



**Cyfoeth  
Naturiol  
Cymru**  
**Natural  
Resources  
Wales**

# **Environmental Impact Assessment Written Confirmation of the EIA Consent Decision**

**Marine Works (Environmental Impact Assessment) Regulations  
2007 (as amended) (“the Regulations”)**

**Llŷr Floating Offshore Wind (FLOW) Project**

**ORML2465**

**19 June 2026**

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# 1. Introduction

This document is the Environmental Impact Assessment ('EIA') Written Confirmation document for the Llŷr Floating Offshore Wind (FLOW) Project, Marine Licence reference ORML2465 ("the Project").

## 2. The Project

### 2.1 Project Background

2.1.1 An application for a Marine Licence for the Project was submitted to Natural Resources Wales (NRW) Marine Licensing Team (MLT) by Llŷr Floating Wind Limited on 28 August 2025.

2.1.2 The Project comprises the following activities:

- Construction of up to 10 Wind Turbine Generators (WTGs), each with a maximum rotor diameter of 285m. Maximum tip height will not exceed 300m;\*
- Construction of up to 10 associated floating platforms;\*
- Deposit of up to 8 mooring lines, for each floating platform (up to 80 in total);\*
- Deposit of up to 8 anchors or piles for each floating platform (up to 80 in total);\*
- Deposit of up to 11 offshore Inter Array Cables, up to 66 kiloVolts (kV) High Voltage Alternating Current (HVAC);\*
- Deposit of up to 2 offshore export cable circuits, up to 132 kV HVAC and approximately 49 km long, will achieve landfall via Horizontal Directional Drilling (HDD) at Freshwater West;\*
- All associated works required to operate, maintain, repair and decommission the proposed project;\*
- Deposit of associated scour and cable protection (if required);\*
- Construction of transition joint bays where up to two offshore and up to two onshore cables will be spliced together (each cable is made up of three individual cables in a trefoil or flat arrangement);
- Deposit of onshore cables (up to two), buried to a target depth of 1.8 m and laid in a maximum of two trenches each up to 1.2 m wide, subject to ground conditions and landowner requirements;
- Construction of cable joint bays may be required if the onshore cable(s) are installed in sections, to join the sections together;
- Construction of onshore substation covering an area of 95 m wide, 63 m length and 15 m in height, which is required to transfer the electricity from the proposed Project prior to connection into the grid at Pembroke Power Station; and
- Deposit of onshore cable from the substation to the grid connection point Pembroke Power Station, laid in trenches and/or ducts.

2.1.3 All activities listed in 2.1.2 with a \* require a Marine Licence under Part 4, (Chapter 1) Section 66 of the Marine and Coastal Access Act.

### 2.2 Location

The Project is located in the Celtic Deep, 35 km off the coast of Pembrokeshire. The coordinates for the offshore Development Area have been provided with the Marine

Licence application as Latitude and Longitude in decimal degrees to four decimal places. See Document Reference *ORML2465 - Continuation sheet 1.pdf*. The coordinates are provided in the WGS84 system.

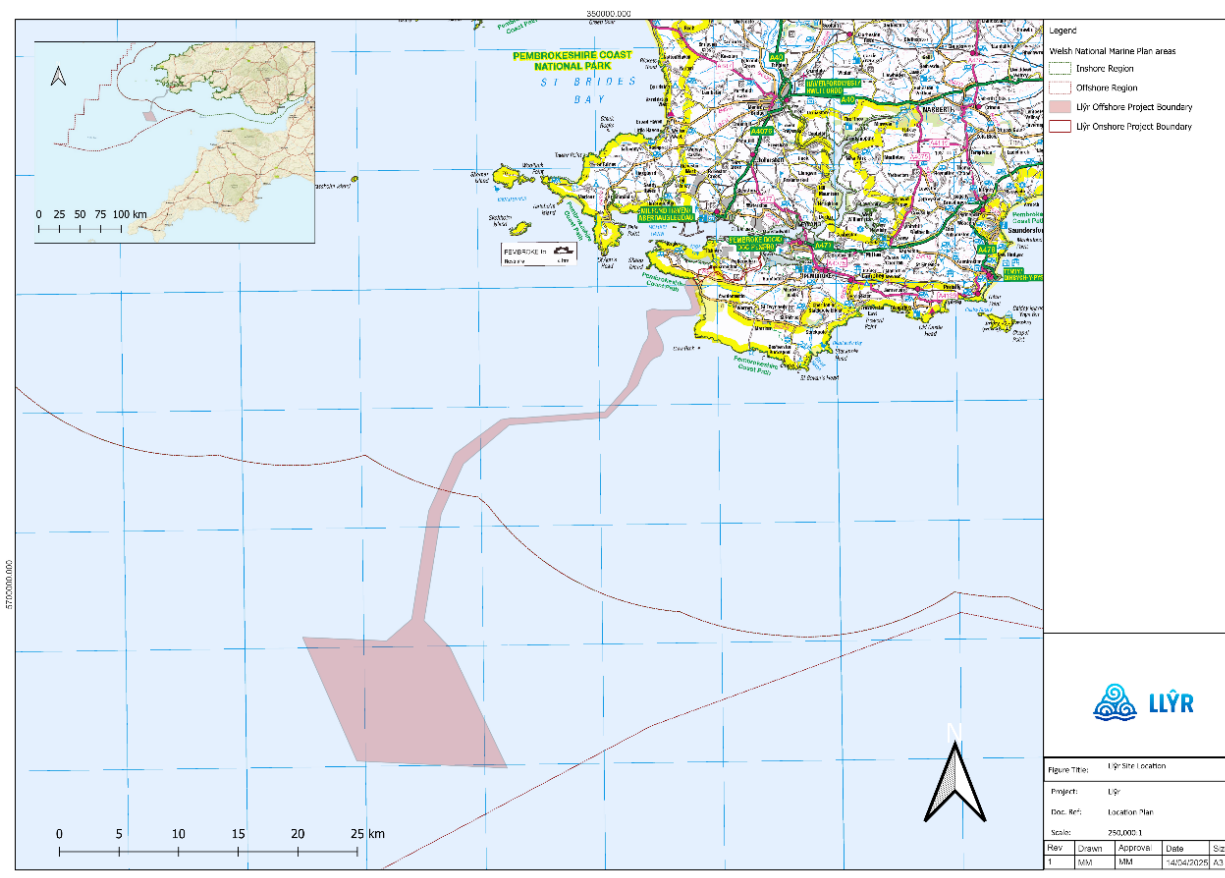


Figure 1 - Location of the proposed Project offshore Development Area taken from Volume 5 Figure 04.1 of the Environmental Statement (ES) (Document Reference ORML2465 - Figure 04.1 Proposed project Offshore Development Area.pdf).

### 2.3 Statement of need

2.3.1 The objective of the proposed Project is to establish a test and demonstration project in the Celtic Sea for a new Floating Offshore Wind (FLOW) technology. This was influenced by the United Kingdom (UK) Government FLOW policy and commitments (HM Government, 2022) (a target of 5 gigawatts (GW) of FLOW projects by 2050) combined with the need to address the technical, investment and risk barriers currently facing new floating wind technology. It is considered that the technology challenge can only be addressed through a step wise scaled demonstration of the technology in a real world environment (as opposed to a test tank) where it is intended to be operational at commercial scale.

2.3.2 Further details regarding the need for the Project and consideration of alternatives have been presented within Chapter 3 of the ES.

### 2.4. Regulating regimes

- 2.4.1 The Project overlaps between two main consenting regimes.
- 2.4.2 A Marine Licence under the Marine and Coastal Access Act 2009, administered by Natural Resources Wales acting on behalf of the Licensing Authority, Welsh Ministers. Aspects applied for via a Marine Licence are identified by \* in the list detailed in section 2.1.2.
- 2.4.3 The Applicant has also submitted a request to Planning and Environment Decisions Wales (PEDW) for a Section 36 consent, reference CAS-01352-L3N2P8.

### 3. Environmental Impact Assessment (EIA)

- 3.0.1 Council Directive 2011/92/EU (as amended) on the assessment of the effects of certain public and private projects on the environment (“the EIA Directive”) 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 EIA before permission is granted.
- 3.0.2 The Marine Works (EIA) Regulations 2007 (as amended) (“the Regulations”) transpose the EIA Directive in Wales and England for Marine Licence applications.
- 3.0.3 Pursuant of Regulation 8 of the Regulations, NRW MLT considered that the proposed works fell under Schedule A2, paragraph 21 of the Regulations on the assessment of the effects of the project on the environment, specifically:
- 21. Installations for the harnessing of wind power for energy production (wind farms).*
- 3.0.4 Accordingly, the Marine Licence application required for the Project was accompanied by an ES.
- 3.0.5 NRW MLT issued a scoping opinion for the proposed Project on 05 July 2022 under reference SC2202.

#### 3.1 The Environmental Statement (ES)

- 3.1.1 The ES outlined the proposed Project organised under the following topic headings
- 3.1.2 Technical chapters:
- Chapter 1 - Introduction
  - Chapter 2 - Legislation Policy and Guidance
  - Chapter 3 - Site Selection and Alternatives
  - Chapter 4 - Project Description
  - Chapter 5 - EIA Approach and Methodology
  - Chapter 6 - Consultations and Stakeholder Engagement
  - Chapter 7 - Landscape and Visual Impact Assessment (LVIA)
  - Chapter 8 - Ecology and Biodiversity
  - Chapter 9 - Historic Environment
  - Chapter 10 - Terrestrial Water Environment

- Chapter 11 - Geology and Hydrogeology
- Chapter 12 - Agriculture and Soils
- Chapter 13 - Traffic and Transport
- Chapter 14 - Air Quality
- Chapter 15 - Noise and Vibration
- Chapter 16 - Socio-economic Recreation and Tourism
- Chapter 17 - Physical Environment
- Chapter 18 - Marine Water and Sediment Quality
- Chapter 19 - Benthic Ecology
- Chapter 20 - Fish and Shellfish
- Chapter 21 - Marine Mammals
- Chapter 22 - Marine Ornithology
- Chapter 23 – Seascape, Landscape and Visual Impact Assessment (SLVIA)
- Chapter 24 - Marine Archaeology and Cultural Heritage
- Chapter 25 - Shipping and Navigation
- Chapter 26 - Commercial Fisheries
- Chapter 27 - Aviation and Radar
- Chapter 28 - Other Sea Users
- Chapter 29 - Climate
- Chapter 30 - Major Accidents and Disasters
- Chapter 31 - Inter-related Effects Assessment
- Chapter 32 - Residual Effects

3.1.3 The ES is considered to satisfy the requirements of Regulation 12 (2) and Schedule 3 of the Regulations. Specific comments pertinent to each ES chapter can be found in section 7.

