



RE: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response 2nd Consultation

From Charman, Colin <Colin.Charman@cyfoethnaturiolcymru.gov.uk>
Date Fri 28/3/25 7:35 AM
To beth@carymor.wales <beth@carymor.wales>
Cc 'Stevie' <stevie@argyllaquaculture.co.uk>; Owen Haines <owen@carymor.wales>; mike@carymor.wales <mike@carymor.wales>; Litt, Emmer <Emmer.Litt@cyfoethnaturiolcymru.gov.uk>; Scorey, Alexander <alexander.scorey@cyfoethnaturiolcymru.gov.uk>

Good Morning Beth, Emmer, whom I shared the email with spotted a typo, it should say 'not' in a sentence below
Apologies
Colin

From: Charman, Colin
Sent: 27 March 2025 16:43
To: beth@carymor.wales
Cc: 'Stevie' <stevie@argyllaquaculture.co.uk>; Owen Haines <owen@carymor.wales>; mike@carymor.wales; Litt, Emmer <Emmer.Litt@cyfoethnaturiolcymru.gov.uk>; Scorey, Alexander <alexander.scorey@cyfoethnaturiolcymru.gov.uk>
Subject: RE: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response 2nd Consultation

Hello Beth,

As per my email on the 17 December 2024, we agree with the MCA, it is up to the developer (in this case CyM) to decide if you satisfy the exemptions criteria or not.

On our marine licensing web page [Natural Resources Wales / Activities that may be exempt from requiring a marine licence](#) NRW advise developers to contact the local harbour authority, Trinity House (Navigation.directorate@trinityhouse.co.uk) and the Maritime and Coastguard Agency (navigationsafety@mcga.gov.uk) in order to ensure that the activity will not cause an obstruction or danger to navigation

Clearly both TH and MCA have issues with your planned expansion and the marine licence exemption.

TH have stated that your activities will cause a further obstruction to navigation in the area and in turn pose additional danger to navigation and they do **NOT** believe your activity should be exempt from licencing.

The MCA have said, based on the information you provided, they are unable to confirm if the activity will cause an obstruction or danger to navigation. Even if you fulfil all the mitigation measures (they suggest) while this might reduce the risk the exemption may not be sufficient to maintain safety of navigation.

In this instance the responsibility lies with you as the decision maker, you need to satisfy yourselves if you have met the exemption criteria '*the deposit does not cause or is likely to cause obstruction or danger to navigation*'

But please be aware, if you don't satisfy exemption criteria you would be operating without a marine licence.

Hope this helps
Colin

From: beth@carymor.wales <beth@carymor.wales>

Sent: 27 March 2025 13:05

To: Charman, Colin <Colin.Charman@cyfoethnaturiolcymru.gov.uk>; 'Stevie'

<stevie@argyllaquaculture.co.uk>; Owen Haines <owen@carymor.wales>; mike@carymor.wales

Subject: Fw: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response
2nd Consultation

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi all,

We have had a somewhat confusing response from the MCA in regards to the updated NRA.

It seems they are still unhappy with some of the information provided, but then have listed risk mitigation measures and then stated at the end of the email 'Should you follow the exemption route, please can you confirm your acceptance of the above risk mitigation measures?' They have also stated that 'The decision on whether to follow the exemption route remains solely with the applicant, and not the MCA.'

In my opinion we have done more than enough to show we are responsible marine users with an active presence in the local community and therefore we have good relationships with other marine users who may come into contact with the farms. We have shown that we will follow their mitigation measures and use navigational markers to clearly mark the farms to reduce the risks as is reasonably expected and will continue to work with both the MCA and Trinity House to ensure ongoing compliance with their recommendations. Outside of this, I don't see what else we could do to reduce the risks further and therefore if the MCA are leaving the decision with us then we should be able to make the decision that we have satisfied the exemption criteria.

Any further advice is very much welcomed, especially Colin on what NRW's view of the MCA response would be.

