

21 August 2025

**REQUEST FOR FURTHER INFORMATION - THE MARINE WORKS (ENVIRONMENTAL  
IMPACT ASSESSMENT) REGULATIONS 2007 (AS AMENDED)**

Dear Marc Murray,

Marine Licence Application - ORML2465 Llyr 1 Floating Offshore Wind Project

I am writing to advise you that the NRW Marine Licensing Team (MLT), on behalf of the Welsh Ministers, as the Licensing Authority, is in the process of determining your application, duly made submitted on 01 November 2024 for a Marine Licence under Part 4 of the Marine and Coastal Access Act 2009.

In accordance with Regulation 14 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended), NRW considers that further information is required to properly consider, or come to a conclusion on, the likely significant environmental effects of the project. NRW will not proceed with the consideration of the environmental impact or the determination of the marine licence until this information is provided.

The consultation responses received during determination have been shared with you and you will note a number of concerns which should be addressed and/or clarified. It is strongly recommended that you review and look to respond accordingly to the points raised by the various consultees, and that further engagement is sought with relevant consultees as you look to address comments made.

Specific attention is given to a number of clarification points and requests for further information below, of which many will need to be addressed before the marine licence process can progress further. However, please note that this list is not exhaustive, and reference should be made to all the consultee comments. A clear signposting document or matrix should be provided showing how requested information has been provided and each consultee comment has been considered and/or addressed.

## Further Information Requested

### 1. National Security

Significant concerns still remain with the Ministry of Defence (MoD) who have objected to the project. This is due to the following:

- air traffic control radar systems sited at MoD Hartland Point, and
- the impact the export cable routes will have on Military Danger Areas D113A and D113B.

As mentioned in the request for further information letter dated 14 February 2025, DEF\_01 of the Welsh National Marine Plan (WNMP) states that a consent “*will only be granted where the MoD is satisfied that the proposal will not cause unacceptable risk to defence and national security interests*”. Whilst we acknowledge that the MoD are still carrying out their review to determine whether these risk are acceptable and can be mitigated, we strongly recommend you continue to discuss the comments made with them directly.

### 2. Offshore

#### 2.1 General comments

There are a number of instances where NRW A have advised that consideration should be given to the provision of an errata document to ensure the information and data associated with the project are clear. Some of the NRW A representation is based on in house assessments which would need to be incorporated into the ES of the project. Moreover, from the perspective of this being a test and demonstration project, and for the avoidance of doubt, we consider that an errata to the ES will be required. NRW A position on this matter is clear and considers this to be required to ensure that the public record is correct and for the benefit of this project and any future projects that might base their assessments on the project (including Llŷr 2 project). See NRW A response in full for further details on the request for an errata document to incorporate all changes to the original ES assessments.

#### 2.2 Benthic Subtidal and Intertidal Ecology

Minor clarification requests relating to the use of concrete versus natural rock cable protection have been raised by NRW A. Please ensure these comments are reviewed and addressed in your response. JNCC have also raised comments which require additional clarification. Please ensure these comments are reviewed and addressed in your response.

#### 2.3 Marine Ornithology

Following submission of further information, NRW A now agree with the conclusions of no significant effect at EIA and no AEOsI at HRA for the project

alone, and cumulatively and in-combination with other plans and project. However, a number of additional comments and clarification requests, largely related to the turbine parameters that feed into the ornithological collision risk model, have been raised by NRW A. Please ensure these comments are reviewed and addressed in your response.

It is worth noting that NRW A has stated that there are some outstanding areas where insufficient information has been provided. However, considering the stage of the consenting process the project is at, and in order to be enabling, NRW A has undertaken their own work to provide MLT with the information required to make an informed decision.

JNCC have stated that there is lack of thorough in-combination assessment including all relevant projects for puffin and lesser black-backed gull. JNCC have also reviewed the advice provided by NRW A on this matter, and have stated that the calculated values by NRW A are indicative at this stage and that JNCC is not able to advise on that basis. I therefore ask that you review their response in full and address all comments raised.