## 3.2 Other Legislative and Policy Framework

Relative considerations under other legislation and / or policy are set out below:

### 3.2.1 Water Framework Directive (WFD) (Council Directive 2000/60/EC)

3.2.1.1 The sea from the mean low water mark up to 1 nautical mile from shore is protected under the WFD which requires a project or activity does not cause or contribute to deterioration in status of European Union (EU) water bodies or ‘prevent the water body achieving ‘good status’.

3.2.1.2 The Potential effect of the Project was screened against the WFD objectives for the following Water Bodies:

- Pembrokeshire South (GB611008590003)
- Milford Haven Outer (GB641008220000)

3.2.1.3 A Water Framework Directive Compliance Assessment concluded that the Project 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 mitigation which can be secured through the Marine Licence including:

- Production and adherence to a Water Quality Pollution Management Plan (WQPMP)

- Production and adherence to a Marine Pollution Contingency Plan (MPCP)
- Production and adherence to a Biosecurity Risk Assessment and Management Plan (BRAMP)
- Production and adherence to a Cable Burial Risk Assessment (CBRA)
- Production and adherence to a Construction Environment Management Plan (CEMP)
- Production and adherence to a Decommissioning Environmental Management Plan (DEMP)
- Production and adherence to a Project Environment Management Plan (PEMP)

3.2.1.4 The Applicant has also committed to using Horizontal Directional Drilling (HDD) techniques through the intertidal area to limit impacts on bathing waters.

3.2.1.5 Further details are described within the WFD Compliance assessment.

### **3.2.2 Waste (England and Wales) Regulations 2011 (2011/988)**

3.2.2.1 'Establishes a legal framework for treating waste in the EU. 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 be dealt with in an environmentally friendly way. To do this it applies the waste hierarchy from the Waste Regulations, which gives an order of preference for how waste is dealt with (prevention, re-use, recycling, recovery, disposal at sea).

3.2.2.2 See consideration under section 7.

### **3.2.3 The Conservation of Habitats and Species Regulations 2017 (as amended)**

3.2.3.1 European sites are those designated under The Conservation of Habitats and Species Regulations 2017 (as amended) ("Habitats Regulations") as Special Protection Areas ("SPAs"), Special Areas of Conservation ("SACs") or Sites of Community Importance ("SCIs").

3.2.3.2 The proposal is located within a European Protected Site.

3.2.3.3 The effects of proposal on the following European Sites, their features and conservation objectives have been considered by NRW MLT during the Licence determination:

- Pembrokeshire Marine / Sir Benfro Forol SAC (UK0013116)
- Limestone Coast of South West Wales / Arfordir Calchfaen de Orllewin Cymru SAC (UK0014787)
- Cleddau Rivers / Afonydd Cleddau SAC (UK0030074)
- Carmarthen Bay and Estuaries / Bae Caerfyddin ac Aberoedd SAC (UK0020020)
- Cardigan Bay / Bae Ceredigion SAC (UK0012712)
- Afon Teifi / River Teifi SAC (UK0012670)
- River Tywi / Afon Tywi SAC (UK0013010)
- River Usk / Afon Wysg SAC (UK0013007)
- Severn Estuary Ramsar (UK11081)
- Severn Estuary / Môr Hafren SAC (UK0013030)

- River Wye / Afon Gwy SAC (UK0012642)
- West Wales Marine / Gorllewin Cymru Forol SAC (UK0030397)
- Bristol Channel Approaches / Dynesfeydd Môr Hafren SAC (UK0030396)
- North Anglesey / Gogledd Môn Forol SAC (UK0030398)
- Rockabill to Dalkey Island SAC (IE0003000)
- Nord Bretagne DH SAC (FR2502022)
- Mers Celtiques – Talus du golfe de Gascogne SAC (FR5302015)
- Roaringwater Bay and Islands SAC (IE0000101)
- Côte de Granit rose-Sept-Iles SAC (FR5300009)
- North Channel SAC (UK0030399)
- Tregor Goëlo SAC (FR5300010)
- Baie de Morlaix SAC (FR5300015)
- Abers - Côte des légendes SAC (FR5300017)
- Ouessant-Molène SAC (FR5300018)
- Blasket Islands SAC (IE0002172)
- Chaussée de Sein SAC (FR5302007)
- Récifs du talus du golfe de Gascogne SAC (FR5302016)
- Lundy SAC (UK0013114)
- Saltee Islands SAC (IE0000707)
- Llyn Peninsula and the Sarnau / Pen Llyn a'r Sarnau SAC (UK0013117)
- Isles of Scilly Complex SAC (UK0013694)
- Lambay Island SAC (IE000204)
- The Maidens SAC (UK0030384)
- Slyne Head Islands SAC (IE000328)
- Inishbofin and Inishshark SAC (IE000278)
- Slieve Tooy / Tormore Island / Loughros Beg Bay SAC (IE000190)
- Duvillaun Islands SAC (IE000495)
- Horn Head and Rinclevan SAC (IE000147)
- Inishkea Islands SAC (IE000507)
- Treshnish Isles SAC (UK0030289)
- Monach Isles SAC (UK0012694)
- North Rona SAC (UK0012696)
- Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA (UK9014051)
- Saltee Islands SPA (IE004002)
- Wicklow Head SPA (IE004127)
- Helvick Head to Ballyquin SPA (IE004192)
- Howth Head Coast SPA (IE004113)
- Ireland's Eye SPA (IE004117)
- Lambay Island SPA (IE004069)
- Old Head of Kinsale SPA (IE0040210)
- Côte de Granit Rose-Sept-Iles SPA (FR5310011)
- Isles of Scilly SPA (UK9020288)
- Baie de Morlaix SPA (FR5300015)
- Ouessant-Molène SPA (FR5310072)
- Glannau Aberdaron ac Ynys Enlli / Aberdaron Coast and Bardsey Island SPA (UK9013121)
- Irish Sea Front SPA (UK9020328)
- Deenish Island and Scariff Island SPA (IE004175)
- Puffin Island SPA (IE004003)

- Skelligs SPA (IE004007)
- Blasket Islands SPA (IE004008)
- Cruagh Island SPA (IE004170)
- Rum SPA (UK9001341)
- St Kilda SPA (UK9001031)
- Cap d'Erquy-Cap Fréhel SPA (FR5300011)
- Dunes et côtes de Trévignon SPA (FR5312010)
- Archipel de Glenan SPA (FR5310057)
- Littoral seino-marin SPA (FR2310045)
- Baie de Quiberon SPA (FR5310093)
- Rivière de Pénerf SPA (FR5310092)
- Iles Houat-Hoedic SPA (FR5300033)
- Baie de Vilaine SPA (FR5310074)
- Estuaire de la Loire SPA (FR5210103)
- Urdaibaiko itsasadarra / Ría de Urdaibai SPA (ES0000144)
- Estuaire de la Bidassoa et baie de Fontarabie SPA (FR7212013)
- Maciço Montanhoso Oriental da Ilha da Madeira SPA (PTZPE0041)
- Grassholm / Ynys Gwales SPA (UK9014041)
- The Bull and The Cow Rocks SPA (IE004066)
- Ailsa Craig SPA (UK9003091)
- Pembrokeshire Bat Sites and Bosherton Lakes / Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton SAC (UK0014793)

3.2.3.4 It was concluded that the Project, when considered alone and in-combination, will not adversely affect the integrity of the European sites when undertaken in accordance with appropriate mitigation which can be secured through the Marine Licence including:

- Production and adherence to a Biosecurity Risk Assessment and Management Plan (BRAMP)
- Production and adherence to a Cable Burial Risk Assessment (CBRA)
- Production and adherence to a Cable Specification and Installation Plan (CSIP)
- Production and adherence to a Construction Environment Management Plan (CEMP)
- Production and adherence to a Decommissioning Environmental Management Plan (DEMP)
- Production and adherence to a Project Environment Management Plan (PEMP)
- Production and adherence to a Marine Mammal Management Plan (MMMP)
- Production and adherence to a Vessel Management Plan (VMP)
- Production and adherence an Otter Mitigation Plan

3.2.3.5 The conservation objectives were updated on 25 June 2025, during the further information consultation of the application. Whilst the HRA had been undertaken in line with the current conservation objectives, NRW MLT request that NRW A provide their advice in line with the new conservation objectives.

3.2.3.6 Further details are described within the Habitats Regulations Assessment.

### **3.2.4 Marine Conservation Zones (MCZs)**

3.2.4.1 Section 116 of the Act provides powers to Welsh Ministers to designate MCZs with the aim of contributing to the achievement of a network of ecologically coherent and well-managed marine protected areas.

3.2.4.2 The Project is not within a MCZs, and was not identified to have an impact on any MCZs. NRW A stated that they did not consider the proposal will present significant risk to the Skomer Marine Conservation Zone (MCZ) under Section 126 of the Marine and Coastal Access Act (MACCA) and agreed with the conclusions presented by the Applicant.

### **3.2.5 Wildlife and Countryside Act 1981 (as amended)**

3.2.5.1 Sites of special scientific interest (“SSSIs”) are protected by law to conserve their wildlife or geology. The Wildlife and Countryside Act 1981 (as amended) ensures that SSSIs are protected and managed effectively.