Thank you all,



Beth Marshall

Marine Biologist, and humbled to be one of Câr-y-Môr's 500+ equal members

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From: navigation safety

Sent: Thursday, March 27, 2025 12:34 PM

To: beth@carymor.wales

Subject: RE: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response 2nd Consultation

Dear Beth,

Thank you for providing the additional information in support for the proposed change of activity at Porthlysgil and Carn Ar Wig. It is our understanding that the intention is to change from a seaweed and shellfish site to shellfish only and an increase in size of both sites. We note that the proposal is for these expanded sites to fall under the exemption arrangements upon expiry of the current marine license in July 2025.

At this time, based on the information provided, the MCA is unable to confirm that the expansion of activity is unlikely to cause an obstruction or danger to navigation under the exemption arrangements. If you were to fulfil all of the risk mitigation measures listed below, then the risk would likely be reduced, however we cannot state this is within the ALARP tolerability parameters. There are multiple risk mitigation measures which are required on this occasion, and our concern is whether the exemption arrangement would be sufficient to maintain the safety of navigation going forward.

These concerns are based on the following reasons:

1. The assessment of AIS traffic is unlikely to include the smaller fishing and recreational vessels which may use the areas. The level of local consultation undertaken is not evidence based with regards to the safety of navigation, and the letters of support in relation to local consultation are anecdotal, rather than based on data.
2. At Porthlysgil, we note the proximity of the site to the anchorage. The potential impact on the anchorage has not been fully assessed at this time nor is the potential effect on the anchorage supported by data in the letters of support. Moreover, the original concerns as per the request below have not been sufficiently addressed:

Please can the size of vessel using the anchorage be confirmed, accounting for safe navigation in poor weather conditions and suitable swing circles. The anchorage is noted in the nautical publications, as having restricted swing room particularly for coasters. The vessel traffic data does not provide a detailed breakdown of the vessels using this cove. A breakdown of vessel size would provide an indication of any turning circle needed for the vessels to approach and leave this anchorage. In doing so, the cumulative effect of the introduction of a larger site should be addressed.

We further note that new information provided states that educational marine wildlife tours will be operated. By doing so, this may introduce additional vessel traffic in the locality. Could you please provide a plan of the intended educational tours, which could include frequency of trips, seasonality and duration in situ in Porthlysgil bay?

3. & 5. Thank you for advising that the Crown Estate lease will be for 20 years from the date of issue for both sites and that the intention is to operate these sites within this period.
4. For both sites, we welcome that consultation is taking place with Trinity House with regards to the use of special markers, the number required and the location of their siting. Please confirm location co-ordinates when this is agreed.
6. The information re-presented remains non-site specific and the new information provided is also the same for both sites, therefore does not address this concern.
7. A detailed breakdown of the AIS data provided has not been updated however we welcome the letter of support from the secretary of Porthclais Harbour, noting that the sites are well marked, and from the local RNLi station explaining that the location of Carn Ar Wig would have no impact on the access to the lifeboat station.
8. We welcome that you have stated that any intention to further increase the size of the farms will not take place without consulting Maritime and Coastguard Agency and Trinity House in advance.

The required risk mitigation measures in addition to those included in the NRA would be as follows:

