information available in the report presented; as the scoping report acknowledges that generally, insufficient information has yet been gathered on the project. Examples are:</p> <ul style="list-style-type: none"> • The detail of the proposed wind turbines, their floating pontoons, and the site layout, as these are still in the process of being tested. We will require this information, to assess the visual impact of the proposal, and to assess any impacts of the development on its proposed location. • A detailed method statement explaining how the project will be transported to its location. • Currently, it hasn't been decided how the cables will cross the land from the grid connection to the proposed wind farm. Three options are being considered, but the location will be agreed via an application through the grid. 	Detailed information regarding the Project has been included in the ES which provides maximum parameters of offshore and onshore infrastructure, site plan, and construction methodology. The final cable route has been assessed in the ES.	<p>ES Volume 1 Chapter 4: Description of the Proposed Project</p> <p>ES Volume 6 Appendix 3A: Cable Route Assessment</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-46	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.2	Terrestrial	NRW TE have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, NRW TE advise that further information is provided with respect to flood risk, protected sites, protected species, sea and landscape, and ground contamination.	Further information regarding flood risk, protected sites, seascape and landscape, and ground contamination has been provided within the ES to address concerns around these topics.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW MLT-47	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.3	Terrestrial	NRW TE notices that there is an error in the numbering of sections in Section 4.4.1.9 on page 49 and page 50 section 4.4.3.1. It is not clear whether there is a missing section that should be available for consideration.	This has been addressed within the ES.	ES Volume 1 Chapter 4: Description of the Proposed Project
NRW MLT-48	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.4	Terrestrial	As stated above, the PCC LPA stresses the large number of projects that would all involve the delivery west-east cable routes across the Angle Peninsula and Pembroke Power Station (sub or converter stations for each project). PCC LPA refers particularly to the Greenlink (under construction), Erebus (applications under the Electricity Act and Marine and Coastal Access Act awaiting determination), and Valorous (EIA Scoping request submitted to	Cumulative effects have been assessed as part of the ES, including all additional developments identified through the EIA Scoping process. An updated methodology and scope for the cumulative effects assessment are set out in ES. Recommended projects have been added to the CEA long list for consideration as part of each cumulative effects assessments, undertaken in the different topic chapters.	ES Volume 1 Chapter 5: EIA Approach and Methodology Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31). Volume 6 Appendix 5A:

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				NRW February 2021) projects. PCC indicates that has previously advised of the need for an integrated approach to delivery.		Cumulative Effects Approach
NRW MLT-49	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.5	SLVIA	The PC NPA indicates that the proposal has potential for adverse seascape, landscape, and visual impacts on the Pembrokeshire Coast National Park.	Further discussions to agree final list of viewpoints and visualisations were undertaken. No further response.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW MLT-50	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.6	SLVIA	PCC LPA considers that two visualisations are limited and one more viewpoint should be provided from Goldborough Road (Chapter 7).	Two viewpoints from Goldborough Road have been included in the ES. Visualisations have been provided for each of the onshore viewpoints, including photomontages from four locations.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						ES Volume 6 Appendix 7A to 7C
NRW MLT-51	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.7	SLVIA	NRW TE considers that NRW LANDMAP all-Wales evidence base should also be referred to with regard to the landfall, cable route and substation proposals. NRW has produced Guidance Note GN46 Using LANDMAP in Landscape and Visual Impact Assessment (https://naturalresources.wales/guidance-and-advice/business-ectors/planning-and-development/evidence-to-inform-developmentplanning/using-landmap-in-landscape-and-visual-impact-assessmentsgn46/?lang=en).	This guidance has been taken into account in the approach to the SLVIA. LANDMAP data has contributed to understanding of the baseline landscape character.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-52	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.8	SLVIA	<p>Account should be taken of NRW's evidence reports on Offshore Wind Development: Seascape and Visual Sensitivity to Offshore Windfarms in Wales: Strategic assessment and guidance (https://naturalresources.wales/evidence-anddata/research-and-reports/landscape-and-geodiversity-reports/publications-aboutlandscape-geology-soils-and-features-of-historic-interest/?lang=en).</p> <ul style="list-style-type: none"> • Stage 1. Ready Reckoner of visual effects related to turbine size (report 315); • Stage 2. Offshore windfarm siting and design guidelines in relation to seascapes (report 330); • Stage 3. Visual sensitivity of marine settings of Wales's Designated Landscapes to offshore windfarms (report 331) <p>These reports are principally focussed on the visual effects in relation to Designated Landscapes. Stage 1 includes buffers to avoid significant adverse effects on high sensitivity receptors. For 280m turbines, there is a 41.6km buffer for low magnitude of</p>	This strategic level guidance has been reviewed and considered as part of siting and design of the Project and in undertaking the SLVIA.	<p>ES Volume 1 Chapter 4: Description of the Proposed Project</p> <p>ES Volume 2 Chapter 7: Landscape and Visual</p> <p>ES Volume 3 Chapter 23: Seascape, Landscape and Visual</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				effect and a 28km buffer for medium magnitude of effect. Combined with high sensitivity, low magnitude of effect is likely to result in effects of moderate significance. Moderate effects can potentially be significant. For sites offshore from the Pembrokeshire Coast National Park between 22.6 and 44km distance, proposals are likely to be visible and adversely affect the special qualities including the setting, tranquillity and apparent wildness of the National Park.		
NRW MLT-53	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.9	SLVIA	NRW TE considers the Study Area defined as 45km from the outermost wind turbines (Section 7.3) to be acceptable and in line with agreed best practice guidance (SNH, 2017). The area includes parts of the Angle and Dale peninsulas and the Islands of Skokholm and Skomer. We understand that the project area and layout of the	The final study area for SLVIA is based on 45km radius from the outermost WTGs. The 3km study area around the onshore substation and 1km study area around the onshore cable route are covered within the ES.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				arrays would be defined in more detail in due course, which may affect the final Zone of Theoretical Visibility (ZTV). Furthermore, 3km Study Area for the onshore substation/control building and 1km Study Area for the onshore cable route have been defined and considered acceptable.		ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW MLT-54	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.10	SLVIA	NRW TE considers that Several Dark Sky Discovery Sites lie within the Study Area, including at Martins Haven and Kete, as such it is noted that aviation lighting is likely to be required on some/all of the wind turbine generators.	An assessment of potential visual effects resulting from aviation lighting on WTGs on all Dark Sky Discovery Sites within the Study Area has been provided in Appendix 23D and summarised in the SLVIA chapter.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 23D: Night-time visual assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-55	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.11	SLVIA	<p>The report states that a separate assessment of night-time landscape & visual effect or night-time visualisations is not proposed, but dark sky characteristics will be taken into account in sensitivity judgements and proposed lighting would be considered in the overall magnitude of change (Section 7.4.1). NRW TE disagrees and considers that a night-time assessment and visualisations is expected for a project of this nature, where dark sky sensitivities are a particular concern. There is also the potential for cumulative night-time effects with other offshore wind farms. Viewpoints for night-time assessment could include Martins Haven, Kete and Freshwater West and NRW TE would be happy to facilitate further discussion with you in this regard.</p>	<p>An assessment of potential visual effects resulting from aviation lighting on WTGs on all Dark Sky Discovery Sites within the Study Area has been provided in Appendix 23D and summarised in the SLVIA chapter.</p>	<p>ES Volume 2 Chapter 7: Landscape and Visual</p> <p>ES Volume 3 Chapter 23: Seascape, Landscape and Visual</p> <p>ES Volume 6 Appendix 23D: Night-time visual assessment</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-56	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.12	SLVIA	<p>NRW TE agree with the report that the National Landscape Character Areas and National Marine Character Areas provide context and the SLVIA (Section 7.4.2) should be undertaken on the basis of the smaller units set out in the National Park's Landscape Character Assessment and Seascape Assessment, with reference also to LANDMAP. There is likely to be some overlap between Seascape Character Areas (SCA) and Landscape Character Areas. However, NRW TE considers that SCAs should not be scoped out as stated in the report given that this is an offshore project.</p>	<p>The SLVIA is based on seascape and landscape character units set out in PCNP's, Landscape Character Assessment and Seascape Assessment as set out in sections 7.5.1 and 23.5.1 of the ES chapters. Relevant LANDMAP aspect areas have also helped inform an understanding of the baseline conditions.</p> <p>All SCAs identified within the 45km Study Area have been considered within the SLVIA as set out in Appendices 23B and 23C.</p>	<p>ES Volume 2 Chapter 7: Landscape and Visual</p> <p>ES Volume 3 Chapter 23: Seascape, Landscape and Visual</p> <p>ES Volume 6 Appendix 23B and 23C</p>
NRW MLT-57	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.13	SLVIA	<p>NRW TE advise that visual receptors (Section 7.4.3) should also include recreational users of the sea and coastal areas, including those undertaking activities such as sailing, wildlife boat trips, kayakers, users of the Pembroke-Rosslare ferry. NRW TE welcome the opportunity to enter dialogue regarding viewpoint selection.</p>	<p>All viewpoints for the SLVIA have been agreed upon further engagement with NRW. This includes the Pembroke-Rosslare ferry.</p>	<p>ES Volume 2 Chapter 7: Landscape and Visual</p> <p>ES Volume 3 Chapter 23: Seascape, Landscape and Visual</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-58	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.14	SLVIA	NRW TE suggest an additional viewpoints are needed. An onshore viewpoint further east along the B4320 towards Corseside/minor road to Neath Farm (Table 7.1). A suitable viewpoint e.g. from the Wales Coast Path at West Angle Bay, from Freshwater West or Angle Bay would be required depending on the cable landfall site. Offshore viewpoints (Table 7.2) from Skokholm Island, West Angle Bay, Hooper’s Point and St Govan’s Head are also suggested. Furthermore, an assessment of the sequential visual impacts on sections of the Wales Coast Path would also be required.	<p>A viewpoint was considered at the suggested location but later replaced with Viewpoint D: B4320, Wogaston at request of NRW.</p> <p>The visual assessment includes viewpoints at each suggested location with the exception of West Angle Bay. This location was initially considered, but later scoped out due to being outside the ZTV.</p> <p>Appendix 7B and 23C provides an assessment of potential visual effects on relevant sections of the Pembrokeshire Coast Path.</p>	<p>S Volume 2 Chapter 7: Landscape and Visual</p> <p>ES Volume 3 Chapter 23: Seascape, Landscape and Visual</p> <p>ES Volume 6 Appendix 7B: LVIA Detailed Assessment</p> <p>ES Volume 6 Appendix 23C: SLVIA Detailed Assessment</p>
NRW MLT-59	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.15	SLVIA	NRW TE agree that photomontages for the cable landfall and cable route would not be required (Section 7.4.4), unless HDD is not possible for the cable landfall and cables were to be laid over cliffs/open ground. NRW TE recommend that more than 5 photomontages may be required from representative viewpoints.	<p>HDD will be used at the landfall and the onshore cable route will be underground, therefore no photomontages are required.</p> <p>Figures VP 01.2 to VP 15.4 provide visualisations for each representative viewpoint, including photomontages for 13 locations.</p>	<p>ES Volume 2 Chapter 7: Landscape and Visual</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-60	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.16	SLVIA	NRW TE considers that Section 7.5 should take account of NRW evidence reports: Seascape and Visual Sensitivity to Offshore Windfarms in Wales, Strategic assessment and guidance Stage 1, 2 & 3 (see above)	This strategic level guidance has been reviewed and considered as part of siting and design of the proposed Project and in undertaking the SLVIA.	ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW MLT-61	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.17	SLVIA	NRW TE advise that the size and height of turbines, the location, orientation and spread of the array within the lease area and the inclusion or exclusion of lighting are also potential mitigation options for the project	Siting of WTGs at considerable distance from coast, within vast seascape are key embedded mitigation measures. Use of aviation lighting with low intensity mode in clear conditions will help to mitigate potential night-time effects.	ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW MLT-62	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.18	SLVIA	NRW TE agree that there is the potential for long term seascape, landscape and visual effects associated with the wind turbine generators and with the substation/control building (Section 7.8). Effects from the landfall and onshore cable route are likely to be temporary and reversible and result mainly from construction and decommissioning, and operational effects of these aspects can be scoped out of the SLVIA, assuming HDD is used at the landfall.	No additional actions. Chapter 23 of the ES considered effects from construction, operational and decommissioning of the WTGs. Chapter 7 of the ES considers effects from construction, operational and decommissioning of the Onshore Substation, and construction and decommissioning of the Onshore Export Cable. Operational stage effects of the Landfall and Onshore Export Cable are scoped out of the assessments.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-63	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.19	Terrestrial Ecology and Biodiversity	<p>NRW TE have concerns that an adverse effect from the proposed development on the integrity of the following protected sites designated as part of the National Site Network (and as identified by the ES, Chapter 8) cannot be ruled out:</p> <ul style="list-style-type: none"> • Limestone Coast of South Wales/Arfordir Calchfaen De Orllewin Cymru SAC • Pembrokeshire Marine/Sir Benfro Forol SAC • West Wales Marine/Gorllewin Cymru Forol SAC • Castlemartin Coast SPA • Pembrokeshire Bat Sites and Bosherton Lakes/Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton SAC <p>The following protected sites identified as being within scope:</p> <ul style="list-style-type: none"> • Broomhill Burrows Site of Special Scientific Interest (SSSI) • Angle Peninsula Coast/Arfordir Penrhyn Angle SSSI • Milford Haven Waterway SSSI • Gweunydd Somerton Meadows SSSI • Castlemartin Corse SSSI • Castlemartin Range SSSI 	The ES assesses effects on relevant SACs, SPAs and SSSIs.	<p>ES Volume 2 Chapter 8: Ecology and Biodiversity</p> <p>ES Volume 6 Appendix 8D and 8E</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> • Limestone Coast of South Wales/Arfordir Calchfaen De Orllewin Cymru SAC • Orierton Stable Block and Cellars SSSI • Stackpole SSSI • Stackpole Courtyard Flats and Walled Garden SSSI • Park House Outbuildings, Stackpole SSSI • Newgale to Little Haven/Arfordir Niwglwl Aber Bach SSSI 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-64	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.20	Terrestrial Ecology and Biodiversity	NRW TE advise that the species-specific impacts in the short, medium, and long term together with any mitigation and compensation measures proposed to offset the impacts identified should be included in the EIA. Should potential impacts be identified, NRW TE advise that the Ecological Impact Assessment (EclA) should set out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility.	Impacts in the short, medium and long term has been assessed and appropriate mitigation outlined in the chapter.	ES Volume 2 Chapter 8: Ecology and Biodiversity
NRW MLT-65	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.21	Terrestrial Ecology and Biodiversity	PCC LPA point out that there are dormouse records on the Angle Peninsula. The effects of the development corridor as well as the in-combination impacts with the other projects of temporary but significant impacts of hedgerow removal (Chapter 8) should be addressed, in terms of dormouse crossing points and bats	Habitat Suitability Assessment of Hedgerows and woodland for dormouse have been assessed in the ES.	ES Volume 2 Chapter 8: Ecology and Biodiversity ES Volume 6 Appendix 8B: Preliminary Ecological Appraisal

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-66	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.22	Historic Environment and Cultural Heritage	The DAT are happy with the approach taken to scoping archaeology, but understand that the extent of the study area for the landfall and grid connection point may need to be adjusted, depending on the height/extent of above ground elements, in line with the criteria outlined by Cadw in their guidance document Setting of Historic Assets in Wales (2017).	Cadw guidance document 'Setting of Historic Assets in Wales' (2017) has been referenced where appropriate. Additional construction detail including compound and infrastructure details have been incorporated into the ES.	ES Volume 2 Chapter 9: Historic Environment and Cultural Heritage
NRW MLT-67	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.23	Historic Environment and Cultural Heritage	The DAT indicates also that the DBA should assess both the visual impact of the development on the historic landscape and on the setting of historic assets and the potential direct impact on archaeological deposits and would expect to see a Written Scheme of Investigation (WSI) for this assessment	Visual impacts on historic landscape and setting of historic assets, and potential direct impacts on archaeological deposits assessed. A Written Scheme of Investigation (WSI) or series of WSI's detailing any recommended requirements for pre-determination evaluation has been prepared following consultation with Dyfed Archaeological Trust	ES Volume 2 Chapter 9: Historic Environment and Cultural Heritage ES Volume 6 Appendix 9A: Terrestrial Archaeology and Built Heritage Technical Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-68	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.24	Historic Environment and Cultural Heritage	CADW notes that it is proposed in section 9.27 Historic Landscape to prepare an Assessment of the Significance of the Impact of Development on Historic Landscapes (ASIDOHL2). CADW will welcome discussions with your cultural heritage experts to determine whether this will be the best approach and the appropriate methodology for assessing the impact on the historic landscape given the type of proposed development.	A Desk Based Assessment (DBA) was submitted to CADW for consultation. Given nature of development an Assessment of the Significance of the Impact of Development on Historic Landscapes (ASIDOHL2) is not relevant.	ES Volume 2, Chapter 9: Historic Environment and Cultural Heritage ES Volume 6 Appendix 9A: Terrestrial Archaeology and Built Heritage Technical Report
NRW MLT-69	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.25	Historic Environment and Cultural Heritage	Section 9.2.1 refers to 2018 PPW, however, the latest version (ed.11) dates to 2021. Furthermore, the 2021 Historic Environment (Archaeology) SPG prepared by PCNPA is a joint document with PCC.	This has been addressed in the ES.	ES Volume 2 Chapter 9: Historic Environment and Cultural Heritage
NRW MLT-70	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.26	Water Environment	NRW TE note that Groundwater Regulation 2009 (Section 10.2.1) no longer exist and are now part of the EPR 2016 under schedule 22 and the reference should be updated.	This has been addressed in the ES.	ES Volume 2 Chapter 11: Geology and Hydrogeology ES Volume 2 Chapter 12: Agriculture and Soils

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-71	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.27	Water Environment	NRW TE notes that the objectives for each element include reaching good status by a given date and section 10.4.7.1, para 3 statement in relation to individual WFD elements having objectives is incorrect. Some of these elements (e.g. Dissolved inorganic nitrogen) are currently at Moderate status which is considered a fail. It should not be considered that these objectives will be achieved by 2025/2026 as a cycle 4 classification will not have been released by that time. NRW TE advise that you will need to use the most up-to-date classifications in their project assessments. You should note that the 2021 cycle 3 WFD classifications have been published and can be found on Water Watch Wales (https://waterwatchwales.naturalresourceswales.gov.uk/en/). The WFD Compliance Assessment must utilise this information as this is the most recent and relevant to use (e.g., Section 10.2.3.1).	It is noted that it should not be assumed that WFD objectives will have been achieved by 2025/2026. The Cycle 3 2021 classifications are used in the ES and WFD assessments.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality ES Volume 6 Appendix 10C and 10D

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-72	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.28	Water Environment	NRW TE disagree scoping out of the assessment small, non-reportable streams running into coastal water bodies (or indeed the Pembrokeshire Marine SAC) due to scale (Section 10.7.6). For example, the potential to create a mixing zone of a pollutant could impact biota and needs consideration.	Impact to small, non-reportable streams running into the coastal waterbodies has been considered in the ES using a source-pathway-receptor approach and will assess those where a pathway is identified.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality
NRW MLT-73	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.29	Water Environment	NRW TE have reviewed the Flood Consequences Assessment (FCA, Section 10.7.7) which is reliant on the final agreed design of the project. As such, NRW TE comments are limited at present, until a completed site-specific FCA is available. The criteria, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given in Chapter 7 and Appendix 1 of TAN15. The FCA should be proportionate to the development proposed. You may also refer to our Building in Flood Risk Areas on the website (https://naturalresources.wales/guidance-and-advice/business-sectors/planningand-development/advice-for-	The technical advice notes have been incorporated into the ES.	ES Volume 6 Appendix 10A: Flood Consequences Assessment (FCA)

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				developers/building-in-flood-risk-areas/?lang=en), which contains technical advice and recommendations		
NRW MLT-74	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.30	Water Environment	The scoping report has identified the need for a Flood Risk Activity Permit (FRAP), but this is again reliant on final designs and location. As such NRW TE cannot comment further and advise a FCA is required which includes but not limited to the information set out above	The ES has been updated in line with the latest design details.	ES Volume 6 Appendix 10A: Flood Consequences Assessment (FCA)
NRW MLT-75	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.31	Water Environment	NRW TE would like to get clarity on WFD water bodies proposed for inclusion within the WFD Assessment. There are inconsistencies between chapters of the report, as Milford Haven Outer and Pembrokeshire South waterbodies are considered in Chapter 19 and Milford Haven Inner and Outer on Chapter 10. NRW TE advise that Milford Haven Inner, Milford Haven Outer and Pembrokeshire South should all be considered within the Marine Chapter 19, as there are potential pathways for effect to this water body.	Milford Haven Inner, Milford Haven Outer and Pembrokeshire South have been considered within the Marine Water Quality and Sediment Quality chapter and WFD.	ES Volume 3 Chapter 18: Marine Water Quality and Sediment Quality ES Volume 6 Appendix 10B and 10C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-76	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.32	Water Environment	NRW TE disagrees with the statements within Section 10.7.6 and considers that all non-reportable water bodies will need to be considered within the WFD Compliance Assessment, regardless of scale, if there is a pathway for effect	All waterbodies are considered within the WFD assessment, whether or not they are reportable reaches.	ES Volume 6 Appendix 10B and 10C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-77	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.33	Geology and Hydrogeology	<p>There are three proposed landfall sites for the cables, but no defined cable routes. NRW TE are therefore providing high level advice assuming that Pembroke Power Station will be used for onward connection and recommends the proposal to be further defined before submission. NRW TE comments would likely change once finalised locations and routes are confirmed, but recommend the following surveys, supported by risk assessment, to determine the level of risk to controlled waters from the proposed project infrastructure:</p> <p>1. Water Feature Survey is completed with a 300m buffer either side of the cable route and around buildings and compounds, which should include the following:</p> <ul style="list-style-type: none"> • Identification of all water features both surface and groundwater (ponds, springs, ditches, culverts etc.) within a 300m radius of the site or either side of a linear development area, e.g., cabling route; • Use made of any of these water features. This should include the construction details of wells and 	A water feature survey with a 300m buffer from the cable route is presented in Appendix 10B and a preliminary risk assessment of historical land uses is presented within Appendix 11A.	<p>ES Volume 6 Appendix 10B: Onshore Water Environment Site Survey Report</p> <p>ES Volume 6 Appendix 11A: Phase 1 Desk Study Report</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>boreholes and details of the lithology into which they are installed;</p> <ul style="list-style-type: none"> • An indication of the flow regime in the spring or surface water feature, for example whether or not the water feature flows throughout the year or dries up during summer months; • Accessibility to the spring/well; • This information should be identified on a suitably scaled map (i.e. 1:10,000), tabulated and submitted to NRW. It would be useful to photograph each of the identified water features during the survey. <p>2. Preliminary Risk Assessment to define historical land uses to:</p> <ul style="list-style-type: none"> • Follow the risk management framework provided in Land contamination risk management (LCRM https://www.gov.uk/government/publications/land-contamination-riskmanagement-lcrm) • Refer to 'Land Contamination: a guide for developers' (WLGA, 2017) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>to other receptors, such as human health.</p> <ul style="list-style-type: none"> • Refer to our groundwater protection advice on www.gov.uk 		

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NRW MLT-78	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.34	Geology and Hydrogeology	Based on the results of the Water Feature Survey you must assess the likely impacts from the development on both quantity and quality of the surface water and groundwater. This should take into consideration both the preferred methods of construction and the assumed hydrogeology in the vicinity of the development.	A Water Feature Survey has been included in the ES.	ES Volume 6 Chapter 10D: Water Features Survey Report
NRW MLT-79	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.35	Geology and Hydrogeology	NRW TE may require that identified groundwater features are monitored during the proposed workings and would therefore recommend that the Water Feature Survey be undertaken as soon as possible to enable the developer to carry out suitable baseline monitoring prior to the commencement of workings at the site.	Please refer to above comment and note that there may be overlap with any groundwater investigation that may be planned. A groundwater investigation will be undertaken, with monitoring before, during and after construction.	ES Volume 2 Chapter 11: Geology and Hydrogeology

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NRW MLT-80	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.36	Geology and Hydrogeology	<p>NRW TE also point out that:</p> <ul style="list-style-type: none"> Any use of HDD will require a groundwater risk assessment to ensure there are no risk to controlled waters from this construction method. Were the onshore cables be fluid filled, pollution prevention measures will need to be developed to avoid risks from leakage. NRW TE indicates that there is a groundwater position statement regarding fluid fill cables – C5 in "approach to groundwater protection" (an NRW adopted guidance from the Environment Agency, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwaterprotection.pdf). 	A groundwater risk assessment is included as part of the mitigation for the proposed Project. Impacts relating to HDD drilling fluids are assessed in the Marine Water Quality and Sediment Quality chapter.	<p>ES Volume 1 Chapter 4: Description of the Proposed Project</p> <p>ES Volume 3 Chapter 18: Marine Water Quality and Sediment Quality</p>
NRW MLT-81	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.37	Agriculture and Soils	No comments were received on this topic.	Noted.	n/a
NRW MLT-82	Natural Resources Wales Marine	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.38	Traffic and Transport	The PCC LPA indicates that the vehicular traffic corridor identified should be extended back to include	Traffic corridor includes the sites requested as part of the study area and is assessed within the ES.	ES Volume 2 Chapter 13: Traffic and

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Licencing Team			the A4075 to the Finger Post Junction of the A477 Trunk Road.		Transport ES Volume 5 Figure 13.2 and 13.4
NRW MLT-83	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.39	Traffic and Transport	The PCC LPA considers that the route from Pembroke Port to the potential sites via the highway should be considered unless it is to be fully ruled out. This is of particular relevance as reference is made to possible abnormal loads which would be restricted due to the presence of railway bridges between the trunk road and the southern strategic route.	The traffic and transport chapter has ruled out the route from Pembroke Port via the highway for the movement of abnormal loads. Following a review of the Erebus CTMP the rail bridge on the A4075 is too low and abnormal loads would have to travel via Ferry Lane. There is a bridge on Ferry Lane but the Erebus CTMP has shown that the substation transformer, the largest part of the substation, can pass through. General construction traffic would still be expected to travel along the A4075 however this has been assessed in the traffic and transport chapter.	ES Volume 2 Chapter 13: Traffic and Transport ES Volume 6 Appendix 13E: Project Erebus Outline Construction Traffic Management Plan
NRW MLT-84	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.40	Aviation and Radar	No specific comments were received on this topic, however, please refer to related comment on dark skies in Seascape, Landscape and Visual section regarding the probable requirement for aviation lighting	Noted.	n/a

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NRW MLT-85	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.41	Air Quality	No comments were received on this topic.	Noted.	n/a
NRW MLT-86	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.42	Noise and Vibration	No comments were received on this topic.	Noted.	n/a
NRW MLT-87	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.43	Socio-Economics, Recreation and Tourism	No comments were received on this topic.	Noted.	n/a
NRW MLT-88	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 2.44	Health and Wellbeing	No comments were received on this topic.	Noted.	n/a
NRW MLT-89	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.1	Marine Environment	NRW TE advises that the relevant National Policy Statements (NPS) are considered and referred to for all relevant receptors in their appropriate chapters throughout the ES. Please note that a review of the energy NPSs is currently underway (https://www.gov.uk/government/consultations/planning-for-new-	The most up to date NPSs have been considered throughout the ES and wider consenting processes. These are detailed in Chapter 2 of the ES.	ES Volume 1 Chapter 2: Legislation, Policy and Guidance

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				energyinfrastructure-review-of-energy-national-policy-statements) which you may need to take account of in further developing their proposals		
NRW MLT-90	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.2	Marine Environment	<p>NRW TE highlights that the following are (but not limited to) other environmental matters relevant to consider:</p> <ul style="list-style-type: none"> • the interaction with Welsh Government’s MPA Network Completion project which could identify Marine Conservation Zones in areas of Floating Offshore Wind (FLOW) interest; • the implications of work under the Offshore Transmission Network Review; • the implications of The Crown Estates FLOW leasing round, aggregates and Round 4 plans, and • the inevitable need to build the evidence base for FLOW. <p>NRW TE would be happy to have discussions about these matters with you at a convenient time</p>	The Welsh Governments MPA network has been considered throughout the consenting process including in the ES chapters and siting and routing of the offshore export cable and array area.	ES Volume 3 (Chapters 17 to 28)

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NRW MLT-91	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.3	Marine Environment	JNCC note that “a buffer distance of 10km of the proposed Project has been considered which encompasses all likely Zol to benthic receptors within the subtidal”. We await the establishment of the Project’s Zol as per Section 30.3.2.1. and further clarity as to how the Zol has been determined.	The zone of influence (ZOI) for benthic ecology will be revised to reflect tidal excursion data as the factor that would determine the potential range of sediment dispersion, which is the impact pathway with the greatest potential ZOI in relation to benthic receptors.	ES Volume 3 Chapter 19: Benthic Ecology
NRW MLT-92	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.4	Marine Environment	RSPB encourages that the developer opens discussions with The Wildlife Trust of South and West Wales and The Wildlife Trusts for advice on Marine Mammals and Benthic Ecology.	Non-statutory stakeholder meetings have been held with The Wildlife Trust, including WTSWW on 10/07/2023, regarding marine mammals and offshore ornithology.	ES Volume 1 Chapter 6: Consultation and Stakeholder Engagement ES Volume 3 Chapter 22: Ornithology
NRW MLT-93	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.5	Physical Environment	NRW TE advise that marine water quality is a receptor in its own right and should not be embedded in the physical processes chapter of the ES. Therefore Section 19.1, 19.4.11, Table 19.4 should be modified to take this into consideration and present a separate marine water quality chapter.	A separate chapter covering marine water and sediment quality is included in the ES.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality

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NRW MLT-94	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.6	Physical Environment	NRW TE would like to clarify that apart from the seabed morphological features at the coast, physical processes are not in themselves receptors. These are instead pathways through which any alteration to the hydrodynamics (waves, currents, water levels) and sediment transport caused by the development proposals, can indirectly impact other environmental receptors. For example, impacts on water quality, and subtidal and intertidal benthic ecology.	Receptors and pathways have been clarified in all technical chapters within the ES.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)

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NRW MLT-95	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.7	Physical Environment	<p>NRW TE welcome the breadth of guidance already sourced to inform the physical processes impact assessment. However, NRW TE would like to point out additional guidance and peer reviewed research papers that in their view should also be used to inform the baseline and impact assessment:</p> <ul style="list-style-type: none"> • King et al. (2019). The impact of waves and tides on residual sand transport on a sediment-poor, energetic, and macrotidal continental shelf. • Guidelines in the use of metocean data through the lifecycle of a marine renewables development'. (ABPmer et al., 2008b); • Offshore Windfarms: Guidance note for Environmental Impact Assessment in Respect of FEPA and CPA requirements'. (Cefas, 2004). • Further review of sediment monitoring data'. (COWRIE ScourSed-09).' (ABPmer et al., 2010); • Review of Round 1 Sediment process monitoring data - lessons learnt. (Sed01)' (ABPmer et al., 2007); • Dynamics of scour pits and scour 	The additional guidance documents identified by NRW have been reviewed and used to inform the Physical Processes assessment methodology.	ES Volume 3 Chapter 17: Physical Processes

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				protection - Synthesis report and recommendations. (Sed02)' (HR Wallingford et al., 2007); and <ul style="list-style-type: none"> • Potential effects of offshore wind developments on coastal processes'. (ABPmer and METOC, 2002). 		