3.2.5.2 See consideration under section 7

### **3.2.6 Marine Policy Statement and Welsh National Marine Plan (WNMP)**

3.2.6.1 The UK Marine Policy Statement (“MPS”) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. NRW must make licensing decisions in accordance with the MPS and the WNMP unless relevant considerations indicate otherwise.

### **3.2.7 Environment (Wales) Act 2016**

3.2.7.1 Article 4 of the Natural Resources Body for Wales (Establishment) Order 2012, as amended by the Environment (Wales) Act 2016 requires NRW to pursue the sustainable management of natural resources in relation to Wales, and apply the principles of sustainable management of natural resources in the exercise of its functions, so far as consistent with their proper exercise.

3.2.7.2 NRW MLT considers that the procedures outlined in this Written Confirmation in the consideration of EIA consent are consistent with this requirement.

### **3.2.8 Well-being of Future Generations (Wales) Act 2015**

3.2.8.1 This Act requires NRW, as a public body, to take reasonable steps in exercising its functions to work in accordance with the sustainable development principle, as set out in Section 5 of the Act.

3.2.8.2 NRW MLT considers that that the EIA process is consistent with the sustainable development principle described in the Act, and that the processes outlined in this Written Statement are sufficient to properly demonstrate the sustainable development principle. In particular, NRW MLT acknowledges that the principles of sustainable management include taking account of all relevant evidence and gathering evidence in respect of uncertainties, and taking account of the short, medium and long term consequences of actions. NRW MLT further acknowledges that it is an objective of sustainable management to maintain and enhance the

resilience of ecosystems and the benefits they provide and, in so doing meet the needs of present generations of people without compromising the ability of future generations to meet their needs, and contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015.

### 3.3 Further information provided by the Applicant pursuant to a notification under regulation 14(1)

- 3.3.1 NRW MLT requested further information from the Applicant on the 14 February 2025, this was subsequently received on the 23 May 2025. A list of documents submitted following the further information request is listed below;
- *ORML2465 P11-LYR-3.4.3-PAP-Rev01-Marine Licence Application Clarifications A2*
  - *ORML2465 2025 03 28 - Llŷr - marine ornithology - clarification note 1 - cumulative & in-combination*
  - *ORML2465 2025 03 28 - Llŷr - marine ornithology - clarification note 2 - auk non-ID apportioning 2*
  - *ORML2465 2025 05 21 - Llŷr - marine ornithology - clarification note 3 - further info on cumulative & in-combination – final*
  - *ORML2465 2025 05 22 - Llŷr - marine ornithology - clarification note 4 - auk non-ID apportioning - further info - vs3*
  - *ORML2465 250425 Historic Assets - Revised Consent Boundary – Satellite*
- 3.3.2 NRW MLT requested further information again from the Applicant on the 21 August 2025, this was subsequently received on the 30 January 2026. A list of documents submitted following the further information request is listed below;
- *ORML2465 P11-LYR-3.4.3-PAP-Rev3-Clarifications 2*
  - *ORML2465 P11-LYR-4.2.3-PLA-002 – Bat Mitigation Scheme*
  - *ORML2465 P11-LYR-4.2.3-PLA-003 - Outline Marine Mammal Mitigation Plan*
  - *ORML2465 P11-LYR-4.2.3-PLA-004 – Llŷr PSR Mitigation Proposal*
  - *ORML2465 P11-LYR-4.2.3-REP-003 – Llŷr Onshore Otter Survey*
  - *ORML2465 251107 – Llŷr – Marine Ornithology – Clarification note 3 - FINAL*
  - *ORML2465 Project Llŷr SLVIA Technical Note - a technical note on points raised by Planning & Environment Decisions Wales (PEDW) and Natural Resources Wales (NRW) on Landscape and Visual issues*
  - *ORML2465 260123 Llŷr Landscape Enhancement Scheme Principles*
  - *ORML2465 251120 Strategic Need for the Llŷr project*
- 3.3.3 Document *ORML2465 P11-LYR-4.2.3-PLA-003 - Outline Marine Mammal Mitigation Plan* was subsequently superseded by *ORML2465 260416 Llŷr Marine Mammal Mitigation Plan A2* submitted on 27 April 2026.
- 3.3.4 Pursuant to Regulations 16 and 17 of the Regulations, consultation with the public and technical consultees was carried out on the further information submission, see Section 4 and 6

## 4. Consultation with the public

### 4.1 Public Notices

- 4.1.1 Pursuant to Regulation 16, public notices were advertised to notify interested parties of the proposed works and give any interested parties or members of the public an opportunity to make representation on the application as necessary.
- 4.1.2 The application documents were made available as follows:
- A translated public notice was placed in the Western Telegraph and Milford Mercury on 27 November and 04 December 2024. Notices were also placed on NRW Consultation Hub and on the Applicants website.
  - The application documents were made available to the public at: Pembrokeshire County Council, The Riverside Library, Gallery and Visitor Information, Off Swan Square, SA61 2AN and at Pembroke Dock Library, Water Street, Pembroke Dock, SA72 6DW, for 42 days following the publication of the first public notice. Documents were also available for inspection via the NRW online public register.
- 4.1.3 One public representation was received.
- 4.1.4 Following submission of further information detailed in Section 3.3.1, public notices were advertised to notify interested parties of the provision of further information and give interested parties or members of the public the opportunity to make representation on the application and further information submissions as necessary.
- 4.1.5 The application documents and further information submission were made available as follows:
- A translated public notice was advertised on the NRW Consultation Hub and on the Applicants website on 16 June 2025. Due to the nature of the further information and only receiving one public representation during the initial consultation, no further newspaper notices were published.
  - The application documents and further information were made available to the public at Pembrokeshire County Council, The Riverside Library, Gallery and Visitor Information, Off Swan Square, SA61 2AN for 42 days following the publication of the notice on the websites. Documents were also available for inspection via the NRW public register.
- 4.1.6 No public representations were received.
- 4.1.7 Following submission of additional further information detailed in Section 3.3.2, public notices were advertised to notify interested parties of the provision of further information and give interested parties or members of the public the opportunity to make representation on the application and further information submissions as necessary.
- 4.1.8 The application documents and additional further information submission were made available as follows:
- A translated public notice was advertised on the NRW Consultation Hub and on the Applicants website on 05 February 2026. Due to the nature of the additional further information and only receiving one response during the initial consultation, no newspaper notice was published.
  - The application documents and additional further information were made available to the public at Pembroke Dock Library, Water Street, Pembroke Dock,

Pembrokeshire, SA72 6DW for 42 days following the publication of the notice on the websites. Documents were also available for inspection via the NRW public register.

4.1.9 No public representations were received.

4.1.10 All representations received from members of the public were dealt with according to Schedule 5 of the Regulations.

## 5. Consultation of European Economic Area (EEA) States

5.0.1 A Transboundary Screening Assessment did not identify potential for effects to any other EEA State.

5.0.2 Consequently, no material was provided to other EEA member States in relation to the application.

## 6. Technical consultation

6.0.1 In accordance with Regulation 17 of the regulations, NRW MLT considered it appropriate to consult the bodies listed in the table below on 16 November 2026 due to their particular expertise. These bodies were consulted for a period of 42 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 (TCE)	Y	06 January 2025
Natural Resources Wales Advisory (NRW A)	Y	29 January 2025
Ministry of Defence (MoD)	Y	20 January 2025
UK Hydrographic Office (UKHO)	Y	11 December 2024
Maritime & Coastguard Agency (MCA)	Y	07 January 2025
Trinity House (TH)	Y	14 January 2025
Royal Yachting Association (RYA)	Y	06 January 2025
Local Authority Biodiversity Officer	N	

Pembrokeshire County Council (PCC)	N	
Pembrokeshire Coast National Park Authority (PCNPA)	N	
Local Port Authority - Milford Haven Port Authority	N	
Local Port Authority - Fishguard	N	
Local Port Authority - Porthclais	N	
Local Port Authority - Saundersfoot	N	
Local Harbour Authority	N	
Welsh Fishermen's Association (WFA)	Y	08 January 2025
National Federation of Fishermen's Organisation (NFFO)	Y	08 January 2025
Royal Society for the Protection of Birds (RSPB)	Y	08 January 2025
Welsh Government Marine and Fisheries Division/Welsh Government Marine Enforcement Officers	Y	29 January 2025
Cadw	Y	15 January 2025
Welsh Archaeological Trust (WAT)	Y	13 December 2024
Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	Y	12 December 2024
Environmental Public Health Service Wales	Y	04 December 2024
Department for Transport (DFT)	N	

UK Chamber of Shipping (CoS)	Y	08 January 2025
NERL Safeguarding	Y	28 December 2024
Department for Transport – Wrecks	N	
Joint Nature Conservation Committee (JNCC)	Y	22 January 2025
Civilian Aviation Authority	N	
Department for Energy Security and Net Zero (DESNZ)	N	

6.0.2 Details of the issues raised by the Consultation Bodies and how they have been addressed is set out in section 7.

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

6.0.4 Following a submission of further information, as detailed in section 3.3.1, NRW MLT consulted the bodies listed in the table below on the 17 June 2025, due to their particular expertise in matters arising in relation to this application. These bodies were consulted for a period of 42 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’:

<b>Consultee</b>	<b>Response received (Y/N)</b>	<b>Date(s) of receipt</b>
The Crown Estate (TCE)	N	
Natural Resources Wales Advisory (NRW A)	Y	29 July 2025
Natural England (NE)	Y	28 July 2025
Ministry of Defence (MoD)	Y	26 June 2025 29 July 2025 11 November 2025
UK Hydrographic Office (UKHO)	Y	27 June 2025

