

WNMP Policy No.	WNMP Policy		Does the project have the potential to impact the Policy?	How Does the Proposed Project Comply with the Policy?
GEN_01	Planning policy	There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales' well-being goals.	Yes	Advances WNMP Vision of clean, healthy, productive and biologically diverse seas by supporting a sustainable and thriving economy through regenerative aquaculture, 19 year-round jobs on St Davids peninsula, £560k annual turnover, £3.1m secured investment including key infrastructure within 3 miles, multi-million pound investment pipeline (XXXXX); sea/soil education programme for over 4,000 children; oyster restoration programme to support river restoration projects, and 20–30% fertiliser reduction via seaweed biostimulants used in terrestrial farming, consistent with SMNR and WFGA well-being goals.
GEN_02	Planning policy	Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making.	Yes	Submitted significant redesign of proposal in direct response to consultees, including 80% buoy reduction and lighting reduction (see Further Information Response sections 1.1, 2.8). Five years of monitored operations show no adverse ecological impact, with adaptive management secured through annual benthic surveys and licence enforcement provisions. The Seascape Sensitivity Assessment relied upon by PCNPA and NRW Advisory was adopted by PCNPA days before the consultation period on this application was intended to close, was not part of the methodology agreed with PCNPA, and was not consulted upon with the aquaculture sector. Implementation Guidance paragraph 57 identifies the need for RPAs to apply policies in a fair, equitable and consistent manner and to avoid introducing unnecessary or inappropriate burdens of proof. Comparable nearshore shellfish cultivation infrastructure may operate under statutory shellfish exemptions without requiring a marine licence; the configuration and navigational marking requirements for such installations are similar to those proposed here.
ECON_01	Sustainable economic growth	Proposals for economically sustainable activities are encouraged, particularly where they contribute to: • the sustainable management of natural resources thereby supporting ecosystem resilience; • a more resilient economy; • employment opportunities particularly for coastal communities; • protecting and creating employment at all skill levels; • maintaining communities with a high-density of Welsh speakers; and/or • tackling poverty by supporting deprived coastal communities.	Yes	Safeguards 19 year-round jobs in a seasonal coastal economy with potential for 8 additional jobs over 3 years, planned aquaculture courses and apprenticeships with Pembrokeshire College supporting development of marine-related skills at all levels, supports 20+ local fishermen and gatherer supply chains by supplying Welsh seafood to 90+ restaurants (supported by commercial processing infrastructure outside of St Davids), retains year-round value locally in a highly seasonable area; and enables sustainable Welsh aquaculture sector growth consistent with WNMP Objective 2 and resilient coastal communities. Investment pipeline for business expansion. Business model reinvests profits in community projects (Community Benefit Society).
ECON_02	Coexistence	Proposals should demonstrate how they have considered opportunities for coexistence with other compatible sectors in order to optimise the value and use of the marine area and marine natural resources.	Yes	3 farms (including one of the same size as the proposed) already co-exist within established working seascapes alongside RNL, fishing and tourism vessels; partnerships with over 20 local fishermen and gatherers to buy and sell catch to 90+ restaurants within the UK; 20 letters of support versus 7 objections confirm effective coexistence with local businesses and residents. Conducting multi-year seaweed biostimulant trials with over 30 Pembrokeshire farmers (agri-aquaculture links) to reduce fertiliser usage and associated nutrient runoff into local waterways.
SOC_01	Access to the marine environment	Proposals that maintain or enhance access to the marine environment are encouraged.	Yes	Harbour and slipway fees around St Justinian's and Solva contribute to upkeep and maintenance, helping support local fishermen as well as ecotourism operators. Projects such as Marine Conservation Society share the sea farm infrastructure in the Grade A waters to nurture oysters before their deployment in the River Cleddau.
SOC_02	Well-being of coastal communities	Proposals that contribute to the well-being of coastal communities are encouraged.	Yes	Contributes to coastal well-being through 19 year-round jobs in a largely seasonal area, partnerships with 20+ fishermen and gatherers and 30 local farmers, supported by over 700+ community members, providing education for 4,000+ children as well as the development of aquaculture course and apprenticeship scheme at Pembrokeshire College. The business model (Community Benefit Society) is owned by the coastal community and profits must be returned into coastal community projects. Refusal would lead to job losses and economic loss for community.