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NRW MLT-96	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.8	Physical Environment	<p>NRW TE would like to point out the following in relation to Table 19.2 (beside the point made about removal of mention to water quality impacts as it is not considered to be a direct Physical Processes impact), some of which will change what is scoped in/out of the EIA:</p> <ul style="list-style-type: none"> Installation: surveys – temporary disturbance causing increase in SSC: Suspended sediment plumes generated that will be advected away from site by the prevailing currents and the maximum extent of these plumes will depend on the sediment size and the maximum tidal excursion. The redeposition of sediment onto the seabed will potentially cause an alteration to the sediment morphology through change to sediment type and sediment thickness variations. Installation: the destruction of sand waves is not necessarily a temporary disturbance. Sand wave recoverability is dependent on the sediment mobility at that site and the hydrodynamics. If the sand waves are stable features with very low movement, then the sand waves 	The points raised by NRW TE with regards to the scope of activities requiring investigation are now fully addressed within the Physical Processes assessment.	ES Volume 3 Chapter 17: Physical Processes

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				<p>may never recover. Sand wave clearance is not just disturbance but a potential alteration to seabed morphology.</p> <ul style="list-style-type: none"> • Cable Laying: Installation: we disagree that cable laying will have no significant impact on the seabed or on associated physical processes. No rationale is provided as to why this is scoped out from further assessment, and we strongly advise that it remains scoped in until evidence is presented that confirms that the cable laying activities do not cause significant impacts to the seabed features or cause alterations to sediment morphodynamics, particularly in relation to the impact on offshore sand banks and beach morphodynamics. • Installation: Cable burial: The rationale notes that this will only be scoped in for cable burial >10m water depth. It is not clear what methods are proposed for water depths <10m. The whole cable route should be assessed. • Installation: Cable Protection: The cable protection will directly impact on other receptor areas such as benthic 		

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				<p>ecology and Water Framework Directive (WFD) depending on where it is in proximity to the coast. However, the impacts of cable protection should be assessed in their respective chapters and not specifically in the physical processes chapter.</p> <ul style="list-style-type: none"> • Installation: anchor deployment: it is not explicitly clear what activity this is referring to. The FLOW structures will be anchored to the seabed. No reference has been made to the potential impacts caused by the drag anchors in deeper water e.g., sediment disturbance. Clarity is sought with regard what this pathway is specifically referring too – we assume that it refers to the boat anchors during cable laying of the export cable. • Installation: Mooring systems: the impacts arising from installing the floating offshore wind structure mooring systems, for example, using drag anchors or pile foundations have not been included. Such impact pathways need to be further considered and scoped in at this stage. • Operation and Maintenance: We are concerned that a number of impacts 		

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				<p>have been omitted (scoped out) from Table 19.2. We strongly advise that you consider and scope in the following:</p> <ul style="list-style-type: none"> i. Potential changes to tidal regime, wave regime and sediment transport regime through blockage effects of the floating OWF structures and mooring cables. Please note that persistent changes to waves and currents may have a net effect over time on net patterns of sediment transport (rate and direction). The sensitivity of these patterns of change will depend upon the relative importance of currents and/or waves, the magnitude and extent of any effect, the nature of the seabed system and degree to which the system is presently in balance e.g., is the present rate and direction of transport essential to the maintenance of a dynamic morphological feature. ii. Abrasion impacts arising through movement of the mooring chains across the seabed leading to scour pits and change to seabed sediment type and increase in SSC plumes. Extent and depth of scour may vary over time. iii. Effects of increased turbulence on 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>sediment transport immediately adjacent to any laying objects, for example in relation to anchoring structures on the seabed which can cause scour.</p> <p>iv. The requirement for cable protection in the nearshore zone and across the intertidal cannot be ruled out at this time, particularly if the cable has to cross another cable. Presence of cable protection so close to the shore will potentially interrupt the longshore sediment transport pathway and cause alteration to the beach morphodynamics downstream of the site. Wave refraction and diffraction processes caused by the presence of the cable protection in shallow water could also cause energy refocussing towards the coast leading to coastal erosion.</p>		

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NRW MLT-97	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.9	Physical Environment	NRW TE consider that clear rationale and evidence should be provided to justify the study area to be 10km as presented in figure 19.1 (Section 19.3). NRW TE strongly advise that the maximum spring tidal excursion is used to define the Zoi which will vary from offshore to inshore depending on the spring tidal ellipses (which are generated by the current velocity and direction of flow). Tides in the region flow from the west-north-west to east-south-east on the flood and reverse in direction on the ebb. The study area shown in figure 19.1 does not suggest that the direction of flow has been considered in defining the Zoi particularly for the offshore array area. The submitted ES must clarify the tidal excursion being proposed with sufficient justification and evidence presented to demonstrate why the value is considered appropriate. Early engagement with NRW TE is advised to agree the Zoi for physical processes as it will also be relevant to the impact assessment for the other receptor areas.	The ZOI used in the ES for this Chapter has been re-evaluated to encompass both the maximum spring tidal excursion distance from any part of the development area, and a conservative additional distance where required to encompass offshore areas and coastlines that might be affected by potentially changes to wave climate by the offshore array.	ES Volume 3 Chapter 17: Physical Processes

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NRW MLT-98	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.10	Physical Environment	NRW TE advise to include only the physical processes criteria in Table 19.3. The table refers to marine receptors that are indirectly impacted by the physical processes i.e., where physical processes is a pathway acting on sediment and water quality. Sensitivity on other receptors should be addressed in their respective chapters, otherwise, important impacts may be omitted if it is considered that the sensitivity to physical processes is low.	The receptor sensitivity criteria used in the assessment have been revised to only include criteria related to physical processes.	ES Volume 3 Chapter 17: Physical Processes
NRW MLT-99	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.11	Physical Environment	JNCC would like to better understand how the baseline (section 19.4) is expected to evolve over the lifespan of the proposed project.	The Physical Processes chapter includes a section specifically considering how the baseline may evolve over the lifetime of the project, in particular as a consequence of climate change.	ES Volume 3 Chapter 17: Physical Processes

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NRW MLT-100	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.12	Physical Environment	NRW TE considers that the detail presented in this scoping report to describe the seabed geomorphology (section 19.4.9) for the study area is insufficient and strongly advise that seabed geomorphology (including: bedform features, sand waves, sand banks, sediment type, mobile sediment depth) are described for the entire project area. This should be done using high resolution multibeam bathymetric survey data, and a description of the bedload and suspended sediment transport processes presented. A data gap analysis should be carried out to determine the requirement for further high-resolution bathymetric surveys if there is insufficient data publicly available. Please note that accurate determination of the bedform migratory rates of sand wave fields and understanding the complexities of the sediment transport regime around sandbanks present in the study area (e.g., Turbot Bank), will be critical for an accurate assessment of the impacts arising from cable laying activities and cable protection measures	The project specific geophysical survey for the array area and export cable corridor has been combined with various other regional scale surveys and bathymetry data (with variable but reasonable resolution) to provide a combined data set for the whole ZOI (and beyond). The available bathymetry supports a sufficiently detailed understanding of baseline seabed bedform dimensions and distribution for the purpose of the assessments undertaken in the ES.	ES Volume 3 Chapter 17: Physical Processes

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NRW MLT-101	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.13	Physical Environment	NRW TE understand that the baseline environment for the chosen landfall location has to be well described in terms of coastal sediment transport processes and beach morphodynamics (section 19.4.13) at the point of submission.	The baseline environmental description of the landfall within the ES includes more detailed information on coastal sediment transport and beach morphodynamics.	ES Volume 3 Chapter 17: Physical Processes
NRW MLT-102	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.14	Physical Environment	The boundaries of the designated sites on the map in section 19.4.14 and the project study area overlayed with the features of interest relating to physical processes should be presented to aid the assessment.	The Physical Processes chapter includes a figure setting out the boundaries of designated sites, along with key morphological features.	ES Volume 3 Chapter 17: Physical Processes ES Volume 5 Figures
NRW MLT-103	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.15	Physical Environment	NRW TE advise that the list in section 19.6 Likely Significant Effects is revisited and the effects to only include the physical processes. The effects on the other receptors should be separated from the physical processes and moved to their respective chapters. Marine physical processes are pathways and the impact to the hydrodynamics and sediment transport processes caused by the development activities can potentially cause indirect impacts to other environmental receptors including the coast, offshore sand	Separate chapters have now been created for marine water and sediment quality, and for benthic ecology.	ES Volume 3 Chapter 17: Physical Processes ES Volume 3 Chapter 18: Marine Water and Sediment Quality ES Volume 3 Chapter 19: Benthic Ecology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				banks (Turbot Bank) and seabed areas contained within nationally or internationally designated sites.		
NRW MLT-104	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.16	Physical Environment	NRW TE considers in Table 19.2, with regards to WFD, should consider waterbody scale impacts and the potential effects of the project on the WFD status and objectives, at an element level. Also, in relation to the composition of the drilling fluids to be used for HDD, it is expected that bentonite could be used which will remain in suspension increasing suspended solid concentration. Therefore, bentonite release (or similar) would need to be assessed in the context of suspended sediment releases.	The impact of HDD drilling fluids and potential of suspension of Bentonite increasing SSC at the landfall has been assessed.	ES Volume 3 Chapter 17: Physical Processes

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NRW MLT-105	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.17	Physical Environment	<p>NRW TE generally agree the potential impact pathways included for water quality elements noted on Table 19-2, however, consider that there are some omissions:</p> <ul style="list-style-type: none"> • Installation / Decommissioning: Contaminants must be considered throughout the cable corridor and all the way up to landfall and must be compared against CEFAS action levels. (Note: at landfall, dependent on sediment type present, the potential to release bacteria from the sediment (noting it is typically associated with fine sediment) might also need to be considered; • Operation: The potential to increase temperature as a result of cabling must be considered – this could also impact both on benthic ecology and bacterial growth; • Installation: While HDD has been included (and scoped out) in terms of water contamination, trenching has not. Trenching should be included and the impacts scoped in due to the potential to release chemicals and / or bacteria; • It would be helpful to lay out the 	Chemical contaminant release with reference to the CEFAS action levels is considered in the Marine Water and Sediment Quality chapter, along with potential release of bacteria from the works.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality

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				potential impact pathways for marine water quality more explicitly and within its own chapter of the ES, so that it can be determined if all correct impact pathways have been identified. For example, it appears that there is no (or very limited) consideration has been made of the potential for bacterial and turbidity releases to impact on Bathing water quality.		
NRW MLT-106	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.18	Physical Environment	Please note that disturbance of Suspended Sediment Concentrations (SSC) will also lead to advection and redeposition of the sediment plume with the spatial extent and concentration of the sediment plume dependent on the percentage distribution of sediment size and type, the water depth, and the hydrodynamics. Redeposition of the suspended sediment plume will also	The assessment of changes to suspended sediment concentration (i.e. sediment plumes) includes the likely advection of the sediment plume and redeposition of the material in the plume.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				cause seabed morphological change which can indirectly impact on the benthic ecology receptor.		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-107	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.19	Physical Environment	NRW TE recommend in relation to section 19.7.1 that you follow the NRW GN041 guidelines (https://naturalresources.wales/guidance-and-advice/businesssectors/marine/marine-physical-processes-and-environmental-impact-assessment/ia/?lang=en), with specific reference to Chapter 6 of the embedded Evidence Report (Guidance on Best Practice for Marine and Coastal Physical Processes Baseline Survey and Monitoring Requirements to Inform EIA of Major Development Projects, NRW Evidence Report 243, Brooks et al., 2018). You will need to clearly demonstrate that the sourced data is fit for purpose and still valid to characterise present day conditions. NRW TE advise that any data used to inform the baseline understanding must have been collected and analysed in accordance with recognised data quality standards. The sourced data will need to provide the appropriate temporal and spatial coverage and resolution which will adequately describe the present-day	The collection of data sources used to inform the assessments is considered to be sufficient, in line with the guidance outlined in these documents.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>conditions within the study area as well as longer-term historical change; both of which are essential to establishing a full conceptual understanding of the natural physical environment baseline of the site and surrounding area. The data sourced should be fit for purpose to sufficiently address the key themes of baseline understanding as described in Brooks et al, 2018 (see below for information):</p> <ul style="list-style-type: none"> • Identification of the processes maintaining the system, the reasons for any past changes, and sensitivity of the system to changes in the controlling processes. • Identification and quantification of the relative importance of high-energy, low frequency (“episodic” events), versus low-energy, high frequency processes. • Identification of the processes controlling temporal and spatial morphological change (e.g., longevity and stability of bedforms; cliff recession; loss of beach volume; or bank and channel migration; inter-tidal accretion/ erosion), which may require 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>a review of bathymetric and topographic data.</p> <ul style="list-style-type: none"> • The identification of sediment sources, pathways and sinks, and quantification of transport fluxes. • The identification of the inherited geological, geophysical, and geotechnical properties of the sediments at the site, and the depth of any sediment strata. • Interaction of waves and tides and the subsequent quantification of the extent to which seabed sediment is mobilised. • The assessment of the scales and magnitudes of processes controlling sediment transport rates and pathways. 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-108	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.20	Physical Environment	NRW TE disagrees with the intention to rule out the potential requirement for numerical modelling to inform the impact assessment for the proposed project (Section 19.7.2). NRW TE will expect a review of available evidence (for example evidence reports from other similar projects / windfarm schemes) to fully understand the range of evaluation techniques and best practice applied to similar schemes. NRW recommend early engagement with NRW TE in this topic before agreeing that numerical modelling is not required	The Physical Processes assessment is now supported by a range of numerical modelling, including a more detailed and quantitative baseline understanding of wave, tidal and sediment transport regimes. Assessments of changes to suspended sediments are based on spreadsheet numerical modelling. New numerical modelling was not considered necessary for the assessment of impacts on waves and currents by the relatively small blockage presented by the proposed worst-case array design.	ES Volume 3 Chapter 17: Physical Processes
NRW MLT-109	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.21	Physical Environment	Furthermore, JNCC would like to better understand which surveys are proposed, as the information provided in Section 19.7.3 is very limited.	The present-day baseline understanding presented in the ES Chapter for this topic is based on the patterns and statistics of relevant conditions over the recent past (last 30-40 years), reflecting the range of natural variability on a range of timescales. The same baseline variability is expected to also reflect future baseline conditions throughout the lifetime of the project. The future influence of climate change trends is also quantified and included in relevant assessments.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
					New bathymetric, sediment and benthic surveys have been carried out (described in the ES) and are used to inform both the baseline understanding and assessments.	
NRW MLT-110	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.22	Physical Environment	NRW TE indicates that Vessels should also follow the Work Boat Code (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441389/Workboat_Code_IWG_Tech_Std_14-06-09-sgs.pdf) as found on the Marine and Coastguard Agency website.	MCA Work Boat Code has been noted in section 18.2.4 of the ES. It has been incorporated in the mitigation measures for pollution events in section 18.8.1 of the ES.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality
NRW MLT-111	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.23	Benthic Ecology	It is stated that the assessment methodology for benthic ecology will follow the standard methodology for ecological receptors outlined Chapter 8, which is in line with CIEEM guidance for ecological impact assessments (CIEEM, 2018). This methodology relates to terrestrial receptors, and	CIEEM EIA guidance has been referenced in the ES as appropriate.	ES Volume 3 Chapter 19: Benthic Ecology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				NRW TE indicates that some of the criteria are not appropriate for benthic habitats. For example, Section 8.7.3.2 describes how the sensitivity of the receptor will be assessed based on geographical frames of reference, some of which are not relevant in the marine environment. NRW TE recommend further clarity is requested on the frames of reference that will be used for marine receptors.		
NRW MLT-112	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.24	Benthic Ecology	JNCC have stated that the turbine's anchor placement impacts should be considered within Table 20-1, given that will be in place for the duration of the project and result in long term disturbance of the seabed. Further discussion on the timescales of what would be considered a permanent and/or temporary loss may be required.	Both permanent and temporary habitat loss have been assessed in the ES.	ES Volume 3 Chapter 19: Benthic Ecology

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NRW MLT-113	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.25	Benthic Ecology	<p>NRW TE considers that in relation to Table 20-1:</p> <p>Operation: Introduction and spread of Invasive non-native species (INNS): New infrastructure could act as a stepping stone for the introduction of INNS. NRW advise that biosecurity is considered and assessed in all stages of the development including the operation phase.</p> <p>Operation: Maintenance potential effects the same as route preparation and cable installation: NRW TE advise the following potential impact pathways should be scoped in for the operation phase:</p> <ul style="list-style-type: none"> i. Temporary increase in SSC and sediment deposition ii. Operation Indirect habitat loss. iii. Operation Disturbance to benthic habitats . iv. Operation Habitat alteration. v. Operation Effects of electromagnetic fields (EMF) emissions vi. Operation Changes in hydrodynamics 	<p>Biosecurity and invasive species impact assessment and appropriate mitigation is covering in Volume 6, Appendix 4B Outline INNS Plan as well as Section 19.7.2.5 in the Chapter 19 of the ES</p> <p>The following potential impact pathways are covered in Chapter 19 of the ES in the following sections:</p> <ul style="list-style-type: none"> - Temporary increase in SSC: Section 19.7.2.2; - Indirect habitat loss: Section 19.7.2.3; - Catenary chain disturbance: Section 19.7.2.4; - Habitat alteration with cable protections: Section 19.7.2.3 and 19.7.2.4; - EMF emissions: Section 19.7.2.5; and - Hydrodynamic change: Section 19.7.2.3. 	<p>ES Volume 3 Chapter 19: Benthic Ecology</p> <p>ES Volume 6 Appendix 4B: Outline INNS Plan</p>

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NRW MLT-114	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.26	Benthic Ecology	NRW TE would like to refer to comments made in Physical Processes with regards to the definition of the ZoI to revise accordingly the buffer distance defining the study area (Section 20.3).	Further clarification has been made on the Study Area in the ES. The Study Area has been divided into two separate buffer distances for intertidal and subtidal benthic features based on the tidal excursion boundary of 14km.	ES Volume 3, Chapter 19: Benthic Ecology
NRW MLT-115	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.27	Benthic Ecology	Native oyster (<i>Ostrea edulis</i>) beds are also present within the offshore cable scoping boundary. <i>Ostrea edulis</i> beds are also a habitat present within the Annex I Estuaries and Large Shallow inlets and Bays features of the Pembrokeshire Marine SAC, a Section 7 species and an OSPAR habitat. NRW TE advise that you contact NRW's data distribution team to be provided with a copy of the relevant data points.	A request for data in relation to native oyster was submitted on 16 June 2023. NRW responded on the 28 June 2023 advising the request had been logged and is being processed. A follow-up was sent on 13/07/23 and mapping of marine habitats and species distribution was provided.	ES Volume 3 Chapter 19: Benthic Ecology
NRW MLT-116	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.28	Benthic Ecology	NRW TE (Section 20.4.3) advise potential impacts to Limestone Coast of South West Wales SAC are also scoped in as the "Submerged or partially submerged sea caves" feature are cross-boundary features between the Limestone Coast SAC and the Pembrokeshire Marine SAC. Whilst NRW TE acknowledge the sensitivity of this feature to project secondary effects may be lower than for other habitat features, some biotopes within	Limestone Coast of South West Wales/Arfordir Calchfaen de Orllewin Cymru SAC (UK0014787) has been included in the ES.	ES Volume 3 Chapter 19: Benthic Ecology ES Volume 6 Appendix 8D and 8E

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				this feature may still be sensitive to project secondary effects.		
NRW MLT-117	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.29	Benthic Ecology	JNCC would like to highlight that impacts from the introduction of scour protection should be considered within Section 20.6 and Table 20-1.	These impact pathways are assessed in the ES.	ES Volume 3 Chapter 19: Benthic Ecology
NRW MLT-118	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.30	Benthic Ecology	NRW TE welcome the proposal to gather project-specific survey data and encourages engagement with NRW TE on survey requirements (Section 20.7). NRW TE would like to remind you of NRW guidance on benthic habitat assessments for marine developments (https://naturalresources.wales/guidance-andadvice/business-sectors/marine/benthic-habitat-assessments-for-marinedevelopments/?lang=en).	Relevant NRW guidance has been referenced in the ES as appropriate.	ES Volume 3 Chapter 19: Benthic Ecology
NRW MLT-119	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.31	Benthic Ecology	JNCC will also require further information regarding the project-specific surveys mentioned in section 20.7 and 20.8 before providing further comments.	24 monthly digital aerial survey (DAS) have been conducted, which are summarised in the Marine Mammal Baseline Report, and detailed in	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
					Sections 21.4.3 and 21.5.1 of the ES chapter.	Appendix 21A Marine Mammals Baseline Technical Report
NRW MLT-120	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.32	Fish and Shellfish Ecology	NRW TE welcomes the intention to further assess sandeel and herring spawning in light of the results of the benthic sampling and would advise that GIS modelling is carried out using the methodology described by Reach et al (2015), Latto et al (2013) and Marine Space Ltd et al (2013a, 2013b).	A herring and sandeel assessment has been included in the fish and shellfish chapter.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW MLT-121	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.33	Fish and Shellfish Ecology	For oceanic species, such as Bluefin tuna (<i>Thunnus thynnus</i>) and Basking shark (<i>Cetorhinus maximus</i>) (a Wildlife and Countryside Act and OSPAR protected species), NRW TE indicates that additional data should be consulted to assess the species-specific risk of entanglement. The ES for Project Erebus list several data sources and records which can be used.	There is only one reference in the Erebus ES: Benjamins, S., Harnois, V., Smith, H.C.M., Johannig, L., Greenhill, L., Carter, C. and Wilson, B. (2014). Understanding the potential for marine megafauna entanglement risk from renewable marine energy developments. Scottish Natural Heritage Commissioned Report. This will be used AND further literature searches have been undertaken.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW MLT-122	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.34	Fish and Shellfish Ecology	NRW TE recommends that surveys proposed for marine mammals, Digital Aerial Surveys for birds, as well as sampling of benthic habitats are used to record any fish encountered. For example sandeel from grab sampling,	Any fish captured during grab sampling will be reported in the fish and shellfish baseline.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				or fish encountered in video surveys as well as to include observations of large oceanic fish to inform the assessment.		Chapter 19: Benthic Ecology
NRW MLT-123	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.35	Fish and Shellfish Ecology	Figure 21-1 Map of study area: NRW TE advise that Cardigan Bay and River Teifi SAC, both of which have Annex II diadromous fish features, are borderline on the screening criteria but should be included on the map and scoped in for migratory fish species.	These sites have been added to the Designated Sites section of Chapter 7 and also included in the HRA.	ES Volume 3 Chapter 20: Fish and Shellfish Ecology ES Volume 6 Appendix 8D and 8E
NRW MLT-124	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.36	Fish and Shellfish Ecology	The Salmon and Freshwater Fisheries Act (1975) should be included in the list of relevant legislation for the project (Section 21.2). Although the site is offshore and outside the 6nm distance from the coast, the cable corridor and wider study area is inside the boundary where the legislation applies.	This Act has been added to the Legislation Section in the Fish and Shellfish chapter.	ES Volume 3 Chapter 20: Fish and Shellfish

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NRW MLT-125	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.37	Fish and Shellfish Ecology	NRW TE agrees that underwater noise from construction activities is likely to be a primary effect on fish, especially for fish where the swimbladder is near or connected to the ear, such as in the clupeids. Recent evidence (Davies et al 2020b) has found that Twaite shad from the River Severn undertake long range migration across the Celtic Sea, and NRW TE therefore recommend that to ensure any fish passing through the Study Area are considered, a regional approach is taken, screening in all sites with noise sensitive fish features (Section 21.3). Furthermore, NRW TE recommend that site and project specific noise modelling is undertaken to inform the detailed assessment.	This has been addressed in the impact assessment and utilises underwater sound modelling.	ES Volume 3 Chapter 20: Fish and Shellfish

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-126	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.38	Fish and Shellfish Ecology	NRW TE does not disagree with the species described in section 21.4.1 to 21.4.4, and understand that this is not an exhaustive list. However, NRW TE advise that for EIA purposes, receptor fish species should primarily be informed through a combination of species conservation status (e.g. Annex II, OSPAR, Section 7), species of commercial importance and their ecological role, e.g. species which form important prey species for other receptors, such as marine mammals and birds and as such this list should be refined and appropriate processes for species selection identified.	An introductory section has been included to show the species scoped in based on conservation status, commercial importance, and key prey item etc. The baseline has then been divided into the key ecological role groups first (e.g. migratory, pelagic, demersal, elasmobranchs) and then the other factors are considered within those key sections. Reference is made where species have commercial importance, but this is not a key distinction or grouping for an ecology chapter. Review of commercial importance in more detail will sit within the Commercial Fisheries chapter.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW MLT-127	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.39	Fish and Shellfish Ecology	Angel shark (<i>Squatina squatina</i>) is listed as a species on the Wildlife and Countryside Act under Schedule 5; is an OSPAR/Section 7 Species, as well as being listed on the Convention on the Conservation of Migratory Species of Wild Animals. NRW TE considers that the angel shark should also be included in section 21.4.4 and the assessment due to historic and current presence in Welsh waters (Barker et al. 2021 in-prep) and the potential for this	Baseline for the fish and shellfish chapter includes a specific section for angelshark. Impacts from EMF has been applied to this chapter.	ES Volume 3 Chapter 20: Fish and Shellfish

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				species to make seasonal inshore-offshore movements particularly in relation to potential effects of EMF.		
NRW MLT-128	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.40	Fish and Shellfish Ecology	You should note and be aware that there are Atlantic herring (<i>Clupea harengus</i>) spawning grounds inside the Pembrokeshire Marine SAC, as well as in the coastal areas (Davies et al., 2020a) so these need to be appropriately captured and considered in the ES, Section 21.4.5. Whilst NRW TE agrees with the use of the fisheries sensitivity maps by Coull et al. 2012, and Ellis et al., 1998 the limitations of these maps should be noted, especially around the lack of survey data for coastal waters and water less than 30m deep, as well as the age of some of the data. NRW TE further advise that additional data sources for the Celtic Sea should be consulted, such as the PELTIC surveys conducted by Cefas. The recent report 'Spawning and nursery grounds of forage fish in Welsh and surroundings waters'	Herring is a species sensitive to benthic activities so are automatically scoped into the assessment, particularly in relation to spawning grounds.	ES Volume 3 Chapter 20: Fish and Shellfish

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				(Campanella & van der Kooij, 2021) presents a useful summary of data sources for a range of fish species in Welsh waters and NRW TE recommend that this is considered.		
NRW MLT-129	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.41	Fish and Shellfish Ecology	NRW TE also advise that Atlantic salmon (<i>Salmo salar</i>) (Annex II migratory fish), and sea trout (<i>Salmo trutta</i>) are included in Section 21.4.7, as described in Section 21.4.3, as these are features of the Severn Estuary SAC/Ramsar site migratory fish assemblage. NRW TE welcomes the intention to screen in the Severn Estuary SAC but would advise that the Rivers Usk and Wye SACs connected to the site, are also included and should therefore be scoped into the assessment.	These sites have been scoped in. However, Severn Estuary SAC not designated for salmon and trout but scoped in due to lamprey and shad. The Severn Estuary Ramsar, designated for migratory fish has also been scoped in. These sites have been included in HRA.	ES Volume 3 Chapter 20: Fish and Shellfish

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NRW MLT-130	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.42	Fish and Shellfish Ecology	NRW TE agree with the list of potential impacts identified in Section 21.8, and that no specific fish or shellfish surveys are required. However, as described above, should any fish be encountered during the benthic surveys this information should be used to validate the desk top study of spawning/nursery habitat, in addition to the recommendations above relating to the additional data sources and modelling for some receptor species.	No additional and specific fish and shellfish surveys were planned nor undertaken.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW MLT-131	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.43	Fish and Shellfish Ecology	NFFO understands that there are potential impacts on fish and shellfish stocks which this scoping document does not adequately capture. NFFO note that the ecological baseline to be used in assessing these impacts relies largely on studies of the regional marine fauna conducted in 2012 or earlier with no Project specific surveys planned for the assessment of impact pathways (section 21.8). NFFO understands that this reliance on outdated surveys, despite subsequent environmental changes and the completion of various offshore construction projects with the	The project team has reviewed data sources at the time of writing the ES baseline for the fish and shellfish chapter to ensure the most up to date information of the study area is included and assessed.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 26: Commercial Fisheries

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>potential for ecological disruption lacks credibility. NFFO points at examples of other projects willing to conduct new baseline and post-construction monitoring surveys for their projects which have aided immeasurably the understanding of the actual environmental impacts of offshore development and the mitigation of any that appear to be negative. NFFO would like to point at the work conducted by Ørsted on the Westermost Rough project is an exemplar of what can be achieved</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-132	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.44	Fish and Shellfish Ecology	NFFO understands that the scoping report dismisses the potential impacts of electromagnetic field emissions (EMF) on fish, shellfish and cetaceans. A feature of floating, as opposed to fixed, wind farms, that the inter array cables descend gradually from each turbine, buoyed in mid water to achieve a 'lazy wave' configuration and allow for the movement of the turbine and as such cables will be suspended for long distances in the water column, not trenched and shielded by sediment or rock armouring. Organisms will therefore be exposed to EMF throughout the array. Therefore, NFFO as well as SNCBs understand that EMF should be scoped in the assessment and the potential impact on commercial fish and shellfish stocks or cetacean populations evaluated should be properly investigated. The NFFO points out that recent research has identified negative effects of EMF on the larval development of crab and lobster [Harsanyi et al (2022) The Effects of Anthropogenic Electromagnetic Fields (EMF) on the Early Development of Two	EMF has been scoped into fish and shellfish and marine mammal chapters though noting there is no evidence suggesting an impact in marine mammals from power cable EMF because of the very localised zone of influence.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 21: Marine Mammals

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Commercially Important Crustaceans, European Lobster, Homarus gammarus (L.) and Edible Crab, Cancer pagurus (L.) J. Mar. Sci. Eng., 10, 564] – both important commercial species in this region.		
NRW MLT-133	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.45	Marine Mammals	NRW TE does not agree with the rationale of using a 50km buffer for scoping purposes for cetaceans, or the 135km buffer for grey seals. The Annex II marine mammal features of SACs are mobile and wide ranging. They are not limited to the boundaries of the SACs, and can be found, and therefore impacted anywhere within the relevant management unit (MU) – including within the impact footprint of the underwater noise activities described in the scoping report. NRW	The species-specific IAMMWG (2015) MUs have been considered in the assessment of cetaceans, and OSPAR Region III interim MU in the assessment of seal species within the ES chapter (Section 21.5.1), as well as in the identification of SACs designated for marine mammal features which require assessment as part of the HRA process.	ES Volume 3, Chapter 21: Marine Mammals ES Volume 6 Appendix 8E: HRA RIAA

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				TE consider the MUs and the SACs within them as functionally linked areas (Chapman & Tyldesley 2016).		
NRW MLT-134	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.46	Marine Mammals	<p>NRW TE advises that the MU is the appropriate scale for consideration of offsite impacts for marine mammals. The proposed works fall within both the Celtic & Irish Seas MU for Harbour porpoise, and the OSPAR Region III interim MU for grey seal. We therefore advise that the following SACs with marine mammal features within the relevant MU should be scoped into the assessment (NRW, 2020a):</p> <ul style="list-style-type: none"> • Gogledd Môn Forol / North Anglesey Marine (Harbour porpoise) • Gorllewin Cymru Forol / West Wales Marine (Harbour porpoise) • Dynesfeydd Môr Hafren / Bristol Channel Approaches (Harbour porpoise) • Pen Llŷn a’r Sarnau / Llyn Peninsula and the Sarnau (Grey seal) • Cardigan Bay / Bae Ceredigion (Grey seal) 	In line with NRW (A) advice, the species-specific Inter-Agency Marine Mammal Working Group (IAMMWG, 2015; 2022) MUs have been considered in the assessment of cetaceans, and OSPAR Region III interim MU in the assessment of seal species within this ES Volume 3, Chapter 21: Marine Mammals as well as in the identification of SACs designated for marine mammal features which require assessment as part of the HRA process. Study areas used in this assessment are defined in ES Volume 3, Chapter 21: Marine Mammals, section 21.4.3.	<p>ES Volume 3 Chapter 21: Marine Mammals</p> <p>ES Volume 6 Appendix 8D and 8E</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> Pembrokeshire Marine / Sir Benfro Forol (Grey seal) 		
NRW MLT-135	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.47	Marine Mammals	Where the MUs include SACs outside of UK waters, transboundary impacts must also be considered, and the potential impacts on SACs within other jurisdictions should be assessed. Details of these sites can be found in NRW (2020a, attached).	Potential for transboundary effects have been considered in Section 21.13 of ES Volume 3, Chapter 21: Marine Mammals. Transboundary SACs have been screened for assessment in the HRA screening report and are included in the RIAA.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8E: HRA RIAA
NRW MLT-136	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.48	Marine Mammals	NRW TE indicates that the proposed works fall within the Offshore Channel, Celtic Sea & SW England MU for Bottlenose dolphin. There are no SACs with bottlenose dolphin features within this MU. We do not consider that the bottlenose dolphin features from the SACs listed above are likely to be found within the project impact	All details of the study area relating to Bottlenose Dolphins is included in section 21.2.4 ES Volume 3, Chapter 21: Marine Mammals. Specifics regarding SACs and the absence of Bottlenose Dolphins from these SACs in the relevant MU is included in the Bottlenose Dolphin existing baseline in section 21.5.1 of ES Volume 3, Chapter	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 21A: Marine Mammal Baseline Technical Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				area and therefore advise that there is no likely significant effect on this feature	21: Marine Mammals as well as Volume 6: Appendix 21A: Marine Mammal Baseline Technical Report.	
NRW MLT-137	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.49	Marine Mammals	With regards to the HRA, NRW TE advise that the proposed works are likely to have a significant effect (either alone or in combination with other plans or projects) on the aforementioned SACs and therefore recommend that an Appropriate Assessment (AA) is carried out on all of the sites listed. Advice on how to carry out the AA for those marine mammal features can be found in NRW (2020a, attached).	An AA has been implemented for marine mammals, based on the results of the HRA Screening Report.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8D and 8E
NRW MLT-138	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.50	Marine Mammals	NRW TE agrees with the use of the data sources listed (section 22.7), although it is not clear what data source IAMMWG (2021) refers to as this reference is not listed in the reference list. NRW TE note the intention to use project specific survey data but there is no further information on what surveys are intended, or what data will be collected. NRW strongly recommend further engagement with NRW TE and JNCC to discuss what surveys are	Additional information of surveys undertaken for the proposed Project have been outlined in the technical chapters where appropriate.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				proposed, to avoid the risk of there being inadequate data to form an assessment.		
NRW MLT-139	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.51	Marine Mammals	JNCC indicates that for offshore areas the relevant Special Areas of Conservation (SACs) for this development have been identified. Potential impacts scoped in and out for the EIA are appropriate but need more detail added as this is a Floating Offshore Wind (FLOW) project, and some impacts are still poorly understood.	Noted. A comprehensive impact assessment was undertaken for all SACs scoped into the assessment. This is including in Volume 3: Chapter 21: Marine Mammals, section 21.8. The chapter utilised Volume 1, Chapter 4: Description of the Proposed Project as well as the most current literature to inform the assessment's accuracy.	ES Volume 3 Chapter 21: Marine Mammals
NRW MLT-140	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.52	Marine Mammals	NRW TE agree with the stated intention that the Study Area (Section 22.3) will take into consideration (where available) species specific marine mammal Management Units (MUs) published by the Inter Agency Marine Mammal Working Group (IAMMWG, 2015) and a consideration of the designated sites within for the initial screening. However, JNCC indicates that the management unit (MU) for bottlenose dolphin relevant to this development is OCSW – offshore Channel, Celtic Sea and South West England, not Irish Sea MU.	The offshore Channel, Celtic Sea and South West England (OCSW) has been used in the assessment of bottlenose dolphin. Study areas are defined in Section 21.2.4 of the ES Chapter.	ES Volume 3 Chapter 21: Marine Mammals