Maritime & Coastguard Agency (MCA)	Y	07 July 2025
Trinity House (TH)	Y	29 July 2025
Royal Yachting Association (RYA)	Y	28 July 2025
Local Biodiversity Officer	N	
Pembrokeshire County Council (PCC)	N	
Pembrokeshire Coast National Park Authority (PCNPA)	Y	07 July 2025 14 July 2025
Local Port Authority - Milford	N	
Local Port Authority - Fishguard	N	
Local Port Authority - Porthclais	N	
Local Port Authority - Saundersfoot	N	
Local Harbour Authority	N	
Welsh Fishermen's Association (WFA)	N	
National Federation of Fishermen's Organisations (NFFO)	N	
Royal Society for the Protection of Birds (RSPB)	N	
Welsh Government Marine and Fisheries Division/Welsh Government Marine Enforcement Officers	Y	29 July 2025
Cadw	Y	28 July 2025
Welsh Archaeological Trust (WAT)	Y	27 July 2025
Royal Commission on the Ancient and Historical	Y	08 July 2025

Monuments of Wales (RCAHMW)		
Environmental Public Health Service Wales	Y	17 June 2025
Department for Transport (DFT)	N	
UK Chamber of Shipping (CoS)	N	
NERL Safeguarding	Y	20 June 2025
Department for Transport – Wrecks	N	
Joint Nature Conservation Committee (JNCC)	Y	29 July 2025
Civilian Aviation Authority	N	
Department for Energy Security and Net Zero (DESNZ)	N	

6.0.5 Following a submission of further information, as detailed in section 3.3.2, NRW MLT consulted the bodies listed in the table below on the 06 February 2026, due to their particular expertise in matters arising in relation to this application. These bodies were consulted for a period of 42 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’:

<b>Consultee</b>	<b>Response received (Y/N)</b>	<b>Date(s) of receipt</b>
The Crown Estate (TCE)	Y	09 February 2026
Natural Resources Wales Advisory (NRW A)	Y	16 March 2026
Natural England (NE)	Y	19 March 2026
Ministry of Defence (MoD)	Y	19 March 2026
UK Hydrographic Office (UKHO)	N	
Maritime & Coastguard Agency (MCA)	Y	13 March 2026

Trinity House (TH)	Y	20 March 2026
Royal Yachting Association (RYA)	Y	09 February 2026
Local Biodiversity Officer	N	
Pembrokeshire County Council (PCC)	Y	16 March 2026
Pembrokeshire Coast National Park Authority (PCNPA)	Y	25 February 2026
Local Port Authority - Milford	N	
Local Port Authority - Fishguard	N	
Local Port Authority - Porthclais	N	
Local Port Authority - Saundersfoot	N	
Local Harbour Authority	N	
Welsh Fishermen's Association (WFA)	Y	11 February 2026
National Federation of Fishermen's Organisations (NFFO)	Y	11 February 2026
Royal Society for the Protection of Birds (RSPB)	N	
Welsh Government Marine and Fisheries Division/Welsh Government Marine Enforcement Officers	N	
Cadw	Y	12 March 2026
Welsh Archaeological Trust (WAT)	N	
Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	Y	09 February 2026

Environmental Public Health Service Wales	Y	13 March 2025
Department for Transport (DFT)	N	
UK Chamber of Shipping (CoS)	Y	20 February 2026
NERL Safeguarding	Y	06 February 2026
Department for Transport – Wrecks	N	
Joint Nature Conservation Committee (JNCC)	Y	18 March 2026
Civilian Aviation Authority	N	
Department for Energy Security and Net Zero (DESNZ)	N	

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

## 7. Issues arising during the consideration of the Environmental Statement, Marine Licence Application and representations received

7.0.1 Material issues that were highlighted by the ES and consultation process and the extent to which they have been addressed are detailed in this section.

7.0.2 Across all individual topics, NE deferred to NRW A and JNCC on shared designated sites.

7.0.3 NRW A and JNCC requested that the Applicant submit an Errata document to ensure the information and data associated with the project is clear and to provide greater clarity to anyone reviewing the Llŷr 1 documentation, regarding what was required of the developer when undertaking this application. Whilst NRW MLT acknowledge that this would provide greater clarity, it is not considered essential to the determination of the application or appropriate to include as a post consent condition. The Applicant has however committed to providing this information to NRW MLT post consent which will set out the changes to the ES that had been presented within the further information submission.

7.0.4 On 01 April 2026, the Welsh Government announced the publication of a revised Section 7 list of species and habitats under the Environment (Wales) Act 2016. The Applicant provided justification via email on 09 April 2026 as to why a revision to the

ES is not considered necessary. NRW A confirmed that their advice, both terrestrial and marine, remained unchanged following publication of the revised Section 7 list. Therefore, NRW MLT are satisfied that habitat and species of principle importance under the Environment (Wales) Act 2016 have been appropriately considered.

## 7.1 Landscape and Visual Impact Assessment (LVIA)

7.1.1 Potential effects of the Project on landscape character and visual amenity, which relates to onshore development only, were assessed within Chapter 7: LVIA of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary direct and indirect changes to landscape character arising from construction activities associated with the Onshore Export Cable Corridor (OnECC) and onshore substation, including vegetation clearance, earthworks, construction compounds and increased movement and activity;
- Temporary effects on the setting, character and special qualities of designated landscapes, including the Pembrokeshire Coast National Park (PCNP) and associated Heritage Coast;
- Temporary visual effects experienced by residential receptors, road users, recreational users and users of the Pembrokeshire Coast Path;
- Localised visual effects at a small number of nearby viewpoints where construction activity would occupy a noticeable part of the view;

### Operational and Maintenance Phase

- Long-term effects on landscape character and visual amenity associated with the presence of the onshore substation;
- Indirect effects on nearby landscape character areas and designated landscapes, including PCNP;
- Ongoing visual effects experienced by nearby receptors;

### Decommissioning Phase

- Temporary landscape and visual effects broadly similar in nature but shorter in duration than construction effects, associated with the removal of the onshore substation and reinstatement works.

7.1.2 The ES concludes that, during construction, minor adverse and not significant effects would occur in relation to landscape designations, landscape character areas and the majority of visual receptors, with localised moderate adverse significant effects predicted at a small number of viewpoints in close proximity to construction activity. These effects would be temporary and short-term, with no further mitigation required beyond standard construction management and reinstatement measures. During operation, the onshore substation would result in negligible to minor adverse effects on landscape character and visual amenity for the majority of receptors. Moderate adverse significant effects are identified at two viewpoints during Year 1 of operation; however, with the implementation of embedded mitigation, including earthworks and native planting secured through the Landscape and Ecological Management Plan (LEMP), all residual effects would reduce to minor adverse or negligible and not significant by Year 15 of operation. Cumulative effects with other existing, consented and reasonably foreseeable developments were assessed and, for the majority of receptors, found to result in minor adverse and not significant cumulative effects. A moderate adverse significant cumulative effect was identified under a theoretical maximum cumulative

scenario involving multiple scoping-stage developments; however, the Project was found to make only a small contribution to this effect and would not materially alter the overall character of the landscape or views.

7.1.3 Consultation responses were received in relation to the LVIA chapter of the ES. However, these responses also related to the SLVIA chapter of the ES, and have therefore been discussed under the SLVIA chapter below.

7.1.4 NRW MLT is satisfied with the conclusions presented within the ES relating to the impact on Landscape and Visual receptors..

## 7.2 Ecology and Biodiversity

7.2.1 Potential effects of the Project on Ecology and Biodiversity, which relates to onshore development only, were assessed within Chapter 8: Ecology and Biodiversity of the ES. The following impact pathways were identified and assessed.

### Construction Phase

- Temporary and permanent habitat loss associated with vegetation clearance for the Onshore Export Cable Corridor (OnECC), construction compounds, access routes and the onshore substation;
- Temporary habitat fragmentation and disturbance arising from construction activities, including noise, lighting and increased human activity;
- Temporary severance of hedgerows and other linear features used as commuting and foraging routes by bats and dormouse;
- Risk of injury or disturbance to protected species (including bats, dormouse, badger, otter, reptiles and breeding birds) during vegetation clearance and earthworks;
- Localised disturbance to designated site features near the landfall, noting that direct impacts are avoided through the use of HDD beneath sensitive habitats;

### Operation and Maintenance Phase

- Permanent loss of small areas of low-value habitat associated with the substation footprint, permanent access routes and link pillars;
- Potential disturbance to nocturnal species, particularly bats, from operational lighting at the substation;
- Minor and intermittent disturbance associated with maintenance activities, including temporary vegetation clearance and vehicle access;

### Decommissioning Phase

- Temporary and localised habitat disturbance during removal of onshore infrastructure, comparable to construction effects;
- Short-term disturbance to protected species, subject to pre-works surveys and mitigation.

7.2.2 The ES concludes that, with embedded mitigation and best practice measures in place, effects on ecology and biodiversity would be negligible to minor adverse across all Project phases. Impacts are generally temporary, localised and reversible, with permanent habitat loss limited to areas of low ecological value. Mitigation measures embedded within the Project include, HDD beneath sensitive habitats, preparation and implementation of a Construction Environment Mitigation Plan (CEMP), precautionary working methods for protected species, sensitive lighting design, habitat reinstatement and enhancement, Ecological Clerk of Works

supervision, and biosecurity controls. With these measures in place, no significant effects are predicted, either alone or cumulatively.

