

Marine Licensing Decision

The Marine and Coastal Access Act (2009)

Applicant: For The Love of The Sea Ltd

Application reference no: DEM2540

Ramsey Sound Pembrokeshire

Integrated Multi-Trophic Aquaculture (IMTA) Seaweed and Shellfish sites at Carn ar Wig and Porthlysgi in the Ramsey Sound, Pembrokeshire.

10 April 2026

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OUR DECISION

Based on all the information available, and having regard to all relevant considerations Natural Resources Wales Marine Licensing Team (NRW MLT) has decided to grant the marine licence sought by the Application subject to the conditions set out in Annex 1.

This decision document:

- explains how the Application has been determined, having regard to the relevant legal framework outlined in section 4;
- explains how relevant considerations have been taken into account and how each of the legal requirements have been considered in determining the Application;
- provides a record of the decision-making process; and
- sets out the reasons for any conditions imposed in connection with any marine licence granted pursuant to the Application.

1. APPLICATION DETAILS

1.1. The Application

Applicant Name and Address	The Applicant is the company set out below: Company name: For the Love of the Sea Limited Company number: RS008172 Address: Upper Clegyr, St Davids, Pembrokeshire, SA62 6QN
Application Reference Number	DEML2540
Date Application was duly made	09 September 2025
Proposal[s] covered by the Application	Integrated Multi-Trophic Aquaculture (IMTA) Seaweed and Shellfish sites at Carn ar Wig and Porthlysgi in the Ramsey Sound, Pembrokeshire. (the Project)
Licensable marine activities	A 2Ha Integrated Multi-Trophic Aquaculture (IMTA) Seaweed and Shellfish sites at Carn ar Wig and a 3Ha Integrated Multi-Trophic Aquaculture (IMTA) Seaweed and Shellfish sites in Porthlysgi. The deposit, maintenance and removal of mooring and growing equipment including; anchors, lines, chains, baskets, buoys and monitoring equipment. The cultivation of the following species; Sugar Kelp (<i>Saccharina latissima</i>) Oarweed (<i>Laminaria digitata</i>) Atlantic wakame (<i>Alaria esculenta</i>) Furbelows (<i>Saccorhiza polyschides</i>)

	Dulse (<i>Palmaria palmata</i>) Pepper Dulse (<i>Osmundea pinnatifida</i>) Sea Lettuce (<i>Ulva lactuca</i>) Scallop (<i>Pecten maximus/Aequipecten opercularis</i>) Native Oyster (<i>Ostrea edulis</i>) Mussels (<i>Mytilus edulis</i>) Deposit and removal of navigational buoys, markers and lighting. Deposit and removal of monitoring equipment and associated infrastructure. Decommissioning activities will include the reverse of the installation process, including the removal of the buoys, lines, followed by the marker buoys and the anchors and chains. (the Proposed Activities)
Marine Plan Area	Welsh inshore region and Welsh offshore region
Application documents:	Application documents submitted 12 June 2025; • DEML2540 - Figure 2 • DEML2540 - Figure 21 - Porthlysgi Current South End Diver Footage Habitats • DEML2540 - Section 6c (i)_ Admiralty Chart of Project • DEML2540 - Figure 16 - Porthlysgi Current Farm Sonar Habitat Map • DEML2540 - Figure 19 - Carn Ar Wig Current South End Diver Footage Habitats • DEML2540 - 1 - Car-y-Mor Marine License Application Form.docx • DEML2540 - 7 - Car-Y-Mor license - INNS Biosecurity RA and Management Plan.docx.docx • DEML2540 - Figure 17 - Porthlysgi Proposed Farm Sonar Habitat Map • DEML2540 - Figure 20 - Porthlysgi Current North End Diver Footage Habitats • EML2540 - Marine Mammal Entanglement Monitoring and Maintenance Log (July 2023-June 2024) • DEML2540 - SLVIA v1 • DEML2540 - 3 - Car-Y-Mor license - Env Responsibilities v1.0.docx • DEML2540 - Car y Mor Letters • DEML2540 - Application Form Section 12a(i) NRW Correspondence Evidence • DEML2540 - Application Form Section 12a(i) The Crown Estate Correspondence Evidence • DEML2540 - Figure 6 • DEML2540 - Figure 9 • DEML2540 - Figure 24 - Porthlysgi Proposed North End DDV Footage Habitats • DEML2540 - Section 6c (ii)_ Construction Plan and Sectional Drawings • DEML2540 - Figure 7

	• DEML2540 - Figure 8 • DEML2540 - Figure 11 • DEML2540 - Figure 10 • DEML2540 - Figure 18 - Carn Ar Wig Current North End Diver Footage Habitats • DEML2540 - 4.2 - Câr-Y-Môr Re-license - NRA MEAC Decom v1.3 - Porthlysgi.docx • DEML2540 - Figure 22 - Carn Ar Wig Proposed North End DDV Footage Habitats • DEML2540 - Figure 5 • DEML2540 - Figure 25 - Porthlysgi Proposed South End DDV Footage Habitats • DEML2540 - CYM welsh-national-marine-plan-signposting-en-only • DEML2540 - Figure 4 • DEML2540 - Figure 14 - Carn Ar Wig Current Farm Sonar Habitat Map • DEML2540 Baseline Benthic Habitat Survey Report - v5 • DEML2540 - Figure 15 - Carn Ar Wig Proposed Farm Sonar Habitat Map • DEML2540 - 2 - Car-Y-Mor license - Method Statement v1.0.docx • DEML2540 - Application Form Section 12a(i) PCNPA Correspondence Evidence • DEML2540 - Application Form Section 12a(i) Trinity House Correspondence Evidence • DEML2540 - Figure 3 • DEML2540 - Figure 23 - Carn Ar Wig Proposed South End DDV Footage Habitats • DEML2540 - View point photomontage • DEML2540 - 4.1 - Câr-Y-Môr Re-license - NRA MEAC Decom v1.3 - Carn Ar Wig.docx • DEML2540 - 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol.docx • DEML2540 - Application Form Section 12a(i) MCA & NRW Advisory Correspondence Evidence • DEML2540 - Figure 1 Application document submitted 05 September 2025; • DEML2540 Car y Mor Environmental information to inform HRA.docx • DEML25406 - Car-Y-Mor license - Marine Mammal Entanglement protocol Revised AUG 25 (Superseding 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol.docx) • DEML2540 Response to Fitness Checks Questionnaire - Marine Mammals • DEML2540 4.1 - Car-Y-Mor Re-license - NRA MEAC Decom v1.5 - Carn Ar Wig.docx (Superseding 4.1 - Câr-Y-Môr Re-license - NRA MEAC Decom v1.3 - Carn Ar Wig.docx) • DEML2540 4.2 - Car-Y-Mor Re-license - NRA MEAC Decom v1.5 - Porthlysgi.docx (Superseding 4.2 - Câr-Y-Môr Re-license - NRA MEAC Decom v1.3 - Porthlysgi.docx)
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	• DEML2540 Marine Emergency Action Card - Carn Ar Wig.docx • DEML2540 Marine Emergency Action Card - Porthlysgi.docx • DEML2540 Car Y Mor WFD scoping application (1).docx • DEML2540 Car Y Mor WFD Detailed Assessment application (1).docx • DEML2540 Car Y Mor WFD screening application (1).docx • DEML2540 Aquaculture Environmental Management Plan • DEML2540 Car Y Mor MECAL Cert Aug 23.pdf • DEML2540 Response to Fitness Checks Questionnaire - Water Quality Further Information Submitted 11 December 2025; • DEML2540 7 - Car-Y-Mor license - INNS Biosecurity RA and Management Plan REVISED NOV25.docx • DEML2540 Aquaculture Environmental Management Plan REVISED NOV25.docx • DEML2540 Figure 4 Updated.pdf • DEML2540 Figure 5 Updated.pdf • DEML2540 Figure 11 Updated.pdf • DEML2540 Figure 8 Original.pdf • DEML2540 MARINE EMERGENCY ACTION CARD - Carn Ar Wig REVISED NOV25.docx • DEML2540 Trinity House confirmation email for Nav Lighting.pdf • DEML2540 MARINE EMERGENCY ACTION CARD - Porthlysgi REVISED NOV25.docx • DEML2540 Updated Photomontages (HD).pdf • DEML2540 Further Information Request Point by Point Response as 11122025.pdf Further Information submitted 05 March 2026 • DEML2540 Closing Statement in support of Application • DEML2540 Updated Welsh National Marine Plan (WNMP) Policy Compliance Signposting Document
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2. APPLICATION PROCEDURE

2.1. The Application

The Application was accepted by Natural Resources Wales Marine Licensing Team (**NRW MLT**) considered duly made on 09 September 2025. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we needed to complete that determination, and the documents considered may therefore include documents provided after the Application was first made.