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-141	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.53	Marine Mammals	JNCC would like to stress that the SCANS surveys proposed in Section 22.4.1 represent a snapshot of cetacean presence, as they represent a single survey conducted in each area. There may be other species present, for example, Risso’s dolphins.	The Project acknowledges that the DAS and SCANS surveys represent snapshot surveys. The marine mammal species scoped in for assessment were agreed with NRW and JNCC on 09/05/2023.	ES Volume 3 Chapter 21: Marine Mammals
NRW MLT-142	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.54	Marine Mammals	JNCC would like that Section 22.4.2 clearly state that the values represented in Table 22-2 are from counts from 2016 – 2019 itself. Also note in the text that the total population estimate is “	Revised population estimates are presented in the existing baseline studies for each scoped in species. These are located in Section 21.5.1 of the ES Chapter. Detail of the impacts scoped in and out are presented in Section 21.8 of the ES Chapter.	ES Volume 3 Chapter 21: Marine Mammals
NRW MLT-143	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.55	Marine Mammals	JNCC indicates that it would be beneficial if the distance between Marine Protected Areas (MPAs) and the array/cable scoping areas in Table 22-3 were separated, as the potential impacts associated with each area could be different.	Separate distances between protected sites and the Project array area and cable corridor have been provided where relevant in the ES Chapter, and in the HRA Screening Report.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8D: HRA Screening

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-144	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.56	Marine Mammals	JNCC indicates the following in relation to potential impact pathways in relation to marine mammals during construction, operation and decommissioning of the proposed project (Table 22-4) under Potential Impact Pathway: Effects of underwater sound: Underwater noise during the operational stage is not included as a potential impact pathway; this should be added. The effects of underwater sound during construction and operation will be very different. FLOW cable “thrums” and operational noise are not mentioned and noting that “maintenance potential effects same as construction” is not sufficient. Please note that cable “thrums” have not been well characterised in terms of underwater sound levels and potential to impact marine mammals either for individual turbines or arrays. This may require specific modelling or other studies. How turbine operating noise propagates from floating turbines is also poorly understood. JNCC also note that the likelihood of finding UXOs, especially in the inshore part of the study area, is considered high. JNCC	The potential impact of underwater noise during operation has been assessed in the Marine Mammal Underwater Noise Report and in Section 21.8.2 of the ES Chapter. The potential impact from entanglement with mooring lines and cables has been assessed in Section 21.8.2 of the ES Chapter. Numerous studies regarding the impact of mooring lines on marine mammals receptors have been cited including most prominently Benjamins et al., 2014.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 21A: Marine Mammals Baseline Technical Report ES Volume 6 Appendix 21C: Marine Mammals Noise Assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				highlight a position statement ¹ published Defra and signed by (amongst others) JNCC and NRW regarding UXO clearance methods. Entanglement with mooring lines and cables: Please include the reference for the specific study mentioned. This is an emerging technology which is poorly understood in terms of potential to impact marine mammals and entanglement events of FLOW with marine mammals not well quantified. This should be made clear.		
NRW MLT-145	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.57	Marine Mammals	NRW TE supports the inclusion of the measures detailed in section 22.5 to minimise the risk of impact to marine mammals.	Mitigation measures for marine mammals have been considered in the draft MMMP presented in Appendix 4A: Outline Construction Environmental Management Plan	ES Volume 6 Appendix 4A: Outline Construction Environmental Management Plan ES Volume 6 Appendix 8E: HRA RIAA

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-146	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.58	Marine Mammals	NRW TE agrees with the list of impact pathways as detailed in Table 22-4 to be scoped in to the assessment for marine mammals.	All impact pathways included in the Scoping Report and recommended throughout the Scoping Opinion have been comprehensively covered in Section 21.8 during the construction, operation, and decommissioning phases of the proposed Project.	ES Volume 3 Chapter 21: Marine Mammals
NRW MLT-147	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.59	Marine Mammals	Section 22.7 states that the assessment methodology for marine mammals will follow the standard methodology outlined for ecological receptors outlined in Volume 2, Chapter 8, which is in line with CIEEM guidance for ecological impact assessments (CIEEM, 2018). However, NRW TE indicates that this assessment methodology relates to terrestrial receptors, and some of the criteria are not appropriate for marine mammals. For example, Section 8.7.3.2 describes how the sensitivity of the receptor will be assessed based on geographical frames of reference, some of which are not relevant in the marine environment. NRW TE recommend further clarity is requested on the frames of reference that will be used for marine receptors.	The study area and relevant geographic frames of reference for marine receptors is defined in Section 21.4.1 of the ES Chapter.	ES Volume 3 Chapter 21: Marine Mammals

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-148	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.60	Marine Mammals	NRW TE note the potential for UXO to be present at the development site, and support the intention to collect magnetometer data to assess the potential for issues. NRW TE note that the potential for underwater noise impacts from UXO have already been scoped in to the assessment. We recommend that should UXO disposal be necessary, you should refer to the joint interim position statement on UXO clearance: https://www.gov.uk/government/publications/marine-environment-unexplodedordnance-clearance-joint-interim-position-statement/marine-environmentunexploded-ordnance-clearance-joint-interim-position-statement	The joint interim position statement on UXO clearance has been considered in the Marine Mammal Underwater Noise Assessment, and in the assessment of UXO clearance (Section 21.8.1)in the ES Chapter.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 21C: Marine Mammals Noise Assessment
NRW MLT-149	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.61	Marine Mammals	RSPB reminds the developer that the ES should provide a detailed programme of ornithological surveys and comprehensive identification of protected sites and species that could be affected by the proposal. All impacts on nature conservation interests should be fully described, assessed and the significance of impacts clearly explained in the ES.	A detailed programme of ornithological surveys, identification of protected sites and species and all required impact assessments are included in the ES both within the chapter and the ornithological technical appendix.	ES Volume 3 Chapter 22: Ornithology ES Volume 6 Appendix 22A: Ornithological baseline technical report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				The mitigation hierarchy should be followed to avoid, mitigate, or compensate for biodiversity losses. All impacts predicted should include fully worked up possible mitigation in the ES. Monitoring should be employed to verify predictions and identify any unexpected impacts.		
NRW MLT-150	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.62	Ornithology	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.	Further information of the evidence used in the ES chapter is provided in sections 22.4.4 and 22.14.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-151	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.63 and 3.69	Ornithology	JNCC indicates that the screening exercise for Special Protected Areas (SPA) at potential Likely Significant Effect (LSE), as part of Habitats Regulations Assessment (HRA), is incomplete and needs additional work.	<p>Screening exercise further has been further refined for ES. Specific revised foraging ranges were covered in Volume 3, Chapter 22: Ornithology, Section 22.4.3 which in turn have informed scoped in SPAs detailed in the Existing Baseline in Volume 3, Chapter 22: Ornithology, Section 22.5.1. These include:</p> <ul style="list-style-type: none"> - Skomer, Skokholm and the Seas off Pembrokeshire SPA; - Grassholm SPA; and - Castlemartin Coast SPA. <p>Smaller foraging ranges used for guillemot (95.2 km instead of 153.7 km) and razorbill (122.2 km instead of 164.6 km) outside of the Northern Isles to exclude data collected at Fair Isle (which presents an unusually high foraging range due to a lack of food). Site-specific foraging data from Grassholm SPA used for northern gannets (516.7 km instead of 509.4 km).</p>	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-152	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.64	Ornithology	It is of JNCC’s opinion that the long list of projects to be included within an incombination assessment is far from complete and needs additional work. This may be best undertaken after a screening exercise has identified the SPAs which may be impacted and upon which in-combination impacts need to be identified.	Addressed subsequent to scoping (during pre-application dialogue) as noted above.	ES Volume 3 Chapter 22: Ornithology ES Volume 6, Appendix 8E: HRA RIAA ES Volume 6: Appendix 22E: Ornithological Connectivity and Apportioning Report
NRW MLT-153	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.65	Ornithology	JNCC and NRW TE as the Statutory Nature Conservation Bodies (SNCBs) advise the use of Woodward et al. (2019) species-specific Mean Max +1SD. This represents a relatively quick and straightforward approach to establishing connectivity between a proposal’s location and a site’s qualifying features, as is required to establish likely significant effects. There is, however, the possibility that using this approach could miss out some colonies; therefore, a sense check will also need to be performed to ensure that all colonies for which	All sites have been scoped in as advised by NRW (A).	ES Volume 6 Appendix 22B: Marine Ornithology Colony Apportioning ES Volume 6 Appendix 8D: HRA screening

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				there is a potential for likely significant effect are included at the screening stage. Assessments should always be based upon the best and most up to date evidence available.		
NRW MLT-154	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.66	Ornithology	The list of species to be included in scoping will need to be expanded to include all marine birds listed as features of designated sites within the mean max +1SD foraging ranges (Woodward et al 2019).	Noted. As above.	ES Volume 3 Chapter 22: Ornithology
NRW MLT-155	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.67	Ornithology	RSPB considers that the scoping document is generally comprehensive and covers most ornithological issues sufficiently. Nevertheless, there are some additional matters that we consider need further consideration as part of the EIA, including the screening of designated sites and cumulative/in-combination effects. Furthermore, the array area also falls within potential spawning and nursery areas for important seabird foods prey items	Noted. All designated sites screened into the existing baseline of the ES are provided in section 22.5 of Chapter 22: Ornithology. A full ornithological CEA was conducted and included in section 22.11.2. Details regarding spawning and nursery grounds for fish are included in Chapter 20: Fish and Shellfish.	ES Volume 3 Chapter 22: Ornithology ES Volume 3 Chapter 20: Fish and Shellfish

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				which include sand eel, herring, and sprats.		
NRW MLT-156	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.68	Ornithology	Section 23.3. paragraph 2 for clarity JNCC suggest rewording to “and selected sites designated for far ranging species with a mean maximum +1 Standard Deviation foraging range (from Woodward et al. 2019) that is greater than 100 km.” Furthermore, NRW TE advise that all designated sites with named features whose foraging ranges fall within the mean maximum foraging range +1 standard deviation (Mean Max +1SD) in Woodward et al 2019, should be included for scoping as it is not possible to know what sites might be affected until the surveys show what species are present, and key work such as apportioning has been completed. Potential impacts on wintering bird features and the potential impacts on birds migrating to and from protected sites, along with estuarine Special Protection Areas (SPA) and Sites of Special Scientific	Mean max +1SD foraging ranges (Woodward et al., 2019) were used to inform the Apportioning Technical Report, ES Chapter and HRA. All protected seabird species colonies/SPAs were listed when within foraging range from the Array Area.	ES Volume 3 Chapter 22: Ornithology ES Volume 6 Appendix 8D: HRA Screening Appendix 22E: Ornithological Connectivity and Apportioning Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>Interest (SSSI) features which could be affected by collision risk on migration, should also be included in scoping and screening. Given that populations of breeding seabird qualifying features at SPAs are afforded protection throughout the year, projects or plans remote from the breeding colony site should be subject to the HRA process regardless of time of year at which birds may interact with those projects/plans, if an impact pathway exists. Therefore, there is a need for an HRA and EIA to consider species at colonies that are within foraging distance of the proposed development during the breeding season, and to also consider assessment of impacts to birds from these colonies in the non-breeding season.</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-157	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.69	Ornithology	In Table 23-1 JNCC notes that for common guillemot outside of the Northern Isles, JNCC recommend a foraging range of 95.2km, which excludes data from Fair Isle collected during years in which the species was thought to show unusual foraging ranges due to lack of food. For razorbill outside of the Northern Isles, JNCC recommend a foraging range of 122.2km, which excludes data from Fair Isle collected during years in which the species was thought to show unusual foraging ranges due to lack of food. For northern gannet at Grassholm SPA JNCC recommend a foraging range of 516.7km based on site-specific tracking data. These foraging ranges will identify SPAs which should be screened in for further consideration as part of the HRA process. Additionally, NRW TE requests that site-specific tracking data are available e.g. for northern gannet at Grassholm SPA should be assessed in addition to the Mean Max +1SD foraging ranges from Woodward et al 2019. These foraging ranges will identify SPAs and SSSIs which should	Seabird features within the Woodward et al., 2019 mean-max foraging ranges +1SD included in the ES assessment.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>be screened in for further consideration as part of the HRA and EIA process.</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-158	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.70	Ornithology	In Table 23-2, JNCC, NRW TE and RSPB indicate that many features of SPAs with foraging ranges which overlap the project array area have been missed in this table. The exercise should be repeated. For example, some missing SPAs include the Isles of Scilly SPA (European Storm Petrel, and assemblage which includes Manx shearwater, northern fulmar and Atlantic puffin as named components) and several SPAs including Manx shearwater as a feature across the western UK. It is not clear why this table does not include many more SPAs. JNCC notes that the text states “Once the ornithological receptors have been established, the foraging ranges set out in Table 23-1 will be used to identify any further designated sites, beyond those listed in Table 23-2, that will need to be assessed as part of the EIA”. However, it remains unclear what the purpose of Table 23-2 is, if it is not to conduct a full review of SPA features within foraging range, that could later be excluded if not present in ornithological characterisation surveys. NRW TE is in	Robust screening was undertaken as part of the HRA Screening exercise, using the Woodward et al., 2019 mean-max foraging ranges + 1SD, with the exception of gannet, guillemot and razorbill, where different or site-specific ranges were used as per JNCC’s request. The Isles of Scilly SPA as well as named species including the European Storm Petrel, Manx shearwater, northern fulmar and Atlantic puffin were all also screened into the ES chapter and addressed specifically in Sections 22.5.1 and 22.7.2.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				agreement that the list of sites and designated features needs to be significantly expanded to include all designated sites within mean max +1SD foraging ranges (Woodward et al 2019) which overlap with the project array. These foraging ranges will identify SPAs which should be screened in for further consideration as part of the HRA process and SSSIs for the EIA. RSPB also stresses that possible adverse impacts may be applied to a range of birds (including seabird features of SPAs and SSSIs) both breeding and nonbreeding populations over a wide area of search; to include seabird features within their mean maximum foraging ranges.		
NRW MLT-159	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.71	Ornithology	RSPB indicates that the Balearic shearwater and appropriate SPAs allocated/designated for this species should be also considered. This is Europe's only critically endangered seabird which occurs in Welsh waters including the Celtic Sea (Phillips et al. "Consistent concentrations of critically	Balearic Shearwater assessed qualitatively in Section 22.5.1 (Existing Baseline) and Sections 22.7.1 and 22.7.2 (Construction and Operational and Maintenance impacts) of the ES Chapter.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				endangered Balearic shearwaters in UK waters revealed by at-sea surveys." Ecology and Evolution (2020).		
NRW MLT-160	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.72	Ornithology	<p>RSPB indicates that Table 23-2 should also include the following international sites:</p> <ul style="list-style-type: none"> • Aberdaron Coast and Bardsey Island SPA • Isles of Scilly SPA • Great Saltee SPA (Republic of Ireland) • SPAs designated for Balearic shearwater • SSSIs which are components or underpin SPAs <p>RSPB also indicates that some of the SSSI features for those listed are incorrect for example, the designated features of the Skerries are incorrectly listed as Herring gull, lesser black-backed gull and puffin. Whereas, the qualifying features are Arctic tern, common tern and roseate tern. RSPB recommend you to liaise with the relevant SNCBs to obtain the correct details of relevant designated sites.</p>	All appropriate sites within the Woodward et al., 2019 mean-max foraging range (+1SD) identified during the HRA Screening. Sites for shearwaters noted.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-161	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.73	Ornithology	<p>JNCC and NRW TE strongly recommends the review of additional data to be used in conjunction with data from digital aerial surveys (section 23.4) to further inform several aspects of the screening, EIA and HRA assessments. For example:</p> <ul style="list-style-type: none"> Tracking data to demonstrate use of the project array area and colony of origin, which is likely available for several species/colonies of relevance (e.g. gannet at Grassholm SPA, several Manx shearwater colonies). This may potentially also inform flight height and flight speed parameters for use within collision risk modelling (noting that discussion with SNCBs would be required in advance of relying on such information that is not currently included within SNCB advice around generic parameters). Colony monitoring to inform demographic parameters for use in Population Viability Analysis (PVA) (e.g. Skomer common Guillemot long-term monitoring study). 	Colony count data and other colony monitoring data was reviewed and checks undertaken of available tracking data as per email of 24 October 2023. The potential impact from the Project on grey seals within the wider OSPAR Region III interim MU has been considered in the HRA assessment.	<p>ES Volume 3 Chapter 21: Marine Mammals</p> <p>ES Volume 6 Appendix 8E: HRA RIAA</p> <p>ES Volume 6 Appendix 22A: Marine Ornithology Baseline</p> <p>ES Volume 6 Appendix 22B: Marine Ornithology Colony Apportioning</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-162	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.74	Ornithology	NRW TE agrees with the 4km buffer for the array area and cable route being applied for the two years of digital aerial surveys (section 23.4). However, NRW TE encourages you to provide details on survey design and coverage so that NRW TE can comment on whether or not it is sufficient. NW TE would welcome early engagement and discussion with you regarding survey requirements.	HiDef issued details of their digital aerial survey design in the survey summary paper (20/01/2023) and further information surrounding survey coverage in their note ‘design and model-based analysis methods’ (16/03/2023). Survey design details can also be found in Appendix 22A: Marine Ornithology Baseline. This was agreed as being sufficient in subsequent meetings with NRW and JNCC (08/02/2023)	ES Volume 6 Appendix 22A: Marine Ornithology Baseline.
NRW MLT-163	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.75	Ornithology	NRW TE would like to understand how you propose to determine flight height (section 23.4 and 23.7). Flight height analysis from digital aerial footage has not yet been proven, or accepted by SNCBs so generic flight heights from Johnston et al. (2014) should also be used in assessing collision risk. As part of the Collision Risk Mortality CRM assessment, applicants are advised to use the Basic Band model option 2 (Johnston et al, 2014) using flight height data. Discussions between the SNCBs and digital aerial providers are ongoing, but in the interim, until these investigations are completed, use of	Collision Risk Modelling made use of generic flight heights from Johnston et al., 2014 and Option 2 of the SCRM.	ES Volume 6 Appendix 22C: Ornithological Collision Risk Modelling Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Johnston et al. (2014), is considered appropriate.		
NRW MLT-164	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.76	Ornithology	RSPB indicates that the scoping area for the EIA should be denoted by meanmaximum foraging ranges from seabird SPAs and SSSIs. RSPB note you reference to Thaxter et al (2012), the initial standard of mean-maximum foraging ranges based on seabird tracking data and more recent studies, Future of the Atlantic Marine Environment (FAME) and Seabird Tracking and Research (STAR) projects. Wakefield et al, 2017 should be used with caution when applied to Lundy.	A detailed Ornithology baseline has been compiled for the proposed Project which includes of vulnerable species of both breeding and non-breeding seabird populations.	ES Volume 3 Chapter 22: Ornithology ES Volume 6 Appendix 22A: Ornithology Baseline Technical Report
NRW MLT-165	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.77	Ornithology	RSPB indicates that based upon the Lundy 2017/18 Manx shearwater survey and the 2021 Cliff nesting survey, Lundy now supports over 27,000 seabirds (i.e. above the 20,000 seabird assemblage SPA qualifying threshold) including 5,504 pairs Manx	All appropriate sites within the Woodward et al., 2019 mean-max foraging range (+1SD) identified during the HRA Screening. Sites for shearwaters noted.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				shearwater, which also exceeds the published international importance threshold for this species.		

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NRW MLT-166	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.78	Ornithology	<p>With regards to site-specific ornithological surveys and baseline data, RSPB indicates:</p> <p>For offshore:</p> <ul style="list-style-type: none"> • Survey methods must comply with up-to-date and best practice guidance. There are limitations associated with aerial surveys including the timing of flights being confined to limited hours of daytime owing to visibility and logistic requirements. Thus, it is crucial to consider the nocturnal and crepuscular activity patterns for all seabirds, especially given the high prevalence of nocturnal species. • The most up to date information should be used including cliff nesting seabirds on Lundy in 2021. The RSPB can provide this information, which is not yet published. It should also be noted that evidence for the importance of the Celtic Sea for some species (e.g. Wakefield et al, 2017 which covered four species, kittiwake, shag, guillemot and razorbill) should be used with caution based on the age of the colony data used in the modelling. Where modelling is based upon old datasets (e.g. Seabird 2000) 	<p>Nocturnal and crepuscular activity of seabirds addressed qualitatively within section 22.7.1 of the ES chapter. Further engagement with SNCBs held in a series of meetings and with non-statutory stakeholders on 06/07/2023 and 10/07/2023 these include NRW, Natural England and the RSPB.</p>	<p>ES Volume 3 Chapter 22: Ornithology</p>

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				<p>and where the populations of seabirds at colonies such as Lundy have changed significantly since, re-modelling should be undertaken to use the latest census data.</p> <ul style="list-style-type: none"> • RSPB strongly recommend that the developer opens discussions with ornithologists from NRW, NE, RSPB and with other experts who are working on a number of on-going seabird study projects, including tracking data. This data will be of importance in the context of temporal limitations of the survey method, especially for shearwater species. It will also be of benefit for parameterising the collision risk and apportioning models. <p>Onshore</p> <ul style="list-style-type: none"> • RSPB understand that the cable landfall and route corridor are in proximity to the Castlemartin Coast SPA and Angle Peninsula Coast SSSI which are designated for chough. Surveys for chough are not adequately defined in section 8.4.4.1. The RSPB can provide terrestrial bird data for the onshore options, including chough data, and would welcome the 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>opportunity to offer further advice on suitable onshore ornithological survey methods. You recognise the potential for a variety of onshore bird surveys which will include a 100m buffer. Surveys under consideration include breeding and wintering bird surveys. Guidance on appropriate bird survey methods can be found in "Bird Monitoring Methods: A Manual of Techniques for Key Species" Gilbert, G. Gibbons, DW and Evans, J. Pub. RSPB, BTO, WWT, JNCC, ITE Sandy 1998. ISBN 1 901930 03 3</p>		

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NRW MLT-167	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.79	Ornithology	JNCC indicates that in Table 23-3, the due to the lack of evidence, mortality effects resulting from displacement of diving birds due to underwater noise (e.g. UXO detonations) cannot be excluded for the Construction of decommissioning Project Phase at this stage. Furthermore, Table 23-3 indicates that creation of roosting habitat as a positive but JNCC would like also to note potential increase in collision risk as a result of this increased attraction for certain species. Related to this, benthic community structures may change as a result of floating wind infrastructure, and this could potentially increasing presence of some seabird species putting them at risk of increased collision.	Addressed in Section 2.7.1 under the subsection Effects of Underwater Noise on Diving Seabirds of the ES Chapter.	ES Volume 3 Chapter 22: Ornithology
NRW MLT-168	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.80	Ornithology	NRW TE consider that the introduction of platforms for the creation of roosting habitat for birds (Table 23-3) should also be assessed with regards the potential increased collision risk.	The potential for increased floating platform collisions addressed in section 22.7.2 of the ES chapter.	ES Volume 3 Chapter 22: Ornithology

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NRW MLT-169	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.81	Ornithology	RSPB notes that Seabird Food Prey items should be properly considered in the assessment. The RSPB recently commissioned desktop work focused on 11 species of forage fish, including Sandeel, Sprat and Herring which are key food prey items for seabirds (Campanella and van der Kooij, 2021). Spawning and nursery grounds of forage fish in Welsh and surrounding waters. Cefas Project Report for RSPB, 65pp). This report (and associated spatial data) provides information on the forage fish community in Welsh and surrounding waters, including the Irish and Celtic Seas and the western English Channel. Given that several forage fish (prey) species in the northeast Atlantic have shown major changes in distribution and abundance, up-to-date information on their recent distribution patterns is vital. The evidence-base for some food prey species such as sand eel, sprats or herring is either old or there is a lack of data (sprats and herring) and we would therefore recommend that appropriate surveys of these species	There have been no surveys of bird prey species undertaken for the proposed Project. Instead, we have relied on desk-based assessments and detailed herring and sandeel spawning heat map-based assessment for inclusion in the fish and shellfish chapter.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 22: Ornithology

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				are included within the site or areas where cumulative impacts could occur.		
NRW MLT-170	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.82	Ornithology	RSPB notes that nocturnal seabirds may be attracted to the offshore project infrastructure lighting causing them to become disorientated and/or increase their risk of collision with the offshore arrays (Table 23-3). The ongoing Llŷr Project offshore bird surveys being carried out will provide information to inform which species are present in the area. However, it is to clarify that there is no uncertainty about the attraction of fledgling shearwaters to light sources in general but only about the magnitude of this effect from offshore wind turbines. It	The attraction of Procellariiformes including shearwater and petrel species to lighting addressed qualitatively in Section 22.7.2 - Attraction of Nocturnal Seabirds to Project Infrastructure Lighting of the ES chapter.	ES Volume 3 Chapter 22: Ornithology

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				should be highlighted that the assessment of this sensitivity will be made more difficult by the temporal limitations of the survey method and therefore the tracking data will be of value to gain the best possible understanding without any direct assessment.		
NRW MLT-171	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.83	Ornithology	RSPB indicates that without detailed information regarding the proposed development in its entirety, it is not possible to consider appropriate mitigation. RSPB acknowledge that baseline data from site-specific surveys will inform the need for mitigation measures. RSPB will be happy to discuss mitigation and feasibility of potential options with the developer once the baseline is established.	The Applicant is fully committed to feasible mitigation and welcomes the opportunity to discuss options with RSPB and other stakeholders should the proposed Project be consented.	ES Volume 3 Chapter 22: Ornithology

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NRW MLT-172	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.84	Ornithology	JNCC are content with the 4km array buffer proposed (section 23.7), given the species present in this area. However, since there is no detail provided on survey design, coverage etc JNCC cannot comment any further on whether coverage is sufficient. There is no mention of density surface modelling; is this intended to be undertaken to inform density and spatial distributions? JNCC would like to stress that they are not satisfied with regard to accuracy of flight heights estimated from digital aerial survey data. As such, generic flight heights (from Johnston et al. (2014)) should also be used in collision assessments (with site specific flight heights shown as context or if desired, used in additional modelling for consideration).	Generic flight heights from Johnston et al., 2014 used in the Collision Risk Assessment report. Density surface modelling was undertaken through Bayesian Point Processing using Inlabru to generate densities and inform spatial distributions.	ES Volume 6 Appendix 22A: Marine Ornithology Baseline ES Volume 6 Appendix 22C: Ornithological Collision Risk Modelling Report
NRW MLT-173	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.85	Marine Archaeology	We remind you that Historic England have no jurisdiction in Wales, as it wrongly stated in the report (Ancient Monuments are Archaeological Areas Act 1979, Paragraph 24.2.2.)	Royal Commission on the Ancient and Historical Monuments of Wales and Cadw has jurisdiction in Wales under the Ancient Monuments are Archaeological Areas Act 1979.	ES Volume 2 Chapter 9: Historic Environment and Cultural Heritage ES Volume 3 Chapter 24:

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						Marine Archaeology
NRW MLT-174	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.86	Marine Archaeology	The Historic Environment (Wales) Act 2016 should be added to the list of relevant legislation given in 24.2. Regulatory and Planning Policy Context. Also, reference should be made to the Protection of Wrecks Act 1973 which is still one of the key pieces of UK-wide legislation for the protection and management of historic shipwrecks.	Reference to the Historic Environment (Wales) Act 2016 and Protection of Wrecks Act 1973 has been made in the ES.	ES Volume 3 Chapter 24: Marine Archaeology
NRW MLT-175	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.87	Marine Archaeology	The RCAHMMW indicates that reference should be made to (section 24.5) recently issued (2021) guidance by the Crown Estate regarding the provision of WSIs for offshore wind schemes: https://www.thecrownestate.co.uk/media/3917/guide-to-archaeologicalrequirements-for-offshore-wind.pdf	Reference 2021 Crown Estate guidance regarding the provision of WSIs for offshore wind schemes has been made in the ES.	ES Volume 3 Chapter 24: Marine Archaeology
NRW MLT-176	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.88	Marine Archaeology	Formal reference should be made to Policy_SOC05 (Historic Assets) of the Welsh National Marine Plan (WNMP), with particular regard to the stated WNMP requirement to 'avoid,	Reference to the WNMP has been made in the ES.	ES Volume 3 Chapter 24: Marine Archaeology

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				minimise, mitigate' impact on historic assets.		
NRW MLT-177	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.89	Marine Archaeology	The RCAHMW would like to stress that a programme of marine archaeological geophysical survey should be put in place (rather than an option as stated in section 24.8) in order to fully understand and assess the marine archaeology located within the study area during the EIA process	Archaeological assessment of marine geophysical survey data has been undertaken. The results are presented in the ES.	ES Volume 3 Chapter 24: Marine Archaeology ES Volume 6 Appendix 24A: Marine Archaeology Desk Based Assessment (DBA)
NRW MLT-178	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.90	Shipping and Navigation	Trinity House have indicated that a full Navigation Risk Assessment will be expected containing: <ul style="list-style-type: none"> • A comprehensive vessel traffic analysis in accordance with MGN 654. • An adequate assessment of the possible cumulative and in-combination effects on shipping routes and patterns. • The consideration and assessment of a potential "corridor" between the Llŷr 1 and Llŷr 2 array areas, including future traffic patterns. 	A full assessment of impacts (risks) to navigation has been included in the ES. A Navigational Risk Assessment has also been included which informs the ES and has been undertaken in compliance with MGN 654. Cumulative projects relevant to shipping and navigation have been considered as part of the cumulative and in-combination effects assessment.	ES Volume 3, Chapter 25: Shipping and Navigation ES Volume 6, Appendix 25A Shipping and Navigation Technical Assessment.