1. Local mariners and fishermen's organisations must be made fully aware of the activity through a local notification. This should be issued at least 5 days before the commencement of works to increase the site. The NRW should be sent a copy of the notification within 24 hours of issue.
2. Zone28@hmcg.gov.uk must be notified prior to commencement of activities.
3. A notification must be sent to The Source Data Receipt team, UK Hydrographic Office (email: sdr@ukho.gov.uk) of commencement of the licensed activities for each phase, at least 10 days before commencement of the works. The information supplied must include the start date and end date, a description of the works, positions of the work area (WGS84), and details of any marking arrangements.
4. A notification must be sent to The Source Data Receipt team, UK Hydrographic Office, (email: sdr@ukho.gov.uk) on completion of each phase of the site increase, no later than 10 working days after their completion. The information provided must include: latitude and longitude coordinates in WGS84 (ETRS89) datum of the installed works on and/or above the seabed, any changes to engineering drawings, and details of new or changed aids to navigation where applicable.
5. A designated point of contact should be made available for other marine users to contact.
7. Suitable arrangements should be made to ensure the deployments remain secure to the seabed for the conditions expected in the area, with a programme of regular inspection and maintenance of the works in place.
8. Appropriate recovery arrangements of all the equipment must be in place for decommissioning of the site, in all eventualities including large scale damage, or bankruptcy. The seabed must be returned to its original profile following decommissioning.
8. The Marine Emergency Action Card must be agreed with HM Coastguard, separated from the NRA, updated and maintained for this site, and sent to oelo@mcga.gov.uk. This is required should search and rescue operations be carried out in or near the site, HM Coastguard needs to know further details about the deployment to facilitate safe and effective incident coordination.
9. Suitable escape lanes must be incorporated into the site design to allow vessels to exit the site, and for emergency services to access.
10. In case of damage to, or destruction or decay of the development seaward of MHWS or any part thereof, that could result in a danger or obstruction to navigation, notification must be issued to NRW, Maritime and Coastguard Agency, Trinity House, the Kingfisher Information Service of Seafish and the UKHO, immediately following the identification of damage, destruction or decay.
11. The works must not encroach on any recognised anchorage, either charted or noted in nautical publications.
12. The site must be lit and marked in accordance with Trinity House requirements.
14. The site must be monitored regularly.
15. The farm position must be monitored as detailed. Should any infrastructure move out of position or break free, the undertaker must as soon as reasonably practicable where safe to do so, be onsite to attend the incident. The HMCg, UKHO and NRW must be notified immediately of any breakaway.
15. The standby vessel must be suitably equipped to deal with any expected incident, with an appropriate safety management system in place.
16. Any expansion of the site or changes to that proposed should be subject to re-consultation with all interested parties;
17. All equipment/components of the shellfish farm must remain within the Crown Estate licenced area and match the defined area of the information submitted to the UKHO for the charted limits.
18. Should any additional sites be proposed for the area, the MCA will expect an assessment of the cumulative impact on shipping and navigation, and the applicant may wish to consider Third Party expertise on this assessment.

We would encourage you to seek guidance from NRW on the application of the exemption to an existing site which was previously a licensable activity, and the application for an expansion to an

existing site. The decision on whether to follow the exemption route remains solely with the applicant, and not the MCA.

Should you follow the exemption route, please can you confirm your acceptance of the above risk mitigation measures?

Kind regards,

Jo Cooke

Marine Licensing and Consenting Advisor

**UK Technical Maritime Services
Navigation**

NavigationSafety@mca.gov.uk

Mobile: 07815 703225



Maritime & Coastguard Agency

Spring Place, 105 Commercial Road,
Southampton, SO15 1EG



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From: beth@carymor.wales <beth@carymor.wales>

Sent: 21 March 2025 15:21

To: navigation safety <navigationsafety@mca.gov.uk>

Subject: Re: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response

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Hi Jo,

Thank you for your email, I appreciate you following up on our call from earlier today. We have been in detailed discussions with NRW, The Crown Estate and Pembrokeshire Coast National Park Authority over the past 10 months, ensuring to keep all relevant stakeholders fully aware of our plans. NRW have been happy with our proposal so far, only requiring yourselves and Trinity House to confirm your views on the Navigational Risk Assessments before an exemption can be satisfied.

If you need any further information, please do not hesitate to get in touch!

Have a lovely weekend,

All the best,

Beth Marshall

Marine Biologist, and humbled to be one of Câr-y-Môr's 500+ equal members

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From: navigation safety <navigationsafety@mcga.gov.uk>
Sent: 21 March 2025 3:06 PM
To: beth@carymor.wales <beth@carymor.wales>
Subject: RE: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response

Dear Beth,

Thank you for the additional information received in the NRAs, your email chasing our response and your call today. We are currently reviewing the recent documents received and should be in a position to provide a response by mid-next week, however, in the meantime, could you please confirm that your intended approach for an exemption has been discussed with NRW before we provide our detailed response.

We look forward to hearing from you.