2.2. Documents considered

In reaching its decision, NRW MLT has considered the documents listed in section 1 of this decision document along with such other information provided by the Applicant or received by consultees as NRW MLT considered relevant.

2.3. Commercial Confidentiality

We have accepted the Applicants claim for commercial confidentiality on the grounds that disclosure of certain information on the public register would adversely affect the confidentiality of commercial or industrial information where such confidentiality is protected by law to protect a legitimate commercial interest. As such we have not included this information on the register.

2.4. Publicity and advertising

As required by s. 68 of the Marine and Coastal Access Act 2009 (the 2009 Act), notice was given to Pembrokeshire County Council on 03 October 2025.

As required by s. 68 of the 2009 Act NRW MLT has required the Applicant to publish notice of the Application.

Public notice advertising the Project was placed in Tenby Observer on 02 October 2025 and a notice was placed on NRW website. The application documents were made available to the public on our online public register. They could also be requested from Natural Resources Wales Marine Licensing Team.

The public were given a period of 28 days from the date of the Public Notice to provide comments on the Application.

7 public responses were received in response to the Public Notice.

Following provision of Further Information on the 11 December 2025 a further Public Notice was placed on NRW website on the 17 December 2025. The application documents were made available to the public on our online public register. They could also be requested from NRW MLT.

27 representations have been considered in coming to our decision. Details of our considerations surrounding relevant matters can be found in section 4.

A number of public representations consider there to have been a lack of sufficient public engagement between the operator and members of the public. NRW MLT strongly encourage operators to engage with the local community throughout their development. NRW MLT consider as detailed above appropriate notices were placed as required by the Marine and Coastal Access Act.

2.5. Environmental impact Assessment

Council Directive 2011/92/EU (as amended) on the assessment of the effects of certain public and private projects on the environment aims to protect the environment and the quality of life by ensuring that projects which are likely to have significant environmental effects by virtue of their nature, size or location are subject to an environmental impact assessment (EIA) before permission is granted.

The Marine Works (Environmental Impact Assessment) Regulations 2007 ("the Regulations") transpose the EIA Directive in Wales and England for marine licence applications.

Having considered the Application NRW MLT has determined that it does not constitute a development requiring EIA under the Regulations.

3. CONSULTATION

3.1. Consultees

NRW MLT considered it appropriate to consult the bodies listed in the table below on 3 October 2025, due to their particular expertise. These bodies were consulted for a period of 28 days. For those bodies which responded to the consultation an 'Y' can be found in the response received column, and those which did not respond to the consultation an 'N':

Consultee	Response received (Y/N)	Date(s) of receipt
The Crown Estate	Y	28 October 2025
NRW Advisory	Y	31 October 2025
MoD - Safeguarding Defence	Y	07 October 2025
Maritime & Coastguard Agency	Y	30 October 2025
Trinity House	Y	12 November 2025
Royal Yachting Association	Y	28 October 2025
Local Biodiversity Officer (Pembrokeshire)	N	
Local Planning Authority (Pembrokeshire)	N	
Pembrokeshire Coast National Park Authority	Y	31 October 2025
Local Harbour Authority (Fishguard)	N	
Local Port Authority (Porthclais)	N	
Royal Society for the Protection of Birds (RSPB)	N	

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Welsh Government Marine Enforcement Officers	Y	10 November 2025
Welsh Archaeological Trust	N	
Royal Commission on the Ancient and Historical Monuments of Wales	Y	14 October 2025
Cadw	Y	17 October 2025
Chamber of Shipping	N	
NERL Safeguarding	Y	06 October 2025
Welsh Fishermen Association	N	
National Federation of Fishermen's Organisations	N	
Public Health Wales	Y	13 October 2025
National Trust	Y	05 November 2025

Consultees who did not provide a response were assumed to have no comment.

Following a submission of further information on the 11 December 2025, NRW MLT consulted the bodies listed below on 17 December 2025, due to their particular expertise on matters arising in relation to this application. These bodies were consulted for a period of 28 days. For those bodies that responded to the consultation an 'Y' can be found in the response received column, and those which did not respond to the consultation an 'N'.

Consultee	Response received (Y/N)	Date(s) of receipt
The Crown Estate	Y	22 December 2025
NRW Advisory	Y	22 January 2026
MoD - Safeguarding Defence	Y	18 December 2025
Maritime & Coastguard Agency	Y	14 January 2025
Trinity House	Y	14 January 2025
Royal Yachting Association	Y	18 December 2025
Local Biodiversity Officer (Pembrokeshire)	N	
Local Planning Authority (Pembrokeshire)	N	

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Pembrokeshire Coast National Park Authority	Y	20 January 2025
Local Harbour Authority (Fishguard)	N	
Local Port Authority (Porthclais)	N	
Royal Society for the Protection of Birds (RSPB)	N	
Welsh Government Marine Enforcement Officers	N	
Welsh Archaeological Trust	N	
Royal Commission on the Ancient and Historical Monuments of Wales	Y	18 December 2025
Cadw	Y	05 January 2026
Chamber of Shipping	N	
NERL Safeguarding	Y	18 December 2025
Welsh Fishermen Association	N	
National Federation of Fishermen's Organisations	N	
Public Health Wales	N	
National Trust	Y	09 January 2026

NRW MLT has had regard to all consultation responses received in making its decision. Where these have impacted on NRW MLT's decision making, this has been noted in the relevant paragraph in section 4 of this decision document.

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4. BASIS FOR OUR DECISION

In determining this application, including the terms on which it was granted, and the conditions attached to it, NRW MLT has had regard to the factors set out in section 4 below in accordance with the 2009 Act.

Under the 2009 Act NRW MLT is required to have regard to the following:

- the need to protect the environment (see section 4.1);
- the need to protect human health (see section 4.2);
- the need to prevent interference with legitimate uses of the sea (see section 4.3);
- in the case of an application for a licence to authorise construction, alteration or improvement of works within the UK marine licensing area, the effects of any use intended to be made of the works in question when constructed, altered or improved (considered, if relevant in sections 4.1 to 4.5 below);
- any representations which it has received from any person having an interest in the outcome of the Application (summarised in section 3 and where relevant considered in sections 4.1 to 4.5 below); and
- such other matters as it thinks relevant (see section 4.5 below).

4.1. The need to protect the environment:

The reference to the “environment” includes the local and global environment; the natural environment; and, by virtue of section 115(2) of the 2009 Act, any site of historic or archaeological interest. The natural environment may include the physical, chemical and biological state of the sea, the seabed and the seashore, and the ecosystems within it, or those that are directly or indirectly affected by an activity, whether within the marine licensing area or otherwise.

In considering the need to protect the environment we have considered the relevant environmental legislation set out below.

4.1.1. Water Framework Directive, Groundwater Directive and Water Environment Regulations

a) The legal framework

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (**Water Environment Regulations**) implement the requirements of the Water Framework Directive (**WFD**) (Directive 2000/60/EC) which requires consideration as to whether that proposals for development may cause deterioration or prevent a water body from achieving ‘good status’. Proposals likely to cause deterioration or prevent a waterbody from achieving good status should be rejected, unless derogation procedures have been applied.