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NRW MLT-179	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.91	Shipping and Navigation	Trinity House consider that this development will need to be marked with marine aids to navigation by the developer/operator in accordance with the general principles outlined in IALA (International Association of Marine Aids to Navigation and Lighthouse Authorities) Guideline G1162 - The Marking of Offshore Man-Made Structures as a risk mitigation measure. In addition to the marking of the structures themselves, it should be borne in mind that additional aids to navigation such as buoys may be necessary to mitigate the risk posed to the mariner, particularly during the construction phase. All marine navigational marking, which will be required to be provided and thereafter maintained by the developer, will need to be addressed and agreed with Trinity House. This will include the necessity for the aids to navigation to meet the internationally recognised standards of availability and the reporting thereof.	Embedded mitigation measures include compliance with lighting and marking requirements in consultation with Trinity House,	ES Volume 3 Chapter 25: Shipping and Navigation
NRW MLT-180	Natural Resources Wales Marine	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.92	Shipping and Navigation	Trinity House considers that an assessment of impact on existing aids to navigation is needed.	The impact of existing navigational aids has been considered in the ES.	ES Volume 3 Chapter 25:

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Licencing Team					Shipping and Navigation
NRW MLT-181	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.93	Shipping and Navigation	A decommissioning plan, which includes a scenario where on decommissioning and on completion of removal operations an obstruction is left on site (attributable to the project) which is considered to be a danger to navigation and which it has not proved possible to remove, should be considered. Trinity House indicates that such an obstruction may require to be marked until such time as it is either removed or no longer considered a danger to navigation, the continuing cost of which would need to be met by the developer/operator.	A decommissioning plan for the removal of obstructions has been considered.	ES Volume 3 Chapter 25: Shipping and Navigation
NRW MLT-182	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.94	Shipping and Navigation	Trinity House indicates that there is a possible requirement for navigational marking of the export cables and the vessels laying them. If it is necessary for the cables to be protected by rock armour, concrete mattresses or similar protection which lies clear of the surrounding seabed, the impact on navigation and the requirement for appropriate risk mitigation measures needs to be assessed.	Compliance with MGN 654 with regard to the reduction of under keel clearance associated with cable protection has been considered.	ES Volume 3 Chapter 25: Shipping and Navigation

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-183	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.95	Commercial Fisheries	Section 26.4 reads: "Average yearly landings at Milford Haven total 686,239 tonnes at a value £1,026,295,194." NFFO points at this as an obvious inaccuracy that should be checked. Whilst the Milford Haven fishing fleet is undeniably industrious and successful, it seems unlikely that it has ever landed over £1 billion of fish, particularly as this is more than the entire UK fleet has landed in some recent years.	The financial error regarding landings has been noted and updated based on the latest available commercial fisheries landings data.	ES Volume 3 Chapter 26: Commercial Fisheries
NRW MLT-184	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.96	Commercial Fisheries	NFFO disagrees with the assessment of the likely impact on fishing businesses of the construction of this wind farm. Table 26.1 assumes that the "loss or restricted access to commercial fishing grounds" during the operational phase of the project will be temporary or partial, at least for static gear fishing vessels. NFFO disagrees with this assumption as their members have been unanimous in the view that it will be impossible to safely operate commercial fishing gear within a floating wind farm. The trailing mooring cables and inter-array electricity export cables present a severe snagging hazard and becoming	The Applicant acknowledges the NFFO response. Whilst UK legislation does not prohibit commercial fishing within offshore wind farms it is acknowledged that there are likely to be stakeholder concerns around fishing within the array area where floating foundations are deployed. A realistic worst case scenario has been applied in the assessment presented in the chapter, assuming commercial fishing activity will not resume within the operational array area.	ES Volume 3, Chapter 26: Commercial Fisheries

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>fast on a seabed obstacle is extremely dangerous for any boat. Towed fishing gear would very easily become entangled, static gear also does not remain motionless, static pots routinely move with wind, waves and tide (displacement of 1km or more is not uncommon), hence fishing gear could easily become entangled in a turbine mooring system. Moreover, fisherman trying to haul this gear might not be aware of this until it is too late, and boats become snagged on the unseen obstacle. Therefore, fishing within a floating wind farm is highly unlikely to be possible from either a safety or economic standpoint.</p>		

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NRW MLT-185	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.97	Commercial Fisheries	NFFO considers that fisheries exclusion from the site will create the additional problem of displacement of fishing effort, which the scoping report does not acknowledge. Fishermen forced out of the area by the construction of the site will either have to accept a permanent reduction in their income, or will have to try to mitigate their losses by fishing elsewhere. This will entail increased fuel costs, longer working hours and an enhanced likelihood of gear conflict, as different fisheries attempt to share the same, increasingly restricted grounds. All of this will be exacerbated by the cumulative effects of displacement from the many other floating turbine arrays currently being proposed for the Celtic Sea. These harms to existing local businesses are substantial and reasonably foreseeable and should be with the scope of the Llŷr projects' impact assessment. The assessment should acknowledge this exclusion and displacement (i.e., that commercial fishing will not resume within the footprint of the array post-	The Applicant acknowledges the NFFO response, and the impact assessment presented in the chapter considers the potential for displacement and assesses potential cumulative displacement effects.	ES Volume 3, Chapter 26: Commercial Fisheries

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				construction) as a realistic worst-case scenario.		
NRW MLT-186	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 3.98	Other Sea Users	No comments were received on this topic.	Noted.	n/a
NRW MLT-187	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.1	Designated Sites	Please see comments above on Fish and Shellfish Ecology, Marine Mammals and Ornithology for additional sites which should be scoped in Table 28-1.	Noted.	n/a
NRW MLT-188	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.1	Climate Change and Major Accidents and Disasters	No comments were received on this topic.	Noted.	n/a

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-189	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.2	Combined and Cumulative Effects of the Project	JNCC and NRW TE advises that projects which are built and operational and have residual impacts would need to be considered in Cumulative Effects Assessment (CEA). Therefore, developments which have been constructed and have ongoing effects on features of protected sites (e.g., operational wind farms) should be included.	Relevant residual impacts were considered in the Cumulative effects assessment undertaken in each topic chapter, following methodology described in the Appendix 5A: CEA Approach.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology
NRW MLT-190	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.3	Combined and Cumulative Effects of the Project	JNCC and NRW TE also advise that developments within foraging range of those SPAs scoped in for LSE should be included within the in-combination assessment. This may include developments beyond the extents indicated in Table 30-1.	Where relevant, operational developments were included as part of the CEA longlist and screened as appropriate for the Cumulative effects assessment in the topic chapters.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology
NRW MLT-191	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.4	Combined and Cumulative Effects of the Project	JNCC and NRW TE are pleased that a variety of sectors/activity types have been considered in Table 30-2 (e.g. Greenlink Interconnector cable project) but understand that the list is far from complete. Additional projects may be relevant based on sites identified as at potential risk of LSE from screening exercise as well as MU overlay with other projects in relation	Cumulative effects have been assessed as part of the ES. An updated methodology and scope for the cumulative effects assessment are set out in ES. Recommended projects have been added to the CEA long list for consideration as part of each cumulative effects assessments, undertaken in the different topic chapters. Round 4 proposed projects	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				to marine mammals. In addition, strategic plans such as TCEs Aggregates, FLOW and R4 plans will need to be considered in cumulative assessment. Round 4 preferred projects, Burbo Bank OWF, Burbo Bank Extension, Gwynt y Môr, Awel y Môr, Rhyl Flats, Robin Riggs, Walney, Arklow Bank, Celtic Interconnector (cable project) should be added. A series of floating offshore wind projects in the Celtic Sea have been omitted, including Llywelyn, Gwynt Glas, White Cross, and Petroc. There are also several offshore wind proposals within 200km in Irish territorial waters of the Celtic Sea, for example the Emerald Project. Please also note the Marine Energy Test Area (META) has applied for a marine licence variation.	have also been added to the inter-related effects assessment these include Burbo Bank OWF, Burbo Bank Extension, Gwynt y Môr, Awel y Môr, Rhyl Flats, Robin Riggs, Walney, Arklow Bank, Celtic Interconnector.	
NRW MLT-192	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.5	Combined and Cumulative Effects of the Project	NRW TE advise that particular attention is paid to temporal and spatial cumulative effects on spawning and nursery habitats for fish receptors, as well as underwater noise.	Noted. This is covered in the fish and shellfish ES chapter.	ES Volume 3 Chapter 20: Fish and Shellfish

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW MLT-193	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.6	Marine Mammals	NRW TE does not agree with the scoping boundaries for marine mammals and therefore considers the cumulative assessment search areas needs to be revised (Table 30-1). The MU is the appropriate scale for screening of plans and projects for marine mammal impacts into the assessment. Therefore, these should also include the Morlais Tidal Energy Development Zone, Project TIGER, Whitecross FLOW and Awel y Mor.	The inclusion of the following projects was noted in section 21.3.3 of the ES chapter with inclusion in the cumulative assessment being located in section 21.11.2: - Morlais Tidal Energy Development Zone; - Project TIGER; - Whitecross; and - Awel y Mor.	ES Volume 3 Chapter 21: Marine Mammals
NRW MLT-194	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.7	In-Combination and Cumulative Effects	In relation to seascape, landscape and visual effects, NRW TE indicates that the Rhoscrowther Wind Farm, Project Erebus (1.7km from the project) and Project Valorous (3km from the project) are likely to result in cumulative effects	Noted. Project Erebus, Valorous and Rhoscrowther Wind Farm have been scoped into the CEA throughout the technical chapters	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)
NRW MLT-195	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.8	In-Combination and Cumulative Effects	Although the cable route is not clearly defined in the report, section 8.3 implies it has been confirmed. NRW understand that you intend to work with the Erebus Project (Blue Gem Wind) to possibly integrate the two developments, which may include use of a common export cable route, grid connection location and substation/ control building for the two projects.	A final cable route has been assessed within the ES. A minimum separation distance of 150 m will be established between the offshore export cables of project Erebus and of the proposed Project.	ES Volume 1 Chapter 4: Description of Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Furthermore, cable routing has potential for interaction with the Greenlink interconnector cable which needs to be clarified. NRW encourage you to work with neighbouring developers on sharing cable routes and associated infrastructure to reduce cumulative environmental impacts.		
NRW MLT-196	Natural Resources Wales Marine Licencing Team	ES Volume 6 Appendix 5B Scoping Opinion, Paragraph 4.9	In-Combination and Cumulative Effects	<p>Please refer to comments throughout this report for impacts that should be included. For example, NRW TE advise the following impacts should be scoped in during the operation phase:</p> <ul style="list-style-type: none"> • Temporary increase in SSC and sediment deposition leading to contaminant mobilisation, turbidity and smothering effects; • Indirect habitat loss; • Disturbance to benthic habitats; • Habitat alteration; • Effects of electromagnetic fields (EMF) emissions; • Changes in hydrodynamics and/or other potential impacts on physical processes that will inform impacts on benthic habitats (see comment above and in Physical Process section). 	Impacts from SSC and sediment deposition, loss, disturbance and alterations to habitat, EMFs, and changes to hydrodynamics and physical processes have been considered within the ES.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
MOD-1	Ministry of Defence	Paragraph 4 of MOD Response	Aviation and Radar	Volume 2, Section 14 Aviation and Radar of the Scoping Report correctly identifies the MOD as a relevant receptor. The use of airspace for defence purposes in the vicinity of the proposed development have been appropriately identified and considered. The Scoping Report considers some of the aviation and radar systems that may be affected by the proposed wind farm.	Impacts to the aviation and radar has been further considered within the ES.	ES Volume 1 Chapter 27: Aviation and Radar
MOD-2	Ministry of Defence	Paragraph 5 of MOD Response	Aviation and Radar	The report identifies that the turbines have the potential to affect and be detectable to, Primary Surveillance Radars (PSR) and that there are 3 PSR in the wider region, all located in North Devon. It is noted that the Scoping Report does not identify potential impact on the Air Defence Radar (ADR) sited at RAF Portreath. Assessment on the basis of the information currently available has identified no MOD concerns.	Impacts to the PSR has been further considered within the ES and includes assessment of the ADR at RAF Portreath.	ES Volume 1 Chapter 27: Aviation and Radar

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
MOD-3	Ministry of Defence	Paragraph 6 of MOD Response	Aviation and Radar	The impact of the development on military low flying is identified at Volume 2 Sections 14.4.7 and 14.5 has been scoped in and the applicant states in the Scoping Report that they are committed to lighting and charting the turbines. In the interests of air safety, the MOD will request that the development is fitted with MOD accredited aviation safety lighting in addition to any requirements set out under the Air Navigation Order 2016. The MOD will also require that sufficient information is submitted to ensure accurate marking of the development on aeronautical charts	Appropriate aviation safety lighting will be installed in all offshore equipment as required. Further details on the project safety measures are described in ES Volume 1, Chapter 4: Description of Proposed Project. Required information will be submitted to MoD once the project design has been finalised, to ensure accurate marking are made to aeronautical charts.	ES Volume 1, Chapter 4: Description of Proposed Project ES Volume 1 Chapter 27: Aviation and Radar
MOD-4	Ministry of Defence	Paragraph 7 of MOD Response	Shipping and Navigation	Impact on military activity has been recognised in Volume 3, Section 27.3.1 of the Scoping Report. Whilst the Llŷr 1 and Llŷr 2 array areas proposed do not overlap with any Practice and Exercise Areas (PEXA), the information provided indicates that cable routing passes close to but not through Danger Area D113A (Castlemartin). Given the use of this Danger Area and the existence of a Marine Disposal Site (as identified at section 27.3.3) the	Llŷr 2 no longer forms part of the project so sensitive areas are avoided.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				installation of this cable within the Danger Area will not be acceptable.		
MOD-5	Ministry of Defence	Paragraph 8 of MOD Response	Shipping and Navigation	The Llŷr 2 array area falls within Oil & Gas blocks containing a highly surveyed route. These highly surveyed routes are retained by the MOD to support national defence requirements. It is necessary to ensure that the navigation of these highly surveyed routes are not obstructed or otherwise impeded by offshore development. The extent and position of highly surveyed routes is not in the public domain.	Llŷr 2 no longer forms part of the project so sensitive areas are avoided.	ES Volume 1 Chapter 4: Description of the Proposed Project
MOD-6	Ministry of Defence	Paragraph 9 of MOD Response	Shipping and Navigation	The Llŷr 2 array area conflicts with highly surveyed routes. Wind turbine development within the Llŷr 2 array area would therefore be incompatible with defence requirements. The MOD would object to any application for the proposed deployment of floating wind turbines at the Llŷr 2 location in its current form. To mitigate this likely objection, it is recommended that the	Llŷr 2 no longer forms part of the project so sensitive areas are avoided.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Llŷr 2 array area is moved at least 3 nautical miles to the west. There is no requirement for the Llŷr 1 array area to be repositioned. Should the developer adjust the location of the Llŷr 2 array area it will be necessary for the MOD to review the amended scheme to ensure no further impacts have been introduced and to confirm our safeguarding position.		
MOD-7	Ministry of Defence	Paragraph 10 of MOD Response	Shipping and Navigation	The potential presence of unexploded ordnance (UXO) has been identified as a relevant consideration. The potential presence of UXO and disposal sites is also a relevant consideration to the installation of cables and other intrusive works that may be undertaken in the maritime environment.	A full UXO survey and assessment will be undertaken pre installation.	ES Volume 1 Chapter 4: Description of the Proposed Project
MOD-8	Ministry of Defence	Paragraph 11 of MOD Response	Shipping and Navigation	In relation to the Onshore element of the proposed development, section 4.2.4 of the Scoping report expects up to two 132KV export cables per project. The MOD should be consulted to determine any impact on MOD assets. A map of the corridor which will contain the Offshore cable route is included in the Scoping Report (Array, Offshore and Onshore Export Cable	The MoD along with the NRW have been consulted in the during the site selection of the onshore cable route final location. The project area consequently has shifted to respond to the MoD request to avoid sensitive areas. Details regarding stakeholder consultation is included in the ES chapter. Detail regarding the offshore	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 1 Chapter 6: Consultations and Stakeholder Engagement

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Route Search Areas and Onshore Substation Search Area Drawing) we request that we are consulted once the cable route and Onshore landfall location is finalised.	cable route options is in Chapter 4: Description of the proposed Project.	
PCC-1	Pembrokeshire County Council	Paragraph 4 of the Pembrokeshire County Council response	Description of the Project	On terrestrial matters, the LPA would like to raise a more substantive issue in respect of the number of projects that would all involve the delivery west-east cable routes (within a relatively wide “development corridor”) across the Angle Peninsula and significant infrastructure near Pembroke Power Station (sub or converter stations for each project). This would result in an extended impact timeframe during construction as these projects appear all to be delivered independently as well as cumulative effects from the permanent above-ground structures during operation. I refer you in particular to the Greenlink (under construction), Erebus (applications under the Electricity Act and Marine and Coastal Access Act awaiting determination), and Valorous (EIA Scoping request	See response to NRW MLT-22.	ES Volume 1 Chapter 5: EIA Approach and Methodology Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31). Volume 6 Appendix 5A: Cumulative Effects Approach

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				submitted to NRW February 2021) projects. The incombination effects of all these projects need to be robustly addressed as part of the EIA. PCC have previously advised of the need for an integrated approach to delivery.		
PCC-2	Pembrokeshire County Council	Paragraph 5 of the Pembrokeshire County Council response	SLVIA	On the scope of the Landscape, Seascape and Visual Impacts Assessment, one more viewpoint should be provided from Goldborough Road. The number of visualisations (two) appear limited.	See response to NRW MLT-50.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 7A to 7C
PCC-3	Pembrokeshire County Council	Paragraph 5 of the Pembrokeshire County Council response	Terrestrial Ecology and Biodiversity	There are dormouse records on the Angle Peninsula and the impacts of the development corridor as well as the in-combination impacts with the other projects of temporary but significant (in terms of dormouse crossing points) hedgerow removal should be addressed (including in relation to bats).	See response to NRW MLT-65.	ES Volume 2 Chapter 8: Ecology and Biodiversity ES Volume 6 Appendix 8B: Preliminary

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						Ecological Appraisal
PCC-4	Pembrokeshire County Council	Paragraph 5 of the Pembrokeshire County Council response	Traffic and Transport	The vehicular traffic corridor identified should be extended back to include the A4075 to the Finger Post Junction of the A477 Trunk Road (albeit it is identified in text form within the relevant chapter). Furthermore reference is made to the use of Pembroke Port. Whilst routing is not fully known at this stage and it is accepted that this may be waterborne activity, the route from the port to the potential sites via the highway should be considered unless it is to be ruled out. This is of particular relevance as reference is made to possible abnormal loads which would be restricted due to the presence of railway bridges between the trunk road and the southern strategic route.	See response to NRW MLT-82 and NRW MLT-83.	ES Volume 2 Chapter 13: Traffic and Transport ES Volume 5 Figure 13.2 and 13.4 ES Volume 6 Appendix 13E: Project Erebus Outline Construction Traffic Management Plan

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
CADW-1	Cadw	Paragraph 2 of the Cadw response	Historic Environment and Cultural Heritage	A scoping report produced by AECOM has been prepared outlining the scope of the proposed environmental impact assessment. In general we agree with both the scope and details of the sections relating to the assessment of terrestrial and marine cultural heritage: However we note that the Historic Environment (Wales) Act 2016 should be added to the list of relevant legislation given in 24.2. Regulatory and Planning Policy Context.	See response to NRW MLT-68.	ES Volume 2, Chapter 9: Historic Environment and Cultural Heritage ES Volume 6 Appendix 9A: Terrestrial Archaeology and Built Heritage Technical Report
CADW-2	Cadw	Paragraph 3 of the Cadw response	Marine Archaeology	We also note that it is proposed in section 9.27 Historic Landscape to prepare an Assessment of the Significance of the Impact of Development on Historic Landscapes (ASIDOHL2). We are not certain whether or not this will be a relevant and appropriate methodology for assessing the impact on the historic landscape given the type of proposed development and we would welcome discussion with the applicant’s cultural heritage experts to finalise the methodology used to determine this impact.	See response to NRW MLT-174.	ES Volume 3 Chapter 24: Marine Archaeology

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DAT-1	Dyfed Archaeological Trust	Paragraph 2 of the Dyfed Archaeological Trust response	Historic Environment and Cultural Heritage	This confirms (9.7.1) that archaeology, built heritage and historic landscapes will be scoped into the EIA and a cultural heritage desk-based assessment will be produced, with a study area of 1km for the proposed landfall site(s) and grid connection point, where above ground elements may be installed, and a 500m study area proposed for the cable routing.	Archaeology, built heritage and historic landscapes has been scoped into the EIA and a cultural heritage desk-based assessment produced. A study area of 1km for the proposed landfall site and grid connection point, and a 500m study area proposed for the cable routing have been used.	ES Volume 2 Chapter 9: Historic Environment and Cultural Heritage ES Volume 6 Appendix 9A: Terrestrial Archaeology and Built Heritage Technical Report
DAT-2	Dyfed Archaeological Trust	Paragraph 3 of the Dyfed Archaeological Trust response	Historic Environment and Cultural Heritage	We are happy with this approach, although the extent of the study area for the landfall and grid connection point may need to be adjusted, depending on the height/extent of above ground elements, in line with the criteria outlined by Cadw in their guidance document Setting of Historic Assets in Wales (2017) The data sources listed for reference and the possible requirement for further mitigation both look appropriate. The DBA should assess both the visual impact of the development on the historic landscape and on the setting of historic assets and the potential direct impact on archaeological	See response to NRW MLT-66 and NRW MLT-67.	ES Volume 2 Chapter 9: Historic Environment and Cultural Heritage ES Volume 6 Appendix 9A: Terrestrial Archaeology and Built Heritage Technical Report

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				deposits. WE would expect to see a WSI for this assessment in advance.		
DAT-3	Dyfed Archaeological Trust	Paragraph 4 of the Dyfed Archaeological Trust response	Historic Environment and Cultural Heritage	As the scheme runs through a Registered Historic Landscape and an EIA is required, we advise consultation with Cadw to ascertain whether ASIDOHL is also appropriate, as referenced in 9.2.7.	See response to NRW MLT-68.	ES Volume 2, Chapter 9: Historic Environment and Cultural Heritage ES Volume 6 Appendix 9A: Terrestrial Archaeology and Built Heritage Technical Report
DAT-4	Dyfed Archaeological Trust	Paragraph 5 of the Dyfed Archaeological Trust response	Historic Environment and Cultural Heritage	One further comment- 2018 PPW is cited in 9.2.1, the latest version (ed.11) dates to 2021. We also understand the 2021 Historic Environment (Archaeology) SPG prepared by PCNPA is a joint document with Pembrokeshire CC.	See response to NRW MLT-69.	ES Volume 2 Chapter 9: Historic Environment and Cultural Heritage

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NATS-1	NATS	Paragraph 1 of the NATS response	Aviation and Radar	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	NATS safeguarding Criteria has been noted in the ES.	ES Volume 3 Chapter 27: Aviation and Radar
NATS-2	NATS	Paragraph 2 of the NATS response	Aviation and Radar	However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.	Appropriate consultation has been undertaken for the proposed project.	ES Volume 1 Chapter 6: Consultation and Stakeholder Engagement ES Volume 3 Chapter 27: Aviation and Radar
UKCS-1	UK Chamber of Shipping	Paragraph 5 of the UK Chamber of Shipping response	Shipping and Navigation	Given the positioning of the potential site directly in front of Milford Haven and its navigational approaches, and that the cable scoping boundary includes the port of Milford Haven and Pembroke Dock, the Chamber has navigational concerns and would	Milford Haven Port Authority (MHPA) have confirmed that installation activities associated with the offshore export cable corridor (OfECC) could be managed through the Milford Haven vessel traffic service (VTS). The risk assessment considers impacts related	ES Volume 3 Chapter 25: Shipping and Navigation ES Volume 6 Appendix 25A:

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				welcome consultation on the navigational aspects.	to installation and operation of the export and inter array cables.	Shipping and Navigation Technical Assessment
UKCS-2	UK Chamber of Shipping	Paragraph 6 of the UK Chamber of Shipping response	Shipping and Navigation	The Chamber is further concerned that the MCA did not respond to the Scoping Report as evidenced by the lack of MCA comments contained within the Scoping Opinion and hope that supplementary engagement is taking place.	The MCA responded to the scoping report received on 11 July 2022. Their comments have been identified and addressed in the ES. Further engagement with the Chamber and wider stakeholders has been undertaken as part of the Navigation Risk Assessment process including the Hazard Workshop.	ES Volume 3 Chapter 25: Shipping and Navigation ES Volume 6 Appendix 25A: Shipping and Navigation Technical Assessment
TH-1	Trinity House	Section 1 of the Trinity House response	Shipping and Navigation	Navigation Risk Assessment: <ul style="list-style-type: none"> • Comprehensive vessel traffic analysis in accordance with MGN 654. • The possible cumulative and in-combination effects on shipping routes and patterns should be adequately assessed. • The potential “corridor” between the Llŷr 1 and Llŷr 2 array areas, including future traffic patterns should be considered and assessed. 	See response to NRW MLT-178.	ES Volume 3, Chapter 25: Shipping and Navigation ES Volume 6, Appendix 25A Shipping and Navigation Technical Assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
TH-2	Trinity House	Section 2 of the Trinity House response	Shipping and Navigation	<p>Risk Mitigation Measures:</p> <ul style="list-style-type: none"> • We consider that this development will need to be marked with marine aids to navigation by the developer/operator in accordance with the general principles outlined in IALA (International Association of Marine Aids to Navigation and Lighthouse Authorities) Guideline G1162 - The Marking of Offshore Man-Made Structures as a risk mitigation measure. In addition to the marking of the structures themselves, it should be borne in mind that additional aids to navigation such as buoys may be necessary to mitigate the risk posed to the mariner, particularly during the construction phase. All marine navigational marking, which will be required to be provided and thereafter maintained by the developer, will need to be addressed and agreed with Trinity House. This will include the necessity for the aids to navigation to meet the internationally recognised standards of availability and the reporting thereof. • Assessment of impact on existing aids to navigation. 	See response to NRW MLT-179 to NRW MLT 182.	ES Volume 3 Chapter 25: Shipping and Navigation

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				<ul style="list-style-type: none"> • A decommissioning plan, which includes a scenario where on decommissioning and on completion of removal operations an obstruction is left on site (attributable to the wind farm) which is considered to be a danger to navigation and which it has not proved possible to remove, should be considered. Such an obstruction may require to be marked until such time as it is either removed or no longer considered a danger to navigation, the continuing cost of which would need to be met by the developer/operator. • The possible requirement for navigational marking of the export cables and the vessels laying them. If it is necessary for the cables to be protected by rock armour, concrete mattresses or similar protection which lies clear of the surrounding seabed, the impact on navigation and the requirement for appropriate risk mitigation measures needs to be assessed. 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
MCA-1	Maritime and Coastguard Agency	Paragraph 2 of the Maritime and Coastguard Agency response	Shipping and Navigation	<p>The Environmental Impact Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:</p> <ul style="list-style-type: none"> • Collision Risk • Navigational Safety • Visual intrusion and noise • Risk Management and Emergency response • Marking and lighting of site and information to mariners • Effect on small craft navigational and communication equipment • The risk to drifting recreational craft in adverse weather or tidal conditions • The likely squeeze of small craft into the routes of larger commercial vessels. 	<p>A full assessment of impacts (risks) to navigation has been included in the ES. A Navigational Risk Assessment has also been included which informs the ES and has been undertaken in compliance with MGN 654.</p>	<p>ES Volume 3 Chapter 25: Shipping and Navigation</p> <p>ES Volume 6 Appendix 25A: Shipping and Navigation Technical Assessment</p>
MCA-2	Maritime and Coastguard Agency	Paragraph 3 of the Maritime and Coastguard Agency response	Shipping and Navigation	<p>The development area carries a significant amount of traffic with a number of important commercial shipping routes to/from UK ports such as Milford Haven which are used by some of the world’s largest tankers. Attention needs to be paid to routing so that vessels can continue to make safe passage without large-scale deviations. The likely cumulative and</p>	<p>Vessel displacement has been considered in the assessment of environmental effects</p>	<p>ES Volume 3 Chapter 25: Shipping and Navigation</p> <p>ES Volume 6 Appendix 24A: Shipping and Navigation</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				in combination effects on shipping routes should be considered which will be an important issue to assess for this project. It should consider the proximity to other windfarm developments, other infrastructure, and the impact on safe navigable sea room.		Technical Assessment
MCA-3	Maritime and Coastguard Agency	Paragraph 4 of the Maritime and Coastguard Agency response	Shipping and Navigation	It is to be noted that a Navigational Risk Assessment will be submitted in accordance with MGN 654, which supersedes MGN 543 that is mentioned in the scoping report. This should be accompanied by a detailed MGN 654 Checklist which can be found at: https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping	Cumulative projects relevant to shipping and navigation have been considered as part of the cumulative effects assessment. Cumulative effects have been considered with other offshore wind farm developments included in the screening exercise.	ES Volume 3 Chapter 25: Shipping and Navigation ES Volume 6 Appendix 5A: Cumulative Effects Approach
MCA-4	Maritime and Coastguard Agency	Paragraph 5 of the Maritime and Coastguard Agency response	Shipping and Navigation	We would like to re-iterate that a vessel traffic survey must be undertaken to the standard of MGN 654 which should account for seasonal variation and hence a winter and summer vessel traffic survey should be carried out. The surveys should consist of a minimum of 28 days of seasonal data (two x 14-day surveys) collected	The dedicated vessel traffic surveys are compliant with MGN 654 requirements. The MGN 654 Checklist has been completed and included in technical appendix	ES Volume 6 Appendix 25A: Shipping and Navigation Technical Assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				from a vessel-based survey using AIS, radar and visual observations to capture all vessels navigating in the study area.		
MCA-5	Maritime and Coastguard Agency	Paragraph 6 of the Maritime and Coastguard Agency response	Shipping and Navigation	The proximity to other offshore windfarms will need to be fully considered, with an appropriate assessment of the distances between OREI boundaries and shipping routes as per MGN 654. The cumulative impacts of other windfarms in close proximity, in particular the proposed Valorous and Erebus offshore wind farms, will change routing. Attention must be paid to the traffic for ensuring the established shipping routes within the Celtic Sea and particularly to/ from the Bristol Channel can continue safely without unacceptable deviations	AIS, Radar and visual observations covering a 28-day period across summer and winter has been used to inform the existing baseline for the Array Area.	ES Volume 3 Chapter 25: Shipping and Navigation
MCA-6	Maritime and Coastguard Agency	Paragraph 7 of the Maritime and Coastguard Agency response	Shipping and Navigation	The turbine layout design will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. Any additional navigation safety and/or Search and Rescue	Turbine layout design will be compliant with MGN 654 requirements. A layout plan agreed with the MMO following appropriate consultation with Trinity House and the MCA is included as an embedded mitigation measure.	ES Volume 3 Chapter 25: Shipping and Navigation

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				requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.		
MCA-7	Maritime and Coastguard Agency	Paragraph 8 of the Maritime and Coastguard Agency response	Shipping and Navigation	Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g. rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.	Embedded mitigation measures include compliance with MGN 654 including in relation to reduction in water depth.	ES Volume 3 Chapter 25: Shipping and Navigation
MCA-8	Maritime and Coastguard Agency	Paragraph 9 of the Maritime and Coastguard Agency response	Shipping and Navigation	Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). The report must recognise the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate	Embedded mitigation measures include compliance with MGN 654 including in relation to SAR.	ES Volume 3 Chapter 25: Shipping and Navigation

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)) that can cover the entire wind farm sites and their surrounding areas. A SAR checklist will also need to be completed in consultation with MCA, as per MGN 654 Annex 5 SAR requirements		
MCA-9	Maritime and Coastguard Agency	Paragraph 10 of the Maritime and Coastguard Agency response	Shipping and Navigation	MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.	Embedded mitigation measures include compliance with MGN 654 including in relation to hydrographic surveys.	ES Volume 3 Chapter 25: Shipping and Navigation
MCA-10	Maritime and Coastguard Agency	Paragraph 11 of the Maritime and Coastguard Agency response	Shipping and Navigation	On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach.	A Navigational Risk Assessment has been undertaken in compliance with MGN 654 including completion of the MGN Checklist.	ES Volume 6 Appendix 25A: Shipping and Navigation Technical Assessment

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RCAHMW-1	Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	SC2202 of the RCAHMW response	Marine Archaeology	The separation of the marine (Chapter 24) and inter-tidal zone (Chapter 9) is understandable from a purely geographical definition of the marine baseline lying at the low-water mark. However, the nature of the archaeological material likely to be located between high and low water has more in common with marine archaeology, than terrestrial archaeology. For the purpose of the EIA/ES, we would therefore recommend combining the inter-tidal elements with the marine elements, to give coverage from high water out, and leaving the terrestrial coverage (Chapter 9) to be purely concerned with historic assets above the high water mark.	See response to NRW MLT-40.	ES Volume 3 Chapter 24: Marine Archaeology
RCAHMW-2	Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	Section 24.2 of the RCAHMW response	Marine Archaeology	Reference, at least in summary, should be made to the Protection of Wrecks Act 1973 which is still one of the key pieces of UK-wide legislation for the protection and management of historic shipwrecks. Historic England have no jurisdiction in Wales regarding the Ancient Monuments are Archaeological Areas Act 1979 as is currently stated in Paragraph 24.2.2.	See response to NRW MLT-174.	ES Volume 3 Chapter 24: Marine Archaeology