SOC_03	Marine pollution incidents	Proposals should demonstrate how they minimise their risk of causing or contributing to marine pollution incidents.	Yes	Strengthened Biosecurity and Aquaculture Environmental Management Plan in place; six-monthly diver inspections undertaken; lost-gear protocols; no pollution incidents recorded during five years of operation.
SOC_04	Welsh language and culture	Proposals that contribute to the promotion and facilitation of the use of the Welsh language and culture are encouraged.	Yes	Supports Welsh cultural heritage through revival of traditional seaweed and shellfish production and community engagement rooted in the St Davids Peninsula. 700 community members include local, national and international participants experiencing culture and produce from Pembrokeshire Peninsula.
SOC_05	Historic assets	Proposals should demonstrate how potential impacts on historic assets and their settings have been taken into consideration and should, in order of preference: a) avoid adverse impacts on historic assets and their settings; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance historic assets are encouraged.	No	No interaction with historic assets; installation limited to low-profile, reversible maritime markers. Cadw and RCAHWW responded to consultation with no concerns relating to the project.

SOC_06	Designated landscapes	Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference: a) avoid adverse impacts on designated landscapes; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance designated landscapes are encouraged.	Yes	SLVIA updated; 80% reduction in surface buoys (150>32; 450>84); spacing increased from 7m to 25m between buoys; 30cm low-profile light-grey markers to blend into water colouring; four low-intensity lanterns per site; footprint 10ha within 138,000ha SAC (0.007%); visible from approx. 0.5% of Coast Path in favourable conditions only. Detailed information can be found in the document submitted on 11/12/2025 (FINAL DEML2540 Further Information Request Point by Point Response as 11122025.pdf). In an independent appeal decision, the PEAD Inspector scrutinised Câr-y-Môr's existing licensed operations following a site visit within the National Park and found them to be visually acceptable and consistent with the Well-being of Future Generations Act. Where residual visual impact remains after avoidance, minimisation and mitigation, Câr-y-Môr presents a clear and convincing case for proceeding as required by SOC_06 and Implementation Guidance paragraphs 31–35, set out in the accompanying Closing Statement and prior submissions, demonstrating overriding economic, social and environmental benefits including 19 existing jobs, £3.1m secured investment, an investment pipeline, and Wales's only operational regenerative sea farm.
SOC_07	Seascapes	Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference: a) avoid adverse impacts on seascapes; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance seascapes are encouraged.	Yes	Avoid–minimise–mitigate hierarchy applied through substantial redesign in response to consultation; installation is reversible; previous licensed operations (including identical 3ha farm) independently reviewed by PEAD Inspector and found visually acceptable. The receiving seascape is an active working seascape including RNLI operations, commercial tour boats, fishing activity and up to six fully illuminated tankers anchored in St Brides Bay at any time, demonstrating existing character and capacity to accommodate change (IG para 115). In NRW's public consultation on the revised design, 20 representations supported the application against only 7 objections, demonstrating stakeholder engagement and community views as required by IG para 116. No marine licence has ever been refused in Wales on seascape grounds alone. Where residual visual impact remains, Câr-y-Môr presents a clear and convincing case for proceeding as required by SOC_07 and Implementation Guidance paragraphs 31–35, set out in the accompanying Closing Statement and prior submissions, demonstrating that the overriding benefits of proceeding — including safeguarding 19 jobs, £3.1m investment, an investment pipeline and Wales's only regenerative sea farming operation.
SOC_08	Resilience to coastal change and flooding	Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.	No	Floating infrastructure; no shoreline modification or increased flood risk.
SOC_09	Effects on coastal change and flooding	Proposals should demonstrate how they: avoid significant adverse impacts upon coastal processes; and minimise the risk of coastal change and flooding; Proposals that align with the relevant Shoreline Management Plan(s) and its policies are encouraged.	No	No interference with coastal processes; minimal seabed interaction limited to moorings.