Kind regards

Jo Cooke

Marine Licensing and Consenting Advisor

**UK Technical Maritime Services
Navigation**

NavigationSafety@mcga.gov.uk



Mobile: 07815 703225

Maritime & Coastguard Agency

Spring Place, 105 Commercial Road,
Southampton, SO15 1EG



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From: beth@carymor.wales <beth@carymor.wales>

Sent: 17 March 2025 10:59

To: navigation safety <navigationsafety@mcga.gov.uk>; stevie@argyllaquaculture.co.uk

Cc: Owen Haines <owen@carymor.wales>; Stephen.Vanstone@trinityhouse.co.uk; 'Charman, Colin' <Colin.Charman@cyfoethnaturiolcymru.gov.uk>; 'Ryan Pratt' <ryan.pratt@thecrownestate.co.uk>; 'Florence PeytonJones' <Florence.PeytonJones@thecrownestate.co.uk>; awadrian1959@gmail.com; Catherine Bransby <Catherine.Bransby@trinityhouse.co.uk>

Subject: Re: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response

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Hi Jo,

Just getting in touch to see if you have been able to review the updated documents I sent a few weeks ago, or if you have a timeline on when this might be done? Our marine license runs out in July so we need to move fast!

Thank you,

Beth Marshall

Marine Biologist, and humbled to be one of Câr-y-Môr's 500+ equal members

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From: beth@carymor.wales <beth@carymor.wales>

Sent: 06 March 2025 3:05 PM

To: navigation safety <navigationsafety@mcga.gov.uk>; stevie@argyllaquaculture.co.uk
<stevie@argyllaquaculture.co.uk>

Cc: Owen Haines <owen@carymor.wales>; Stephen.Vanstone@trinityhouse.co.uk
<Stephen.Vanstone@trinityhouse.co.uk>; 'Charman, Colin' <Colin.Charman@cyfoethnaturiolcymru.gov.uk>;
'Ryan Pratt' <ryan.pratt@thecrownestate.co.uk>; 'Florence PeytonJones'
<Florence.PeytonJones@thecrownestate.co.uk>; awadrian1959@gmail.com <awadrian1959@gmail.com>;
Catherine Bransby <Catherine.Bransby@trinityhouse.co.uk>

Subject: Re: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response

Hi Jo,

Thank you for your email and response to the Navigational Risk Assessment for the proposed farm

expansions at Carn Ar Wig and Porthlysgi.

Please see attached an updated Navigational Risk Assessment for both Carn Ar Wig and Porthlysgi which I hope provides all the additional information requested. The only thing not included is recommendations from Trinity House regarding location coordinates of navigational buoys as we have not agreed this with them yet.

I have also attached a PDF of 11 letters of support we have received for the expansions, from a variety of marine users including local fishermen, scientific divers, Porthstinian Boat Owners Association, Porthclais Harbour Authority, the RNLI, RYA and the Pembrokeshire Marine SAC Officer. I hope this will show that Câr-y-Môr has garnered an overwhelming amount of support from our local community and that those who most use the areas where the proposed farms will be located do not have any concerns about the expansions and are in fact hoping we succeed with our proposal.

If you need any further information please don't hesitate to get in touch.

All the best,

Beth Marshall

Ocean Farm Monitoring Lead, and humbled to be one of Câr-y-Môr's 500+ equal members

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From: navigation safety <navigationsafety@mcga.gov.uk>
Sent: 24 January 2025 12:04 PM
To: stevie@argyllaquaculture.co.uk <stevie@argyllaquaculture.co.uk>
Cc: Beth Marshall <beth@carymor.wales>; Owen Haines <owen@carymor.wales>
Subject: RE: Car-Y-Mor NRA - lighting arrangement and general comments please - MCA response

Dear Stevie,

Thank you for the information provided for the activity changes at Porthlysgil and Carn Ar Wig. It is our understanding that the proposal is a change of activity from seaweed and shellfish to shellfish only and an increase in size of both sites. We note that the proposal is for these expanded sites to fall under the exemption arrangements upon expiry of the current marine license in July 2025.

The MCA has assessed both sites and at this time, particularly for the Porthlysgil site, we are unable to confirm that the expansion of activity is unlikely to cause an obstruction or danger to navigation under the exemption arrangements, based on the information provided. There are multiple risk mitigation measures which would be required on this occasion, and our concern is whether the exemption arrangement would be sufficient to maintain the safety of navigation going forward.