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RCAHMW-3	Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	Section 24.5 of the RCAHMW response	Marine Archaeology	Reference should be made to recently issued (2021) guidance by the Crown Estate regarding the provision of WSIs for offshore wind schemes: https://www.thecrownestate.co.uk/media/3917/guide-to-archaeological-requirements-for-offshore-wind.pdf . Formal reference should be made to Policy_SOC05 (Historic Assets) of the Welsh National Marine Plan (WNMP), with particular regard to the stated WNMP requirement to 'avoid, minimise, mitigate' impact on historic assets.	See response to NRW MLT-175 and NRW MLT-176.	ES Volume 3 Chapter 24: Marine Archaeology
RCAHMW-4	Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	Section 24.8 of the RCAHMW response	Marine Archaeology	This states that a programme of marine archaeological geophysical survey 'may' be required. We would assume that such a programme would automatically be put in place in order to fully understand and assess the marine archaeology located within the study area during the EIA process	See response to NRW MLT-177.	ES Volume 3 Chapter 24: Marine Archaeology ES Volume 6 Appendix 24A: Marine Archaeology Desk Based Assessment (DBA)

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NFFO-1	National Federation of Fishermans Organisation	Paragraph 2 of NFFO response	Commercial Fisheries	There is at least one clear error in the Commercial Fisheries chapter (Volume 3 – Marine Environment, section 26.4 – Baseline), which states that “Average yearly landings at Milford Haven total 686,239 tonnes at a value £1,026,295,194.” While the Milford Haven fishing fleet is undeniably industrious and successful, it seems unlikely that it has ever landed over £1 billion of fish: particularly as this is more than the entire UK fleet has landed in some recent years. With such an obvious inaccuracy overlooked in the publication of this report, we hope that the data relied on in assessing the impact of this project will be checked with greater care.	See response to NRW MLT-183.	ES Volume 3 Chapter 26: Commercial Fisheries

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NFFO-2	National Federation of Fishermans Organisation	Paragraph 3 of NFFO response	Commercial Fisheries	We believe that the view taken in the scoping document of the likely impact on fishing businesses of the construction of this wind farm is overly optimistic. Table 26.1 (“Scoping matrix of potential impact pathways in relation to commercial fisheries during construction, operation and decommissioning of the proposed Project”) assumes that the “loss or restricted access to commercial fishing grounds” during the operational phase of the project will be temporary or partial, at least for static gear fishing vessels. We do not agree with this assumption. Our members, even those experienced in fishing within fixed turbine arrays, have been unanimous in the view that it will be impossible to safely operate commercial fishing gear within a floating wind farm. The trailing mooring cables and inter-array electricity export cables present a severe snagging hazard and becoming fast on a seabed obstacle is extremely dangerous for any boat. Towed fishing gear would very easily become entangled. Static gear may not be towed by the boat that deploys it, but	See response to NRW MLT-184.	ES Volume 3 Chapter 26: Commercial Fisheries

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				it does not remain motionless. Static pots routinely move with wind, waves and tide: displacement of 1km or more is not uncommon. Fishing gear worth thousands of pounds could easily become entangled in a turbine mooring system and the fisherman trying to haul it might not be aware of this until they discovered that their boat had become snagged on the unseen obstacle. Fishing within a floating wind farm is therefore highly unlikely to be possible from either a safety or economic standpoint.		
NFFO-3	National Federation of Fishermans Organisation	Paragraph 4 of NFFO response	Commercial Fisheries	The recently completed Environmental Statement for the nearby Erebus wind farm acknowledges this fact and bases its impact analysis on the realistic worst-case scenario that commercial fishing will not resume within the footprint of the array post-construction. We submit that the impact of the Llŷr projects must be judged in the same way.	See response to NRW MLT-185.	ES Volume 3 Chapter 26: Commercial Fisheries

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NFFO-4	National Federation of Fishermans Organisation	Paragraph 5 of NFFO response	Commercial Fisheries	Exclusion from the site will create the additional problem of displacement of fishing effort, which the scoping report does not acknowledge. Fishermen forced out of the area by the construction of the site will either have to accept a permanent reduction in their income, or will have to try to mitigate their losses by fishing elsewhere. This will entail increased fuel costs, longer working hours and an enhanced likelihood of gear conflict, as different fisheries attempt to share the same, increasingly restricted grounds. All of this will be exacerbated by the cumulative effects of displacement from the many other floating turbine arrays currently being proposed for the Celtic Sea. These harms to existing local businesses are substantial and reasonably foreseeable and should be with the scope of the Llŷr projects' impact assessment.	See response to NRW MLT-185.	ES Volume 3 Chapter 26: Commercial Fisheries
NFFO-5	National Federation of Fishermans Organisation	Paragraph 6 of NFFO response	Commercial Fisheries	As well as these direct impacts on the fishing fleet, we believe that there are potential impacts on fish and shellfish stocks which this scoping document does not adequately capture.	Impacts on fish and shellfish stocks has been considered in ES Volume 3 Chapter 20.	ES Volume 3 Chapter 20: Fish and Shellfish

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NFFO-6	National Federation of Fishermans Organisation	Paragraph 7 of NFFO response	Commercial Fisheries	We note that the ecological baseline to be used in assessing these impacts relies largely on studies of the regional marine fauna conducted in 2012 or earlier and yet “No Project specific surveys for fish and shellfish will be undertaken as available data are considered sufficient to undertake an assessment of the identified impact pathways” (Volume 3 – Marine Environment, section 21.8). We have noted a similar reliance on historic research in many other environmental impact assessments. It is increasingly difficult to maintain the credibility of desk-based studies of the marine environment which continually refer back to outdated surveys, despite subsequent environmental changes and the completion of various offshore construction projects with the potential for ecological disruption. Some developers have been willing to conduct new baseline and post-construction monitoring surveys for their projects and these have aided immeasurably the understanding of the actual environmental impacts of offshore development and the	See response to NRW MLT-131.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 26: Commercial Fisheries

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				<p>mitigation of any that appear to be negative. The extremely valuable work conducted by Ørsted on the Westermost Rough project is an exemplar of what can be achieved.</p>		

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NFFO-7	National Federation of Fishermans Organisation	Paragraph 8 of NFFO response	Commercial Fisheries	<p>The scoping report also repeatedly dismisses the potential impacts of electromagnetic field emissions (EMF) on fish, shellfish and cetaceans. Table 21-3 (“Scoping matrix of potential impact pathways in relation to fish and shellfish during construction, operation and decommissioning of the proposed Project”) states that “EMF emissions from subsea cables have the potential to affect the foraging and migratory success and behaviour of electro-receptive (such as elasmobranchs), migratory fish (such as salmon), and shellfish. Therefore, the worst-case scenario of cables in separate trenches will be appraised.”</p> <p>This entirely misses the crucial point that these cables will not be entirely trenched. It is a novel feature of floating, as opposed to fixed, wind farms, that the inter array cables descend gradually from each turbine, buoyed in mid water to achieve a ‘lazy wave’ configuration and allow for the movement of the turbine. EMF-emitting cables will therefore be suspended for long distances in the water column, not trenched and</p>	See response to NRW MLT-132.	<p>ES Volume 3 Chapter 20: Fish and Shellfish</p> <p>ES Volume 3 Chapter 21: Marine Mammals</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				shielded by sediment or rock armouring. Benthic and pelagic species will therefore be exposed to EMF throughout the array. Rather than ignoring this point and scoping out EMF from the impact assessment as this report proposes, we believe it should be properly investigated and any potential impact on commercial fish and shellfish stocks or cetacean populations evaluated.		
NFFO-8	National Federation of Fishermans Organisation	Paragraph 9 of NFFO response	Commercial Fisheries	Even without this significant difference in the design of this new type of turbine array, we believe that the report is entirely too quick to dismiss the potential impacts of EMF. Recent research has identified negative effects of EMF on the larval development of crab and lobster [Harsanyi et al (2022) The Effects of Anthropogenic Electromagnetic Fields (EMF) on the Early Development of	See response to NRW MLT-132.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 21: Marine Mammals

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Two Commercially Important Crustaceans, European Lobster, <i>Homarus gammarus</i> (L.) and Edible Crab, <i>Cancer pagurus</i> (L.) J. Mar. Sci. Eng., 10, 564] – both important commercial species in this region.		
NFFO-9	National Federation of Fishermans Organisation	Paragraph 10 of NFFO response	Commercial Fisheries	While we accept the necessity for the development of low-carbon energy sources for the UK, this must not come at the expense of excessive environmental harm, or avoidable damage to local businesses and communities. The scope of environmental impact assessments must be comprehensive if licencing authorities are to make genuinely informed decisions, acknowledging and accepting their likely consequences.	The ES has been undertaken by competent experts with engagement from relevant stakeholders.	ES Volume 3 Chapter 26: Commercial Fisheries

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-1	RSPB Cymru	Screening Opinion section of RSPB response	Ornithology	<p>We concur with NRW’s preliminary review of the documents and consideration that the proposed works fall within Annex 2, under paragraph 3(a) of the EIA regulations.</p> <p>In addition, we consider that the project may have a significant effect(s) on the environment, as it is in an environmentally sensitive area being within/adjacent to designated sites for nature conservation including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).</p> <p>Identification of designated sites that potentially may be affected requires careful consideration. We have concerns with the location of the proposal, being within and/or in close proximity to important areas for seabirds and chough. The construction and operation of the proposed development has the potential to/is likely to result in adverse effects on the following designated sites and their species (in the immediate vicinity):</p>	<p>The impact assessment to ornithology and associated protected sites identified by the RSPB was undertaken in the ES.</p>	<p>ES Volume 3 Chapter 22: Ornithology</p> <p>ES Volume 6 Appendix 8B: Habitats Regulations Assessment (HRA) Screening</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> • Skomer, Skokholm and the Seas off Pembrokeshire SPA • Grassholm SPA • Castlemartin Coast SPA • Limestone Coast of South West Wales SAC • Pembrokeshire Marine SAC • West Wales Marine SAC <p>The RSPB therefore concludes that an EIA will be required to be undertaken in support of the proposal</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-2	RSPB Cymru	Environmental Statement section of RSPB response	Ornithology	The ES should provide a detailed programme of ornithological surveys and comprehensive identification of protected sites and species that could be affected by the proposal. All impacts on nature conservation interests should be fully described, assessed and the significance of impacts clearly explained in the ES. The mitigation hierarchy should be followed to avoid, mitigate or compensate for biodiversity losses. All impacts predicted should include fully worked up possible mitigation in the ES. Monitoring should be employed to verify predictions and identify any unexpected impacts. 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.	See responses to NRW MLT-149 and NRW MLT-150.	ES Volume 3 Chapter 22: Ornithology ES Volume 6 Appendix 22A: Ornithological baseline technical report
RSPB-3	RSPB Cymru	Habitats Regulations section of RSPB response	Ornithology	The RSPB considers the proposal will require assessment under the Habitats Regulations (Conservation of Habitats and Species Regulations 2017) including the following: <ul style="list-style-type: none"> • Assessment of potential impacts to 	Assessment of potential impacts to SPA seabird populations is included in the ES. A Chough survey report, Ornithological Collision Risk Modelling Report and Ornithological Displacement Report have been	ES Volume 3 Chapter 22: Ornithology ES Volume 6 Appendix 8A:

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>SPA seabird populations within foraging range through collision risk, barrier effect and displacement;</p> <ul style="list-style-type: none"> Assessment of potential impacts through disturbance and loss of foraging habitat for the chough population of Castlemartin Coast SPA. 	included in the ES to support the assessment of ornithological features.	<p>Chough Survey Report</p> <p>Volume 6 Appendix 8B: Habitats Regulations Assessment (HRA) Screening</p>
RSPB-4	RSPB Cymru	Scoping Opinion section of RSPB response	Ornithology	<p>The RSPB has the following comments to make in respect of the Scoping document. Overall we consider that the scoping document is generally comprehensive and covers most ornithological issues sufficiently. Nevertheless, there are some additional matters that we consider need further consideration as part of the EIA, including the screening of designated sites and cumulative/incombination effects. Furthermore, the array area also falls within potential spawning and nursery areas for important seabird foods prey items which include sand eel, herring and sprats. We defer to The Wildlife Trust of South and West Wales (WTSWW) and The Wildlife Trusts (TWT) on the following topics: Marine</p>	<p>Non-statutory stakeholder meeting held with The Wildlife Trust including WTSWW on 10/07/2023 regarding marine mammals and offshore ornithology.</p>	<p>ES Volume 3 Chapter 22: Ornithology</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Mammals and Benthic Ecology. We recommend that the developer opens discussions with WTSWW and TWT for advice on these topics. Our comments are expanded upon below.		
RSPB-5	RSPB Cymru	Seabird Species section of RSPB response	Ornithology	<p>It is essential to establish the presence of vulnerable species of seabird. All species of seabirds need to be considered as part of the screening process for the EIA and HRA. Possible adverse impacts may be applied to a range of birds (including seabird features of SPAs and SSSIs) both breeding and nonbreeding populations over a wide area of search; to include seabird features within their mean maximum foraging ranges.</p> <p>The scoping area for the EIA should be denoted by mean-maximum foraging ranges from seabird SPAs and SSSIs. We note the applicant’s reference to</p>	See responses to NRW MLT-159 and NRW MLT-164. Balearic Shearwater assessed qualitatively in Section 22.5.1 (Existing Baseline) and Sections 22.7.1 and 22.7.2 (Construction and Operational and Maintenance impacts) of the ES Chapter.	<p>ES Volume 3 Chapter 22: Ornithology</p> <p>ES Volume 6 Appendix 22A: Ornithology Baseline Technical Report</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>Thaxter et al (2012), the initial standard of mean-maximum foraging ranges based on seabird tracking data and more recent studies, Future of the Atlantic Marine Environment (FAME) and Seabird Tracking and Research (STAR) projects. Wakefield et al, 2017 should be used with caution when applied to Lundy (see Seabird surveys and baseline data below).</p> <p>There is one notable absence in the seabird species listed in the Ornithology section, Balearic shearwater and appropriate SPAs allocated/designated for this species. This is Europe's only critically endangered seabird which occurs in Welsh waters including the Celtic Sea.</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-6	RSPB Cymru	Designated Sites section of RSPB response	Ornithology	<p>The list of designated sites presented in Table 23-2 appears incomplete and there are a number of anomalies regarding the ornithological features of SSSIs. We recommend the following international sites should be considered:</p> <ul style="list-style-type: none"> • Aberdaron Coast and Bardsey Island SPA • Isles of Scilly SPA • Great Saltee SPA (Republic of Ireland) <p>Furthermore, the ornithological section omits SPAs designated for Balearic shearwater (as mentioned above).</p> <p>The table omits some SSSIs which are components or underpin SPAs. Some of the SSSI features for those listed are incorrect for example, the designated features of the Skerries are incorrectly listed as Herring gull, lesser black-backed gull and puffin. Whereas, the qualifying features are Arctic tern, common tern and roseate tern. We recommend the applicant needs to seek advice Natural England and NRW</p>	See responses to NRW MLT-160 and NRW MLT-165. Species scoped in for quantitative and qualitative assessment have been agreed with NRW (A) and JNCC.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>(advisory) for correct details of relevant designated sites.</p> <p>Based upon the Lundy 2017/18 Manx shearwater survey and the 2021 Cliff nesting survey, Lundy now supports over 27,000 seabirds (i.e. above the 20,000 seabird assemblage SPA qualifying threshold) including 5,504 pairs Manx shearwater, which also exceeds the published international importance threshold for this species.</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-7	RSPB Cymru	Bird Surveys and Baseline Data section of RSPB response	Ornithology	<p>Offshore: Offshore survey methods must comply with contemporary guidance, the most appropriate being detailed in NatureScot (2020) Marine Bird Impact Assessment Guidance Workshop Report. There are limitations associated with aerial surveys including the timing of flights being confined to limited hours of daytime owing to visibility and logistic requirements. Thus, it is crucial to consider the nocturnal and crepuscular activity patterns for all seabirds, especially given the high prevalence of nocturnal species. As outlined above, there is up to date information on the populations of cliff nesting seabirds on Lundy in 2021. The RSPB can provide this information, which is not yet published. It should also be noted that evidence for the importance of the Celtic Sea for some species (e.g. Wakefield et al, 2017 which covered four species, kittiwake, shag, guillemot and razorbill) should be used with caution based on the age of the colony data used in the modelling. Where modelling is based upon old datasets</p>	See response to NRW MLT-166.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>(e.g. Seabird 2000) and where the populations of seabirds at colonies such as Lundy have changed significantly since, re-modelling should be undertaken to use the latest census data. We strongly recommend that the developer opens discussions with ornithologists from NRW, NE, RSPB and with other experts who are working on a number of on-going seabird study projects, including tracking data. This data will be of importance in the context of temporal limitations of the survey method, especially for shearwater species. It will also be of benefit for parameterising the collision risk and apportioning models.</p> <p>Onshore: We understand that the cable landfall and cable route corridor are in proximity to the Castlemartin Coast SPA and Angle Peninsula Coast SSSI which are designated for chough. Although, the route is difficult to determine from the information provided owing to the resolution of Figure 1-1, (Volume 1). Initial onshore</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>surveys have been undertaken and further surveys are planned. However, further surveys for chough are not adequately defined in section 8.4.4.1. The RSPB can provide terrestrial bird data for the onshore options, including chough data, and would welcome the opportunity to offer further advice on suitable onshore ornithological survey methods. The applicant recognises the potential for a variety of onshore bird surveys which will include a 100m buffer. Surveys under consideration include breeding and wintering bird surveys. Guidance on appropriate bird survey methods can be found in "Bird Monitoring Methods: A Manual of Techniques for Key Species" Gilbert, G. Gibbons, DW and Evans, J. Pub. RSPB, BTO, WWT, JNCC, ITE Sandy 1998. ISBN 1 901930 03 3</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-8	RSPB Cymru	Seabird Food Prey Items section of RSPB response	Ornithology	The RSPB recently commissioned desktop work focused on 11 species of forage fish, including Sandeel, Sprat and Herring which are key food prey items for seabirds. This report (and associated spatial data) provides information on the forage fish community in Welsh and surrounding waters, including the Irish and Celtic Seas and the western English Channel. Given that several forage fish (prey) species in the northeast Atlantic have shown major changes in distribution and abundance, up-to-date information on their recent distribution patterns is vital. The evidence-base for some food prey species such as sand eel, sprats or herring is either old or there is a lack of data (sprats and herring) and we would therefore recommend that appropriate surveys of these species are included within the site or areas where cumulative impacts could occur.	See response to NRW MLT-169.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-9	RSPB Cymru	Nocturnal Activity section of RSPB response	Ornithology	<p>Attraction to artificial light is identified in Table 23-3 (Volume 3). Potential impacts of the proposed Project on seabirds:</p> <p>Nocturnal seabirds may be attracted to the offshore project infrastructure lighting causing them to become disorientated and/or increase their risk of collision with the offshore arrays. The ongoing Llŷr Project offshore bird surveys being carried out will provide information to inform which species are present in the area. It has to be clarified that there is no uncertainty about the attraction of fledgling shearwaters to light sources in general but only about the magnitude of this effect from offshore wind turbines. It should be highlighted that the assessment of this sensitivity will be made more difficult by the temporal limitations of the survey method and therefore the tracking data will be of value to gain the best possible understanding without any direct assessment.</p>	See response to NRW MLT-170.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-10	RSPB Cymru	Mitigation and Monitoring section of RSPB response	Ornithology	<p>Without detailed information regarding the proposed development in its entirety, it is not possible to consider appropriate mitigation. We acknowledge that baseline data from site-specific surveys will inform the need for mitigation measures. We will be happy to discuss mitigation and feasibility of potential options with the developer once the baseline is established. Furthermore, we consider there is a requirement for a thorough monitoring plan, to include monitoring of seabird behaviour in and around the turbines to identify displacement and avoidance behaviours. Examples of appropriate offshore wind farm monitoring programmes:</p> <ul style="list-style-type: none"> • Forth & Tay Regional Advisory Group: https://marine.gov.scot/ml/forth-tay-regional-advisory-group-ftarg • European Offshore Wind Deployment Centre (Also known as Aberdeen Offshore Wind Farm): https://group.vattenfall.com/uk/what-we-do/our-projects/european-offshore-wind-deploymentcentre 	See response to NRW MLT-171.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
RSPB-11	RSPB Cymru	Cumulative Effects Assessment section of RSPB response	Ornithology	<p>We understand that the Applicant intends to work with the Erebus Project (Blue Gem Wind) to possibly integrate the two developments, which may include use of a common export cable route, grid connection location and substation/ control building for the two projects. Although, 8.3 implies that a confirmed route has been identified. Unfortunately, the route is not clearly defined owing the resolution of Figure 1-1, (Volume 1). Furthermore, cable routing has potential for interaction with the Greenlink interconnector cable which needs to be clarified. We encourage the applicant to work with neighbouring developers on sharing cable routes and associated infrastructure to reduce cumulative environmental impacts.</p> <p>The list of projects and plans in section 30.3 (Volume 4) is incomplete, for example neighbouring floating offshore wind projects in the Celtic Sea have been omitted, including:</p> <ul style="list-style-type: none"> • Llywelyn • Gwynt Glas 	<p>Cumulative effects have been assessed as part of the ES across all technical chapters including:</p> <ul style="list-style-type: none"> • Project Erebus • Greenlink • Whitecross. <p>Floventis has engaged with other developers of planned large-scale developments throughout the planning and design process. Other developers engaged include:</p> <ul style="list-style-type: none"> • Project Erebus • Greenlink • Whitecross. <p>Only developments which have submitted an ES and / or marine license application to NRW MLT, MMO or equivalent licencing body were considered in the cumulative effects assessment for each chapter.</p>	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> • White Cross • Petroc <p>There are also several offshore wind proposals within 200km in Irish territorial waters of the Celtic Sea, for example the Emerald Project. In addition to the sources identified in section 30.3.3 (Volume 4), Initial Screening of Other Development Projects and Allocations, we advise that relevant projects and plans for consideration may also be found within:</p> <ul style="list-style-type: none"> • The Developments of National Significance Register: https://gov.wales/developmentsnational-significance-dns-applications • Planning Policy e.g. Local Development Plans, Transport Plans (National and Local) and National Policy Statements. 		

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RSPB-12	RSPB Cymru	Area Statements section of RSPB response	Ornithology	Regard should also be given to Natural Resources Wales' emerging Area Statements (Marine and South West Wales Areas).	The key local development plans (LDPs) relating to the proposed Project include Pembrokeshire Coast National Park Development Plan and South West Wales Area Statement. Both these local development plans incorporate biodiversity protections including for marine ornithological receptors by recognising the importance of SAC and SPA sites.	ES Volume 3 Chapter 22: Ornithology
JNCC-1	Joint Nature Conservation Committee (JNCC)	Overarching Comments section of JNCC response	Combined and Cumulative Effects of the Project	JNCC would like to take this opportunity to highlight that with regard to Cumulative Effects Assessment, we are of the opinion that projects which are built and operational and have residual impacts would need to be considered in Cumulative Effects Assessment (CEA).	See response to NRW MLT-191.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-2	Joint Nature Conservation Committee (JNCC)	Overarching Comments section of JNCC response	General	<p>We note that throughout the scoping documents clarification is needed as to whether potential impacts will occur in territorial waters or offshore (beyond the territorial limit). This is not only to make advice provision easier for the consultees, but also to allow the project teams to better understand which impacts may be occurring under which areas of legislation. We request that:</p> <ul style="list-style-type: none"> • clarification is provided as to what proposed operations will occur offshore, • inclusion of the 12nm boundary / territorial limit on maps <p>The use of the title “Likely Significant Effects” in Sections 16.9, 20.6, 22.6 and 23.6 is confusing. This section lists potential impact pathways to be considered in the EIA which is not clear from the title as the term likely significant effect has significant meaning in the HRA process.</p>	See responses to NRW MLT-9 and NRW MLT-13.	<p>Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).</p> <p>ES Volume 6 Appendix 8D and 8E</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-3	Joint Nature Conservation Committee (JNCC)	Marine Ornithology Summary Comments section of JNCC response	General	<p>The screening exercise for Special Protected Areas (SPA) at potential Likely Significant Effect (LSE), as part of Habitats Regulations Assessment (HRA), is incomplete and needs additional work.</p> <p>The long list of projects to be included within an in-combination assessment is far from complete and needs additional work. This may be best undertaken after a screening exercise has identified the SPAs which may be impacted and upon which in-combination impacts need to be identified.</p>	See response to NRW MLT-152.	<p>ES Volume 3 Chapter 22: Ornithology</p> <p>ES Volume 6, Appendix 8E: HRA RIAA</p> <p>ES Volume 6: Appendix 22E: Ornithological Connectivity and Apportioning Report</p>
JNCC-4	Joint Nature Conservation Committee (JNCC)	Section 23.3, Paragraph 2 Comments section of JNCC response	Ornithology	<p>For clarity we suggest rewording to “and selected sites designated for far ranging species with a mean maximum +1 Standard Deviation foraging range (from Woodward et al. 2019) that is greater than 100 km.”</p>	See response to NRW MLT-153.	<p>ES Volume 6 Appendix 22B: Marine Ornithology Colony Apportioning</p> <p>ES Volume 6 Appendix 8D: HRA screening</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-5	Joint Nature Conservation Committee (JNCC)	Table 23-1 Comments section of JNCC response	Ornithology	<p>Please note that for common guillemot outside of the Northern Isles, we recommend a foraging range of 95.2km, which excludes data from Fair Isle collected during years in which the species was thought to show unusual foraging ranges due to lack of food. For razorbill outside of the Northern Isles, we recommend a foraging range of 122.2km, which excludes data from Fair Isle collected during years in which the species was thought to show unusual foraging ranges due to lack of food. For northern gannet at Grassholm SPA we recommend a foraging range of 516.7km based on site-specific tracking data. These foraging ranges will identify SPAs which should be screened in for further consideration as part of the HRA process.</p>	See response to NRW MLT-157.	ES Volume 3 Chapter 22: Ornithology

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JNCC-6	Joint Nature Conservation Committee (JNCC)	Table 23-2 Comments section of JNCC response	Ornithology	<p>There are many SPAs which have features with foraging ranges which overlap the project array area, and which are not included in this table. The exercise should be repeated. For example, some missing SPAs include the Isles of Scilly SPA (European Storm Petrel, and assemblage which includes Manx shearwater, northern fulmar and Atlantic puffin as named components) and several SPAs including Manx shearwater as a feature across the western UK. It is not clear why this table does not include many more SPAs. It is noted that the text states “Once the ornithological receptors have been established, the foraging ranges set out in Table 23-1 will be used to identify any further designated sites, beyond those listed in Table 23-2, that will need to be assessed as part of the EIA”. However, it remains unclear what the purpose of Table 23-2 is, if it is not to conduct a full review of SPA features within foraging range, that could later be excluded if not present in ornithological characterisation surveys. These foraging ranges will identify SPAs</p>	See response to NRW MLT-158.	ES Volume 3 Chapter 22: Ornithology

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				which should be screened in for further consideration as part of the HRA process.		
JNCC-7	Joint Nature Conservation Committee (JNCC)	Section 23.4 Comments section of JNCC response	Ornithology	<p>We would strongly urge data in addition to project characterisation digital aerial surveys to be reviewed and that this can be informative to several aspects of the screening, EIA and HRA assessments. For example;</p> <ul style="list-style-type: none"> Tracking data to demonstrate use of the project array area and colony of origin, which is likely available for several species/colonies of relevance (e.g. gannet at Grassholm SPA, several Manx shearwater colonies). This may potentially also inform flight height and flight speed parameters for use within collision risk modelling (noting 	See response to NRW MLT-161.	<p>ES Volume 3 Chapter 21: Marine Mammals</p> <p>ES Volume 6 Appendix 8E: HRA RIAA</p> <p>ES Volume 6 Appendix 22A: Marine Ornithology Baseline</p> <p>ES Volume 6</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>that discussion with SNCBs would be required in advance of relying on such information that is not currently included within SNCB advice around generic parameters).</p> <ul style="list-style-type: none"> • Colony monitoring to inform demographic parameters for use in Population Viability Analysis (PVA) (e.g. Skomer common Guillemot long-term monitoring study) 		Appendix 22B: Marine Ornithology Colony Apportioning
JNCC-8	Joint Nature Conservation Committee (JNCC)	Table 23-3 Comments section of JNCC response	Ornithology	<p>Construction of decommissioning Project Phase; Mortality effects resulting from displacement of diving birds due to underwater noise (e.g. UXO detonations) cannot be excluded at this stage, because we don't know enough about this.</p> <p>Table 23-3 goes on to mentions creation of roosting habitat as a positive but should also note potential increase in collision risk as a result of this increased attraction for certain species. Related to this, benthic community structures may change as a result of floating wind infrastructure, and this could</p>	See response to NRW MLT-167.	ES Volume 3 Chapter 22: Ornithology

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				potentially increasing presence of some seabird species putting them at risk of increased collision.		
JNCC-9	Joint Nature Conservation Committee (JNCC)	Section 23.7 Comments section of JNCC response	Ornithology	We are content with the 4km array buffer proposed, given the species present in this area. There is no detail provided on survey design, coverage etc so we cannot comment on whether coverage is sufficient. There is no mention of density surface modelling; is this intended to be undertaken to inform density and spatial distributions? Note that JNCC are not satisfied with regard to accuracy of flight heights estimated from digital aerial survey data. As such, generic flight heights (from Johnston et al. (2014)) should also be used in collision assessments (with site specific flight heights shown as context or if	See response to NRW MLT-172.	ES Volume 6 Appendix 22A: Marine Ornithology Baseline ES Volume 6 Appendix 22C: Ornithological Collision Risk Modelling Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				desired, used in additional modelling for consideration).		
JNCC-10	Joint Nature Conservation Committee (JNCC)	Section 30.3 Comments section of JNCC response	Ornithology	Developments which have been constructed and have ongoing effects on marine birds and/or SPAs should be included. This may include operational windfarms for example.	See response to NRW MLT-189.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology
JNCC-11	Joint Nature Conservation Committee (JNCC)	Table 30-1 Comments section of JNCC response	Combined and Cumulative Effects of the Project	Developments within foraging range of those SPAs scoped in for LSE should be included within the in-combination assessment. This may include developments beyond the extents indicated in Table 30-1.	See response to NRW MLT-190.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology

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JNCC-12	Joint Nature Conservation Committee (JNCC)	Table 30-2 Comments section of JNCC response	Combined and Cumulative Effects of the Project	We are pleased to see that various sectors/activity types have been considered and not only windfarms (e.g. Greenlink Interconnector cable project). However, this list is far from complete. We would add Round 4 preferred projects, Burbo Bank OWF, Burbo Bank Extension, Gwynt y Môr, Awel y Môr, Rhyl Flats, Robin Riggs, Walney, Arklow Bank, Celtic Interconnector (cable project). Additional projects may be relevant (including from other sectors/activities), we have not undertaken a full assessment but this needs to be undertaken based on sites identified as at potential risk of LSE from screening exercise (noting our comments above in this process).	See response to NRW MLT-191.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology
JNCC-13	Joint Nature Conservation Committee (JNCC)	Marine Mammal Summary Comments section of JNCC response	Marine Mammals	Relevant Special Areas of Conservation (SACs) for this development have been identified. Potential impacts scoped in and out for the Environmental Impact Assessment are appropriate but need more detail added as this is a Floating Offshore Wind (FLOW) project, and some impacts are still poorly understood.	See response to NRW MLT-139.	ES Volume 3 Chapter 21: Marine Mammals

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-14	Joint Nature Conservation Committee (JNCC)	Section 22.3 Comments section of JNCC response	Marine Mammals	The management unit (MU) for bottlenose dolphin relevant to this development is OCSW – offshore Channel, Celtic Sea and South West England, not Irish Sea MU.	See response to NRW MLT-140.	ES Volume 3 Chapter 21: Marine Mammals
JNCC-15	Joint Nature Conservation Committee (JNCC)	Section 22.4.1 Comments section of JNCC response	Marine Mammals	Note the SCANS surveys represent a snapshot of cetacean presence, as they represent a single survey conducted in each area. There may be other species present, for example, Risso’s dolphins.	See response to NRW MLT-141.	ES Volume 3 Chapter 21: Marine Mammals
JNCC-16	Joint Nature Conservation Committee (JNCC)	Section 22.4.2 Comments section of JNCC response	Marine Mammals	Please add a note that these are from counts from 2016 – 2019 in the table itself. Also note in the text that the total population estimate is “<15”; the figure of <10 is observed individuals on the survey only.	See response to NRW MLT-142.	ES Volume 3 Chapter 21: Marine Mammals
JNCC-17	Joint Nature Conservation Committee (JNCC)	Table 22-3 Comments section of JNCC response	Marine Mammals	It would be beneficial if the distance between Marine Protected Areas (MPAs) and the array/cable scoping areas were separated as the potential impacts associated with each area could be different.	See response to NRW MLT-143.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8D: HRA Screening