Under the Water Environment Regulations, NRW must exercise its relevant functions to ensure compliance with the requirements of the WFD, the Environmental Quality Standards Directive (Directive 2008/105/EC) and the Groundwater Directive (Directive 2006/118/EEC).

b) Factors relevant to our determination

NRW MLT has considered the potential effect of the Proposed Activities on the following WFD waterbodies:

- Pembrokeshire South (GB611008590003)

A Water Framework Directive Compliance Assessment has been undertaken for the Proposed Activities and taken into account in this decision. In light of the conclusions of a detailed compliance assessment, and taking account of the advice received from technical specialist advisors, it has been established that the activities has no potential to cause deterioration of any water body or prevent a water body or WFD Protected Area from meeting its objectives, taking into account any conditions or restrictions as applicable, either alone or in-combination with other activities.

Based on this assessment it is considered that the Proposed Activities when considered alone and in-combination, will not pose a risk to deterioration in the status of any of the above listed waterbodies or jeopardise their attainment of good surface water status when undertaken in accordance with appropriate conditions secured in the Marine Licence including;

- measures to minimise the potential spread of Invasive Non-native Species secured through a Biosecurity Risk Assessment (see Annex 1 condition 3.21).

Further details are described within the Water Framework Directive Compliance Assessment.

4.1.2.Biodiversity and resilience of ecosystems duty

a) The legal framework

Section 6 of the Environment Wales Act 2016 requires that we seek to maintain and enhance biodiversity in the exercise of our functions, and in so doing promote the resilience of ecosystems, in a manner that is consistent with the proper exercise of our functions.

b) Factors relevant to our determination

A number of section 7 species and habitats have also been considered within the project HRA for example Otter are a section 7 species but are also a feature of the Pembrokeshire Marine/Sir Benfro Forol SAC and as such have been considered within the HRA accordingly.

In addition as noted by the Applicant multitrophic farming has the potential to provide habitat enhancements by increasing habitat complexity resulting in enhanced biodiversity.

NRW MLT is satisfied we have taken into account and had due regard to this duty in so far as it is consistent with the function of determining an application for a Marine Licence under the Marine and Coastal Access Act 2009.

4.1.3.European Protected Sites and Ramsar Sites

a) The legal framework

European sites are those designated under the Conservation of Habitats and Species Regulations 2017 (**Habitats Regulations 2017**) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (**Offshore Habitats Regulations 2017**) as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).

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The Habitats Regulations 2017 and the Offshore Habitats Regulations 2017 require that any project that is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects) must be subject to an appropriate assessment. NRW undertakes a Habitats Regulation Assessment (HRA) to establish whether an appropriate assessment is required.

In addition NRW must exercise its functions under the 2009 Act so as to secure compliance with the requirements of the relevant European Directives. NRW also has a duty under the Habitats Regulations 2017 to support wild birds by protecting habitats and avoiding pollution.

A Ramsar site is a wetland which has been designated under the Ramsar Convention. The Ramsar Convention does not place specific legal requirements on its parties (though Ramsar sites are often SSSIs or SPAs, considered below), however Ramsar status is considered by NRW as matter of policy in its decision making.

b) Factors relevant to our determination

The Project may affect the following European Protected Sites;

- Pembrokeshire Marine/Sir Benfro Forol SAC
- West Wales Marine/ Gorllewin Cymru Forol SAC
- St David's / Ty Ddewi SAC
- Ramsey and St David's Peninsula Coast SPA

The following sites have been considered only for their marine mammal features:

- Bristol Channel Approaches SAC (Harbour porpoise)
- Cardigan Bay SAC / Bae Ceredigion SAC (Bottlenose dolphin, grey seal)
- Pen Llyn a'r Sarnau SAC / Llyn Peninsula and the Sarnau SAC (Bottlenose dolphin, grey seal)
- North Anglesey Marine / Gogledd Môn Forol SAC (Harbour porpoise)

A Habitats Regulations Assessment of the Proposed Activities has been undertaken, and NRW (as Statutory Nature Conservation Body) were consulted on the HRA.

The HRA concluded that the plan or project will not adversely affect the integrity of any European sites when undertaken in accordance with appropriate conditions.

The works lie within the Pembrokeshire Marine SAC. The Applicant has committed within *DEML2540 Responses to Further Information* dated 11 December 2025, to include the Carn ar Wig and Porthlysgi sites within their annual monitoring programme, agreeing clear trigger points with NRW A to ensure that adverse impact on the Large Shallow inlet and Bay feature and the reef features of the SAC did not occur. NRW MLT are satisfied that the adherence to a monitoring programme can be secured through Marine Licence condition (see Annex 1 condition 3.23).

Potential impact on marine mammal features of designated sites, specifically harbour porpoise and grey seal were identified as a result of potential entanglement however subject to adherence to a Marine Mammal Entanglement Protocol, NRW MLT are satisfied that adverse effect on these features can be ruled out (see Annex 1 condition 3.19).

In addition potential impact resulting from the introduction of non-native species will be controlled by a requirement to produce and implement a Biosecurity Protocol (see Annex 1 condition 3.21).

NRW MLT are satisfied that the measures above can be secured through Marine Licence condition.

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NRW MLT is therefore satisfied that the Proposed Activities, either alone or in combination with other plans or projects, will not adversely affect the integrity of European Site(s) when undertaken in accordance with appropriate conditions.

4.1.4. European Protected Species

a) The legal framework

The Habitats Regulations 2017 and the Offshore Habitats Regulations 2017 also confer protection on certain designated species (European Protected Species). A licence (EPS licence) must be obtained in order, whether deliberately or accidentally, to capture, kill, disturb or injure such a species, damage or destroy their breeding or resting places or obstruct access to their resting or sheltering places.

b) Factors relevant to our determination

NRW MLT considers that the following protected species are likely to be impacted by the Project:

- Grey seal
- Harbour porpoise

Adherence to a Marine Mammal Entanglement Protocol has been proposed and secured to the marine licence to manage risk of entanglement of marine mammals with project infrastructure.

NRW MLT has no reason to believe should an EPS be required for Licensable Marine Activities that it would not be forthcoming.

Any determination made as part of this decision are without prejudice to the consideration NRW is required to give an EPS licence application as the body with a statutory responsibility for its determination and do not constrain or bind NRW in exercising this function. Should an application for an EPS licence in relation to the Project be made it will be determined by NRW based on all the relevant information available to NRW at that time.

4.1.5. Marine Conservation Zones

a) The legal framework

Marine Conservation Zones (MCZ) were established under the 2009 Act to protect nationally important, rare or threatened habitats and species. The only currently designated MCZ in Wales is Skomer.

Under the 2009 Act, NRW must exercise its functions in the manner which it considers best furthers the conservation objectives stated for any MCZ or, where that is not possible, in the manner which it considers least hinders the achievement of those objectives.

b) Factors relevant to our determination

NRW MLT is satisfied that there is no significant risk of the Proposed Activities on the Skomer MCZ due to the nature of the works and the distance to the MCZ. Consideration of grey seals which are highly mobile were considered as part of the assessment of the Pembrokeshire Marine SAC within the HRA which concluded no adverse effect on features of this site.

4.1.6.Sites of Special Scientific Interest (SSSIs)

a) The legal framework

Sites of Special Scientific Interest are designated under the Wildlife and Countryside Act 1981 (**1981 Act**) and protected by law to conserve their wildlife or geology. NRW must take reasonable steps, consistent with the proper exercise of its functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which an SSSI is of special scientific interest.

b) Factors relevant to our determination

NRW MLT has considered the impact of the Project on the following sites:

- St David's Peninsula Coast SSSI

The works lie outside the boundary of the SSSI. Due to the location and nature of the works NRW MLT is satisfied that the Proposed Activities do not have the potential to impact on features of the site.

4.1.7.The Waste (England and Wales) Regulations 2011

a) The legal framework

The Waste (England and Wales) Regulations 2011 (as amended) establish a legal framework for treating waste. This is designed to protect the environment and human health by emphasising the importance of proper waste management, recovery and recycling techniques to reduce pressure on resources and improve their use. Waste generated by a project or activity must in general terms be dealt with in an environmentally friendly way. To achieve this the Regulations describe a waste hierarchy which gives an order of preference for how waste is dealt with (prevention, re-use, recovery for other purposes such as energy, and finally disposal).

b) Factors relevant to our determination

NRW MLT is satisfied that the Proposed Activities meet the requirements of The Waste (England and Wales) Regulations 2011.