- 7.2.3 Consultation responses were received from NRW A in relation to the Ecology and Biodiversity chapter of the ES.
- 7.2.4 NRW A raised concerns relating to European Protected Species (EPS), specifically bats, otters and dormice, protected sites, survey sufficiency, hedgerow and habitat loss, potential disturbance to bats, otters and dormice, and the adequacy of mitigation proposed.
- 7.2.5 NRW A expressed concerns regarding the extent and timing of bat surveys, the need for further inspection of buildings and trees with potential roost features, and the requirement for clarity on how potential noise, lighting and vibration impacts would be managed. They also sought confirmation of how the Applicant would avoid or minimise hedgerow loss and ensure habitat connectivity for commuting and foraging bats. The Applicant confirmed that the construction corridor width would be reduced to 12 metres in sensitive locations, that existing gateways would be used wherever practicable, and that reinstatement would prioritise hedgerow translocation to accelerate re-establishment of mature habitat. A commitment was also made to prepare a detailed lighting plan to ensure illumination did not spill into bat habitats. These matters were brought together in a Bat Mitigation Plan which NRW A later confirmed addressed their previous concerns.
- 7.2.6 NRW A initially advised that the absence of specific otter surveys meant that potential impacts on commuting routes and natal holts could not be properly assessed. The Applicant subsequently undertook a full otter survey in December 2025, which was provided to NRW A along with confirmation that pre-construction checks, holt exclusion buffers, and otter-proof fencing around HDD pits would be incorporated into a mitigation plan to be submitted post consent for approval. NRW A confirmed that the implementation of these measures addressed these concerns.
- 7.2.7 Dormice were assumed to be present within all suitable habitat across the onshore development area, and NRW A emphasised the importance of managing the potential severance effects of the working corridor. The Applicant confirmed that the corridor would be narrowed in important hedgerow areas, that hedgerow translocation would be employed where feasible, and that any required EPS licensing would be sought prior to construction. These commitments, together with requirements for dormouse surveys to be completed pre-construction and for the final CEMP and Landscape and Ecological Management Plan (LEMP) to secure long-term habitat management, were accepted by NRW A as sufficient to address the predicted impacts.
- 7.2.8 Following the undertaking of additional surveys and commitment for further mitigation to be implemented, which will be secured through planning and licence conditions, NRW MLT is satisfied that Ecology and Biodiversity have been adequately assessed and any impacts are not considered significant.

### 7.3 Historic Environment

7.3.1 Potential effects of the Project on the Historic Environment, which relates to onshore development only, were assessed within Chapter 9: Historic Environment of the ES. The following impact pathways were identified and assessed.

#### Construction Phase

- Risk of permanent and temporary damage to below-ground archaeological remains during works associated with the Onshore Export Cable Corridor (OnECC), construction compounds and the onshore substation;
- Potential temporary effects on the setting of designated heritage assets (including scheduled monuments and listed buildings) due to construction activity, vehicle movements, lighting and visual intrusion;
- Disturbance or loss of non-designated archaeological features within the onshore development area, noting that many remains are sub-surface and not currently visible;
- Temporary impacts on historic landscape character through removal of small sections of field boundaries and temporary disruption to land use;
- Risk of accidental damage to heritage assets;

#### Operation and Maintenance Phase

- Permanent effects on the setting of designated heritage assets arising from the presence of the onshore substation and associated infrastructure;
- Minor and localised visual effects on the historic landscape character area in the vicinity of the substation;

#### Decommissioning Phase

- Temporary and localised disturbance associated with removal of above-ground infrastructure;
- Potential for limited disturbance to below-ground archaeological remains if foundations are removed, comparable to construction effects;
- Removal of operational infrastructure expected to reverse operational setting effects over time.

7.3.2 The ES concludes that, with the application of embedded and additional mitigation, no significant residual adverse effects on the historic environment or cultural heritage are predicted. Where construction phase impacts initially resulted in moderate or major adverse effects on archaeological receptors, these are reduced to non-significant following implementation of appropriate mitigation measures. Mitigation measures include route alignment, use of HDD beneath sensitive areas, archaeological geophysical survey, evaluation trenching, watching briefs, protective fencing, and adherence to a CEMP and Archaeological Mitigation Strategy agreed with statutory consultees. Operational effects on the setting of designated assets are assessed as minor adverse with embedded design mitigation (including control of scale, materials, lighting and screening of the substation). Overall, the Project is not predicted to result in significant adverse effects on the historic environment or cultural heritage, either alone or cumulatively.

7.3.3 Consultation responses were received from Cadw and Welsh Archaeological Trust (WAT) in relation to the Historic Environment chapter of the ES.

7.3.4 The WAT and Cadw raised no concerns within their response regarding the Historic Environment and were content with the conclusions presented within the ES. Impacts as a result of the offshore works are considered in section 7.18 (Marine Archaeology and Cultural Heritage) below.

7.3.5 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Historic Environment chapter.

## 7.4 Terrestrial Water Environment

7.4.1 Potential effects of the Project on the terrestrial water environment were assessed within Chapter 10: Terrestrial Water Environment of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary disturbance to ordinary watercourses, ponds and ditches crossed by the Onshore Export Cable Corridor (OnECC);
- Short-term risk of sediment mobilisation or pollution affecting surface water and groundwater receptors, including downstream WFD water bodies (Milford Haven Inner, Milford Haven Outer and Pembrokeshire South);
- Temporary changes to local flood risk during earthworks and excavation;
- Temporary interaction with groundwater and private water supplies;

### Operational and Maintenance Phase

- Impacts from surface water runoff from the onshore substation;

### Decommissioning Phase

- Temporary effects similar to construction, associated with removal of infrastructure and reinstatement.

7.4.2 The ES concludes that, with the implementation of embedded mitigation and good practice measures, which includes HDD at the landfall, pollution prevention and spill response procedures, controlled crossing methods for watercourses and sustainable drainage systems, effects on the terrestrial water environment would be minor or negligible and not significant. A WFD compliance assessment concluded that the Project would not cause deterioration in status or prevent future achievement of WFD objectives for any assessed surface water or groundwater bodies. Cumulative effects with other developments were assessed and concluded that no significant cumulative impacts on surface water quality, groundwater, flood risk or WFD receptors were predicted.

7.4.3 Consultation responses were received from NRW A in relation to the Terrestrial Water Environment chapter of the ES.

7.4.4 Overall, NRW A considered the risk to groundwater receptors as low, provided the pollution prevention measures are incorporated into the construction and operational phases. These will be secured through the submission of a CEMP post consent for approval.

7.4.5 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Terrestrial Water Environment chapter.

## 7.5 Geology and Hydrogeology

7.5.1 Potential effects of the Project on Geology and Hydrogeology were assessed within Chapter 11: Geology and Hydrogeology of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary, localised disturbance to geology associated with the landfall works, Onshore Export Cable Corridor (OnECC) and construction compounds;
- Temporary interaction with geological designated sites, including limited overlap with the Broomhill Burrows SSSI and Freshwater West (North) Geological Conservation Review;
- Temporary sterilisation of Mineral Safeguarding Zones (sand and gravel and hard rock) under construction compounds;
- Temporary changes to land contamination risk during excavation, HDD and earthworks, with potential pathways to groundwater and private water supplies;

### Operational and Maintenance Phase

- Permanent, localised sterilisation of mineral resources beneath the onshore substation footprint and the buried cable route;

### Decommissioning Phase

- Temporary effects similar in nature to construction, associated with removal of infrastructure and reinstatement works.

7.5.2 The ES concluded that the majority of effects on geological features, mineral resources, hydrogeology and land contamination would be minor adverse or negligible with the application of embedded mitigation measures. This includes adherence to the CEMP, pollution prevention measures, HDD groundwater risk assessment, materials and waste management plans, and good practice for ground investigation and contamination management. Cumulative effects with other energy and infrastructure developments in the area, were assessed and found to result in no significant additional effects, with some instances of minor beneficial cumulative outcomes where land remediation is undertaken.

7.5.3 No consultation responses were received in relation to the Geology and Hydrogeology Chapter of the ES.

7.5.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Geology and Hydrogeology chapter.

## **7.6 Agriculture and Soils**

7.6.1 Potential effects of the Project on Agriculture and Soils were assessed within Chapter 12: Agriculture and Soils of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary loss of agricultural land associated with installation of the Onshore Export Cable Corridor (OnECC), temporary construction compounds and access routes;
- Short-term disturbance of soil resources arising from excavation, handling, storage and reinstatement of topsoil and subsoil within the cable corridor and temporary working areas;
- Temporary disruption to agricultural land use and farming activities during construction;
- Permanent loss of a small area of agricultural land associated with construction of the onshore substation and transition joint bays;

### Operation and Maintenance Phase

- Ongoing disturbance to agricultural land or soil resources beyond the permanent footprint of built infrastructure;
- Operational effects on soil structure, agricultural productivity or land use following reinstatement;

#### Decommissioning Phase

- Temporary effects comparable to those experienced during construction, associated with removal of infrastructure and reinstatement of land.

7.6.2 The ES concludes that, with the implementation of embedded mitigation and good practice measures impacts are not significant. Mitigation measures include route selection and micro-siting to minimise land take, avoidance of higher-grade agricultural land where practicable, preparation and implementation of a Soil Management Plan incorporated in the CEMP, appropriate timing of soil handling to prevent compaction, and full reinstatement of disturbed land. As a result, all residual effects on agriculture and soils would be minor or negligible and not significant. Cumulative effects with other developments were also assessed and no significant cumulative impacts on agricultural land quality or soil resources are predicted.

7.6.3 No consultation responses were received in relation to the Agriculture and Soils Chapter of the ES.

7.6.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Agriculture and Soils chapter.

## **7.7 Traffic and Transport**

7.7.1 Potential effects of the Project on Traffic and Transport were assessed within Chapter 13: Traffic and Transport of the ES. The following impact pathways were identified and assessed:

#### Construction Phase

- Temporary increases in traffic flows on the local and strategic road network associated with delivery of materials, workforce movements accessing the landfall, Onshore Export Cable Corridor (OnECC) and onshore substation;
- Short-term changes to severance, fear and intimidation, pedestrian and cyclist amenity, pedestrian and cyclist delay, driver delay and road safety, including effects in the vicinity of higher sensitivity receptors such as a school on the A4139;
- Temporary use of rural and urban road sections connecting Pembroke Dock, the landfall and onshore work areas;

#### Operation and Maintenance Phase

- Negligible traffic generation associated with routine inspection and maintenance activities;

#### Decommissioning Phase

- Any temporary traffic effects similar to those experienced during construction, with no long-term change to baseline conditions.