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-18	Joint Nature Conservation Committee (JNCC)	Table 22-4 - Effects of Underwater Sound Comments section of JNCC response	Marine Mammals	Underwater noise during the operational stage is not included as a potential impact pathway; this should be added. The effects of underwater sound during construction and operation will be very different. FLOW cable “thrums” and operational noise are not mentioned and noting that “maintenance potential effects same as construction” is not sufficient. Please note that cable “thrums” have not been well characterised in terms of underwater sound levels and potential to impact marine mammals either for individual turbines or arrays. This may require specific modelling or other studies. How turbine operating noise propagates from floating turbines is also poorly understood. We note the likelihood of finding UXOs, especially in the inshore part of the study area, is considered high. We highlight a position statement ¹ published Defra and signed by (amongst others) JNCC and NRW regarding UXO clearance methods.	See response to NRW MLT-144.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 21A: Marine Mammals Baseline Technical Report ES Volume 6 Appendix 21C: Marine Mammals Noise Assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-19	Joint Nature Conservation Committee (JNCC)	Table 22-4 - Entanglement with Mooring Lines and Cables Comments section of JNCC response	Marine Mammals	Please reference the specific study mentioned. This is an emerging technology which is poorly understood in terms of potential to impact marine mammals and entanglement events of FLOW with marine mammals not well quantified. This should be made clear.	See response to NRW MLT-144.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 21A: Marine Mammals Baseline Technical Report ES Volume 6 Appendix 21C: Marine Mammals Noise Assessment
JNCC-20	Joint Nature Conservation Committee (JNCC)	Section 22.7 Comments section of JNCC response	Marine Mammals	Note that species and project specific surveys must be conducted for the area in question.	See response to NRW MLT-144.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 21A: Marine Mammals Baseline Technical Report ES Volume 6 Appendix 21C: Marine Mammals Noise Assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-21	Joint Nature Conservation Committee (JNCC)	Section 4.2.5 Comments section of JNCC response	Description of the Project	JNCC note that there will be “up to two 132 kV cables per project”. Section 4.2.5 then goes on to state that “the two cables for the projects will be laid in separate trenches with a cable separation of around 50m”. It is unclear to JNCC whether this applies to a scenario where each project requires one or two 132 kV cables. We would request clarity on this matter.	See response to NRW MLT-23.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-22	Joint Nature Conservation Committee (JNCC)	Section 4.2.6 Comments section of JNCC response	Description of the Project	JNCC acknowledge that the amount of rock protection and scour protection are currently unknown but note that the application involves the introduction of hard substrate into a mainly sedimentary environment. Although the changes are not necessarily considered as having a significant impact in this instance, we still encourage the operator to continue working to minimise the amount of hard substrate material used. We note that the long-term effect of the introduction of substratum into naturally sandy or muddy seabeds is not fully understood at present, and should be carefully considered by the regulators. Where stabilisation material cannot be avoided, we recommend using a more targeted placement method e.g. fallpipe vessel rather than using vessel-side discharge methods. In conjunction with the information to be gathered on the proposed offshore array and export cable corridor through survey work, we highlight that it would be helpful to have details on the following technical aspects relating to the	See response to NRW MLT-25.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 3 Chapter 10: Fish and Shellfish Ecology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>installation and operation of the Project:</p> <ul style="list-style-type: none"> • Footprint of area affected by laying of the export cables; • Footprint of area affected by export cable protection; • Footprint of area affected by inter-array electrical cables; • Footprint of area affected by inter-array cable protection; • Estimation of electromagnetic fields (EMF) potentially arising from cables both at exterior of cables and at surface of seabed above buried cables; • Footprint of area affected by placement of drag embedment anchors; • Footprint of area affected by mooring lines; • Duration and rate of cable-laying; • Number and types of vessels to be used in cable-laying operations; • Routes of vessels for cable works. 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-23	Joint Nature Conservation Committee (JNCC)	Section 4.4.1.2 Comments section of JNCC response	Description of the Project	JNCC note that route clearance activities may include pre-sweeping of sandwaves. We would advise that modification of / removal of sandwaves would result in temporary disturbance of the seabed and changes to patterns of sediment transport resulting in morphological change. We would also highlight that any disturbed sediment resulting from these activities should be retained within the same sediment system.	See response to NRW MLT-26.	ES Volume 3 Chapter 17: Physical Processes
JNCC-24	Joint Nature Conservation Committee (JNCC)	Section 4.4.1.4 Comments section of JNCC response	Description of the Project	As with sandwave pre-sweeping, any material disturbed through cable installation activities such as ploughing or trenching must be deposited at a location that enables it to remain within the same sediment system, for example depositing the disturbed sediment up stream of the trenches to encourage natural backfill.	See response to NRW MLT-26.	ES Volume 3 Chapter 17: Physical Processes
JNCC-25	Joint Nature Conservation Committee (JNCC)	Section 19.4 Comments section of JNCC response	Physical Environment	JNCC would like to better understand in what way Floventis Energy and AECOM Ltd expect the baseline to evolve over the lifespan of the proposed project.	See response to NRW MLT-109.	ES Volume 3 Chapter 17: Physical Processes
JNCC-26	Joint Nature Conservation	Section 19.7.3 Comments section of JNCC response	Marine Environment	JNCC would like to better understand what these proposed survey are as the	See response to NRW MLT-91.	ES Volume 3 Chapter 19: Benthic Ecology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Committee (JNCC)			information provided in Section 19.7.3 is very limited.		
JNCC-27	Joint Nature Conservation Committee (JNCC)	Chapter 20 Comments section of JNCC response	Marine Environment	JNCC note that “a buffer distance of 10km of the proposed Project has been considered which encompasses all likely ZOI to benthic receptors within the subtidal”. We await the establishment of the Project’s ZOI as per Section 30.3.2.1. and further clarity as to how the ZOI has been determined.	See response to NRW MLT-91.	ES Volume 3 Chapter 19: Benthic Ecology
JNCC-28	Joint Nature Conservation Committee (JNCC)	Section 20.6 Comments section of JNCC response	Benthic Ecology	Overall JNCC agree with the potential impacts that will be scoped in and will require further assessment at an EIA stage. However, we would like to highlight that impacts from the introduction of scour protection have not been, and should be, considered here.	See response to NRW MLT-117.	ES Volume 3 Chapter 19: Benthic Ecology
JNCC-29	Joint Nature Conservation Committee (JNCC)	Table 20-1 Comments section of JNCC response	Benthic Ecology	JNCC would consider, given that the turbine’s anchor placement will be in place for the duration of the project, that these impacts should be considered long term disturbance of the seabed. Further discussion on the timescales of what would be considered a permanent and/or temporary loss may be required.	See response to NRW MLT-112.	ES Volume 3 Chapter 19: Benthic Ecology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
JNCC-30	Joint Nature Conservation Committee (JNCC)	Section 20.7 Comments section of JNCC response	Benthic Ecology	JNCC acknowledge that key data sources used for the assessment will include “Projects specific survey data” and that “project specific intertidal and subtidal benthic surveys will be completed to ensure the full range of habitats and any potentially sensitive and / or protected species located within proximity to the project are identified”. JNCC would await further details regarding said surveys before providing further comment.	See response to NRW MLT-112.	ES Volume 3 Chapter 19: Benthic Ecology
PCNPA-1	Pembrokeshire Coast National Park Authority	Paragraph 3 to 5 of PCNPA response	SLVIA	We note that policy SOC_06 Designated landscapes (Wales National Marine Plan) requires proposals to demonstrate how potential impacts on the purposes and special qualities for which National Parks have been designated have been taken into consideration. These should, in order of preference: a. avoid adverse impacts on designated landscapes; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. The policy also states that	See response to NRW MLT-16.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendixes 7B and 23C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>opportunities to enhance designated landscapes are encouraged.</p> <p>Special qualities of Pembrokeshire Coast National Park include seascape, landscape, biodiversity, tranquillity and wildness. Were the development to proceed, we would anticipate that there would be residual adverse impacts, in which case mitigation would be required.</p>		
PCNPA-2	Pembrokeshire Coast National Park Authority	Paragraph 6 of PCNPA response	Ornithology	<p>We are concerned that ornithological data, including flight height data, may be insufficient to adequately assess impacts at the scoping stage. This takes on additional importance in the light of potential in-combination effects with other projects.</p>	See response to NRW MLT-172.	<p>ES Volume 6 Appendix 22A: Marine Ornithology Baseline</p> <p>ES Volume 6 Appendix 22C: Ornithological Collision Risk Modelling Report</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
PCNPA-3	Pembrokeshire Coast National Park Authority	Paragraph 7 of PCNPA response	Combined and Cumulative Effects of the Project	The effects of cable landfall and onshore works must also be considered in combination with other projects.	See response to NRW MLT-33.	ES Volume 1 Chapter 4: Description of the Proposed Project Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW TE-1	Natural Resources Wales Technical Experts	Requirement for EIA bullet of NRW TE response	General	We agree that an EIA is required as the proposed works fall under Schedule A2 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended).	Applicant agrees and has undertaken an EIA, culminating in the preparation of this environmental statement.	ES Volume 1 to 4
NRW TE-2	Natural Resources Wales Technical Experts	Adequacy of Scoping Report bullet of NRW TE response	General	The scoping report is adequate in terms of describing the proposal, however, for several receptors, there are a number of potential impact pathways that have not been adequately defined and/or have been scoped out that will require additional consideration. Details are provided throughout this response. Furthermore, the assessment methodology proposed for some marine receptors is not appropriate and will require further thought.	This is noted and specific points have been responded to within the corresponding technical chapters.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

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NRW TE-3	Natural Resources Wales Technical Experts	Requirement for HRA and Appropriate Assessment bullet of NRW TE response	General	The proposed works are likely to have a significant effect (either alone or in combination with other plans or projects) on a number of protected sites. An appropriate assessment will be required.	A Habitats Regulations Assessment (HRA) Screening is provided in Volume 6, Appendix 8D. A Report to Inform Appropriate Assessment (RIAA) is provided in Volume 6, Appendix 8E.	ES Volume 6 Appendix 8D and 8E
NRW TE-4	Natural Resources Wales Technical Experts	Cumulative Impacts bullet of NRW TE response	General	A preliminary review of other projects and plans that are likely to require consideration within the cumulative effects assessment has been provided. However, potential cumulative impacts have not been identified. Both the long-list of projects and plans, identification of potential cumulative impacts for each receptor, and screening and assessment criteria will need to be further developed. In addition, strategic plans such as TCEs Aggregates, FLOW and R4 plans will need to be considered in cumulative assessment.	Volume 6, Appendix 5A CEA Approach and Methodology outlines the approach to cumulative effects assessment, including details on how the longlist of projects and plans, identification of potential cumulative impacts for each receptor, and screening and assessment criteria have been further developed. The Crown Estates Aggregates, floating offshore wind (FLOW) and Round 4 plans have been considered in the cumulative assessments, which are detailed in each of the corresponding technical chapters.	ES Volume 6 Appendix 5A: CEA Approach and Methodology
NRW TE-5	Natural Resources Wales Technical Experts	Transboundary Impacts bullet of NRW TE response	General	Potential transboundary impacts have not been considered in the report. The potential for transboundary impacts will need to be considered in project-level assessments.	Volume 1, Chapter 5 EIA Approach and Methodology outlines the approach to transboundary effects assessment. Project-level transboundary assessments are detailed in each of the corresponding technical chapters.	ES Volume 1 Chapter 5: EIA Approach and Methodology

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NRW TE-6	Natural Resources Wales Technical Experts	Structure bullet of NRW TE response	General	A revised structure for the Environmental Statement (ES) is advised as the structure as currently proposed is not considered facilitative to the reader. We are happy to work with the applicant on this.	The structure of the ES has been revised to reflect NRW's comments.	ES Volume 1 to 4
NRW TE-7	Natural Resources Wales Technical Experts	Surveys bullet of NRW TE response	General	Limited information is provided with respect to proposed project surveys and / or what data will be collected. We strongly recommend further engagement to discuss exact survey requirements in order to avoid the risk of there being inadequate data to inform assessments.	Details on all project surveys, including what data has been collected, as well as engagement with stakeholders to inform survey approach has been outlined within corresponding technical chapters.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW TE-8	Natural Resources Wales Technical Experts	Use of NRW Guidance bullet of NRW TE response	General	We encourage the applicant to use the NRW guidance that has previously been provided to inform project-level considerations and assessments. We have provided the links to some of these guidance documents again throughout this response.	Applicant has noted the NRW guidance that has been shared. This has been used to inform approach and detailed within corresponding technical chapters where relevant.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW TE-9	Natural Resources Wales Technical Experts	National Policy Statements bullet of NRW TE response	General	It is advised that the relevant National Policy Statements (NPS) are considered and referred to for all relevant receptors in their appropriate chapters throughout the ES. Please note that a review of the energy NPSs is currently underway which the	National Policy Statements have been considered and referred to within all technical chapters where relevant, including the energy NPSs that were updated in November 2023.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

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				applicant may need to take account of in further developing their proposals.		
NRW TE-10	Natural Resources Wales Technical Experts	Engagement bullet of NRW TE response	General	We encourage the applicant to engage as early as possible with NRW (A) to further develop their project proposals, particularly with respect to (but not limited to): understanding export-cable and landfall site selection requirements; survey and assessment requirements, and; potential mitigation and monitoring requirements.	The Applicant has engaged with NRW (A) from an early stage including the establishment of a planning performance agreement. NRW (A) guidance has used when developing project proposals including site selection, survey requirements and monitoring and mitigation.	ES Volume 1 Chapter 6: Consultation and Stakeholder Engagement
NRW TE-11	Natural Resources Wales Technical Experts	Inshore and Offshore Waters bullet of NRW TE response	General	It would be helpful to include the territorial limits and 12nm boundaries on maps. This will help identify where potential impacts may occur as a result of the project proposal.	Territorial limits and 12nm boundaries have been included on all maps where relevant.	ES Volume 5 Figures
NRW TE-12	Natural Resources Wales Technical Experts	Paragraph 1 of NRW TE response	Marine Environment	NRW (A) strongly advise that the applicant engages early with NRW (A) to review and refine the export cable route corridor and landfall options, to avoid and mitigate environmental impacts, through a clear site selection process. We advise that in addition to the key guidance materials cited, the applicant also considers NRW's advice note for offshore cabling - entitled	See response to NRW MLT-28.	ES Volume 1 Chapter 3: Alternatives ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>“Sensitivity of marine ecology receptors to cabling activities in Wales” - in assessment processes. NRW (A) recommends that The Crown Estate’s Cable Route Protocol is also referenced and considered as well as considerations highlighted within the relevant NPSs.</p>		
NRW TE-13	Natural Resources Wales Technical Experts	Paragraph 2 of NRW TE response	Marine Environment	<p>It is NRW (A)’s position that in the absence of understanding future environmental conditions, all decommissioning options must be considered; including the complete removal of installed infrastructure. This includes not only the buried cable but all cable protection measures employed over the course of the project. We endorse Natural England’s advice on scour and cable protection which recommends that for future projects requiring scour protection, developers consider solutions that produce minimal to no negative environmental impact to the seabed, and therefore can remain in place at the end of the project as evidence suggests this is the most cost effective and sustainable approach.</p>	See response to NRW MLT-31.	<p>ES Volume 1 Chapter 4: Description of the Proposed Project</p> <p>Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).</p>

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NRW TE-14	Natural Resources Wales Technical Experts	Paragraph 3 of NRW TE response	Marine Environment	NRW (A) advise that marine water quality is a receptor in its own right and should not be embedded in the physical processes chapter of the Environmental Statement (ES). Apart from the seabed morphological features at the coast, physical processes are not in themselves receptors but are instead pathways through which any alteration to the hydrodynamics (waves, currents, water levels) and sediment transport, caused by the development proposals, can indirectly impact other environmental receptors such as, for example, water quality, and subtidal and intertidal benthic ecology.	See response to NRW MLT-93.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality

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NRW TE-15	Natural Resources Wales Technical Experts	Paragraph 4 of NRW TE response	Marine Environment	<p>We welcome the breadth of guidance already sourced to inform the physical processes impact assessment. We include reference to additional guidance and peer reviewed research papers that should, in our view, also be used to inform the baseline and impact assessment:</p> <ul style="list-style-type: none"> • King, E. V., Conley, D. C., Masselink G., Leonardi, N., McCarroll, R. J., & Scott, T. (2019). The impact of waves and tides on residual sand transport on a sediment-poor, energetic, and macrotidal continental shelf. <i>Journal of Geophysical Research: Oceans</i>, 124, 4974–5002. https://doi.org/10.1029/2018JC014861 • Guidelines in the use of metocean data through the lifecycle of a marine renewables development'. (ABPmer et al., 2008b); and • Offshore Windfarms: Guidance note for Environmental Impact Assessment in Respect of FEPA and CPA requirements'. (Cefas, 2004). 	See response to NRW MLT-95.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> • Further review of sediment monitoring data'. (COWRIE ScourSed-09).' (ABPmer et al., 2010); • Review of Round 1 Sediment process monitoring data - lessons learnt. (Sed01)' (ABPmer et al., 2007); • Dynamics of scour pits and scour protection - Synthesis report and recommendations. (Sed02)' (HR Wallingford et al., 2007); and <ul style="list-style-type: none"> • Potential effects of offshore wind developments on coastal processes'. (ABPmer and METOC, 2002). 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-16	Natural Resources Wales Technical Experts	Paragraph 5 of NRW TE response	Marine Environment	States that "...a wider study area of up to 10km is considered" for far field effects on the surrounding marine environment and coastal habitats. NRW (A) consider that clear rationale and evidence should be provided to justify the study area to be 10km as presented in figure 19.1. We strongly advise that the maximum spring tidal excursion is used to define the zone of influence which will vary from offshore to inshore depending on the spring tidal ellipses (which are generated by the current velocity and direction of flow). Tides in the region flow from the west-north-west to east-south-east on the flood and reverse in direction on the ebb. The study area shown in figure 19.1 does not suggest that the direction of flow has been considered in defining the zone of influence particularly for the offshore array area. The submitted ES must clarify the tidal excursion being proposed with sufficient justification and evidence presented to demonstrate why the value is considered appropriate. We recommend that the applicant engages with NRW (A) at an early	See response to NRW MLT-97.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				stage to agree the zone of influence for physical processes as it will also be relevant to the impact assessment for the other receptor areas.		
NRW TE-17	Natural Resources Wales Technical Experts	Paragraph 6 of NRW TE response	Marine Environment	The detail presented in this scoping report to describe the seabed geomorphology for the study area is insufficient. We strongly advise for the ES that seabed geomorphology (including: bedform features, sand waves, sand banks, sediment type, mobile sediment depth) are described for the entire project area using high resolution multibeam bathymetric survey data, and a description of the bedload and suspended sediment transport processes presented. A data gap	See response to NRW MLT-100.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				analysis should be carried out to determine the requirement for further high resolution bathymetric surveys if there is insufficient data publicly available. Please note that accurate determination of the bedform migratory rates of sand wave fields and understanding the complexities of the sediment transport regime around sandbanks present in the study area (e.g. Turbot Bank), will be critical for an accurate assessment of the impacts arising from cable laying activities and cable protection measures.		
NRW TE-18	Natural Resources Wales Technical Experts	Paragraph 7 of NRW TE response	Marine Environment	We advise that this should be taken out of the physical processes chapter and be a chapter in its own right (see comments above and below in the water quality section).	See response to NRW MLT-93.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality
NRW TE-19	Natural Resources Wales Technical Experts	Paragraph 8 of NRW TE response	Marine Environment	We acknowledge that the export cable route and cable route landfall location has not been decided. However, it is fundamental that the baseline environment for the chosen landfall location is well described in terms of coastal sediment transport processes and beach morphodynamics.	See response to NRW MLT-101.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-20	Natural Resources Wales Technical Experts	Paragraph 9 of NRW TE response	Marine Environment	It would be helpful to show the boundaries of the designated sites on a map and the project study area overlaid with the features of interest relating to physical processes.	See response to NRW MLT-102.	ES Volume 3 Chapter 17: Physical Processes ES Volume 5 Figures
NRW TE-21	Natural Resources Wales Technical Experts	Paragraph 10 of NRW TE response	Marine Environment	The list presented is a mix between physical processes, water quality and benthic ecology. We advise that this list is revisited and the effects on only the physical processes included in this section. The effects on the other receptors should be separated from the physical processes and moved to their respective chapters.	See response to NRW MLT-103.	ES Volume 3 Chapter 17: Physical Processes ES Volume 3 Chapter 18: Marine Water and Sediment Quality ES Volume 3 Chapter 19: Benthic Ecology
NRW TE-22	Natural Resources Wales Technical Experts	Paragraph 11 of NRW TE response	Marine Environment	It is important however, to recognise that marine physical processes are pathways and the impact to the hydrodynamics and sediment transport processes caused by the development activities can potentially cause indirect impacts to other environmental receptors (e.g.	See response to NRW MLT-103.	ES Volume 3 Chapter 17: Physical Processes ES Volume 3 Chapter 18: Marine Water

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				Suspended Sediment Concentration (SSC) plumes). Physical process receptors include specifically the coast, offshore sand banks (Turbot Bank) and seabed areas contained within nationally or internationally designated sites.		and Sediment Quality ES Volume 3 Chapter 19: Benthic Ecology
NRW TE-23	Natural Resources Wales Technical Experts	Paragraph 12 of NRW TE response	Marine Environment	Note that disturbance of SSC will also lead to advection and redeposition of the sediment plume with the spatial extent and concentration of the sediment plume dependent on the percentage distribution of sediment size and type, the water depth and the hydrodynamics. Redeposition of the suspended sediment plume will also cause seabed morphological change which can indirectly impact on the benthic ecology receptor.	See response to NRW MLT-106.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-24	Natural Resources Wales Technical Experts	Paragraph 13 of NRW TE response	Marine Environment	<p>Please remove water quality impacts from the table. Water quality is not considered to be a direct physical processes impact.</p> <p>Installation: surveys – temporary disturbance causing increase in SSC: Suspended sediment plumes will be generated that will be advected away from site by the prevailing currents and the maximum extent of these plumes will depend on the sediment size and the maximum tidal excursion. The redeposition of sediment onto the seabed will potentially cause an alteration to the sediment morphology through change to sediment type and sediment thickness variations.</p> <p>Installation: the destruction of sand waves is not necessarily a temporary disturbance. Sand wave recoverability is dependent on the sediment mobility at that site and the hydrodynamics. If the sand waves are stable features with very low movement, then the sand waves may never recover. Sand wave clearance is not just disturbance but a potential alteration to seabed morphology.</p> <p>Cable Laying: Installation: we disagree</p>	See response to NRW MLT-96.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>that cable laying will have no significant impact on the seabed or on associated physical processes. No rationale is provided as to why this is scoped out from further assessment and we strongly advise that it remains scoped in until evidence is presented that confirms that the cable laying activities do not cause significant impacts to the seabed features or cause alterations to sediment morphodynamics, particularly in relation to the impact on offshore sand banks and beach morphodynamics.</p> <p>Installation: Cable burial: The rationale notes that this will only be scoped in for cable burial >10m water depth. It is not clear what methods are proposed for water depths <10m. The whole cable route should be assessed.</p> <p>Installation: Cable Protection: The cable protection will directly impact on other receptor areas such as benthic ecology and Water Framework Directive (WFD) depending on where it is in proximity to the coast. However, the impacts of cable protection should be assessed in their respective</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>chapters and not specifically in the physical processes chapter.</p> <p>Installation: anchor deployment: it is not explicitly clear what activity this is referring to. The FLOW structures will be anchored to the seabed. No reference has been made to the potential impacts caused by the drag anchors in deeper water e.g. sediment disturbance. Clarity is sought with regard what this pathway is specifically referring too – we assume that it refers to the boat anchors during cable laying of the export cable.</p> <p>Installation: Mooring systems: the impacts arising from installing the floating offshore wind structure mooring systems, for example, using drag anchors or pile foundations have not been included. Such impact pathways need to be further considered and scoped in at this stage.</p> <p>Operation and Maintenance: We are concerned that a number of impacts have been omitted (scoped out) from the table 19.2. We strongly advise that the applicant considers and scopes in the following:</p> <p>i. Potential changes to tidal regime,</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>wave regime and sediment transport regime through blockage effects of the floating OWF structures and mooring cables. Please note that persistent changes to waves and currents may have a net effect over time on net patterns of sediment transport (rate and direction). The sensitivity of these patterns of change will depend upon the relative importance of currents and/or waves, the magnitude and extent of any effect, the nature of the seabed system and degree to which the system is presently in balance e.g is the present rate and direction of transport essential to the maintenance of a dynamic morphological feature.</p> <p>ii. Abrasion impacts arising through movement of the mooring chains across the seabed leading to scour pits and change to seabed sediment type and increase in SSC plumes. Extent and depth of scour may vary over time.</p> <p>iii. Effects of increased turbulence on sediment transport immediately adjacent to any laying objects, for example in relation to anchoring structures on the seabed which can cause scour.</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>iv. The requirement for cable protection in the nearshore zone and across the intertidal cannot be ruled out at this time, particularly if the cable has to cross another cable. Presence of cable protection so close to the shore will potentially interrupt the longshore sediment transport pathway and cause alteration to the beach morphodynamics downstream of the site. Wave refraction and diffraction processes caused by the presence of the cable protection in shallow water could also cause energy refocussing towards the coast leading to coastal erosion.</p> <p>v. We advise that Horizontal Directional Drilling (HDD) is the preferred option at the cable landfall as this method of instal will minimise the negative impacts.</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-25	Natural Resources Wales Technical Experts	Paragraph 14 of NRW TE response	Marine Environment	NRW (A) disagrees with the intention to rule out the potential requirement for numerical modelling to inform the impact assessment for the proposed project. Before NRW (A) can agree that numerical modelling is not required, we advise that a review of available evidence (for example evidence reports from other similar projects / windfarm schemes) is undertaken in order to be able to more fully understand the range of evaluation techniques and best practice applied to similar schemes.	See response to NRW MLT-108.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-34	Natural Resources Wales Technical Experts	Paragraph 15 of NRW TE response	Marine Environment	We recommend that the applicant follows the NRW GN041 guidelines, with specific reference to Chapter 6 Data Requirements for EIA Baseline Characterisation of the embedded Evidence Report (Guidance on Best Practice for Marine and Coastal Physical Processes Baseline Survey and Monitoring Requirements to Inform EIA of Major Development Projects, NRW Evidence Report 243, Brooks et al., 2018). The applicant will need to clearly demonstrate that the sourced data is fit for purpose and still valid to characterise present day conditions. We advise that any data used to inform the baseline understanding must have been collected and analysed in accordance with recognised data quality standards. The sourced data will need to provide the appropriate temporal and spatial coverage and resolution which will adequately describe the present-day conditions within the study area as well as longer-term historical change; both of which are essential to establishing a full conceptual understanding of the natural physical	See response to NRW MLT-107.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>environment baseline of the site and surrounding area. The data sourced should be fit for purpose to sufficiently address the key themes of baseline understanding as described in Brooks et al, 2018 (see below for information):</p> <ul style="list-style-type: none"> · Identification of the processes maintaining the system, the reasons for any past changes, and sensitivity of the system to changes in the controlling processes. · Identification and quantification of the relative importance of high-energy, low frequency (“episodic” events), versus low-energy, high frequency processes. · Identification of the processes controlling temporal and spatial morphological change (e.g. longevity and stability of bedforms; cliff recession; loss of beach volume; or bank and channel migration; intertidal accretion/ erosion), which may require a review of bathymetric and topographic data. · The identification of sediment sources, pathways and sinks, and quantification of transport 		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>fluxes.</p> <ul style="list-style-type: none"> · The identification of the inherited geological, geophysical and geotechnical properties of the sediments at the site, and the depth of any sediment strata. · Interaction of waves and tides and the subsequent quantification of the extent to which seabed sediment is mobilised. · The assessment of the scales and magnitudes of processes controlling sediment transport rates and pathways. 		

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NRW TE-35	Natural Resources Wales Technical Experts	Paragraph 16 of NRW TE response	Marine Environment	We advise to include only the physical processes criteria in table 19.3. The table refers to marine receptors that are indirectly impacted by the physical processes i.e. where physical processes is a pathway acting on sediment and water quality. Sensitivity on other receptors should be addressed in their respective chapters, otherwise, important impacts may be omitted if it is considered that the sensitivity to physical processes is low.	See response to NRW MLT-98.	ES Volume 3 Chapter 17: Physical Processes
NRW TE-36	Natural Resources Wales Technical Experts	Paragraph 17 of NRW TE response	Marine Environment	Again, the table should include only the physical processes and not sediment and water quality.	See response to NRW MLT-98.	ES Volume 3 Chapter 17: Physical Processes
NRW TE-37	Natural Resources Wales Technical Experts	Paragraph 18 of NRW TE response	Marine Environment	We advise that a review is carried out to establish if there are any data gaps requiring the need for further surveys. We reiterate that in order to accurately assess sand wave mobility (migration rates and directions) and the complex morphodynamics that maintain sand bank features such as Turbot Sand Bank, we strongly advise that high resolution multibeam bathymetry data sets are used.	See response to NRW MLT-100.	ES Volume 3 Chapter 17: Physical Processes

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NRW TE-38	Natural Resources Wales Technical Experts	Paragraph 19 of NRW TE response	Benthic Ecology	We strongly encourage the applicant to engage in discussions with NRW (A) on the proposed cable routes. Of particular concern is the potential for the cable route to interact with sensitive features (Annex 1 habitats) of the Pembrokeshire Marine Special Area of Conservation (SAC). Clarity is required as to whether alternative cable routes have been considered as part of the process. The applicant will likely be aware that there are a number of current and potential developments in the area. Any potential loss of Annex I features will need to be considered very carefully.	See response to NRW MLT-28.	ES Volume 1 Chapter 3: Alternatives ES Volume 1 Chapter 4: Description of the Proposed Project
NRW TE-39	Natural Resources Wales Technical Experts	Paragraph 20 of NRW TE response	Benthic Ecology	Whilst we understand it is not possible at this stage to determine whether trenching or HDD will be used for the cable installation at landfall, we strongly encourage the applicant to use HDD where possible given the potential environmental impacts of trenching on conservation features.	See response to NRW MLT-30.	ES Volume 1 Chapter 4: Description of the Proposed Project
NRW TE-40	Natural Resources Wales Technical Experts	Paragraph 21 of NRW TE response	Benthic Ecology	We advice that the ES should consider the maximum number of cable repairs predicted to occur during the operation of the project and establish and assess the parameters likely to	See response to NRW MLT-32.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				result in the maximum adverse effect (worst case scenario). This includes the potential for cable protection to be required following cable repairs.		Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW TE-41	Natural Resources Wales Technical Experts	Paragraph 22 of NRW TE response	Benthic Ecology	Please refer to the report recently published by Natural England to inform the evidence gap in relation to the feasibility of and options for removing scour and cable protection upon decommissioning of offshore windfarms.	See response to NRW MLT-31.	ES Volume 1 Chapter 4: Description of the Proposed Project Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).
NRW TE-42	Natural Resources Wales Technical Experts	Paragraph 23 of NRW TE response	Benthic Ecology	We note the generic criteria provided in tables 5-1 to 5-4 will be applied to several topics where possible. In general we agree with value/sensitivity and magnitude criteria applied here. However, the applicant should refine which value/sensitivity category habitats are protected under, for example, The Conservation of Habitats and Species Regulations 2017, Environment (Wales) Act 2016, OSPAR Convention.	See response to NRW MLT-35.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

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NRW TE-43	Natural Resources Wales Technical Experts	Paragraph 24 of NRW TE response	Benthic Ecology	Notes that "...for subtidal benthic ecology, a buffer distance of 10km of the proposed project has been considered, which encompasses all likely Zol benthic receptors within the subtidal". Please refer to comments made above in the Physical processes section with respect to screening distances applied to the Zol.	See response to NRW MLT-91.	ES Volume 3 Chapter 19: Benthic Ecology
NRW TE-44	Natural Resources Wales Technical Experts	Paragraph 25 of NRW TE response	Benthic Ecology	Native oyster <i>Ostrea edulis</i> beds are also present within the offshore cable scoping boundary. <i>Ostrea edulis</i> beds is also a habitat present within the Annex I Estuaries and Large Shallow inlets and Bays features of the Pembrokeshire Marine SAC, a Section 7 species and an OSPAR habitat. We advise that the applicant contact NRW's data distribution team to be provided with a copy of the data points.	See response to NRW MLT-115.	ES Volume 3 Chapter 19: Benthic Ecology
NRW TE-45	Natural Resources Wales Technical Experts	Paragraph 26 of NRW TE response	Benthic Ecology	We advise potential impacts to this designated site are also scoped in as the "Submerged or partially submerged sea caves" feature are cross-boundary features between the Limestone Coast SAC and the Pembrokeshire Marine SAC. Whilst we acknowledge the sensitivity of this	See response to NRW MLT-116.	ES Volume 3 Chapter 19: Benthic Ecology ES Volume 6 Appendix 8D and 8E

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				feature to project secondary effects may be lower than for other habitat features, some biotopes within this feature may still be sensitive to project secondary effects.		

