



DEML2540 – Closing Statement

in Support of Application DEML2540 – Câr-y-Môr

What Câr-y-Môr Is Asking For

Câr-y-Môr seeks approval of Application DEML2540: a modest expansion of two existing, NRW-consented trial sea farm sites at Carn ar Wig and Porthlysgi. This is the final nearshore phase needed to achieve sustainability and so prove the concept prior to future offshore development. The resources, expertise and infrastructure needed to complete this work, including monitoring the environmental outcomes, are all based at or near its current nearshore sites, and this continuity and efficiency is essential for project stability and so investor confidence.

Why This Application Matters

Câr-y-Môr is Wales's only operating seaweed farm and the country's first integrated regenerative sea farming operation. It provides 19 year-round jobs on a highly seasonal peninsula, education (4,000+ children), aquaculture courses and apprenticeships in development with Pembrokeshire College, emerging biostimulant products reducing synthetic fertiliser use by 20–30%, and an oyster restoration programme. It is supported by over 700 community members, enjoys strong public support, generates approximately £560,000 in annual turnover, and has attracted £3.1 million in public and private investment. Its £1.2 million Defra-funded processing facility, shop and education hub is already partially operational. A further investment package is in active development, XXXXX.

Five years of monitored operations within the current envelope have recorded no adverse ecological impact and positive biodiversity outcomes (21 fish species recorded on farm structures).

Why the Seascape Impact Is Limited

Since December 2025, the proposal has been materially redesigned in direct response to consultee concerns and in recognition of the National Park context: surface buoys reduced by 80% (from 600 to 116 maximum), spacing widened from 7m to 25m, buoys limited to 30cm above sea level in low-contrast grey, and navigation lighting cut to just two low-intensity flashing yellow lanterns per site. For proportionality, the total footprint is approximately 10 hectares within a 138,000-hectare SAC (0.007%), visible from roughly 0.5% of the 186-mile Coast Path and only in favourable weather conditions. The receiving seascape already includes RNLI operations, commercial tour boats, fishing activity and up to six fully illuminated tankers anchored in St Brides Bay at any time.

In an independent Planning and Environmental Appeal Decision (PEAD) the PEAD Inspector scrutinised Câr-y-Môr's existing licensed operations following a site visit within the marine park (as did NRW in granting the original licenses) and found it to be visually acceptable and consistent with the Well-being of Future Generations Act. The proposed installation along with Câr-y-Môr's existing installations are of course reversible.

No marine licence has ever been refused in Wales on seascape grounds. Granting this application would not create a novel risk; refusing it would set an unprecedented and chilling precedent for the entire Welsh aquaculture sector.

The Consultee Position Appears Inconsistent and Disproportionate

Pembrokeshire Coast National Parks Authority (PCNPA) did not respond, to the best of our knowledge and belief, to Câr-y-Môr's original marine licence applications for its earlier sites and raised no seascape objection during the successful licence extension appeal. PCNPA supported the DeltaStream tidal energy device and the £9.5m RNLI lifeboat station in the same seascape — both with far greater visual impact. While these approvals predated the 2019 WNMP, the framework for balancing interests and policy under the Marine Policy Statement 2011 was already in place. The Seascape Sensitivity

Assessment now relied upon by both PCNPA and NRW Advisory was adopted by PCNPA days before the consultation on this application was intended to close — it did not exist in adopted form when Câr-y-Môr prepared its SLVIA, was not part of the agreed methodology, and does not appear to have been consulted upon with the aquaculture sector. In NRW's public consultation on the revised design of this licence application, 20 representations supported the application against only 7 objections.

Consequences of Refusal

Refusal now would almost certainly precipitate Câr-y-Môr's insolvency, extinguishing 19 existing jobs, and at least 8 new positions, forfeiting £3.1 million in investment and public funding, rendering the Defra-funded facility redundant, and collapsing the XXXXX investment pipeline. Licensing delays have already cost over £900,000 in lost production and caused five staff to leave for more secure work. The signal to investors, funders, the local community, staff, and other marine enterprises would be that a well-researched, monitored and stepped approach to developing aquaculture in Wales cannot succeed regardless of scale, mitigation or community benefit. One of the lasting benefits of Câr-y-Môr's nearshore work is that it will generate the evidence base to reduce or eliminate the need for similar nearshore trials by future operators.

Câr-y-Môr respectfully requests that NRW determine the application positively, with conditions the applicant is content to accept: 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. This closing statement, together with the accompanying WNMP Policy Compliance Signposting and prior submissions, presents the clear and convincing case for proceeding required under WNMP Policies SOC_06 and SOC_07 and the Implementation Guidance (paragraphs 31–35). It is consistent with the plan-led, adaptive management approach required by the WNMP.

This closing statement is not a substitute for prior detailed submissions by Câr-y-Môr in support of its application. We are very happy to provide further guidance to help NRW navigate our prior submissions to the key points made in this closing statement if this would assist.

Signed:

Beth Marshall

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5th March 2026