SOC_10	Minimising climate change	Proposals should demonstrate how they, in order of preference: a) avoid the emission of greenhouse gases; and/or b) minimise them where they cannot be avoided; and/or c) mitigate them where they cannot be minimised. Where significant emission of greenhouse gases cannot be avoided, minimised or mitigated, proposals for regulated activities must present a clear and convincing case for proceeding.	Yes	a) Avoid: Seaweed and shellfish cultivation require no feed, fertiliser or freshwater inputs. b) Minimise: Operational emissions are reduced through proximity of farms to the Sied-y-Môr processing facility (approx. 3 miles), use of existing vessels and infrastructure, consolidation of operational trips, and integration with locally based staff and assets. Local processing and sales through Câr-y-Môr's supply chain also reduce transport distances compared with export-based seafood distribution. c) Mitigate: Early trials of seaweed biostimulants indicate up to 20–30% reductions in synthetic fertiliser use in agriculture, contributing to lower agricultural emissions. Câr-y-Môr is also participating in a UKRI-funded project exploring electrification options for small workboats.
SOC_11	Resilience to climate change	Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaptation measures, taking into account Climate Change Risk Assessments for Wales. Proposals that contribute to climate change adaptation and/or mitigation are encouraged.	Yes	Site selected for high-flow resilience; infrastructure designed for storm tolerance; biosecurity plan addresses invasive species. Both the sites selected and the wider scope of the operation contributes to climate adaptation (nutrient mitigation; soil health) and food security objectives.
ENV_01	Resilient marine ecosystems	Proposals should demonstrate how potential impacts on marine ecosystems have been taken into consideration and should, in order of preference: a) avoid adverse impacts; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to the protection, restoration and/or enhancement of marine ecosystems are encouraged.	Yes	61-page Baseline Benthic Survey submitted; five years monitoring show no adverse ecological effect; 21 fish species recorded on underwater farms using BRUV; contributes to habitat complexity and ecosystem resilience. Annual monitoring and trigger points agreed, and adaptive mitigation embedded. On-growing of Native Oyster stock for river restoration projects.
ENV_02	Marine Protected Areas	Proposals should demonstrate how they: avoid adverse impacts on individual Marine Protected Areas (MPAs) and the coherence of the network as a whole; have regard to the measures to manage MPAs; and avoid adverse impacts on designated sites that are not part of the MPA network.	Yes	HRA informed by baseline surveys; footprint minimal (0.007% of SAC); no adverse effect on site integrity identified to date. Five years of monitored operation within the SAC have recorded no adverse effect on designated features. Proposal includes annual benthic monitoring with trigger points and adaptive mitigation measures embedded in the Aquaculture Environmental Management Plan.
ENV_03	Invasive non-native species	Proposals should demonstrate how they avoid or minimise the risk of introducing and spreading invasive non-native species. Where appropriate, proposals should include biosecurity measures to reduce the risk of introducing and spreading of invasive non-native species.	Yes	Biosecurity Risk Assessment and Management Plan submitted to minimise risk of introducing or spreading invasive species.
ENV_04	Marine litter	Proposals should demonstrate how they: avoid the deliberate introduction of litter into the marine plan area; and minimise the risk of accidental release of litter.	Yes	Regular inspection and maintenance regime including six-monthly diver checks; secured infrastructure reduces risk of marine litter.

ENV_05	Underwater noise	Proposals should demonstrate that they have considered man-made noise impacts on the marine environment and, in order of preference: a) avoid adverse impacts; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	No	No piling or high-noise construction; limited low-speed vessel operations only.
ENV_06	Air and water quality	Proposals should demonstrate that they have considered their potential air and water quality impacts and should, in order of preference: a) avoid adverse impacts; and/or b) minimise adverse impacts where they cannot be avoided; and/or c) mitigate adverse impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	No	No discharge, feed or chemical inputs; maintains existing Class A water quality status.