4.1.8.Other matters considered relevant to the need to protect the environment

Coastal Processes

The Applicant submitted *DEML2540 Physical Processes Assessment for Small-Scale Project – Car y Mor* to support their application. Although NRW A note some deficiencies within the assessment they are satisfied that due to the strong tidal currents and wave energies experienced at the site location, coupled with the spacing between infrastructure that significant impact on hydrodynamics resulting from the site infrastructure would not be predicted.

NRW A highlighted that although a zone of influence had not been provided to calculate the potential spatial extent of change associated with the project, that in this instance due to the scale of the project and the dynamic nature of the site in respect to wave and tidal forces NRW A were satisfied that significant impacts were not predicted.

NRW MLT are satisfied that coastal processes have been adequately considered in this instance, and no significant impacts are predicted.

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Water Quality

The Applicant has proposed a number of pollution prevention best practice measures to ensure the works do not lead to an adverse impact on water quality, these include adherence to *DEML2540 Aquaculture Environmental Management Plan Revision Nov25*. NRW A agree that subject to pollution prevention best practices no adverse impact on water quality is predicted.

NRW MLT consider it appropriate to include licence conditions relating to pollution prevention best practices and adherence to the Environmental Management Plan (see Annex 1 condition 3.22).

Benthic Ecology

Public Representation were received raising concerns surrounding the potential impacts of the works on benthic habitats.

The works lie within the Pembrokeshire Marine SAC. *DEML2540 Baseline Benthic Habitat Survey Report* dated 20 June 2025 was submitted with the application. The survey concluded that the Car y Wig site was a mixture of boulders and sediment habitat, while the Porthlysgi site was predominantly sandy sediment with areas of bedrock and boulders.

As detailed within the Applicants *DEML2540 Environment Information to inform HRA* submitted 05 September 2025 the Applicant has committed to the use of drop-down video to help microsite the location of anchors and chains avoiding sensitive habitats. The Applicant has also committed within the *DEML2540 Baseline Benthic Habitat Survey Report* to monitor areas of the farm for effects of infrastructure such as chains and cages on the seabed.

NRW A in representation dated 3 October 2025 noted that impact of the proposals include build-up of sediment, modification of habitat and potential scour resulting from farm infrastructure. Due to location of the works within the Pembrokeshire Marine SAC and potential impacts on its features, specifically Large Shallow Inlets and Bays and Reef features, NRW A welcomed the Applicants commitments to regular monitoring however considered further detail was required surrounding potential trigger points at which intervention will be initiated. The applicant in *DEML2540 Further Information Request Response* dated 11 December 2025, confirmed its commitment to include the proposed Carn ar Wig and Porthlysgi sites within its annual monitoring programme and to work with NRW A to agree clear trigger points.

NRW MLT consider that there remains uncertainty surrounding potential impact of the works surrounding features of the Pembrokeshire Marine SAC, however that a programme of monitoring and regular reporting can be conditioned as part of the Marine Licence and action taken should potential impact be identified (see Annex 1 condition 3.23). NRW MLT has sought timing of reporting to coincide with reporting requirements of the applicants Marine Licence DEML2151 for the Câr-Y-Môr site. NRW MLT welcome the Applicants commitment to use drop-down video to support the micro-siting of anchors and chains avoiding sensitive habitats. NRW MLT consider that this should be incorporated into the Environment Management Plan (see Annex 1 Condition 3.22).

Invasive Non-Native Species

The Applicant submitted *INNS Biosecurity Risk Assessment* to demonstrate how potential risk of the introduction of marine invasive non-native species can be managed and minimised. NRW A welcome the assessment however noted that further consideration should be given to how genetic diversity of cultured seaweed will be maintained, and further information surrounding the sourcing of shellfish stock, namely native oyster and scallop, and any procedure to ensure that non-native species are not introduced. The applicant looked to address this through updating the *DEML2540 INNS Biosecurity RA and Management Plan REVISED NOV25*. NRW A confirmed that their concerns remains in relation to protocols around the sourcing of shellfish and consider the Risk Assessment should include information about sorting shellfish stock, particularly native oyster, imported from hatchery produced stock.

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NRW MLT consider it appropriate to secure adherence to a Biosecurity Risk Assessment and Management Plan within the Marine Licence (see Annex 1 condition 3.21). NRW MLT consider that further information should be providing surrounding any additional measure that may be in place if shellfish stock are required to be sourced from a hatchery not from the existing farm stock.

Marine Litter

NRW A in representation dated 3 October 2025 raised concern that in the event that infrastructure of the site is impacted during severe weather events, abandoned infrastructure could lead to a negative impact on features of the Pembrokeshire Marine SAC. The Applicant looked to address this through updating *DEML2540 Environmental Management Plan Revision Nov25* highlighting regular maintenance and detailing a protocol to be followed in the event of potential loss of infrastructure during a severe weather event. Within NRW A representation dated 22 January 2026 they confirmed that the revised plan had addressed their concerns.

NRW MLT consider it appropriate to include conditions to ensure adherence to *Environmental Management Plan Revision Nov25* (see Annex 1 condition 3.22).

Marine Mammals

A Public Representation was received raising concerns surrounding impact of the proposal on marine mammals as a result of entanglement.

The Applicant has submitted a *DEML2540 Marine Mammal Entanglement Protocol Revised Aug 25* which present measures to monitor and manage the potential risk of entanglement of marine mammals with site infrastructure. NRW A confirmed in representation dated 3 October 2025 they were satisfied with the Protocol presented.

NRW MLT consider it appropriate to include licence conditions ensuring adherence to *Marine Mammal Entanglement Protocol Revised Aug 25* (see Annex 1 condition 3.19).

Seascape and Landscape

The Applicant submitted a seascape, landscape and visual impact assessment (SLVIA) in support of their application *DEML2540 Car-y-Mor Farm site: Seascape, Landscape and Visual Impact Assessment (January 2025)*. The project is located within the immediate setting of the Pembrokeshire Coast National Park (PCNP) and the assessment considered effects of the proposal on seascape and landscape character, visual receptors and designated landscapes. The assessment concluded that proposed works would result in localised changes to the seascape, landscape and visual experience, but considered these effects to be minor or moderate and largely confined to the areas near the development and considered that the project was consistent with the existing maritime character.

Concerns were raised by National Trust, Pembrokeshire Coast National Park Authority and NRW A surrounding landscape, seascape and visual impacts. In addition a number of representations from the public raised concerns surrounding the matter.

NRW A raised a number of concerns surrounding the *DEML2540 Car-y-Mor Farm site: Seascape, Landscape and Visual Impact Assessment (January 2025)* submitted by the Applicant, this included;

- Concerns surrounding the methodology used and judgements reached within the SLVIA.
- Concerns surrounding viewpoint selection, including that no viewpoints had been selected from the section of the coast path parallel to the length of the Carn Ar Wig site.
- Visualisations (baseline photographs and photomontages) do not conform to best practice guidance (Visual Representation of Development Proposals, Technical Guidance Note 06/19

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(TGN 06/19)). NRW A consider that the visualisations provided cannot be relied upon, and due to the way they have been prepared and presented underestimate the scale and impact of the proposed development.

NRW A consider the Pen Dal-Aderyn headland where the works are located is one of the wildest and most dramatic parts of the Pembrokeshire coast, and is considered highly sensitive to aquaculture development, being highlighted as such within *The Pembrokeshire Seascape Sensitivity Assessment and Siting and Design Guidance for Aquaculture September 2025 (Final Draft) (Seascape Sensitivity Assessment)* which was prepared by LDA Design on behalf of The Crown Estate, NRW, and the Pembrokeshire Coast National Park Authority.

NRW A considered the proposed development would detract significantly from the character of the seascape at Pen Dal-Aderyn and harm its special qualities, including those of '*outstanding coastal scenery*', '*tranquillity, soundscapes and wildness*', '*Excellent opportunities to enjoy and experience the National Park*' in addition the experience of darkness would be disturbed by the flashing navigation lights.