## **2.4 Marine Mammals**

NRW A consider that there remain some pending material issues that have not been fully addressed by the further information provided. Nonetheless, NRW A consider that with additional commitment with respect to key mitigation measures NRW A would be able to agree with the conclusions of no significant adverse effects at EIA scale and no AEOsI at HRA scale.

Please review their responses in order to ensure you can comply with the requested conditions and address any comments they have raised.

JNCC agree that mitigation measures for the impact pathways detailed in their response could be finalised post-consent, provided appropriate information is detailed within the outline Marine Mammal Management Plan (oMMMP). Please ensure you review their response in full and address the comments raised through the submission of an updated oMMMP.

We therefore request you provide an updated oMMMP which should address JNCC and NRW A comments raised throughout their responses.

## **3. Onshore**

### **3.1 European Protected Species Terrestrial**

NRW A cannot agree with a conclusion of no Likely Significant Effect for otters as a feature of the Pembrokeshire Marine SAC and Pembrokeshire Bat Sites and Bosherton Lakes SAC.

As no specific otter surveys have been carried out, it is not possible to ascertain whether an otter natal holt is present in close proximity to the cabling landfall works. In the absence of such survey information, significant effects cannot be ruled out. If further surveys can rule out the likely presence of a natal holt within 200m of the works, NRW A would be content to agree with a conclusion of no likely significant effect on this feature of both SACs.

Regarding your proposal to leave further protected species surveys to the post-consent pre-construction phase, NRW A have referred to their previous advice dated 28 March 2025 and continue to advise that this approach does not accord with planning policy or case law.

With respect to the potential proposals for inclusion of new buffer (exclusion) zones within the application documents for bats, these will need to be formally submitted to MLT for consideration in consultation with NRW A. Any proposal would need to demonstrate that the proposed buffer zones would be sufficient to address any potential impacts on bats, including those from noise, vibration and construction lighting.

### **3.2 Designated Landscapes**

Whilst NRW A welcome the commitment to reduce the turbine blade tip height from 325.5m to 300m (above Highest Astronomical Tide), NRW A considers it would still be inside within the low magnitude of effect buffer identified for turbines of this height. As such, NRW A have advised that a reduction in blade tip height to 270m would reduce impacts within the Pembrokeshire Coastal National Park (PCNP) and likely to an acceptable level.

Whilst it is noted that the Pembrokeshire Coastal National Park Authority (PCNPA) has removed their objection to the development as a result of further information, the PCNPA maintains concern regarding the outcomes of the Seascape, Landscape and Visual Impact Assessment. The PCNPA agrees with NRW A that reducing the blade tip height to 270m would reduce the landscape and visual impacts on the PCNP and would result in less significant effects for the PCNP.

NRW A and the PCNPA have requested an updated Seascape and Landscape Visual Impact Assessment and photomontages to be able to conclude that the impacts on the PCNP would be reduced to an acceptable level.

The PCNPA has also requested that a landscape and biodiversity enhancement scheme is implemented to secure compensation for the residual impact as a whole on the PCNP.

Please provide the information requested above within **6 weeks**, this date being **02 October 2025**. If the MLT has not received this information by this date, application **ORML2465** will be treated as having been withdrawn. Please contact the MLT as soon as possible if additional time will be required to collate the necessary information.

Please note that once additional information is submitted, if deemed further information in line with Regulation 14 of the Marine Works (Environmental Impact Assessment) (EIA) Regulation 2007 (as amended) it must be publicised in accordance with the requirements stipulated in Regulation 16 of the Marine Works (Environmental Impact Assessment) (EIA) Regulation 2007 (as amended). Therefore, once the information is received by the MLT, you will be provided with a public notice to publish at your own expense in the same newspapers as the project was previously publicised. The public notice must be placed twice in the same publication a week apart. e.g., 1st notice published on a Tuesday, must be published on the following Tuesday in the same newspapers, with the 42 days starting from the first notice.

In the meantime, should you have any queries please do not hesitate to contact me on [joseph.thomas@cyfoethnaturiolcymru.gov.uk](mailto:joseph.thomas@cyfoethnaturiolcymru.gov.uk).

Yours sincerely

**Joe Thomas**  
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