ENV_07	Fish species and habitats	Proposals potentially affecting important feeding, breeding (including spawning & nursery) and migration areas or habitats for key fish and shellfish species of commercial or ecological importance should demonstrate how they, in order of preference: a) avoid adverse impacts on those areas; and/or b) minimise adverse impacts where they cannot be avoided; and/or c) mitigate adverse impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to positive cumulative effects are encouraged.	Yes	Evidence indicates shellfish and seaweed structures enhance local biodiversity and provide nursery areas for fish; 21 species recorded; no obstruction of migration routes; minimal seabed footprint.
GOV_01	Cumulative effects	Proposals should demonstrate that they have assessed potential cumulative effects and should, in order of preference: a) avoid adverse effects; and/or b) minimise effects where they cannot be avoided; and/or c) mitigate effects where they cannot be minimised. If significant adverse effects cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to positive cumulative effects are encouraged.	Yes	a) Avoid: Site selection and farm design minimise interaction with other marine activities and sensitive habitats; monitoring of existing licensed sites has recorded no adverse ecological effects. b) Minimise: Design amendments described in the Further Information Response (December 2025) substantially reduced surface infrastructure (approx. 80% buoy reduction), increased spacing between lines and reduced lighting to minimise visual and spatial interaction with other uses. c) Mitigate: Ongoing environmental monitoring, including annual benthic surveys and adaptive management measures secured through licence conditions, provides mechanisms to address any potential effects. The proposal also contributes positive cumulative socio-economic effects through 19 year-round jobs, local supply chains and £3.1m secured investment in the coastal economy, plus investment pipeline.
GOV_02	Cross-border and plan compatibility	Relevant public authorities, in making their decisions, should have regard to: any applicable policy in a relevant marine plan; any applicable policy in relevant terrestrial development plans or related documents; the Natural Resources Policy; any relevant local well-being plan(s) (including the local well-being assessment); and evidence in any relevant Area Statement(s) produced by Natural Resources Wales (NRW).	Yes	Advances the Sustainable Farming Scheme and Agricultural Pollution Regulations (2021) through demonstrated 20–30% reduction in synthetic fertiliser use supporting nutrient management and water quality objectives; aligns with the Natural Resources Policy's integrated land–sea approach; strengthens coastal economic resilience via 19 year-round local jobs under Foundational Economy principles and the Pembrokeshire Well-being Plan; and supports Curriculum for Wales environmental learning through education of over 4,000 children.
SCI_01	Using sound science responsibly	Relevant public authorities should make decisions using sound evidence and a risk-based, proportionate approach. Where appropriate they should apply the precautionary principle and consider opportunities to apply adaptive management.	Yes	Decision informed by baseline surveys, SLVIA, HRA and five years operational data; adaptive management applied in accordance with Implementation Guidance paragraphs 237–239 and SMNR principles. Proposed licence conditions include a fixed development envelope, annual monitoring, no further nearshore expansion beyond this envelope, and NRW's retained powers to intervene should evidence of harm arise — the practical expression of risk-based, adaptive management.
AGG_01a	Aggregates (supporting)	Proposals for new aggregate extraction will be supported, within any tonnage limits, where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	No	Not applicable — proposal does not involve aggregate extraction.
AGG_01b	Aggregates (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other	No	Not applicable — proposal does not involve aggregate extraction.
AQU_01a	Aquaculture (supporting)	Proposals for new aquaculture developments will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Yes	This application represents the final nearshore phase needed to achieve sustainability and so prove the concept for Seaweed and Shellfish IMTA aquaculture in Pembrokeshire prior to future offshore development. It directly contributes to the WNMP Vision of productive, resilient seas supporting a thriving economy by delivering regenerative IMTA aquaculture, safeguarding 19 year-round jobs and supporting sector growth.
AQU_01b	Aquaculture (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for the sustainable use of aquaculture resources including the identification of: natural resources that provide aquaculture potential opportunities to define and, once in place, further develop and refine Strategic Resource Areas for aquaculture in order to support the sustainable development of the aquaculture sector through marine planning.	Yes	Supports collaborative sector development through partnerships with fishermen, researchers and industry bodies, contributing to the Welsh seaweed evidence base as the only operational seaweed farm in Wales. The proposal provides the practical nearshore infrastructure necessary to enable sustainable offshore aquaculture development consistent with strategic resource planning objectives.