NRW A considered that the scale of the proposed development are significantly greater than the existing trial sites and that individually and in-combination would not be sympathetic to the sensitivities of the receiving seascape and would dominate the existing character of the seascape.

NRW A consider that the seascape assessment submitted by the applicant has significantly underestimated the effect of the proposal on seascapes. NRW A consider that the impact on character and special qualities of the local seascape surrounding the headland would lead to a Major Adverse Effect. NRW A highlight that the proposal would not conserve nor enhance the beauty of the National Park but instead would detract from its natural beauty.

NRW A also disagree with the Applicants assessment on effect of the project on visual amenity of people. NRW A consider the project would impact upon viewpoints along the National Trail within the National Park. NRW A consider the view along the trail to be sensitive to change, and due to the location of the site along the coast path the aquaculture infrastructure would be obvious and intrusive and detract from the visual amenity. NRW A consider this would lead to a Moderate/Major adverse effect.

In addition, NRW A consider that the sites proposed at Carn ar Wig and Porthlysgi as well as the existing buoy at the Câr-Y-Môr site near St Justinian's would lead to cumulative impacts as people may walk past the sites in succession increasing the occurrence at which aquaculture development would be experienced along the coast. NRW A consider this would lead to a Major Adverse Cumulative Effect on the visual amenity of people walking along the coast path.

PCNPA also raised similar concerns surrounding the impact of the proposal due to impacts on seascape and visual impacts. Like NRW A, PCNPA raised concerns surrounding the assessment that was conducted within the *Car-y-Mor Farm site: Seascape, Landscape and Visual Impact Assessment (January 2025)* and disagreed with a number of its conclusions. PCNPA consider that the proposed activity would have an adverse effect on a number of the special qualities of the National Park. In addition they consider the project would lead to an adverse visual effect as the site would be apparent from elevated sections of the Pembrokeshire Coast Path National Trail. PCNPA noted that no nighttime assessment or cumulative impact assessment was submitted as part of the SLVLA.

National Trust (NT) provided representation dated 04 November 2025 confirming that they endorsed the concerns raised by PCNPA and that they did not support any further development of the Carn ar Wig and Porthlysgi sites. NT highlight that a number of the viewpoints lie on land owned and managed by the NT. NT consider that the proposed development would introduce features that would detract from the dramatic seascape, rugged coastline and expansive views. Like NRW A and PCNPA, NT consider that impact on seascapes and visual impact has been underestimated within the Applicants assessment.

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The Applicant looked to address concerns raised within further information submission, *DEML2540 Further Information Request Point by Point Response* dated 11 December 2025. Within which the Applicant proposed a number of changes to the project to reduce seascape and visual impacts, this included;

- Reducing the numbers of buoys (reduction to 32 buoys at Carn ar Wig and 84 buoys at Porthlysgi, down from the earlier submission of 150 and 450)
- A shift towards lighter-coloured grey buoys selected for their lower visual prominence at a maximum of 30cm above sea level.
- Refined lighting arrangement, namely 2 lit buoys rather than 8, and the change to a yellow flashing light rather than permanent white light.

Within representation dated 17 December 2025, NRW A confirmed that they did not consider that the proposed amendments had addressed the concerns previously raised. NRW A considered that due to the sensitivity of the location, the scale of the proposals, and the spread of development across two separate sites that their concerns remain. NRW A noted a number of flaws within the assessment submitted however noted that even if issues surrounding visualisations were addressed that this would not change NRW A view on the conclusion of the assessment.

Within PCNPA representation dated 20 January 2025 PCNPA confirmed that as availability of the final *Pembrokeshire Seascape Sensitivity Assessment and Siting and Design Guidance for Aquaculture* produced by Crown Estate was not available at the point of application, then it was reasonable that the impact is assessed within the context of existing guidance rather than the Crown Estate guidance which was unavailable.

PCNPA welcome modifications including the reduced buoy numbers, change in buoy colour, profile and spacing and reduced lighting. However despite this PCNPA concerns remain that any expansion of the existing trial site would result in an adverse effect on the National Park seascape, landscape and special qualities. In particular the site would be seen from a number of elevated sections of the coast path which were in close proximity to the works.

PCNPA also highlight the difference in the setting of proposed development to the existing 3ha farm at St Justinian's. Noting that although both are in the vicinity of the National Park the Carn ar Wig and Porthlysgi sites are located in unspoilt and undeveloped parts with open views of Ramsey Island.

NT welcome the reduced number of buoys and decreased navigational lighting. However NT remain concerned surrounding the likely adverse effect on the National Park seascape, landscape and special qualities resulting from the proposed development and as such do not support the development. NT consider the importance of the uncluttered nature of the seascape and water surface and consider this will be impacted by the development. NT continue to consider that the development would distract from the natural character of the area. NT consider their visitor attend the site due to its sense of tranquillity and lack of major infrastructure and unspoilt views.

NT also raised concerns that should the consent move forward, it may lead to further applications or expansion at a later date.

NRW MLT have considered the information submitted by the applicant alongside representation received in relation to seascape, landscape and visual impacts. NRW MLT recognise that concerns remain surrounding the seascape assessment carried out including the suitability of the visualisation photomontages provided. NRW MLT recognises there are flaws in the assessment which have been identified by NRW A and PCNPA, although note as detailed by NRW A that amendments to this would not result in changing the conclusion or concerns raised regarding the proposal.

NRW MLT welcome the reduction in number of buoys, change in colour of buoys, and reduced lighting proposed. However, NRW MLT agree with NRW A and PCNPA that despite these mitigations due to the sensitivity of the location, the proposed works would significantly adversely impact on the special qualities of the National Park including those of '*outstanding coastal scenery*', '*tranquillity*', '*soundscapes and wildness*'. In addition NRW MLT consider that the proposed development would

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have a significant visual impact at specific locations in close proximity to the project including from location of the coast path.

NRW MLT therefore consider in line with the Welsh National Marine Plan SOC_06 and SOC_07 that if significant adverse impacts cannot be avoided, minimised or mitigated proposal must present a clear and convincing case to proceed. Similarly in accordance with Policy 14 of the Local Development Plan the proposal should not be permitted if there is unacceptable adverse effects on the qualities and special landscape and seascape character of Pembrokeshire Coast National Park. Further consideration surrounding this is given in section 4.4. NRW MLT conclude as is detailed in section 4.4 that the benefits of the project provides a convincing case for proceeding in line with the WNMP.

Historic Environment

Royal Commission of Ancient and Historical Monuments of Wales (RCAHMW) confirmed that no impact on known archaeological sites were predicted as a result of the proposal. RCAHMW did however note that there remains a potential to encounter unknown archaeological material during the proposed activities and have provided advice surrounding reporting should any archaeological material be discovered during the course of their operations.

NRW MLT consider it appropriate to include licence conditions to ensure that if any artefact discovered during operations is appropriately reported (see Annex 1 condition 3.20).

Cadw confirmed that the proposed activities are located within the landscape of outstanding historic interest St Davids Peninsula and Ramsey Island. Cadw also confirmed that the proposed activity will not significantly affect the character of this register historic landscape.

Cadw confirmed that although the works may result in a very slight visual change in the view from the Castell Heinif scheduled monument, that this impact would not have any significant effect on the way that it is experienced, understood and appreciated.

4.1.9. Conclusion of our considerations under the need to protect the Environment

In summary, having considered the need to protect the environment, NRW MLT does not consider that any impacts of the Project on the environment (either alone or in combination with other plans or projects) are sufficient on their own to justify refusal of the Application provided that the Proposed Activities are implemented in accordance with the conditions set out in Annex 1.

4.2. The need to protect human health

Public Health Wales confirmed in representation dated 13 October 2025 that there are not likely to be any risk to public health from this development, including during the construction/deployment stage.