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NRW TE-46	Natural Resources Wales Technical Experts	Paragraph 27 of NRW TE response	Benthic Ecology	<p>The rationale for inclusion of this pathway notes that “Studies have indicated that the introduction of hard substrate in otherwise barren areas are quick to be colonised and used by local species”. It is important to note the introduction of hard substrate in a soft sediment habitat is a change of habitat type. The loss of a sedimentary habitat to a different habitat type (hard substrate in this case) is not beneficial even if the anthropogenic structure is colonised by local species as the sedimentary habitat is lost and will not be replaced.</p> <p>Operation: Maintenance potential effects the same as route preparation and cable installation: We advise this potential impact pathway should be refined further as it currently encompasses a number of potential impacts. See detailed comments below.</p> <p>In this regard, we advise the following potential impact pathways should be scoped in for the operation phase:</p> <ul style="list-style-type: none"> i. Temporary increase in SSC and sediment deposition leading to contaminant mobilisation, turbidity 	See response to NRW MLT-113.	<p>ES Volume 3 Chapter 19: Benthic Ecology</p> <p>ES Volume 6 Appendix 4B: Outline INNS Plan</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>and smothering effects – from maintenance operations</p> <p>ii. Operation Indirect habitat loss – potential impacts on adjacent benthic habitats from on-going scour, changes in hydrodynamics and abrasion from the movement of catenary chains.</p> <p>iii. Operation Disturbance to benthic habitats – potential disturbance to benthic habitats from planned maintenance, cable failure, excavation but also disturbance from the movement of the catenary chains. We note this impact pathway might potentially be covered under “maintenance potential effects the same as route preparation and cable installation” but advise the impact is defined further as noted above and scoped in. In particular we believe potential impacts to benthic habitats from the movement of catenary chains during the operation phase have not been scoped in at present and we advise this will need to be assessed in the ES.</p> <p>iv. Operation Habitat alteration – The introduction of hard substrate in the form of cables and scour protection</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>may lead to increased heterogeneity and consequently to new different biological communities, particularly in areas of soft sediment where hard substrate is uncommon. Adjacent habitats may be indirectly affected by infrastructure through scour, changes in hydrodynamics, increased sedimentation/smoothening in the construction phase and through additional ongoing scour and change in hydrodynamics in the operation and maintenance phase. We advise this potential impact pathway is scoped in and assessed.</p> <p>v. Operation Effects of electromagnetic fields (EMF) emissions – We disagree this potential impact can be scoped out as there is some evidence that EMFs affect crustacea behavioural patterns (Scott et al., 2021, Harsanyi et al, 2022) which would potentially include certain species under Section 7 (Environment Wales Act 2016) e.g. Crawfish <i>Palinurus elephas</i>. As Section 7 habitats and species have not been incorporated into the current scoping document it is not possible to scope</p>		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>out these elements without further assessment. These should be review and assessed (where appropriate) as part of the ES.</p> <p>vi. Operation Changes in hydrodynamics – We note this potential impact pathway has not been scoped in for benthic habitats. We advise it will be important to make links between potential impacts to the physical environment and subsequent impacts on benthic habitats in the ES given the close interlinkages and inter-dependancies between both receptors i.e impacts on physical processes informs impacts on benthic habitats. It is currently unclear from the scoping report how impacts that span across both of these receptors (physical processes and benthic habitats) will be assessed and/or how links will be made between chapters with other receptors e.g. water quality. For specific comments on impacts on physical processes that should be used to inform impacts on benthic impacts we defer to comments made above in the physical processes section.</p>		

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NRW TE-47	Natural Resources Wales Technical Experts	Paragraph 28 of NRW TE response	Benthic Ecology	We welcome the proposal to gather project-specific survey data. We welcome engagement with the applicant in discussions on survey requirements. In the meantime we would like to remind the applicant to refer to the NRW guidance on benthic habitat assessments for marine developments which sets out our approaches for survey and monitoring of benthic habitats to support environmental and ecological impact assessments: Natural Resources Wales / Benthic habitat assessments for marine developments.	See response to NRW MLT-118.	ES Volume 3 Chapter 19: Benthic Ecology
NRW TE-48	Natural Resources Wales Technical Experts	Paragraph 29 of NRW TE response	Benthic Ecology	This section also states that the assessment methodology for benthic ecology will follow the standard methodology for ecological receptors outlined in Volume 2, Chapter 8, which is in line with CIEEM guidance for ecological impact assessments (CIEEM, 2018). However, this assessment methodology relates to terrestrial receptors, and some of the criteria are not appropriate for benthic habitats. For example, Section 8.7.3.2 describes how the sensitivity of the receptor will be assessed based on geographical	See response to NRW MLT-147.	ES Volume 3 Chapter 21: Marine Mammals

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				frames of reference, some of which are not relevant in the marine environment. We recommend further clarity is requested on the frames of reference that will be used for marine receptors.		
NRW TE-49	Natural Resources Wales Technical Experts	Paragraph 29 of NRW TE response	Benthic Ecology	See comments above regarding EMF. Furthermore, NRW (A) welcomes the intention to undertake site specific surveys and recommend that any fish encountered during sampling of benthic habitats, e.g. sandeel from grab sampling, or fish encountered in video surveys, are noted and the information included to inform the assessment in the Fish and Shellfish chapter.	See response to NRW MLT-122.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 19: Benthic Ecology
NRW TE-50	Natural Resources Wales Technical Experts	Paragraph 30 of NRW TE response	Benthic Ecology	We agree with the preliminary long list provided in table 30-2, from a benthic ecology perspective. Please note the Marine Energy Test Area (META) has applied for a marine licence variation.	See response to NRW MLT-191.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6

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						Appendix 5A: CEA Methodology
NRW TE-51	Natural Resources Wales Technical Experts	Paragraph 31 of NRW TE response	Benthic Ecology	<p>Please refer to our comments further above. We advise the following impacts should be scoped in during the operation phase:</p> <ul style="list-style-type: none"> · Temporary increase in SSC and sediment deposition leading to contaminant mobilisation, turbidity and smothering effects · Indirect habitat loss · Disturbance to benthic habitats · Habitat alteration · Effects of electromagnetic fields (EMF) emissions · Changes in hydrodynamics and/or other potential impacts on physical processes that will inform impacts on benthic habitats (see comment above and in Physical Process section). 	See response to NRW MLT-196.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)
NRW TE-52	Natural Resources Wales Technical Experts	Paragraph 32 of NRW TE response	Fish and Shellfish Ecology	The Salmon and Freshwater Fisheries Act (1975) should be included in the list. Although the site is offshore and outside the 6NM distance from the coast, the cable corridor and wider	See response to NRW MLT-124.	ES Volume 3 Chapter 20: Fish and Shellfish

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				study area is inside the boundary where the legislation applies.		
NRW TE-53	Natural Resources Wales Technical Experts	Paragraph 33 of NRW TE response	Fish and Shellfish Ecology	NRW (A) agrees that underwater noise from construction activities is likely to be a primary effect on fish, especially for fish where the swimbladder is near or connected to the ear, such as in the clupeids. Recent evidence (Davies et al 2020b) has found that Twaite shad from the river Severn undertake long range migration across the Celtic sea, and NRW (A) therefore recommend that to ensure any fish passing through the Study Area are considered, a regional approach is taken, screening in all sites with noise sensitive fish features. Furthermore, NRW (A) recommends that site and project specific noise modelling is undertaken to inform the detailed assessment.	See response to NRW MLT-125.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW TE-54	Natural Resources Wales Technical Experts	Paragraph 34 of NRW TE response	Fish and Shellfish Ecology	NRW (A) advise that Cardigan Bay and River Teifi SAC, both of which have Annex II diadromous fish features, are borderline on the screening criteria but should be included on the map and scoped in for migratory fish.	See response to NRW MLT-123.	ES Volume 3 Chapter 20: Fish and Shellfish Ecology ES Volume 6 Appendix 8D and 8E

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NRW TE-55	Natural Resources Wales Technical Experts	Paragraph 35 of NRW TE response	Fish and Shellfish Ecology	NRW (A) does not disagree with the species described in these sections, and understand that this is not an exhaustive list. However, NRW (A) advise that for EIA purposes receptor fish species should primarily be informed through a combination of species conservation status (e.g. Annex II, OSPAR, Section 7), species of commercial importance and their ecological role, e.g. species which form important prey species for other receptors, such as marine mammals and birds and as such this list should be refined and appropriate processes for species selection identified.	See response to NRW MLT-126.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW TE-56	Natural Resources Wales Technical Experts	Paragraph 36 of NRW TE response	Fish and Shellfish Ecology	Angelshark (<i>Squatina squatina</i>) is listed as a species on the Wildlife and Countryside Act under Schedule 5; is an OSPAR/Section 7 Species, as well as being listed on the CMS (Convention on the Conservation of Migratory Species of Wild Animals). Angelshark should also be included in this section due to historic and current presence in Welsh waters (Barker et al. 2021 in-prep) and the potential for this species to make seasonal inshore- offshore movements particularly in relation	See response to NRW MLT-127.	ES Volume 3 Chapter 20: Fish and Shellfish

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				to potential effects of EMF. This should also be considered as part of assessment.		
NRW TE-57	Natural Resources Wales Technical Experts	Paragraph 37 of NRW TE response	Fish and Shellfish Ecology	The applicant should note and be aware that there are Atlantic herring spawning grounds inside the Pembrokeshire Marine SAC, as well as in the coastal areas (Davies et al, 2020a) so these need to be appropriately captured and considered in the ES. While NRW (A) agrees with the use of the fisheries sensitivity maps by Coull et al. 2012, and Ellis et al., 1998 the limitations of these maps should be noted, especially around the lack of survey data for coastal waters and water less than 30 m deep, as well as the age of some of the data. NRW (A) further advise that additional data sources for the Celtic sea should be consulted, such as the PELTIC surveys conducted by Cefas. T of forage fish in Welsh and surroundings waters' (he recent report 'Spawning and nursery grounds' Campanella & van der Kooij	See response to NRW MLT-128.	ES Volume 3 Chapter 20: Fish and Shellfish

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				2021) presents a useful summary of data sources for a range of fish species in Welsh waters and we recommend that this is considered.		
NRW TE-58	Natural Resources Wales Technical Experts	Paragraph 38 of NRW TE response	Fish and Shellfish Ecology	NRW (A) welcomes the intention to further assess sandeel and herring spawning in light of the results of the benthic sampling (please note comment above) and would advise that GIS modelling is carried out using the methodology described by Reach et al (2015), Latto et al (2013) and Marine Space Ltd et al (2013a, 2013b).	See response to NRW MLT-120.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW TE-59	Natural Resources Wales Technical Experts	Paragraph 39 of NRW TE response	Fish and Shellfish Ecology	Furthermore, for oceanic species, such as Bluefin tuna and Basking shark (a Wildlife and Countryside Act and OSPAR protected species) additional data should be consulted to assess the species-specific risk of entanglement. The ES for Project Erebus list several	See response to NRW MLT-121.	ES Volume 3 Chapter 20: Fish and Shellfish

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				data sources and records which can be used.		
NRW TE-60	Natural Resources Wales Technical Experts	Paragraph 40 of NRW TE response	Fish and Shellfish Ecology	NRW (A) notes that project specific mammal surveys and Digital Aerial Surveys for birds are proposed. NRW (A) recommend that these also include observations of large oceanic fish to inform the assessment. Furthermore, NRW (A) welcomes the intention to undertake site specific surveys and would recommend that any fish encountered during sampling of benthic habitats, e.g. sandeel from grab sampling, or fish encountered in video surveys, are noted and the information used to inform the assessment in the Fish and Shellfish chapter.	See response to NRW MLT-122.	ES Volume 3 Chapter 20: Fish and Shellfish ES Volume 3 Chapter 19: Benthic Ecology
NRW TE-61	Natural Resources Wales Technical Experts	Paragraph 41 of NRW TE response	Fish and Shellfish Ecology	Please see comment above relating to screening distances and inclusion of Cardigan Bay and River Teifi SAC Annex II features. NRW (A) also advise that Atlantic salmon (Annex II migratory fish), and sea trout are included, as described in Section 21.4.3, as these are features of the Severn Estuary SAC/Ramsar site migratory fish	See response to NRW MLT-129.	ES Volume 3 Chapter 20: Fish and Shellfish

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				assemblage. NRW (A) welcomes the intention to screen in the Severn Estuary SAC but would advise that the rivers Usk and Wye SACs connected to the site, are also included and need to be scoped into the assessment.		
NRW TE-62	Natural Resources Wales Technical Experts	Paragraph 42 of NRW TE response	Fish and Shellfish Ecology	NRW (A) agree with the list of potential impacts identified, and that no specific fish or shellfish surveys are required. However, as described above, should any fish be encountered during the benthic surveys this information should be used to validate the desk top study of spawning/nursery habitat and please note advice above relating to additional data sources and modelling for some receptor species.	See response to NRW MLT-130.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW TE-63	Natural Resources Wales Technical Experts	Paragraph 43 of NRW TE response	Fish and Shellfish Ecology	Please see comments above on additional sites which should be scoped in for Annex II migratory fish features.	See response to NRW MLT-129.	ES Volume 3 Chapter 20: Fish and Shellfish
NRW TE-64	Natural Resources Wales	Paragraph 44 of NRW TE response	Fish and Shellfish Ecology	NRW (A) agrees with the listed project and plans from a fish perspective and advise that particular attention is paid to temporal and spatial cumulative	See response to NRW MLT-192.	ES Volume 3 Chapter 20: Fish and Shellfish

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Technical Experts			effects on spawning and nursery habitats for fish receptors, as well as underwater noise.		
NRW TE-65	Natural Resources Wales Technical Experts	Paragraph 45 of NRW TE response	Ornithology	Notes that "...the Study Area for the baseline encompasses all sites designated for birds with a marine component within 100 km of the Array Area Scoping Boundary and Offshore Cable Scoping Boundary and selected sites designated for far ranging species with a maximum foraging range of +1 Standard Deviation (SD) that is greater than 100 km." NRW (A) advise that all designated sites with named features whose foraging ranges fall within the mean maximum foraging range +1 standard deviation (Mean Max +1SD) in Woodward et al 2019, should be included for scoping as it is not possible to know what sites might be affected until the surveys show what species are present, and key work such as apportioning has been completed. Potential impacts on wintering bird features and the potential impacts on birds migrating to and from protected sites, along with estuarine Special Protection Areas (SPA) and Sites of Special Scientific Interest (SSSI)	See response to NRW MLT-156.	ES Volume 3 Chapter 22: Ornithology ES Volume 6 Appendix 8D: HRA Screening Appendix 22E: Ornithological Connectivity and Apportioning Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<p>features which could be affected by collision risk on migration, should also be included in scoping and screening. Given that populations of breeding seabird qualifying features at SPAs are afforded protection throughout the year, projects or plans remote from the breeding colony site should be subject to the HRA process regardless of time of year at which birds may interact with those projects/plans, if an impact pathway exists. Therefore, there is a need for an HRA and EIA to consider species at colonies that are within foraging distance of the proposed development during the breeding season, and to also consider assessment of impacts to birds from these colonies in the non-breeding season.</p>		

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NRW TE-66	Natural Resources Wales Technical Experts	Paragraph 46 of NRW TE response	Ornithology	The Statutory Nature Conservation Bodies (SNCBs) advise the use of Woodward et al. (2019) species-specific Mean Max +1SD. This represents a relatively quick and straightforward approach to establishing connectivity between a proposal's location and a site's qualifying features, as is required to establish likely significant effects. There is however, the possibility that using this approach could miss out some colonies; therefore a sense check will also need to be performed to ensure that all colonies for which there is a potential for likely significant effect are included at the screening stage. Assessments should always be based upon the best and most up to date evidence available.	See response to NRW MLT-153.	ES Volume 6 Appendix 22B: Marine Ornithology Colony Apportioning ES Volume 6 Appendix 8D: HRA screening
NRW TE-67	Natural Resources Wales Technical Experts	Paragraph 47 of NRW TE response	Ornithology	In addition to the Mean Max +1SD foraging ranges from Woodward et al 2019, site-specific tracking data are available e.g. for northern gannet at Grassholm SPA, and should also be assessed. These foraging ranges will identify SPAs and SSSIs which should be screened in for further	See response to NRW MLT-157.	ES Volume 3 Chapter 22: Ornithology

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				consideration as part of the HRA and EIA process.		
NRW TE-68	Natural Resources Wales Technical Experts	Paragraph 48 of NRW TE response	Ornithology	The list of species to be included in scoping will need to be expanded to include all marine birds listed as features of designated sites within the mean max +1SD foraging ranges (Woodward et al 2019).	See response to NRW MLT-154.	ES Volume 3 Chapter 22: Ornithology
NRW TE-69	Natural Resources Wales Technical Experts	Paragraph 49 of NRW TE response	Ornithology	This list of sites and designated features needs to be significantly expanded to include all designated sites within mean max +1SD foraging ranges (Woodward et al 2019) which overlap with the project array. These foraging ranges will identify SPAs which should be screened in for further consideration as part of the HRA process and SSSIs for the EIA.	See response to NRW MLT-158.	ES Volume 3 Chapter 22: Ornithology
NRW TE-70	Natural Resources Wales Technical Experts	Paragraph 50 of NRW TE response	Ornithology	Notes that “The Digital Aerial Surveys will characterise the ornithological baseline of the Study Area and establish the ornithological receptors taken forward for assessment in the EIA.” In addition to digital aerial surveys we would advise that additional data be reviewed to inform the EIA and HRA assessments e.g.	See response to NRW MLT-161.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8E: HRA RIAA ES Volume 6

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				tracking data and colony monitoring data.		Appendix 22A: Marine Ornithology Baseline ES Volume 6 Appendix 22B: Marine Ornithology Colony Apportioning
NRW TE-71	Natural Resources Wales Technical Experts	Paragraph 51 of NRW TE response	Ornithology	It is stated at section 23.4 that “Digital Aerial Survey (DAS) will be used to collect project-specific baseline site characterisation data to inform the EIA. This includes the Array Area and Offshore Cable Scoping Boundary, plus a surrounding 4 km buffer, with monthly surveys undertaken to gather seabird species abundance and distribution data over a 24-month period...” We agree with the 4km buffer for the array area and cable route being applied for the two years of digital aerial surveys. The applicant should provide details on survey design and coverage so we can comment on whether or not it is sufficient. We would welcome early	See response to NRW MLT-162.	ES Volume 6 Appendix 22A: Marine Ornithology Baseline.

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				engagement and discussion with the applicant regarding survey requirements		
NRW TE-72	Natural Resources Wales Technical Experts	Paragraph 52 of NRW TE response	Ornithology	We note that “Survey data will include species, count, sex (where possible), age (where possible), flight height, flight direction, activity (in flight or on the seas surface), rafting/loafing, etc.), position, and date and timestamp.” However, it is not clear how the applicant proposes to determine flight height. Flight height analysis from digital aerial footage has not yet been proven, or accepted by SNCBs so generic flight heights from Johnston et al. (2014) should also be used in assessing collision risk. As part of the Collision Risk Mortality CRM assessment, applicants are advised to use the Basic Band model option 2 (Johnston et al, 2014: Modelling flight heights of marine birds to more	See response to NRW MLT-163.	ES Volume 6 Appendix 22C: Ornithological Collision Risk Modelling Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				accurately assess collision risk with offshore wind turbines - Johnston - 2014 - Journal of Applied Ecology - Wiley Online Library) using flight height data. Discussions between the SNCBs and digital aerial providers are ongoing, but in the interim, until these investigations are completed, use of Johnston et al. (2014), is considered appropriate.		
NRW TE-73	Natural Resources Wales Technical Experts	Paragraph 53 of NRW TE response	Ornithology	Operation: Direct creation of roosting habitat for birds due to the presence of floating platforms and associated infrastructure: The rationale for this impact pathway notes that “The introduction of floating platforms and associated infrastructure presents the opportunity for new roosting habitat which may be utilised by foraging birds.” NRW (A) consider that the introduction of platforms should also be assessed with regards the potential increased collision risk.	See responses to NRW MLT-167 and NRW MLT-168.	ES Volume 3 Chapter 22: Ornithology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-74	Natural Resources Wales Technical Experts	Paragraph 54 of NRW TE response	Ornithology	Section 23.7 states that “The Project-specific marine ornithological survey programme will also collect flight height data for each of the relevant species recorded within the proposed ornithological Study Area (area of the array plus a 4 km buffer).” Please see our comments above with respect to use of flight height analysis from digital aerial footage.	See response to NRW MLT-162.	ES Volume 6 Appendix 22A: Marine Ornithology Baseline.
NRW TE-75	Natural Resources Wales Technical Experts	Paragraph 55 of NRW TE response	Ornithology	The list of other relevant major developments to be considered as part of the inter-project effects assessment will be developed in parallel with undertaking the EIA considering temporal scope, shared receptors or pathways for effects.” Developments which have already been constructed and have ongoing effects on marine birds and /or SPAs e.g. operational windfarms should also be included.	See response to NRW MLT-189.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology
NRW TE-76	Natural Resources Wales Technical Experts	Paragraph 56 of NRW TE response	Ornithology	Developments which are within the foraging ranges (see Woodward et al 2019) of all SPAs scoped in for LSE should be included within this cumulative assessment.	See response to NRW MLT-190.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						Appendix 5A: CEA Methodology
NRW TE-77	Natural Resources Wales Technical Experts	Paragraph 57 of NRW TE response	Ornithology	This 'long list' will need to be expanded to include all sites identified as potential LSE during screening, noting our comments relating to Table 30-1 above.	See response to NRW MLT-191.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31) ES Volume 6 Appendix 5A: CEA Methodology
NRW TE-78	Natural Resources Wales Technical Experts	Paragraph 58 of NRW TE response	Marine Mammals	NRW (A) agree with the stated intention that the Study Area will take into consideration (where available) species specific marine mammal Management Units (MUs) published by the Inter Agency Marine Mammal Working Group (IAMMWG) (IAMMWG, 2015) and a consideration of the designated sites within for the initial screening.	See response to NRW MLT-138.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-79	Natural Resources Wales Technical Experts	Paragraph 59 of NRW TE response	Marine Mammals	NRW (A) does not agree with the rationale of using a 50km buffer for scoping purposes for cetaceans, or the 135km buffer for grey seals. The Annex II marine mammal features of SACs are mobile and wide ranging. They are not limited to the boundaries of the SACs, and can be found, and therefore impacted anywhere within the relevant MU – including within the impact footprint of the underwater noise activities described in the scoping report. NRW (A) consider the MUs and the SACs within them as functionally linked areas (Chapman & Tyldesley 2016).	See response to NRW MLT-133.	ES Volume 3, Chapter 21: Marine Mammals ES Volume 6 Appendix 8E: HRA RIAA
NRW TE-80	Natural Resources Wales Technical Experts	Paragraph 60 of NRW TE response	Marine Mammals	We advise that the MU is the appropriate scale for consideration of offsite impacts for marine mammals. The proposed works fall within both the Celtic & Irish Seas MU for Harbour porpoise, and the OSPAR Region III interim MU for grey seal. We therefore advise that the following SACs with marine mammal features within the relevant MU should be scoped in to the assessment (NRW, 2020a): · Gogledd Môn Forol / North Anglesey Marine (Harbour porpoise)	See response to NRW MLT-134.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8D and 8E

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> · Gorllewin Cymru Forol / West Wales Marine (Harbour porpoise) · Dynesfeydd Môr Hafren / Bristol Channel Approaches (Harbour porpoise) · Pen Llŷn a’r Sarnau / Llyn Peninsula and the Sarnau (Grey seal) · Cardigan Bay / Bae Ceredigion (Grey seal) · Pembrokeshire Marine / Sir Benfro Forol (Grey seal) 		
NRW TE-81	Natural Resources Wales Technical Experts	Paragraph 61 of NRW TE response	Marine Mammals	Where the MUs include SACs outside of UK waters, transboundary impacts must also be considered, and the potential impacts on SACs within other jurisdictions should be assessed. Details of these sites can be found in NRW (2020a).	See response to NRW MLT-135.	<p>ES Volume 3 Chapter 21: Marine Mammals</p> <p>ES Volume 6 Appendix 8E: HRA RIAA</p>
NRW TE-82	Natural Resources Wales Technical Experts	Paragraph 62 of NRW TE response	Marine Mammals	Note that the proposed works fall within the Offshore Channel, Celtic Sea & SW England MU for Bottlenose dolphin. There are no SACs with bottlenose dolphin features within this MU. We do not consider that the bottlenose dolphin features from the SACs listed above are likely to be found within the project impact area	See response to NRW MLT-136.	<p>ES Volume 3 Chapter 21: Marine Mammals</p> <p>ES Volume 6 Appendix 21A: Marine Mammal Baseline Technical Report</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				and therefore advise that there is no likely significant effect on this feature.		
NRW TE-83	Natural Resources Wales Technical Experts	Paragraph 63 of NRW TE response	Marine Mammals	With respect to considerations under the Habitats Regulations, we advise that the proposed works are likely to have a significant effect (either alone or in combination with other plans or projects) on the aforementioned SACs and therefore recommend that an AA is carried out on all of the sites listed. Advice on how to carry out the AA for those marine mammal features can be found in NRW (2020a).	See response to NRW MLT-135.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8E: HRA RIAA
NRW TE-84	Natural Resources Wales Technical Experts	Paragraph 64 of NRW TE response	Marine Mammals	NRW (A) supports the inclusion of the measures detailed in this section to minimise the risk of impact to marine mammals.	See response to NRW MLT-145.	ES Volume 6 Appendix 4A: Outline Construction Environmental Management Plan ES Volume 6 Appendix 8E: HRA RIAA

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-85	Natural Resources Wales Technical Experts	Paragraph 65 of NRW TE response	Marine Mammals	NRW (A) agrees with the list of impact pathways as detailed in Table 22-4 to be scoped in to the assessment for marine mammals.	See response to NRW MLT-146.	ES Volume 3 Chapter 21: Marine Mammals
NRW TE-86	Natural Resources Wales Technical Experts	Paragraph 66 of NRW TE response	Marine Mammals	This section states that the assessment methodology for marine mammals will follow the standard methodology outlined for ecological receptors outlined in Volume 2, Chapter 8, which is in line with CIEEM guidance for ecological impact assessments (CIEEM, 2018). However, this assessment methodology relates to terrestrial receptors, and some of the criteria are not appropriate for marine mammals. For example, Section 8.7.3.2 describes how the sensitivity of the receptor will be assessed based on geographical frames of reference, some of which are not relevant in the marine environment. We recommend further clarity is requested on the frames of reference that will be used for marine receptors.	See response to NRW MLT-147.	ES Volume 3 Chapter 21: Marine Mammals
NRW TE-87	Natural Resources Wales	Paragraph 67 of NRW TE response	Marine Mammals	We agree with the use of the data sources listed. It is not clear what data source IAMMWG, (2021) refers to as	See response to NRW MLT-138.	All technical chapters within the ES Volumes 2

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Technical Experts			this reference is not listed in the reference list.		to 4 (Chapters 7 to 31)
NRW TE-88	Natural Resources Wales Technical Experts	Paragraph 68 of NRW TE response	Marine Mammals	We note the intention to use project specific survey data but there is no further information on what surveys are intended, or what data will be collected. We strongly recommend further engagement with NRW (A) to discuss what surveys are proposed, to avoid the risk of there being inadequate data to form an assessment.	See response to NRW MLT-138.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)
NRW TE-89	Natural Resources Wales Technical Experts	Paragraph 69 of NRW TE response	Marine Mammals	We note the potential for UXO to be present at the development site, and we support the intention to collect magnetometer data to assess the potential for issues. We note that the potential for underwater noise impacts from UXO have already been scoped in to the assessment. We recommend that should UXO disposal be necessary, the applicant should refer to the joint interim position statement on UXO clearance here: Marine environment: unexploded ordnance clearance joint interim position statement - GOV.UK (www.gov.uk).	See response to NRW MLT-148.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 21C: Marine Mammals Noise Assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-90	Natural Resources Wales Technical Experts	Paragraph 70 of NRW TE response	Marine Mammals	As advised above, NRW (A) does not agree with the scoping boundaries and therefore does not agree with the cumulative assessment search areas described in Table 30-1. We advise that the MU is the appropriate scale for consideration of offsite impacts for marine mammals, and that all plans and projects within the relevant MU (IAMMWG, 2015) should be scoped in to the assessment as they have the potential to affect the same marine mammal populations.	See response to NRW MLT-193.	ES Volume 3 Chapter 21: Marine Mammals
NRW TE-91	Natural Resources Wales Technical Experts	Paragraph 71 of NRW TE response	Marine Mammals	From a mammal perspective, these should also include the Morlais Tidal Energy Development Zone, Project TIGER, Whitecross FLOW and Awel y Mor which have the potential to act cumulatively / in-combination with the relevant MU populations.	See response to NRW MLT-193.	ES Volume 3 Chapter 21: Marine Mammals
NRW TE-92	Natural Resources Wales Technical Experts	Paragraph 72 of NRW TE response	Marine Mammals	The cumulative and in combination assessment should also consider transboundary impacts from other plans or projects within the relevant marine mammal management units (NRW, 2020a).	See response to NRW MLT-134.	ES Volume 3 Chapter 21: Marine Mammals ES Volume 6 Appendix 8D and 8E