D&D_01	Dredging and disposal	Proposals that maintain navigable channels and long term access to open at-sea disposal	No	Not applicable — proposal does not involve dredging or disposal.
ELC_01a	Low carbon energy	Proposals for offshore wind energy generation will be supported where they contribute	No	Not applicable — proposal does not involve wind energy generation.
ELC_01b	Low carbon energy	In order to understand future opportunities for offshore wind development, including	No	Not applicable — proposal does not involve wind energy generation.
ELC_02a	Low carbon energy	Proposals for wave energy generation will be supported where they contribute to the	No	Not applicable — proposal does not involve wave energy generation.
ELC_02b	Low carbon energy	In order to understand future opportunities for wave energy development, relevant	No	Not applicable — proposal does not involve wave energy generation.
ELC_03a	Low carbon energy	Proposals for tidal stream energy generation will be supported where they contribute to	No	Not applicable — proposal does not involve tidal stream energy generation.
ELC_03b	Low carbon energy	In order to understand future opportunities for tidal stream energy development,	No	Not applicable — proposal does not involve tidal stream energy generation.
ELC_04	Low carbon energy	In order to understand future opportunities for tidal range development, strategic	No	Not applicable — proposal does not involve tidal range energy generation.
O&G_01a	Oil and gas (supporting)	Proposals that maximise the economic recovery of oil and gas sustainably will be	No	Not applicable — proposal does not involve oil and gas extraction.
O&G_01b	Oil and gas (supporting)	Welsh Government policy is to avoid the continued extraction of fossil fuels in intertidal	No	Not applicable — proposal does not involve oil and gas extraction.
O&G_02	Oil and gas (supporting)	Proposals that support the long-term development of carbon capture and storage	No	Not applicable — proposal does not involve carbon capture and storage.
FIS_01a	Fisheries (supporting)	Proposals that support and enhance sustainable fishing activities will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Yes	Supports local fishermen through supply partnerships; no displacement of fishing grounds; farms function as small refuge areas within busy corridors and contributes to habitat complexity consistent with sustainable fisheries objectives.
FIS_01b	Fisheries (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other	No	Not applicable — proposal does not involve fisheries strategic planning.
P&S_01a	Ports and shipping	Proposals for ports, harbours and shipping activities will be supported where they	No	Not applicable — proposal does not involve ports or shipping.
P&S_01b	Ports and shipping	Relevant public authorities and the sector are encouraged, in liaison with other	No	Not applicable — proposal does not involve ports or shipping.
P&S_02	Ports and shipping	Proposals that provide for the maintenance, repair, development and diversification of	No	Not applicable — proposal does not involve port facilities.
CAB_01	Subsea cabling	Proposals that facilitate the growth of digital communications networks and/or the	No	Not applicable — proposal does not involve subsea cabling.
T&R_01a	Tourism and recreation (supporting)	Proposals that demonstrate a positive contribution to tourism and recreation opportunities and policy objectives (for the sector) around the Welsh coast will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Yes	Contributes positively to sustainable coastal tourism through new bi-annual Festival of Seaweed in St Davids (in partnership with other community businesses) enhancing eco-tourism and public understanding of regenerative marine activity.
T&R_01b	Tourism and recreation	Relevant public authorities and the sector are encouraged, in liaison with other	No	
SAF_01	Safeguarding existing	a: Proposals likely to have significant adverse impacts upon an established activity	Yes	No significant adverse impact on established activities; navigation agreed with Trinity House; compatible
SAF_02	Safeguarding strategic	Proposals which may have significant adverse impacts upon the prospects of any sector	No	Not applicable — no Strategic Resource Areas currently designated for this location.
DEF_01	Defence (safeguarding)	Proposals that: • potentially affect Ministry of Defence (MOD) Danger Areas, Exercise	No	Not applicable — proposal does not affect MOD interests.