4.2.1. Conclusion of our considerations under the need to protect human health

In summary, having considered the need to protect human health, NRW MLT does not consider that any impacts of the Project (either alone or in combination with other plans or projects) are sufficient on their own to justify refusal of the Application provided that the Proposed Activities are implemented in accordance with the conditions set out in Annex 1

4.3. The need to prevent interference with legitimate uses of the sea

Legitimate uses of the sea include (but are not limited to): navigation (including taking any steps for the purpose of navigational safety); fishing; mineral extraction; and amenity use.

Public representation was received raising potential impact on recreational sea users.

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The Applicant carried out a Navigation Risk Assessment for each site to support their application, *DEML2540 Câr-Y-Môr Re-license - NRA MEAC Decom v1.5 - Carn Ar Wig* and *DEML2540 Câr-Y-Môr Re-license - NRA MEAC Decom v1.5 – Porthlysgi*.

The MCA, within representation dated 30 October 2025, confirmed they were content with the Navigation Risk Assessment carried out. The MCA detailed that the location of the proposed activity is away from main navigable routes and areas of the bay where the majority of recreational activities take place. The MCA note there appears to be sufficient sea room around the site for other marine users to safely manoeuvre and the site does not impede access to harbours, marinas or slipways.

Following consideration of the application documents and consultation responses received, NRW MLT consider that a number of conditions will be required in order to ensure navigational safety this includes;

A requirement to notify relevant organisations and marine users prior to commencement of any phase of licensed activities and upon completion (see Annex 1 condition 3.1, 3.4 and 3.6).

- Marine Emergency Action Card is agreed with the HM Coastguard and kept up to date to ensure should search and rescue operations be carried out in or near the site, HM Coastguard are able to receive further details about the deployment to facilitate safe and effective incident coordination (see Annex 1 condition 3.18.4).
- Requirement that the devices are regularly inspected and maintained, with the requirement for the Marine Licence Holder to inform the relevant authorities including the MCA and TH in case of damage to any infrastructure. Third Party Verification of the mooring arrangements should take place (see Annex 1 condition 3.18.5 and 3.18.6).
- Requirements to adhere to action presented within the Navigation Risk Assessment, including surrounding site monitoring and ensuring suitable escape lanes are incorporated into the site design to allow vessels to enter and exit the site, and for emergency service access (see Annex 1 condition 3.18.1).
- Requirement that site is lit and marked as directed by TH (see Annex 1 condition 3.18.2).

Public representations were received raising concern surrounding loss of fishing area and suggesting other areas for the activity. As detailed within the *DEML2540 updated Welsh National Marine Plan Signposting Document* dated 5 March 2026 the Applicant considers that the farm would not displace any recognised fishing grounds and that the seaweed farm would contribute to habitat complexity likely supporting fish. NRW MLT consulted with the Welsh Fisherman's Association and the National Federation of Fishermen's Organisations, no representation were made by these organisations therefore it is assumed they had no comment to make. In addition, as detailed in *DEML2540 Further Information Request Response*, the operator considers that location of the works in this locality is the only feasible option considering the location of existing infrastructure and operation at St Davids. NRW MLT are satisfied that the works will not significantly impact on commercial fishing activities.

4.3.1. Conclusion of our considerations regarding the need to prevent interference with legitimate uses of the sea

In summary, having considered the need to protect interference with legitimate uses of the sea, NRW MLT does not consider that any impacts of the Project (either alone or in combination with other plans or projects) are sufficient on their own to justify refusal of the Application provided that the Proposed Activities are implemented in accordance with the conditions set out in Annex 1.

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4.4. Marine Policy Documents

a) The Legal framework

NRW is required to take its decision in accordance with the appropriate marine policy documents unless relevant considerations indicate otherwise.

UK Marine Policy Statement 2011 (MPS)

The MPS is the framework for preparing Marine Plans and taking decisions affecting the marine environment.

Welsh National Marine Plan (WNMP)

The WMNP is the Marine Plan for the Welsh inshore region and the Welsh offshore region and sets out the Welsh Government's policies for and in connection with the sustainable development of this area.

b) Our determination

UK Marine Policy Statement 2011

This decision has been taken in accordance with marine policy as set out in the UK Marine Policy Statement 2011.

Welsh National Marine Plan (WNMP)

The proposal is considered to comply with the relevant cross cutting general policies and has appropriately considered impact of the works including on marine ecosystems (Policy ENV_01), water quality (Policy ENV_06), underwater noise (ENV_05) and Invasive non-native species (ENV_03). These topics are discussed above in section 4.1.8.

A HRA was carried out and concluded that adverse effect on Marine Protected Sites could be ruled out. NRW MLT consider that the proposal is in line with Policy ENV_02.

SOC_06 and SOC_07 requires that proposal should demonstrate how potential impacts on seascapes and designated landscapes have been taken into consideration, and should look to avoid adverse impacts, minimise impacts that cannot be avoided, mitigate impacts that cannot be minimised and if adverse impacts are still present then must provide a convincing case for proceeding.

As detailed in section 4.1.8 NRW MLT have considered the information submitted by the Applicant alongside representation received in relation to seascape, landscape and visual impacts. NRW MLT recognise that concerns remain surrounding the seascape assessment carried out including the suitability of the visualisation photomontages provided. However as noted by NRW A that although there are flaws in the assessment amendments this would not result in changing the conclusion or concerns raised regarding the proposal. Therefore NRW MLT are satisfied that seascape and landscapes have been appropriately considered.

The Applicant currently operates trial sites at Carn ar Wig and Porthlysgi in the Ramsey Sound, Pembrokeshire under Marine Licence DEML2013, it is these sites this application is seeking to expand. In addition the Applicant operates a Integrated Multi-Trophic Aquaculture (IMTA) Seaweed and Shellfish sites at in the vicinity to the proposed sites at St Justinians under Marine Licence DEML2151 with authorises the activity until 22 March 2042. As detailed within *DEML2540 Further Information Request Response*, the operator considers the proposed location of the works is the only feasible option considering the location of existing infrastructure and operation at St Davids which

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includes a DEFRA funded facility within 3 miles of the site. NRW MLT acknowledge the need for locating the sites near existing infrastructure in order to make it both practical and commercially feasible.

As detailed in section 4.18 NRW MLT consider due to the location of the project it would significantly adversely impact on the special qualities of the National Park including those of '*outstanding coastal scenery*', '*tranquillity*', '*soundscapes and wildness*'. In addition NRW MLT consider that the proposed development would have a significant visual impact at specific locations in close proximity to the project including from location of the coast path.

NRW MLT consider that the Applicant has sought to minimise and mitigate impact where possible and welcome the reduction in number of buoys, change in colour of buoys, and reduced lighting proposed. However NRW MLT agree with NRW A and PCNPA that despite these mitigations due to the sensitivity of the location, significantly adversely impact on the special qualities of the National Park remain including on '*outstanding coastal scenery*', '*tranquillity*', '*soundscapes and wildness*'.

NRW MLT therefore consider in line with the WNMP SOC_06 and SOC_07 that as significant adverse impacts cannot be avoided, minimised or mitigated the proposal must present a clear and convincing case to proceed. Similarly in accordance with Policy 14 of the Local Development Plan the proposal should not be permitted if there is unacceptable adverse effects on the qualities and special landscape and seascape character of Pembrokeshire Coast National Park.

The WNMP recognises that development in the inshore marine region may change the character around the Welsh coastline, and that there is likely to be ongoing changes to the seascape character of Wales resulting from development which is a result of Wales' aspiration to derive greater benefits from our seas for current and future generations.

The Applicant submitted *DEML2540 closing statement* and an *DEML2540 updated Welsh National Marine Plan Signposting Document* on the 05 March 2026. As presented within these documents it is recognised that the proposal would safeguard existing jobs, providing potential for additional jobs, as well as supporting the local economy along the supply chain. This is in line with policy ECON_01. In addition significant investment has already been made in infrastructure in St Davids with additional investment expected based on the proposed development. Within the Closing Statement the Applicant has detailed that without the proposed expansion that the organisation would be at significant risk, likely leading to a loss of local jobs as well as making the funded facilities redundant.