7.7.2 The ES concludes that, with implementation of embedded mitigation and standard good practice measures, traffic and transport effects would be minor or negligible and not significant. Mitigation measures include preparation and implementation of a Construction Traffic Management Plan (CTMP), agreed access routes, signage, temporary speed restrictions near sensitive receptors, escorting of abnormal loads,

wheel washing, Public Rights of Way (PRoW) management, and ongoing liaison with Pembrokeshire County Council (PCC) and emergency services. Cumulative traffic effects with other developments were also assessed and found not to give rise to significant cumulative impacts on traffic flows, road safety, severance or pedestrian and cyclist amenity.

7.7.3 No consultation responses were received in relation to the Traffic and Transport Chapter of the ES.

7.7.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Traffic and Transport chapter.

## 7.8 Air Quality

7.8.1 Potential effects of the Project on Air Quality were assessed within Chapter 14: Air Quality of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary generation of fugitive dust and particulate matter arising from earthworks, construction activities and vehicle movements along the Onshore Export Cable Corridor (OnECC), landfall works and onshore substation;
- Short-term risk of dust soiling impacts on nearby receptors, including residential properties and designated sites in proximity to the landfall area;
- Potential for adverse effects on human health, noting that baseline air quality is good and existing pollutant concentrations are well below relevant air quality objectives;
- Emissions from construction traffic;

### Operation and Maintenance Phase

- Changes in road traffic emissions associated with occasional maintenance visits;

### Decommissioning Phase

- Temporary and localised dust generation during decommissioning activities, comparable in nature and magnitude to construction effects.

7.8.2 The ES concludes that, with the implementation of standard good-practice mitigation, effects on Air Quality would be not significant across all phases of the Project. Mitigation measures will be secured through a CEMP and Construction Dust and Air Quality Management Plan, including dust suppression, vehicle and track-out controls, stockpile management, and site housekeeping. With these measures in place, impacts from fugitive dust and emissions would be temporary, localised and effectively controlled, with no significant effects on human health or ecological receptors.

7.8.3 Consultation responses were received from NRW A in relation to the Air Quality chapter of the ES.

7.8.4 It was noted by NRW A that control measures identified in the outline CEMP will be implemented to deal with unforeseen circumstances where a significant effect could potentially occur. Standard dust control measures will also be set out within a CEMP. NRW A also highlighted that the CEMP and Construction Dust and Air Quality Management Plan will need to be submitted for approval post-consent. The CEMP will be secured through the marine licence, however, the Construction Dust

and Air Quality Management Plan will be secured by another consenting authority, as detailed within section 8.2.2.34.

7.8.5 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Air Quality chapter.

## 7.9 Noise and Vibration

7.9.1 Potential effects of the Project on Noise and Vibration, which relates to onshore development only, were assessed within Chapter 15: Noise and Vibration of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Noise generated by onshore construction activities including cable trenching, Horizontal Directional Drilling (HDD) and onshore substation construction;
- Night-time noise associated with continuous HDD activities, assessed on a realistic worst-case basis;
- Vibration arising from use of heavy plant, HDD activities and reinstatement works;
- Temporary increases in road traffic noise associated with construction vehicle movements;

### Operation and Maintenance Phase

- Operational noise emissions from fixed plant associated with the onshore substation, including transformers and auxiliary equipment;
- Potential tonal and low-frequency noise effects;
- Noise effects associated with routine operational and maintenance traffic;

### Decommissioning Phase

- Temporary noise and vibration effects associated with removal of onshore infrastructure and reinstatement, comparable to construction-phase effects, but without HDD activities.

7.9.2 The ES concludes that construction-phase noise and vibration effects would be temporary and localised. Without mitigation, significant effects were identified in a small number of locations, primarily associated with night-time HDD activities and at the closest residential receptor to the onshore substation. However, with implementation of embedded and additional mitigation which includes buffer distances, acoustic barriers, selection of quieter equipment, communication with residents, all residual construction and decommissioning effects would be minor or negligible and not significant, with the exception of residual moderate adverse effects for night-time HDD at a limited number of receptors. Operational noise effects from the onshore substation were assessed using a precautionary worst-case approach. While significant effects were identified for operational noise effects from the onshore substation pre-mitigation at the nearest receptors, the Applicant has committed to design, construct and operate the substation so that rating levels are controlled to defined limits through engineering design and attenuation measures. With these commitments in place, all residual operational noise effects would be minor adverse or negligible and not significant. Cumulative noise and vibration effects with other developments were also assessed and found not to result in significant cumulative impacts.

7.9.3 No consultation responses were received in relation to the Noise and Vibration Chapter of the ES.

7.9.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Noise and Vibration chapter.

## 7.10 Socio-economics, Recreation and Tourism

7.10.1 Potential effects of the Project on Socio-economics, Recreation and Tourism were assessed within Chapter 16: Socio-economics, Recreation and Tourism of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary and permanent employment generation associated with construction activities, including direct and indirect jobs within the local and regional economy;
- Short-term demand for accommodation arising from non-home-based construction workers, with potential effects on the local housing market and visitor accommodation;
- Temporary disruption to recreation amenities, including local beaches, coastal access points and Public Rights of Way (PRoW), particularly sections of the Pembrokeshire Coast Path intersecting the onshore development area;
- Temporary effects on tourism activity and visitor experience associated with construction traffic, localised access restrictions and short-term changes to amenity;
- Short-term effects on local businesses and community facilities arising from construction activity and workforce presence;

### Operation and Maintenance Phase

- Long-term employment opportunities associated with operation and maintenance activities, supporting the offshore renewables supply chain and regional skills base;
- Ongoing skills development, training and education opportunities linked to the Project, including engagement with local colleges and schools;
- Effects on housing, recreation assets, tourism activity and community facilities during routine operational activities;

### Decommissioning Phase

- Temporary employment generation associated with decommissioning works;
- Temporary and localised effects comparable to construction, including short-term disruption to recreation assets and local access, with reinstatement following completion of works.

7.10.2 The ES concludes that socio-economic effects would be predominantly beneficial, particularly in relation to employment generation, skills development and economic activity, with adverse effects limited to temporary and localised disruption to recreation and tourism. Embedded mitigation measures includes phased construction, temporary diversions, reinstatement of PRoW, stakeholder engagement, and management plans secured through the CEMP and Traffic Management Plans. With these implemented, it will ensure that these effects would be short-term and of low magnitude. No significant adverse effects on tourism, recreation or community receptors were identified. Cumulative socio-economic and recreation effects with other developments were also assessed and considered not significant.

7.10.3 No consultation responses were received in relation to the Socio-economics, Recreation and Tourism Chapter of the ES.

7.10.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Socio-economics, Recreation and Tourism Chapter.

## 7.11 Physical Environment

7.11.1 Potential effects of the Project on the Physical Environment were assessed within Chapter 17: Physical Environment of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary increases in Suspended Sediment Concentration (SSC) and localised sediment deposition arising from seabed disturbance during installation of anchors or piles, cable installation and protection works, sandwave levelling, and offshore and nearshore works associated with the offshore export cable and landfall;
- Localised changes to seabed bathymetry from sandwave levelling and seabed preparation along the Offshore Export Cable Corridor (OfECC);
- Temporary, highly localised disturbance to sediment transport pathways associated with installation activities;
- Localised physical disturbance at the landfall associated with HDD exit pits;

### Operational and Maintenance Phase

- Localised changes to hydrodynamic conditions, wave propagation and sediment transport patterns arising from the presence of floating structures, moorings, anchors, inter-array cables, export cables and any required cable protection;
- Localised scour or sediment mobility around subsea infrastructure;
- Temporary, localised increases in SSC associated with maintenance or repair activities;

### Decommissioning Phase

- Temporary and localised seabed disturbance, SSC increases and changes in seabed morphology associated with removal of infrastructure and reinstatement of sediments.

7.11.2 The ES concludes that effects on the physical environment would be negligible to minor adverse, being spatially limited, temporary in nature, and reversible, with no significant changes predicted to the wider hydrodynamic or sediment transport regime, including designated features. The Applicant has incorporated a range of embedded mitigation and best-practice measures, including design controls, method selection, and commitments to post-consent plans and assessments. With these measures in place, no significant effects on the Physical Environment are predicted.

7.11.3 Consultation responses were received from NRW A in relation to the Physical Processes chapter of the ES.

7.11.4 NRW A advised that the baseline characterisation of hydrodynamics, bathymetry and geomorphology was sufficient to inform the assessment. However, they identified several areas requiring clarification within the impact assessment methodology, including HDD construction methods, SSC plume modelling assumptions, and cumulative assessment.

7.11.5 NRW A requested additional information on HDD exit pit construction, specifically regarding excavation, backfilling materials, and whether seabed roughness would

be impacted. NRW A also queried whether pits may be exposed for extended periods. The Applicant confirmed that excavated material will be reused for backfilling, with upper seabed material reinstated on top, and that HDD exit pits are expected to be reinstated within four weeks. NRW A confirmed that, following clarification, they had no further concerns.