This concern is based on the following reasons:

1. The assessment of AIS traffic is unlikely to consider the smaller fishing and recreational vessels which may use the areas. The level of local consultation undertaken is not detailed or evidenced.
2. At Porthlysgil, we note the proximity of the site to the anchorage, and the potential impact on the anchorage has not been fully assessed at this time. Please can the the size of vessel using the anchorage be confirmed, accounting for safe navigation in poor weather conditions and suitable swing circles. The anchorage is noted in the nautical publications, as having restricted swing room particularly for coasters. The vessel traffic data does not provide a detailed breakdown of the vessels using this cove. A breakdown of vessel size would provide an indication of any turning circle needed for the vessels to approach and leave this anchorage. In doing so, the cumulative effect of the introduction of a larger site should be addressed.
3. At Porthlysgil, we understand that the intention is to install 7 longlines 18m apart, 350m in length with the total width of the site to be 110m. We note there will be a buoy located every 7m along each longline. The intended deployment duration is not mentioned.

4. For both sites, we welcome that consultation is taking place with Trinity House with regards to the use of special markers, the number required and the location of their siting. Please confirm location co-ordinates when this is agreed.
5. At Carn Ar Wig, we understand that the intention is to install 4 longlines in length, 20m apart with the total width at 85m. We note that the intended duration is not mentioned. This site is close inshore and is bordering a harbour approach to Porthstinian where RNLI is stationed.
6. The local consultation is duplicated/repeated for the two locations, and does not appear to be site specific. This raises concerns whether this is a site-specific navigation risk assessment with appropriate consideration of local navigational features.
7. A detailed breakdown of vessel traffic and/or evidence of consultation with the harbour master at Porthstinian, who should have knowledge of local vessel traffic, would be welcomed as well as consultation with the RNLI at Porthstinian.
8. The MCA is also concerned that under the exemption arrangement multiple further expansions could be undertaken with no re-assessment of risk. The MCA would expect to be reconsulted in the event of any future changes or expansion in advance.

The MCA would be happy to re-assess the risk and comment further once the above points have been addressed.

Kind regards,

Jo Cooke

Marine Licensing and Consenting Advisor

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From: stevie@argyllaquaculture.co.uk <stevie@argyllaquaculture.co.uk>

Sent: 10 January 2025 10:53

To: Stephen.Vanstone@trinityhouse.co.uk; Helen Croxson <Helen.Croxson@mcga.gov.uk>; Sam.Madeley@UKHO.gov.uk; sdr@ukho.gov.uk; Julia Stringer <Julia.Stringer@mcga.gov.uk>; navigation safety <navigationsafety@mcga.gov.uk>; HMCG OELO <OELO@mcga.gov.uk>

Cc: 'Florence PeytonJones' <Florence.PeytonJones@thecrownestate.co.uk>; ryan.pratt@thecrownestate.co.uk; Beth Marshall <beth@carymor.wales>; Owen Haines <owen@carymor.wales>

Subject: Car-Y-Mor NRA - lighting arrangement and general comments please

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Dear All,

Câr-Y-Môr are a Community Benefit Society based in Pembrokeshire, West Wales - Registered Company Number RS008172 as "For the love of the sea Limited". Trading address – Upper Clegyr, St Davids, Pembrokeshire, SA62 6QN.

Câr-Y-Môr have operated 2 small test aquaculture sites, Carn Ar Wig and Porthlysgi for nearly 5 years since 2020. These were originally licensed as a trial seaweed and shellfish IMTA sites under Marine License DEML2013. This license was granted by Natural Resources Wales (NRW) to run from 01/08/2020 to 31/07/2025.

Câr-Y-Môr intend to expand both sites, whilst at the same time Crown Estate have agreed to take the sites on as Leases (with agreement from NRW) to simplify the processing of small inshore aquaculture sites. This negates the need for complex marine licensing for such simple operations.

Proper Duty of Care will of course still be adhered to at all times.

NRW have undertaken a Habitat Assessment of the sites and activities.

Pembrokeshire Coast National Park Authority (PCNPA) have requested a (seascape)LVIA, which Car-Y-Mor are contacting a consultant to perform.

And here we present a Navigational Risk Assessment for both sites for your consideration. I hope I have included all relevant details, NRA, and MEAC.

Please could you give your thought on Special Mark positioning and if required any mitigation Car-Y-Mor need to undertake for these expanded sites.

With thanks, Stevie

Stevie Jarron

My working days are Tue, Wed, Thu

Aquaculture Consultant

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