The company has sought to provide a number of community benefits during its operation to date, including into education. We consider this wider work by the organisation is in line with SOC_02 proposals that contribute and support well-being of coastal communities are encouraged. A number of public representations were raised in support of the application including highlighting the work of the organisation with education. NRW MLT acknowledged that this is not specific to the proposal but rather the company as a whole but note as presented by the Applicant that without the proposed development the company would be at risk.

NRW MLT consider that the proposal will lead to an adverse effect on seascapes and designated landscapes. NRW MLT consider that the largest impacts would be in localised area in close proximity to the site where the farm infrastructure (buoys) would be visible. NRW MLT consider as detailed above that the proposal contributes to the local economy including through job creation. NRW MLT consider that the proposal is supported by WNMP policy AQU_01 which details that new proposals for aquaculture should be supported where they contribute to the objectives of the Plan, the objective of the plan includes blue growth and job creation in coastal communities. NRW MLT also recognise that the infrastructure which consists of buoys and chains can be removed in their entirety at the end of the licence, or operations making any impact reversible and temporary. NRW MLT consider that the benefits of the project that are detailed above provides a convincing case for proceeding in line with the WNMP. NRW MLT consider for the same reasons the activity does not pose an unacceptable adverse effect on the qualities and special landscape and seascape character of Pembrokeshire Coast National Park.

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The works are not located within a Tidal Stream Energy Area and due to the location and scale of the works the proposal is not considered to have an adverse impact on any Tidal Stream Energy Strategic Resource Area (Policy SAF_02).

4.5. Other matters NRW thinks relevant**4.5.1. Well-being of Future Generations (Wales) Act 2015****a) The legal framework**

In making its decision, NRW is required to take all reasonable steps to meet its published well-being objectives, which are designed to maximise NRW's contribution to achieving each of the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015. NRW must also act in accordance with the principles of sustainable development.

b) Our determination

NRW MLT has taken into account its well-being objectives and is satisfied that its decision is consistent with meeting those objectives.

NRW MLT is also satisfied that its decision is consistent with the sustainable development principle i.e. seeking to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

4.5.2. Sustainable management of natural resources**a) The legal framework**

NRW's general purpose is to pursue the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources as set out in section 4 of the Environment (Wales) Act 2016 so far as consistent with the proper exercise of its functions.

b) Our determination

NRW MLT is satisfied that this decision, when implemented in accordance with the attached conditions, is consistent with its general purpose of pursuing the sustainable management of natural resources in relation to Wales, and applying the principles of sustainable management of natural resources.

5. Conclusions and Recommendations

Based on all the information available, and having regard to all relevant considerations including the consultation responses, NRW MLT's decision is to grant the Marine Licence sought by the Application. We have reached this decision having had regard to the relevant legal framework outlined in section 4 and have also explained in section 4 how each of the legal requirements have been considered. NRW MLT has determined that a Marine Licence for the Proposed Activities should be granted.

Conditions have been attached to the Marine Licence as set out in Annex 1. The reason for the inclusion of each condition is set out with the conditions.

6. AUTHORISATION

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Report by: Peter Morrison	Date: 9 April 2026	Signed: <i>Peter Morrison</i>
Position: Lead Specialist Officer		
Authorised by: Emmer Litt	Date: 10 April 2026	Signed: 
Position: Marine Licensing Team Leader		

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ANNEX 1

Conditions imposed and reasons for those conditions.

Note: Condition numbers used below reflect the condition numbers used in the licence.

CONDITIONS

Notification and Inspection

3.1 Notification of Commencement

- 3.1.2** The Licence Holder must notify the Licensing Authority no less than **10 days** before the commencement of the Licensed Activities, or an individual phase of the Licensed Activities, is expected to commence.

Reason: To ensure the Licensing Authority are aware of the commencement of Licensed Activities.

- 3.1.2** The Licence Holder must notify Welsh Government Fisheries Division (Control & Enforcement) no less than **10 days** before the commencement of the Licensed Activities, or an individual phase of the Licensed Activities, is expected to commence.

Reason: To ensure the Marine Enforcement Officers are aware of the commencement of Licensed Activities.

- 3.1.3** The Licence Holder must ensure that local mariners and fishermen's organisations are made fully aware of the Licensed Activities through local notices to mariners **10 days** prior to the commencement of the Licensed Activities.

Reason: To minimise interference with other sea users and ensure other vessels in the vicinity can safely plan and conduct their passage.

- 3.1.4** The Licence Holder must ensure that notification is sent to The Source Data Receipt team, UK Hydrographic Office (email: sdr@ukho.gov.uk) at least **10 days** prior to 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.

Reason: To minimise interference with other sea users and ensure other vessels in the vicinity can safely plan and conduct their passage.

3.2 Notification of Vessels and/or Vehicles

The Licence Holder must ensure that the details of the vessels and/or vehicles utilised to undertake the Licensed Activities are submitted to the Licensing Authority and Welsh Government Fisheries Division (Control & Enforcement) at least **24 hours** prior to the commencement of the Licensed Activities.

Reason: To ensure that the Licensing Authority are made aware, in a timely manner, of the vessels and/or vehicles operating under this licence to enable the Licensing Authority to comply with the

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reporting obligations in the Marine Licensing (Register of Licensing Information (Wales) Regulations 2011 as amended.

3.3 Notification of Agents/Contractors/Sub-contractors

The Licence Holder must ensure that details of any agent(s), contractor(s) or sub-contractor(s) utilised to undertake the Licensed Activities are submitted to the Licensing Authority at least **24 hours** prior to the commencement of Licensed Activities.

Reason: To ensure that the Licensing Authority are made aware, in a timely manner, of the agent(s), contractor(s) or sub-contractor(s) operating under this licence and in order to enable the Licensing Authority to comply with the reporting obligations in the Marine Licensing (Register of Licensing Information (Wales) Regulations 2011 as amended.

3.4 Notification of HM Coastguard

The Licence Holder must ensure that HM Coastguard is made aware of the Licensed Activities at least **24 hours** prior to commencement by contacting The National Maritime Operations Centre at **zone36@hmcg.gov.uk**.

Reason: To ensure the safety of navigation.

3.5 Inspection of Licensed Activities

The Licence Holder must allow Marine Enforcement Officers or any other person authorised by the Licensing Authority to inspect the Works at any reasonable time.

Reason: To allow for inspection of the Licensed Activities to check compliance with the Licence.

3.6 Notification of Completion

- 3.6.1** The Licence Holder must notify the Licensing Authority within **10 days** of completion of the Licensed Activities.

Reason: To ensure the Licensing Authority are aware of the completion of Licensed Activities.

- 3.6.2** The Licence Holder must notify Welsh Government Fisheries Division (Control & Enforcement) within **10 days** of completion of the Licensed Activities.

Reason: To ensure the Marine Enforcement Officers are aware of the completion of Licensed Activities.

3.7 Accident or Emergency

- 3.7.1** If, by reason of force majeure any substances or articles are deposited otherwise than as permitted as part of the Licensed Activities or in the Licensed Area full details of the circumstances shall be notified to the Licensing Authority within **48 hours** of the incident occurring.

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Reason: To allow the Licensing Authority to take appropriate action to ensure the appropriate removal of the unlicensed deposit.

- 3.7.2** If it is necessary for the Licence Holder to recover or remove any equipment, plant or machinery used to undertake the Licensed Activities that have been dropped as a result of an accident or emergency, the Licence Holder is permitted to do so provided that the methodology for such recovery or removal has been approved by the Licensing Authority.

Reason: To allow for the recovery of objects that have been accidentally dropped when carrying out the Licensed Activities.

3.8 Distribution of Copies of this Licence

The Licence Holder is required to ensure that a copy of this Licence is given to:

- All agents, contractors and subcontractors whose names have been provided to the Licensing Authority under condition 3.3 and
- The Masters of any vessels and transport managers responsible for the vehicles employed in accordance with this Licence whose details have been submitted to the Licensing Authority under condition 3.2.

Reason: To ensure that all agent(s), contractor(s), sub-contractor(s) and vessel Masters are aware of their obligations under the conditions established within this Licence to ensure compliance with the conditions.