- 7.11.6 NRW A sought further evidence that the burial depth for HDD exit pits would ensure long-term stability, noting potential exposure due to storm events or seasonal variability. The Applicant provided baseline information on historical beach and seabed profiles and confirmed that cable burial design would take this variability into account. NRW A welcomed this clarification and raised no further concerns.
- 7.11.7 NRW A requested further detail on the empirical modelling approach used to predict SSC plumes, including project-specific inputs and assumptions. The Applicant provided a methodology statement referencing the Erebus ES and detailed the hydrodynamic and sediment parameters used. NRW A subsequently confirmed they had no concerns regarding the model's technical basis.
- 7.11.8 NRW A advised that further assessment of cumulative SSC plumes with the Erebus project was required, particularly relating to finer sediment fractions. The Applicant provided additional modelling demonstrating that cumulative overlap is highly unlikely due to plume dilution rates, vessel separation, and sediment settling behaviour. NRW A agreed with these conclusions and had no further concerns.
- 7.11.9 NRW A requested additional assessment of cumulative changes to hydrodynamics and sediment transport resulting from overlapping sandwave levelling and cable protection zones between Erebus and Llŷr. The Applicant provided further justification, noting the localised nature of potential impacts and limited overlap between the projects. NRW A accepted the conclusion that cumulative impacts are unlikely.
- 7.11.10 NRW A raised concerns regarding recovery rates of bedforms following sandwave levelling, given the significant volumes involved (up to 900,520 m<sup>3</sup>). They recommended monitoring of seabed recovery rates post-consent. The Applicant confirmed that targeted seabed monitoring will be undertaken and that data sharing with NRW A can be discussed. NRW A raised no further concerns and monitoring of seabed recovery will be secured through the Cable Specification and Implementation Plan (CSIP).
- 7.11.11 NRW A noted that in shallow waters (<10 m), cable protection (e.g., articulated iron pipe of 500 mm diameter) may reduce water depth by more than 5%, triggering Maritime & Coastguard Agency (MCA) navigational requirements and potential hydrodynamic impacts. The Applicant confirmed that minimum burial depths would prevent reductions greater than 5% and committed to providing further assessment via the Cable Burial Risk Assessment (CBRA). NRW A welcomed this approach.
- 7.11.12 NRW A welcomed the Applicant's commitment to a post-consent condition requiring the submission and approval of the CBRA and CSIP, including pre-construction surveys and seabed monitoring.

7.11.13 Following the submission of additional modelling/assessments and the clarifications provided, NRW MLT is satisfied that the Physical Environment has been adequately assessed and any impacts are not considered significant. This is subject to the implementation of the mitigation measures discussed above including the submission of a CBRA and CSIP post consent which will be secured through licence conditions.

## 7.12 Marine Water and Sediment Quality

7.12.1 Potential effects of the Project on Marine Water and Sediment Quality were assessed within Chapter 18: Marine Water and Sediment Quality of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary and localised increases in SSC and turbidity arising from seabed preparation, sandwave levelling, anchor and mooring installation, cable installation and burial, and Horizontal Directional Drilling (HDD) works at the landfall;
- Temporary mobilisation of naturally occurring chemical contaminants within sediments due to seabed disturbance;
- Temporary and highly localised release of bacteria associated with sediment disturbance;
- Risk of accidental pollution events (e.g. fuel or hydraulic fluid spills) associated with vessel use and construction activities;
- Localised and short-term release of drilling fluids and drill cuttings during HDD works;

### Operation and Maintenance Phase

- Localised and intermittent sediment disturbance and minor increases in SSC associated with mooring chain movement, seabed interaction of dynamic cables, and periodic maintenance or repair activities;
- Localised scour around anchors, cable protection and scour protection;
- Localised potential changes in bacterial activity in sediments adjacent to buried cables due to small operational temperature increases (up to 2.5°C);
- Risk of pollution incidents associated with vessel traffic and turbine operation;

### Decommissioning Phase

- Temporary and localised increases in SSC and turbidity associated with removal of subsea infrastructure, cable protection and buried cables, comparable in nature and extent to construction effects;
- Short-term and localised mobilisation of sediment-bound contaminants and bacteria;
- Risk of pollution events associated with increased vessel activity during removal works.

7.12.2 The ES concludes that effects on marine water and sediment quality would be negligible to minor adverse across all project phases. Effects are predicted to be short term, spatially limited and highly localised, with high capacity for dilution and dispersion. No significant adverse effects are anticipated on WFD water bodies, designated bathing waters, or European and national nature conservation sites. Embedded mitigation and best practice measures has been incorporated into the Project design, including implementation of a CEMP, use of environmentally friendly

drilling fluids, pollution prevention and spill response measures, careful selection of cable burial and protection methods, and vessel management controls. With these measures in place, no significant effects on marine water or sediment quality are predicted.

- 7.12.3 Consultation responses were received from NRW A in relation to the Marine Water and Sediment Quality chapter of the ES.
- 7.12.4 NRW A considered the standard of the Applicant's assessment of Marine Water and Sediment Quality to be generally good. They confirmed that appropriate impact pathways had been identified and assessed. However, NRW A noted that the assessment would have been strengthened through direct contaminant sampling within the Offshore Export Cable Corridor (OfECC) and array area, rather than relying on extrapolated data.
- 7.12.5 NRW A agreed that the outline CEMP provides an appropriate high-level framework, but emphasised that the full CEMP must be supported by a Water Quality Pollution Management Plan (WQPMP). This will be secured through licence conditions with approval required in consultation with NRW A prior to commencement of Licensed Activities.
- 7.12.6 NRW A welcomed the use of Horizontal Directional Drilling (HDD) through the intertidal zone and the embedded mitigation set out in Table 18-14 of the ES. However, they advised that the ES should explicitly consider the potential effects of accidental bentonite release on Bathing Water Quality, including bacteriological survival. The Applicant confirmed that this will be considered and included in the CEMP and WQPMP to be agreed in consultation with NRW A.
- 7.12.7 NRW A welcomed the Applicant's commitment to preparing a Decommissioning Programme under Section 105 of the Energy Act (2004). They recommended that water-quality monitoring also be undertaken during decommissioning to mirror the approach used during construction. The Applicant agreed to consider this at the appropriate time.
- 7.12.8 NRW A agreed with the Applicant's modelling approach to predict suspended sediment plume behaviour. They concurred that SSC increases from construction, decommissioning and cable repair activities would be small, temporary and localised, with no risk of adverse effects on site integrity either alone or in-combination.
- 7.12.9 NRW A agreed that the likelihood of remobilising sediment-bound contaminants is low given the coarse sediments (<63 µm) along the cable route. NRW A therefore agreed with the Applicant's conclusion that this would not lead to adverse effects on site integrity.
- 7.12.10 NRW A welcomed embedded mitigation such as spill-response procedures, International Convention for the Prevention of Pollution from Ships (MARPOL) compliance and pollution-prevention measures. They agreed that, with these measures in place, accidental vessel-related pollution would not lead to any adverse effects on site integrity either alone or in-combination.

7.12.11 NRW A agreed with the overall WFD conclusion that the project will not cause deterioration to any WFD waterbody or Protected Area, subject to the implementation of the CEMP and WQPMP, and additional mitigation discussed above.

7.12.12 NRW MLT is satisfied with the conclusions presented within the ES that there are no significant effect on Marine Water and Sediment Quality. This is as a result of the use of HDD through the intertidal zone and the requirement for a CEMP, WQPMP being submitted for approval post consent, which will be secured through licence conditions. Licence conditions will also be included to ensure decommissioning methods are approved at the appropriate time.

### 7.13 Benthic Ecology

7.13.1 Potential effects of the Project on Benthic Ecology were assessed within Chapter 19: Benthic Ecology of the ES. The following impact pathways were identified and assessed:

#### Construction Phase

- Temporary, localised loss and physical disturbance of benthic habitats arising from seabed preparation, anchor and mooring installation, sandwave levelling, cable installation and burial, and Horizontal Directional Drilling (HDD) works at the landfall;
- Temporary increases in SSC and localised sediment deposition, with potential for short-term smothering of benthic communities;
- Temporary disturbance to benthic infaunal and epifaunal species within the Offshore Export Cable Corridor (OfECC) and array area, with recovery expected through natural recolonisation;
- Risk of introduction and spread of invasive non-native species (INNS) associated with vessel movements and installation activities;

#### Operational and Maintenance Phase

- Permanent, highly localised loss or alteration of benthic habitat arising from the presence of subsea infrastructure, including export and inter-array cables, anchors, mooring systems, and any required cable protection;
- Localised introduction of hard substrate leading to small-scale habitat heterogeneity and colonisation by new biological communities;
- Localised scour, abrasion or sediment disturbance arising from infrastructure and mooring chain movement;
- Temporary, localised disturbance to benthic habitats and short-term increases in SSC associated with maintenance or repair activities;
- Effects associated with thermal emission and Electromagnetic Fields (EMF) from buried cables;

#### Decommissioning Phase

- Temporary and localised seabed disturbance and increases in SSC associated with removal of subsea infrastructure;
- Risk of introduction and spread of INNS associated with vessel movements and decommissioning activities.

7.13.2 The ES concludes that effects on benthic ecology would be negligible to minor adverse, being spatially limited, short-term or highly localised, and with high

recoverability of affected habitats and species. No significant adverse effects are predicted on benthic habitats or species, including designated features such as Annex I reef and sandbank habitats. The Applicant has incorporated embedded mitigation and best practice measures, including route refinement and micro-siting to avoid sensitive habitats, minimisation of seabed disturbance, selection of appropriate installation techniques, INNS biosecurity controls, and commitments to post-consent plans and assessments. With these measures in place, no significant effects on Benthic Ecology are anticipated.

- 7.13.3 Consultation responses were received from NRW A and JNCC in relation to the Benthic Subtidal and Intertidal Ecology chapter of the ES.
- 7.13.4 NRW A raised a number of concerns during the initial consultation relating to the potential for interactions between the OfECC and Annex I Reef features of the Pembrokeshire Marine SAC, the adequacy of survey coverage, the need for clearly defined habitat differentiation criteria, the use of artificial substrates, and the management of INNS. JNCC also raised a number of concerns applicable to offshore waters, including, consistency of assessment methods, clarity on impact footprints, the treatment of habitat sensitivity, and the robustness of lifecycle impact assessments.
- 7.13.5 NRW A highlighted that, due to gaps in survey coverage in parts of the OfECC (e.g. Kilometre Points 46–48), it was not possible at this stage to state with certainty that Annex I Reef features could be avoided. They therefore advised that the potential impact pathway of the OfECC intersecting with Annex I Reef should be explicitly included in the ES and HRA assessments. The Applicant confirmed that routing has been designed to avoid known areas of reef, and that where the cable passes through uncertain areas, the articulated cable will be secured in place either through its weight or through additional pinning to ensure no movement and prevent any scour or abrasion of surrounding Annex I habitat. Further post-consent geophysical and geotechnical surveys will be undertaken to refine micro-siting, with the scope and interpretation of these surveys to be agreed in writing with NRW A as a licence condition. NRW A acknowledged these commitments and confirmed they have no further concerns regarding the potential for interactions with Annex I Reef.
- 7.13.6 NRW A emphasised the need for additional post-consent surveys, noting that these are necessary to characterise habitat features along the OfECC and ensure that sensitive habitats, particularly Annex I Reef, can be avoided or appropriately mitigated. The Applicant confirmed that the CBRA and Cable Specification and Installation Plan (CSIP) will include detailed pre-construction survey requirements, with the survey scope and results interpretation to be agreed in writing with NRW A. These commitments were welcomed by NRW A, who confirmed that they are satisfied with this approach. JNCC also supported the need for clearly defined survey inputs, particularly in relation to quantifying drill arisings, wet-storage footprints, and clarifying any deviations from the impact assessment matrix.
- 7.13.7 Subject to post-consent geophysical and geotechnical surveys being undertaken to refine micro-siting and a CBRA and CSIP being submitted for approval post consent, NRW MLT agree that there is no significant effect as a result of the loss and physical disturbance from cable installation and that this impact pathway has

been appropriately considered. These mitigation measures can be secured through marine licence conditions.