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-93	Natural Resources Wales Technical Experts	Paragraph 73 of NRW TE response	Physical Environment	Sections 4.3.1, 19.3 and 20.2 set out the potential landfall options, currently including West Angle Bay, Angle Bay and Freshwater West Beach. We advise the applicant engages early with NRW to discuss the export cable route and landfall options so that we can provide advice to minimise the environmental impacts as far as possible.	See response to NRW MLT-58.	S Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 7B: LVIA Detailed Assessment ES Volume 6 Appendix 23C: SLVIA Detailed Assessment
NRW TE-94	Natural Resources Wales Technical Experts	Paragraph 74 of NRW TE response	Physical Environment	In relation to Section 4.4.1.3, whilst at this stage we recognise it is not possible to determine its suitability, we advise that HDD is the preferred option for cable laying in the nearshore and intertidal area and where the cable makes landfall; HDD is the most benign option in terms of its potential effects in this environment.	See response to NRW MLT-30.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-95	Natural Resources Wales Technical Experts	Paragraph 75 of NRW TE response	Physical Environment	The Zone of Influence must be defined based on robust evidence and any Water Framework Directive (WFD) water bodies where there are (a) direct effects (e.g. host the export cable corridor) or (b) there is a pathway for effect (e.g. biotic or migratory routes), these must be adequately considered within the WFD Assessment.	See response to NRW MLT-36.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31). ES Volume 6 Appendix 8D and 8E ES Volume 6 Appendix 10C and 10D
NRW TE-96	Natural Resources Wales Technical Experts	Paragraph 76 of NRW TE response	Physical Environment	The project lifespan is predicted to be 25 years and the scoping report sets out that decommissioning options will be considered when the project is nearing the end of its operational life. We advise that all potential decommissioning options remain, including complete removal of all infrastructure associated with the project, at this point in time, when it is not possible to define the environmental effects of decommissioning with confidence.	See response to NRW MLT-31.	ES Volume 1 Chapter 4: Description of the Proposed Project Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-97	Natural Resources Wales Technical Experts	Paragraph 77 of NRW TE response	Physical Environment	Clarity is sought with respect to how the WFD Assessment will be provided as part of the wider EIA package. Section 5.4.3 states that “A standalone WFD Assessment will be prepared and included as an appendix to the ES” however, this information is omitted from the proposed structure of the ES, presented in Section 6.1. Furthermore, WFD is discussed within Chapter 19, “Physical Environment” however it is not within Chapters 20 or 21, where there are synergies between topic areas and WFD, which are “Benthic Ecology” and “Fish and Shellfish”, respectively. Currently, the structure of the chapters appears to be confused.	See response to NRW MLT-39.	ES Volume 6 Appendix 10B and 10C
NRW TE-98	Natural Resources Wales Technical Experts	Paragraph 78 of NRW TE response	Physical Environment	Clarity is sought on what WFD water bodies are proposed for inclusion within the WFD Assessment as currently, there are inconsistencies between chapters. Section 19.4.11 states that the proposed project would interact with two water bodies - Milford Haven Outer and Pembrokeshire South. However, both Milford Haven Inner and Outer water bodies are referred to in the Water	See response to NRW MLT-75.	ES Volume 3 Chapter 18: Marine Water Quality and Sediment Quality ES Volume 6 Appendix 10B and 10C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				Environment chapter. We advise that is necessary to include Milford Haven Inner water body within the marine environment chapter, in addition to Milford Haven Outer and Pembrokeshire South, as there are potential pathways for effect to this water body.		
NRW TE-99	Natural Resources Wales Technical Experts	Paragraph 79 of NRW TE response	Physical Environment	Section 10.2.3.1 states that the most recent River Basin Management Plans (RBMPs) were produced for Cycle 2 in 2015. This is no longer correct – the most recent classification data available are the Cycle 3 2021 classifications, which were published and made publicly available in December 2021. The WFD Compliance Assessment must utilise this information as this is the most recent and relevant to use.	See response to NRW MLT-71.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality ES Volume 6 Appendix 10C and 10D
NRW TE-100	Natural Resources Wales Technical Experts	Paragraph 80 of NRW TE response	Physical Environment	No scoping information specific to WFD has been provided. There are also gaps in what has been provided for other topic areas, where there are synergies with WFD elements. These have been identified within the comments provided for each topic area.	See response to NRW MLT-39.	ES Volume 6 Appendix 10B and 10C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-101	Natural Resources Wales Technical Experts	Paragraph 81 of NRW TE response	Physical Environment	In relation to Table 19.2, there appears to be some confusion in terms of how WFD is assessed, based on the information presented in the table. In terms of the WFD Compliance Assessment, while the WFD assessment will draw upon assessments carried out as part of the wider EIA, we advise that any impact assessment will need to be made at the water body scale and will need to consider the potential effects of the project on the WFD status and objectives, at an element level. NRW (A) advise that in considering WFD assessments, the applicant refers to the guidance that has previously been provided on assessing compliance with WFD and has an awareness of derogations under Regulation 19 of the Water Regulations.	See response to NRW MLT-104.	ES Volume 3 Chapter 17: Physical Processes
NRW TE-102	Natural Resources Wales Technical Experts	Paragraph 82 of NRW TE response	Physical Environment	All non-reportable water bodies will need to be considered within the WFD Compliance Assessment, regardless of scale, if there is a pathway for effect. Section 10.7.6, suggests that they will not.	See response to NRW MLT-76.	ES Volume 6 Appendix 10B and 10C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-103	Natural Resources Wales Technical Experts	Paragraph 83 of NRW TE response	Physical Environment	In terms of mitigation, the proper process for consideration of mitigation in the context of the WFD, is to scope any potential effects in to the detailed assessment stage and then consider mitigation, once the impacts have been adequately defined.	See response to NRW MLT-37.	ES Volume 6 Appendix 10B and 10C
NRW TE-104	Natural Resources Wales Technical Experts	Paragraph 84 of NRW TE response	Marine Environment	It is noted that in the scoping report 'Water Quality' is split by marine works and terrestrial works. As noted in the physical processes chapter above, we advise that in compiling the ES marine water quality falls under its own section.	See response to NRW MLT-38.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality
NRW TE-105	Natural Resources Wales Technical Experts	Paragraph 85 of NRW TE response	Marine Environment	We note that the Milford Haven Outer Water body has been suggested for assessment in the Marine Environment Chapter and both Milford Haven Inner and Outer water bodies in the Water environment chapter. Impacts on Milford Haven Inner water body from both run off and landfall (which is mentioned in the Marine Chapter) must be considered.	See response to NRW MLT-75.	ES Volume 3 Chapter 18: Marine Water Quality and Sediment Quality ES Volume 6 Appendix 10B and 10C
NRW TE-106	Natural Resources Wales Technical Experts	Paragraph 86 of NRW TE response	Marine Environment	The applicant should note that the 2021 cycle 3 WFD classifications have been published and can be found on Water Watch Wales; these should be used in the assessment.	See response to NRW MLT-71.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						ES Volume 6 Appendix 10C and 10D
NRW TE-107	Natural Resources Wales Technical Experts	Paragraph 87 of NRW TE response	Marine Environment	In section 10.4.7.1, para 3, the statement “it is assumed that these objectives will be achieved” is made in relation to individual WFD elements having objectives. The objectives for each element include reaching good status by a given date. Some of these elements (e.g. Dissolved inorganic nitrogen) are currently at Moderate status which is considered a fail. It should not be considered that these objectives will be achieved by 2025/2026 as a cycle 4 classification will not have been released by that time. NRW (A) advise that the applicant will need to use the most up-to-date classifications in their project assessments.	See response to NRW MLT-71.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality ES Volume 6 Appendix 10C and 10D
NRW TE-108	Natural Resources Wales Technical Experts	Paragraph 88 of NRW TE response	Marine Environment	We disagree that small, non-reportable streams running into coastal water bodies (or indeed the Pembrokeshire Marine SAC) will not be assessed due to scale as stated in Section 10.7.6 of Volume 2. This is because if there is the potential to	See response to NRW MLT-72.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				create a mixing zone of a pollutant which could impact biota, for example, it should be considered. We therefore advise that this is scoped in.		
NRW TE-109	Natural Resources Wales Technical Experts	Paragraph 89 of NRW TE response	Marine Environment	We note that data from NRW at two datapoints around the Milford Haven Outer water body will be requested (volume 3, section 19.4.11, para 10). We advise that the assessment of impact must be made at a water body scale.	See response to NRW MLT-93.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality
NRW TE-110	Natural Resources Wales Technical Experts	Paragraph 90 of NRW TE response	Marine Environment	NRW (A) advise that evidence will need to be presented that provides an indication of the sediment quality in the proposed cable route and at landfall. This will need to include the potential for chemical contaminant release, as detailed, and comparison should be made against CEFAS action levels. At landfall, dependent on sediment type present, we will require an assessment of the potential to release bacteria from the sediment (noting it is typically associated with fine sediment).	See response to NRW MLT-105.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-111	Natural Resources Wales Technical Experts	Paragraph 91 of NRW TE response	Marine Environment	We note that vessels will be used which are in compliance with IMO MARPOL regulations and they will have suitable waste disposal facilities. Vessels should follow the Work Boat Code as found on the Marine and Coastguard Agency website.	See response to NRW MLT-110.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality
NRW TE-112	Natural Resources Wales Technical Experts	Paragraph 92 of NRW TE response	Marine Environment	We welcome the use of a Construction Environmental Management Plan (CEMP) and request the opportunity to review the document once produced. We advise the applicant to refer to relevant Guidance for Pollution Prevention, including GPP5 Works and Maintenance in or near water.	See response to NRW MLT-44.	ES Volume 6 Appendix 4A: OCEMP
NRW TE-113	Natural Resources Wales Technical Experts	Paragraph 93 of NRW TE response	Marine Environment	At present, the composition of the drilling fluids to be used for HDD (volume 3, section 19.6) is unknown. However, previous applications have suggested bentonite could be used which has the potential to remain in suspension and can be considered as a suspended solid. Though inert, a release of bentonite (or similar) would need to be assessed in the context of suspended sediment releases. We welcome early confirmation of the composition of drilling fluids.	See response to NRW MLT-104.	ES Volume 3 Chapter 17: Physical Processes

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-114	Natural Resources Wales Technical Experts	Paragraph 94 of NRW TE response	Marine Environment	<p>We generally agree the potential impact pathways included for water quality elements noted here and supported by the described rationale. However, we consider that there are some aspects missing that need to be further considered:</p> <ul style="list-style-type: none"> i. Installation / Decommissioning: Contaminants must be considered all the way up to landfall and must be compared against CEFAS action levels; ii. Installation / Decommissioning: The potential for bacteria mobilisation must be considered; iii. Operation: The potential to increase temperature as a result of cabling must be considered – this could also impact both on benthic ecology and bacterial growth; iv. Installation: While HDD has been included (and scoped out) in terms of water contamination, trenching has not. Trenching should be included and the impacts scoped in due to the potential to release chemicals and / or bacteria; v. It would be helpful to lay out the potential impact pathways for marine 	See response to NRW MLT-104.	ES Volume 3 Chapter 18: Marine Water and Sediment Quality

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				water quality more explicitly and within its own section of the ES, so that it can be determined if all correct impact pathways have been identified. For example, it appears that there is no (or very limited) consideration has been made of the potential for bacterial and turbidity releases to impact on Bathing water quality.		
NRW TE-115	Natural Resources Wales Technical Experts	Paragraph 95 of NRW TE response	Terrestrial Ecology and Biodiversity	We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, we advise that further information from the applicant should be sought with respect to flood risk, protected sites, protected species, sea	See response to NRW MLT-46.	Technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31).

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				and land-scape, and ground contamination. Further details are provided in the relevant sections below.		
NRW TE-116	Natural Resources Wales Technical Experts	Paragraph 96 of NRW TE response	Terrestrial Ecology and Biodiversity	<p>The scoping report acknowledges that generally, insufficient information has yet been gathered on the project, such as:</p> <ul style="list-style-type: none"> · The detail of the proposed wind turbines, their floating pontoons, and the site layout, as these are still in the process of being tested. We will require this information, to assess the visual impact of the proposal, and to assess any impacts of the development on its proposed location · A detailed method statement explaining how the project will be transported to its location · Currently, it hasn't been decided how the cables will cross the land from the grid connection to the proposed wind farm. Three options are being considered, but the location will be agreed via an application through the grid. 	See response to NRW MLT-45.	<p>ES Volume 1 Chapter 4: Description of the Proposed Project</p> <p>ES Volume 6 Appendix 3A: Cable Route Assessment</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-117	Natural Resources Wales Technical Experts	Paragraph 97 of NRW TE response	SLVIA	The proposal has potential for adverse seascape, landscape, and visual impacts on the Pembrokeshire Coast National Park.	See response to NRW MLT-49.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-118	Natural Resources Wales Technical Experts	Paragraph 98 of NRW TE response	SLVIA	We agree that the relevant National and Local Planning Policy contexts have been identified, including the Pembrokeshire Coast National Park Authority's LDP2 policies and SPG and Management Plan 2020-24.	Noted.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-119	Natural Resources Wales Technical Experts	Paragraph 99 of NRW TE response	SLVIA	NRW LANDMAP all-Wales evidence base should also be referred to with regard to the landfall, cable route and substation proposals. NRW has produced Guidance Note GN46 Using LANDMAP in Landscape and Visual Impact Assessment.	See response to NRW MLT-51.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape,

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						Landscape and Visual
NRW TE-120	Natural Resources Wales Technical Experts	Paragraph 100 of NRW TE response	SLVIA	Seascape and Visual Sensitivity to Offshore Windfarms in Wales, Strategic assessment and guidance Stage 1. Ready Reckoner of visual effects related to turbine size; Stage 2. Offshore windfarm siting and design guidelines in relation to seascapes; Stage 3. Visual sensitivity of marine settings of Wales’s Designated Landscapes to offshore windfarms. These reports are principally focussed on the visual effects in relation to Designated Landscapes. Stage 1 includes buffers to avoid significant adverse effects on high sensitivity receptors. For 280m turbines, there is a 41.6km buffer for low magnitude of effect and a 28km buffer for medium magnitude of effect. Combined with high sensitivity, low magnitude of effect is likely to result in effects of moderate significance. Moderate effects can potentially be significant. For sites offshore from the Pembrokeshire Coast National Park between 22.6 and 44km distant,	See response to NRW MLT-52.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				proposals are likely to be visible and adversely affect the special qualities including the setting, tranquillity and apparent wildness of the National Park.		
NRW TE-121	Natural Resources Wales Technical Experts	Paragraph 101 of NRW TE response	SLVIA	The reports have previously been provided to the applicant, but can also be found on NRW's website by searching for NRW Series Report Numbers 315, 330, 331 here: Natural Resources Wales / Publications about landscape, geology, soils and features of historic interest.	See response to NRW MLT-52.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-122	Natural Resources Wales Technical Experts	Paragraph 102 of NRW TE response	SLVIA	The Study Area for the wind farm has been defined as 45km from the outermost wind turbines, in line with 'Visual Representation of Wind Farms: Good Practice' guidance (SNH 2017). This is considered acceptable. The area includes parts of the Angle and Dale peninsulas and the Islands of Skokholm and Skomer. We understand that the project area and layout of the arrays would be defined in more detail in due course, which may affect the final Zone of Theoretical Visibility (ZTV).	See response to NRW MLT-53.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-123	Natural Resources Wales Technical Experts	Paragraph 103 of NRW TE response	SLVIA	A 3km Study Area for the onshore substation/control building has been defined and is considered acceptable.	See response to NRW MLT-53.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape,

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						Landscape and Visual
NRW TE-124	Natural Resources Wales Technical Experts	Paragraph 104 of NRW TE response	SLVIA	A 1km Study Area for the onshore cable route has been defined and is considered acceptable.	See response to NRW MLT-53.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-125	Natural Resources Wales Technical Experts	Paragraph 105 of NRW TE response	SLVIA	As well as the National Park, the Study Area includes the Marloes & Dale and South Pembrokeshire Heritage Coasts.	See response to NRW MLT-53.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-126	Natural Resources Wales Technical Experts	Paragraph 106 of NRW TE response	SLVIA	Several Dark Sky Discovery Sites lie within the Study Area, including at Martins Haven and Kete. It is noted that aviation lighting is likely to be required on some/all of the wind turbine generators.	See response to NRW MLT-54.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-127	Natural Resources Wales Technical Experts	Paragraph 107 of NRW TE response	SLVIA	The study area includes parts of the Milford Haven Waterway and Skomer Island Landscapes of Outstanding Historic Interest, which are included on the Register of Landscapes of Historic Interest in Wales. The Dyfed Archaeological Trust should be consulted on this matter.	See response to NRW MLT-53.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 2 Chapter 7: Landscape and

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-128	Natural Resources Wales Technical Experts	Paragraph 108 of NRW TE response	SLVIA	The report states that a separate assessment of night-time landscape & visual effect or night-time visualisations is not proposed, but dark sky characteristics will be taken into account in sensitivity judgements and proposed lighting would be considered in the overall magnitude of change. We advise that a night-time assessment and visualisations should be undertaken and would be expected for a project of this nature where dark sky sensitivities are a particular concern. There is the potential for cumulative night-time effects with other offshore wind farms. Viewpoints for night-time assessment could include Martins Haven, Kete and Freshwater West. NRW (A) would be happy to facilitate further discussion with the applicant in this regard.	See response to NRW MLT-55.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 23D: Night-time visual assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-129	Natural Resources Wales Technical Experts	Paragraph 109 of NRW TE response	SLVIA	We agree with the report that the National Landscape Character Areas and National Marine Character Areas provide context and the SLVIA should be undertaken on the basis of the smaller units set out in the National Park’s Landscape Character Assessment and Seascape Assessment, with reference also to LANDMAP. There is likely to be some overlap between Seascape Character Areas (SCA) and Landscape Character Areas.	See response to NRW MLT-56.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 23B and 23C
NRW TE-130	Natural Resources Wales Technical Experts	Paragraph 110 of NRW TE response	SLVIA	The report states that SCAs that are entirely offshore would be scoped out. Given that this is an offshore project, we advise that affected offshore SCAs should not be scoped out and should be scoped in.	See response to NRW MLT-56.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 23B and 23C

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-131	Natural Resources Wales Technical Experts	Paragraph 111 of NRW TE response	SLVIA	NRW (A) advise that visual receptors would also include recreational users of the sea and coastal areas, including those undertaking activities such as sailing, wildlife boat trips, kayakers, users of the Pembroke-Rosslare ferry. NRW (A) welcome the opportunity to enter dialogue regarding viewpoint selection.	See response to NRW MLT-57.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-132	Natural Resources Wales Technical Experts	Paragraph 112 of NRW TE response	SLVIA	We suggest an additional viewpoint further east along the B4320 towards Corseside/minor road to Neath Farm. A suitable viewpoint e.g. from the Wales Coast Path at West Angle Bay, from Freshwater West or Angle Bay would be required depending on the cable landfall site.	See response to NRW MLT-58.	S Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 7B: LVIA Detailed Assessment ES Volume 6 Appendix 23C:

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						SLVIA Detailed Assessment
NRW TE-133	Natural Resources Wales Technical Experts	Paragraph 113 of NRW TE response	SLVIA	We suggest additional viewpoints from Skokholm Island, West Angle Bay, Hooper’s Point and St Govan’s Head.	See response to NRW MLT-58.	S Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 7B: LVIA Detailed Assessment ES Volume 6 Appendix 23C: SLVIA Detailed Assessment

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-134	Natural Resources Wales Technical Experts	Paragraph 114 of NRW TE response	SLVIA	An assessment of the sequential visual impacts on sections of the Wales Coast Path would also be required.	See response to NRW MLT-58.	S Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual ES Volume 6 Appendix 7B: LVIA Detailed Assessment ES Volume 6 Appendix 23C: SLVIA Detailed Assessment
NRW TE-135	Natural Resources Wales Technical Experts	Paragraph 115 of NRW TE response	SLVIA	NRW (A) agree that photomontages for the cable landfall and cable route would not be required, unless HDD is not possible for the cable landfall and cables were to be laid over cliffs/open ground.	See response to NRW MLT-59.	ES Volume 2 Chapter 7: Landscape and Visual
NRW TE-136	Natural Resources Wales	Paragraph 116 of NRW TE response	SLVIA	We recommend that more than 5 photomontages may be required from representative viewpoints.	See response to NRW MLT-59.	ES Volume 2 Chapter 7:

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Technical Experts					Landscape and Visual
NRW TE-137	Natural Resources Wales Technical Experts	Paragraph 117 of NRW TE response	SLVIA	This should take account of NRW evidence reports: Seascape and Visual Sensitivity to Offshore Windfarms in Wales, Strategic assessment and guidance Stage 1, 2 & 3 (see above)	See response to NRW MLT-60.	ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-138	Natural Resources Wales Technical Experts	Paragraph 118 of NRW TE response	SLVIA	We advise that the size and height of turbines, the location, orientation and spread of the array within the lease area and the inclusion or exclusion of lighting are also potential mitigation options for the project.	See response to NRW MLT-61.	ES Volume 3 Chapter 23: Seascape, Landscape and Visual
NRW TE-139	Natural Resources Wales Technical Experts	Paragraph 119 of NRW TE response	SLVIA	We agree that there is the potential for long term seascape, landscape and visual effects associated with the wind turbine generators and with the substation/control building. Effects from the landfall and onshore cable route are likely to be temporary and reversible and result mainly from construction and decommissioning, and operational effects of these aspects can be scoped out of the SLVIA, assuming HDD is used at the landfall.	See response to NRW MLT-62.	ES Volume 2 Chapter 7: Landscape and Visual ES Volume 3 Chapter 23: Seascape, Landscape and Visual

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-140	Natural Resources Wales Technical Experts	Paragraph 120 of NRW TE response	SLVIA	In relation to cumulative assessment of seascape, landscape and visual effects, the Rhoscrowther Wind Farm, Project Erebus (1.7km from the project) and Project Valorous (3km from the project) are likely to result in cumulative effects.	See response to NRW MLT-194.	All technical chapters within the ES Volumes 2 to 4 (Chapters 7 to 31)
NRW TE-141	Natural Resources Wales Technical Experts	Paragraph 121 of NRW TE response	Terrestrial Ecology and Biodiversity	Please note that this section only concerns advice from a terrestrial perspective. Advice with respect to marine protected sites and any potential impacts upon them can be found in the marine receptors sections above.	Noted.	ES Volume 2 Chapter 8: Ecology and Biodiversity
NRW TE-142	Natural Resources Wales Technical Experts	Paragraph 122 of NRW TE response	Terrestrial Ecology and Biodiversity	The Competent Authority will need to conduct a test of likely significant effects (TLSE) for the SAC, which is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017. This test applies to impacts on the SACs from the proposed works, either alone or in combination with other plans and projects.	Noted.	ES Volume 2 Chapter 8: Ecology and Biodiversity
NRW TE-143	Natural Resources Wales Technical Experts	Paragraph 123 of NRW TE response	Terrestrial Ecology and Biodiversity	The Wildlife and Countryside Act 1981 (as amended) places a duty on Competent Authorities in exercising their functions, so far as this is likely to affect the flora, fauna,	Noted.	ES Volume 2 Chapter 8: Ecology and Biodiversity

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				geological or physiographical features of a SSSI, to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of those features.		

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-144	Natural Resources Wales Technical Experts	Paragraph 124 of NRW TE response	Terrestrial Ecology and Biodiversity	<p>We have concerns that an adverse effect from the proposed development on the integrity of the following protected sites designated as part of the National Site Network (and as identified by the ES) cannot be ruled out:</p> <ul style="list-style-type: none"> · Limestone Coast of South Wales/Arfordir Calchfaen De Orllewin Cymru SAC · Pembrokeshire Marine/Sir Benfro Forol SAC · West Wales Marine/Gorllewin Cymru Forol SAC · Castlemartin Coast SPA · Pembrokeshire Bat Sites and Bosherton Lakes/Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton SAC <p>The following protected sites identified as being within scope:</p> <ul style="list-style-type: none"> · Broomhill Burrows Site of Special Scientific Interest (SSSI) · Angle Peninsula Coast/Arfordir Penrhyn Angle SSSI · Milford Haven Waterway SSSI · Gweunydd Somerton Meadows SSSI · Castlemartin Corse SSSI 	See response to NRW MLT-63.	<p>ES Volume 2 Chapter 8: Ecology and Biodiversity</p> <p>ES Volume 6 Appendix 8D and 8E</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				<ul style="list-style-type: none"> · Castlemartin Range SSSI · Limestone Coast of South Wales/Arfordir Calchfaen De Orllewin Cymru SAC · Orielton Stable Block and Cellars SSSI · Stackpole SSSI · Stackpole Courtyard Flats and Walled Garden SSSI · Park House Outbuildings, Stackpole SSSI · Newgale to Little Haven/Arfordir Niwgrwl Aber Bach SSSI 		
NRW TE-145	Natural Resources Wales Technical Experts	Paragraph 125 of NRW TE response	Terrestrial Ecology and Biodiversity	Currently, insufficient information has been provided to assess the risk of the proposal against the protected features of the protected sites. Section 6.4 confirms 'The proposed project is	See response to NRW MLT-42.	ES Volume 2 Chapter 8: Ecology and Biodiversity

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				in the process of data collection...'. Enough information will need to be provided in line with best practice guidance. We refer the applicant to NRW's species licensing website for further advice.		
NRW TE-146	Natural Resources Wales Technical Experts	Paragraph 126 of NRW TE response	Terrestrial Ecology and Biodiversity	Section 6.2 'Habitats Regulations Assessment' of the scoping report states 'A separate standalone HRA report will be produced and included as an appendix to the ES'. We agree with this statement, and welcome the commitment to produce a HRA.	An HRA has been produced and is provided as an appendix to the ES.	ES Volume 2 Chapter 8: Ecology and Biodiversity ES Volume 6 Appendix 8D and 8E
NRW TE-147	Natural Resources Wales Technical Experts	Paragraph 127 of NRW TE response	Terrestrial Ecology and Biodiversity	We advise the Competent Authority would need to undertake an Appropriate Assessment for the proposed development under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, and to consult NRW on the results of their assessment should they conclude a likely effect on a Site on the National Site Network.	See response to NRW MLT-43.	ES Volume 2 Chapter 8: Ecology and Biodiversity ES Volume 6 Appendix 8D and 8E
NRW TE-148	Natural Resources Wales Technical Experts	Paragraph 128 of NRW TE response	Terrestrial Ecology and Biodiversity	By satisfying the requirements regarding the SACs, as indicated above, it is likely the requirements for the SSSIs will also be met. We refer the applicant to NRW's Development	See response to NRW MLT-43.	ES Volume 2 Chapter 8: Ecology and Biodiversity

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				works within sites of special scientific interest page on the website for further advice.		ES Volume 6 Appendix 8D and 8E
NRW TE-149	Natural Resources Wales Technical Experts	Paragraph 129 of NRW TE response	Physical Environment	We have reviewed the Flood Consequences Assessment (FCA) available in section 10.7.7 of the scoping report. The FCA is reliant on the final agreed design of the project, which we understand at this point is still in the process of being finalised. Our comments as such are limited at present, until a completed site-specific FCA is available. The criteria, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given in Section 7 and Appendix 1 of TAN15. The FCA should be proportionate to the development proposed. The applicant may also refer to our Building in flood risk areas on the website, which contains technical advice and recommendations.	See response to NRW MLT-73.	ES Volume 6 Appendix 10A: Flood Consequences Assessment (FCA)
NRW TE-150	Natural Resources Wales Technical Experts	Paragraph 130 of NRW TE response	Physical Environment	The scoping report has identified the need for a Flood Risk Activity Permit (FRAP), but this is again reliant on final designs and location. Until the final design/location has been chosen, NRW	See response to NRW MLT-74.	ES Volume 6 Appendix 10A: Flood Consequences Assessment (FCA)

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				(A) cannot comment further, and as such, advise a FCA which includes but not limited to the information set out above is required.		
NRW TE-151	Natural Resources Wales Technical Experts	Paragraph 131 of NRW TE response	Physical Environment	The comments in this section are based on the associated onshore infrastructure for the project. Advice on the offshore geological aspects can be found in the physical processes section above.	Noted.	ES Volume 3 Chapter 17: Physical Processes
NRW TE-152	Natural Resources Wales Technical Experts	Paragraph 132 of NRW TE response	Physical Environment	We note that Table 31-1 summaries the items that will be scoped in and out as part of the Environmental Impact Assessment – we agree with the items that are to be scoped in.	Noted.	ES Volume 3 Chapter 17: Physical Processes
NRW TE-153	Natural Resources Wales Technical Experts	Paragraph 133 of NRW TE response	Physical Environment	We note that there are three proposed landfall sites for the cables, but no cable routes have been proposed (we assume to Pembroke Power Station for onward grid connection). We recommend determining the landfall site and cable route in order to inform the proposal further. Therefore, our comments at present are only high-level advice and will likely change once finalised locations and routes are confirmed.	See response to NRW MLT-77.	ES Volume 6 Appendix 10B: Onshore Water Environment Site Survey Report ES Volume 6 Appendix 11A: Phase 1 Desk Study Report

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-154	Natural Resources Wales Technical Experts	Paragraph 134 of NRW TE response	Physical Environment	We therefore recommend that the following surveys are completed. The surveys should be supported by risk assessment to determine the level of risk to controlled waters from the proposed project infrastructure: 1. Water Feature Survey is completed with a 300m buffer either side of the cable route and around buildings and compounds (requirements detailed below); 2. Preliminary Risk Assessment to define historical land uses (details below).	See response to NRW MLT-77.	ES Volume 6 Appendix 10B: Onshore Water Environment Site Survey Report ES Volume 6 Appendix 11A: Phase 1 Desk Study Report
NRW TE-155	Natural Resources Wales Technical Experts	Paragraph 135 of NRW TE response	Physical Environment	Any use of HDD will require a groundwater risk assessment to ensure there are no risk to controlled waters from this construction method.	See response to NRW MLT-80.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 3 Chapter 18: Marine Water Quality and Sediment Quality
NRW TE-156	Natural Resources Wales Technical Experts	Paragraph 136 of NRW TE response	Physical Environment	If the onshore cables will be fluid filled, we advise pollution prevention measures will need to be employed should leakage occur.	See response to NRW MLT-80.	ES Volume 1 Chapter 4: Description of the Proposed Project

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						ES Volume 3 Chapter 18: Marine Water Quality and Sediment Quality
NRW TE-157	Natural Resources Wales Technical Experts	Paragraph 137 of NRW TE response	Physical Environment	We have a groundwater position statement regarding fluid fill cables – please consult the position statements C5 in "approach to groundwater protection" (an NRW adopted guidance from the Environment Agency).	See response to NRW MLT-80.	ES Volume 1 Chapter 4: Description of the Proposed Project ES Volume 3 Chapter 18: Marine Water Quality and Sediment Quality
NRW TE-158	Natural Resources Wales Technical Experts	Paragraph 138 of NRW TE response	Physical Environment	There appears to be an error in the numbering of sections in Section 4.4.1.9 on page 49 and page 50 section 4.4.3.1. Clarification is sought as to whether there are missing sections (e.g., 4.4.2?) that should be available.	See response to NRW MLT-47.	ES Volume 1 Chapter 4: Description of the Proposed Project
NRW TE-159	Natural Resources Wales Technical Experts	Paragraph 139 of NRW TE response	Physical Environment	Note that these no long exist and are now part of the EPR 2016 under schedule 22. This reference should therefore be updated.	See response to NRW MLT-70.	ES Volume 2 Chapter 11: Geology and Hydrogeology ES Volume 2 Chapter 12:

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
						Agriculture and Soils
NRW TE-160	Natural Resources Wales Technical Experts	Paragraph 140 of NRW TE response	Physical Environment	<p>The applicant must undertake a water feature survey, which should include the following:</p> <ul style="list-style-type: none"> · Identification of all water features both surface and groundwater (ponds, springs, ditches, culverts etc.) within a 300 metres radius of the site or either side of a linear development area, e.g., cabling route; · Use made of any of these water features. This should include the construction details of wells and boreholes and details of the lithology into which they are installed; · An indication of the flow regime in the spring or surface water feature, for example whether or not the water feature flows throughout the year or dries up during summer months; · Accessibility to the spring/well; · This information should be identified on a suitably scaled map (i.e. 1:10,000), tabulated and submitted to NRW. It would be useful for the applicant to photograph each 	See response to NRW MLT-77.	<p>ES Volume 6 Appendix 10B: Onshore Water Environment Site Survey Report</p> <p>ES Volume 6 Appendix 11A: Phase 1 Desk Study Report</p>

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
				of the identified water features during the survey.		
NRW TE-161	Natural Resources Wales Technical Experts	Paragraph 141 of NRW TE response	Physical Environment	Based on the results of the survey the applicant must assess the likely impacts from the development on both quantity and quality of the surface water and groundwater. This should take into consideration both the preferred methods of construction and the assumed hydrogeology in the vicinity of the development.	See response to NRW MLT-78.	ES Volume 6 Chapter 10D: Water Features Survey Report
NRW TE-162	Natural Resources Wales	Paragraph 142 of NRW TE response	Physical Environment	NRW may require identified groundwater features to be monitored during the proposed workings. We would therefore recommend that the	See response to NRW MLT-79.	ES Volume 2 Chapter 11: Geology and Hydrogeology

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
	Technical Experts			survey be undertaken as soon as possible to enable the developer to carry out suitable baseline monitoring prior to the commencement of workings at the site.		
NRW TE-163	Natural Resources Wales Technical Experts	Paragraph 143 of NRW TE response	Physical Environment	<p>Requirement for Preliminary Risk Assessment for historical land use</p> <ol style="list-style-type: none"> 1. Follow the risk management framework provided in Land contamination risk management (LCRM) 2. Refer to 'Land Contamination: a guide for developers' (WLGA, 2017) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health. 3. Refer to our groundwater protection advice on www.gov.uk 	See response to NRW MLT-77.	<p>ES Volume 6 Appendix 10B: Onshore Water Environment Site Survey Report</p> <p>ES Volume 6 Appendix 11A: Phase 1 Desk Study Report</p>
NRW TE-164	Natural Resources Wales Technical Experts	Paragraph 144 of NRW TE response	Terrestrial Ecology and Biodiversity	We agree with the list of terrestrial species to be scoped in to the ES. Please see comments in the marine receptor section with regard to any relevant marine advice.	Noted.	ES Volume 3

Response ID	Stakeholder	Appendix 5B Response Reference	Topic	Scoping Consultation Response	How Addressed in ES	Location in ES
NRW TE-165	Natural Resources Wales Technical Experts	Paragraph 145 of NRW TE response	Terrestrial Ecology and Biodiversity	We advise that the species-specific impacts in the short, medium, and long term together with any mitigation and compensation measures proposed to offset the impacts identified should be included in the EIA. Should potential impacts be identified, we advise that the Ecological Impact Assessment (EclA) should set out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility.	See response to NRW MLT-62.	ES Volume 2 Chapter 8: Ecology and Biodiversity
NRW TE-166	Natural Resources Wales Technical Experts	Paragraph 146 of NRW TE response	Terrestrial Ecology and Biodiversity	Upon receipt of detailed survey information, we will be able to provide advice on the risk of the proposal to protected species, and whether any European Protected Species (EPS) licences are required.	See response to NRW MLT-15.	ES Volume 2 Chapter 8: Terrestrial Ecology ES Volume 3 Chapter 19 to 22 ES Volume 6 Appendix 8B: Preliminary Ecological Appraisal