3.9 Inspection of Documents

Copies of this Licence shall be made available at the following locations:

- at the address of the Licence Holder specified in section 1.2;
- at any site office, located at or adjacent to the Licensed Area, used by the Licence Holder or its agent(s), contractor(s) or sub-contractor(s) responsible for the loading transportation or deposit of any substances or articles permitted as part of the Licensed Activities;
- on board each vessel or vehicle carrying out Licensed Activities.

The documents referred to in this Condition shall be available at all reasonable times for inspection by officers appropriately authorised by the Licensing Authority and authorised Marine Enforcement Officers at the locations stated in that paragraph.

Reason: To ensure that all agent(s), contractor(s), sub-contractor(s) and vessel Masters may access the details of this Licence at all times and to ensure that the details of this Licence are available for inspection when required.

Vessels, Plant and Equipment

3.10 Notified Contractors, Vessels and/or Vehicles only to Carry out Licensed Activities

Only those agent(s), contractor(s), sub-contractor(s), vessels and/or vehicles whose details have been notified to the Licensing Authority may operate under the terms of this Licence. Any changes must be notified to and be approved by the Licensing Authority in writing prior to any such agent, contractor, subcontractors or vehicles carrying out any Licensed Activities pursuant to or otherwise operating under this Licence.

Reason: To ensure that the Licensing Authority are made aware, in a timely manner, of the agent(s), contractor(s), sub-contractor(s) operating under this Licence to enable the Licensing Authority to comply with the reporting obligations in the Marine Licensing (Register of Licensing Information (Wales) Regulations 2011 as amended.

3.11 Refuelling of Plant and Equipment

The Licence Holder must ensure that plant, vehicles and machinery are not refuelled on the foreshore or in the sea.

Reason: To minimise the risk of fuels/other contaminants entering the marine environment.

3.12 Equipment, Structures and Access

The Licence Holder must ensure that all equipment, temporary structures, access tracks, waste and/or debris associated with the Licensed Activities are removed on completion of the Licensed activities.

Reason: To minimise impacts on the marine environment and other users of the sea/seabed.

Safety

3.13 Removal of Deposited Material

If the Licensing Authority considers it necessary or advisable for the safety of navigation, the Licence Holder must remove any deposit specified by the Licensing Authority or Marine Enforcement Officers within one month of notice being given by the Licensing Authority, and shall not replace such material until the Licensing Authority has given its written approval.

Reason: To ensure that any material which may pose a hazard to safe navigation has been removed.

Pollution control

3.14 Pollution Prevention

The Licence Holder must ensure that pollution prevention best practice is adhered to at all times. Any incidents must be reported to the Licensing Authority as soon as possible using the hotline number **0300 065 3000**.

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Reason: To minimise the risk of pollution incidents and to ensure the timely report of such incidents to enable the Licensing Authority to take action as appropriate.

3.15 Spillage of Pollutants

The Licence Holder must employ bunding, storage facilities and spill kits to contain and prevent the release of fuel, oils and chemicals associated with the plant, refuelling and construction equipment into the marine environment. Secondary containment must be used with a capacity of **no less than 110%** of the container's storage capacity

Reason: To minimise the risk of fuels/other contaminants entering the marine environment.

3.16 Prevention of Disposal of Man-made Debris

The Licence Holder must ensure that all reasonable precautions are taken to prevent the disposal of man-made debris to the marine environment. Such material must be removed immediately and be disposed of appropriately. If it is not possible to prevent manmade debris from entering the marine environment during the Licensed Activities, the Licensed Activities must cease immediately.

Reason: To minimise the amount of man-made materials disposed of at sea.

3.17 Cleanliness of Equipment

The Licence Holder must ensure that equipment, machinery and PPE are washed with freshwater and/or thoroughly airdried before deployment and before moving between locations.

Reason: To minimise the risk of spread of invasive non-native species.

Activity-specific Conditions

3.18 Navigation

3.18.1 The Licence Holder must ensure any actions outlined in "DEML2540 Câr-Y-Môr Re-license - NRA MEAC Decom v1.5 - Carn Ar Wig" are implemented. Any proposed changes to the actions outlined in the document must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

3.18.2 The Licence Holder must ensure any actions outlined in "DEML2540 Câr-Y-Môr Re-license - NRA MEAC Decom v1.5 – Porthlysgi" are implemented. Any proposed

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changes to the actions outlined in the document must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

- 3.18.3** The Licence Holder must ensure that the Licensed Activities exhibit such lights, marks, sounds, signals and other aids to navigation and to take such steps for the prevention of danger to navigation as directed by Trinity House.
- 3.18.4** The Licence Holder must provide notification to Trinity House detailing the availability of aids to navigation using the reporting system provided by Trinity House.
- 3.18.5** The Licence Holder must ensure that the Marine Emergency Action Card (MEAC) is maintained. Any updated document must be submitted to the HM Coastguard at **oelo@mcga.gov.uk**.
- 3.18.6** The Licence Holder must at all times ensure that the Licensed Activities are maintained in a safe condition that does not present a danger to the environment, or other marine users. Third-Party verification of the mooring arrangements deposit must take place.
- 3.18.7** The Licence Holder must ensure a regular programme of monitoring of structure condition. In the event of damage, destruction or decay of the authorised project, the Licence Holder must as soon as possible and no later than **24 hours** after becoming aware of such damage, destruction or decay notify the Licensing Authority, Marine and Coastguard Agency, Trinity House, Marine Enforcement Officers, Kingfisher Information Service or Seafish and the UKHO.

Reason: To ensure the safety of navigation

3.19 Marine Mammal Entanglement Protocol

- 3.19.1** The Licence Holder must ensure any actions outlined in “DEML2540 Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25” are implemented. Any proposed changes to the actions outlined in the document must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

Reason: To mitigate entanglement risk to marine mammals

3.20 Archaeology

- 3.20.1** The Licence Holder must ensure that any evidence of artefacts discovered within the site are reported through the Marine Portable Antiquities Scheme and to the Royal Commission on the Historical Monuments of Wales.

Reason: To ensure that any archaeological material discovered during the course of their operations is appropriately recorded.

3.21 Biosecurity Plan

- 3.21.1** 3.21.1 The Licence Holder must submit a Biosecurity Plan which accords with the “DEML2540 Car-Y-Mor license - INNS Biosecurity RA and Management Plan REVISED NOV25” to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.
- 3.21.2** The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.21.1 are implemented as approved in writing by the Licensing Authority.

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Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

Reason: To minimise the risk of spread of invasive non-native species.

3.22 Environmental Management Plan

3.22.1 The Licence Holder must submit a Environment Management Plan which accords with the “DEML2540 Environmental Management Plan Revision Nov25” to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.

3.22.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.22.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

Reason: To minimise the risk of pollution incidents occurring by adopting best practice techniques. To ensure appropriate environmental mitigation are adhered too and to ensure that appropriate measures are put in place.

3.23 Monitoring

3.23.1 The Licence Holder must submit a Monitoring Plan to the Licensing Authority for written approval at least **6 weeks** prior to commencement of the Licensed Activities. Licensed Activities may not be undertaken prior to written approval from the licensing Authority.

3.23.2 The Licence Holder must ensure that any actions outlined in the Monitoring Plan detailed in Condition 3.23.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the Monitoring Programme must be submitted to, and agreed in writing by NRW acting on behalf of the Licensing Authority, prior to any changes being enacted.

3.23.3 The Licence Holder must submit its first report to the Licensing Authority before the **31 March 2027**. Thereafter subsequent reports shall be submitted to the Licensing Authority **every year** unless otherwise approved by the Licensing Authority.

Reason: To ensure potential impacts on benthic habitats are monitored and reported allowing appropriate action to be taken if adverse impacts are identified.

3.24 Decommissioning

3.24.1 The Licence Holder must ensure that all infrastructure and associated equipment are decommissioned prior to **10 April 2046**, or **within 2 months** from the cessation of operations, whichever is the sooner.

Reason: To ensure that all infrastructure is removed from the marine environmental at the end of operations.