- 7.13.8 NRW A noted that clear criteria are required to distinguish between mixed gravel habitats and low-resemblance stony reef, to ensure that the latter is not impacted by any boulder clearance activities. The Applicant confirmed that such criteria will be developed within the CBRA and CSIP, informed by recognised guidance (e.g., Irving 2009; Golding *et al.* 2020), and agreed with NRW A in writing prior to commencement of any Licensed Activities, which addressed the comments raised by NRW A.
- 7.13.9 NRW A and JNCC both raised concerns regarding the potential introduction and spread of INNS as a result of the proposed Project. NRW A noted that although the overall INNS risk is considered low, the Milford Haven Waterway is a recognised hotspot and contains species such as *Didemnum vexillum*, which increases the importance of effective biosecurity management. They advised that INNS monitoring should be incorporated into project planning and that a full Biosecurity Risk Assessment and Management Plan (BRAMP) should be completed for all project phases once contractor and vessel details are known.
- 7.13.10 JNCC similarly emphasised the need to minimise the use of artificial materials that may increase the likelihood of INNS colonisation, specifically advising that the use of plastic-based fronded mattresses should be avoided where possible. In response to these concerns, the Applicant confirmed that a risk-based INNS monitoring approach will be implemented to validate assumptions made in the ES. Any INNS detected will be used to inform biosecurity planning for maintenance and decommissioning.
- 7.13.11 The Applicant also committed to preparing a full Biosecurity Risk Assessment and Management Plan (BRAMP) once contractor and vessel details are known, to be agreed in writing with NRW A and JNCC. The Applicant further confirmed that the use of plastic materials will be minimised where practicable. Both NRW A and JNCC were satisfied that, with these commitments and the requirement for post-consent agreement of the biosecurity measures, there are no remaining INNS-related concerns.
- 7.13.12 Subject to an Biosecurity Risk Assessment and Management Plan (BRAMP) being submitted for approval post consent, NRW MLT agree that there is no significant effect as a result of the introduction and spread of INNS and that this impact pathway has been appropriately considered. These mitigation measures can be secured through marine licence conditions.
- 7.13.13 JNCC considered that decommissioning activities had not been fully assessed in the ES and advised that a worst-case, quantitative decommissioning footprint should be included, consistent with newly published Offshore Energies UK Designing for Decommissioning guidance. JNCC noted that, without a quantitative assessment of likely decommissioning impacts, the full project lifecycle effects could not be clearly understood. The Applicant confirmed that a Best Practicable Environmental Option (BPEO) assessment will be carried out prior to

decommissioning and will accompany the necessary discharge of condition application at that stage.

- 7.13.14 Whilst JNCC are still of the opinion that the Applicant has not taken a quantitative approach to the worst-case scenario for decommissioning, however, NRW MLT are content that an appropriate assessment of impact on benthic receptors have taken place. NRW MLT note that there are limitation to the assessment possible on decommissioning activities at this stage but are satisfied that through appropriate conditions suitable measures will be put in place to mitigate impact on benthic receptors during Decommissioning Activities. Decommissioning methods will need to be approved prior to commencement through the submission of a DEMP, and this will be done in consultation with JNCC.
- 7.13.15 JNCC also raised the need for assessment of Unexploded Ordnance (UXO) clearance impacts on benthic features; the Applicant clarified that detailed UXO assessment will be completed only once site-specific ordnance data is available. The Applicant has not requested UXO clearance as part of their application. A separate Marine Licence application will need to be applied for should any UXO clearance be required.
- 7.13.16 Considering all of the above, NRW MLT is satisfied with the conclusions presented within the ES relating to the Benthic Ecology chapter, and that all impact pathways have been appropriately assessed.

## 7.14 Fish and Shellfish

- 7.14.1 Potential effects of the Project on Fish and Shellfish receptors were assessed within Chapter 20: Fish and Shellfish of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary disturbance and loss of seabed habitat associated with installation of anchors, moorings, export and inter-array cables, seabed preparation and any required cable protection;
- Short-term increases in SSC and sediment deposition arising from seabed disturbance;
- Underwater noise generated during construction activities and UXO clearance;
- Temporary disturbance to spawning, nursery and migration areas for fish species;

### Operation and Maintenance Phase

- Long-term presence of localised seabed infrastructure;
- Effects associated with EMF from subsea cables;
- Disturbance associated with maintenance activities;

### Decommissioning Phase

- Temporary seabed disturbance and sediment mobilisation associated with removal of infrastructure and reinstatement of seabed conditions.

- 7.14.2 The ES concludes that effects on fish and shellfish ecology would be minor or negligible, spatially limited, and reversible, with no significant adverse effects predicted, either alone or in combination with other plans and projects. Embedded mitigation measures have been incorporated into the Project design, including route

selection, micro-siting of infrastructure, minimisation of seabed disturbance and adherence to good-practice construction and pollution prevention measures.

- 7.14.3 Consultation responses were received from NRW A in relation to the Fish and Shellfish chapter of the ES.
- 7.14.4 Overall, NRW A agreed that the project alone is unlikely to give rise to significant adverse effects on fish receptors. This conclusion was primarily based on the limited spatial footprint of the works and the short duration of impact piling (maximum 45 days). NRW A did, however, raise a series of detailed concerns regarding specific species, assessment methodologies, thresholds used in the underwater noise assessment, and the approach to cumulative and in-combination effects.
- 7.14.5 NRW A did not agree with the Applicant's approach or conclusions regarding potential cumulative and in-combination impacts to sandeel and herring. NRW A advised that additional work was required to quantify areas of potential habitat disturbance and to reassess noise impacts using cumulative sound exposure levels for static fish receptors. In response, the Applicant provided clarification and presented quantitative estimates of the temporary and permanent areas of disturbance for both sandeel and herring habitats. These included predicted zones of influence associated with construction disturbance, sediment deposition, and permanent habitat loss. NRW A restated that they continue to disagree with the Applicant's rationale for not presenting effects as a percentage of total available sandeel habitat, however using professional judgement and recognising the limited spatial extent of the project, confirmed that they are satisfied that no further quantitative work is required on this aspect for this project.
- 7.14.6 NRW A requested a quantitative rather than qualitative assessment of areas of suitable sandeel and herring habitat potentially affected by construction activities. The Applicant subsequently provided quantitative values for predicted disturbance areas (temporary and permanent) and explained the application of the MarineSpace guidance and Cefas advice on habitat sensitivity and data interpretation. The Applicant maintained that, although a percentage-based assessment of available habitat was not appropriate per Cefas advice, the absolute areas affected were small in the context of wider habitat availability. NRW A disagree that it is not considered appropriate to calculate the potential areas of effect as a percentage of the total area of available habitat, however confirmed that, despite continued disagreement regarding the appropriateness of presenting habitat loss as a percentage of total habitat, they accept the Applicant's submitted quantification for the purposes of determining this application.
- 7.14.7 NRW A advised that for impulsive sources such as impact piling, thresholds for fish should be based on cumulative sound exposure levels (SEL<sub>cum</sub>) for static receptors, in line with Popper *et al.* (2014), and that the behavioural threshold applied in the ES was uncertain. In response, the Applicant provided updated modelling outputs using SEL<sub>cum</sub> thresholds over the maximum piling duration (three hours per day) and clarified the isopleths for mortality, recoverable injury, temporary threshold shift and behavioural responses. The Applicant also summarised the associated propagation characteristics and reiterated that the

predicted effects remain temporary and spatially limited. No further comments were raised by NRW A on this matter.

7.14.8 NRW A queried the evidence base for soft-start procedures providing mitigation for fish. The Applicant clarified that the soft-start was proposed primarily for marine mammals, but noted that evidence does exist demonstrating behavioural responses in some fish species during sound ramp-up. The Applicant accepted that soft-start is not specifically designed for fish mitigation and acknowledged that it does not change the overall assessment conclusions, which NRW A acknowledge and agree with.

7.14.9 NRW A raised concerns regarding the use of Transitional and Coastal Waters survey data for migratory salmonids and potential limitations of shallow-water sampling for certain species such as sandeel. The Applicant acknowledged these limitations and confirmed they would be more clearly articulated in future assessments. The Applicant also highlighted that alternative data sources had been used to inform baseline understanding and that these limitations did not materially affect assessment outcomes.

7.14.10 NRW A requested clarification on EMF sensitivity for different fish life stages and the potential for impacts to be greater in areas where cables may be exposed or protected with rock armour. The Applicant explained the basis for sensitivity ratings and referenced the available evidence base, noting that predicted EMF strengths are low and diminish rapidly with distance. The Applicant further confirmed that areas of cable protection had already been assessed as the worst-case scenario and that effects remained negligible.

7.14.11 NRW A advised that the cumulative assessment should include all effects greater than negligible and raised concerns about compounding impacts on key species. The Applicant confirmed that all relevant pathways (temporary disturbance, permanent loss, EMF, underwater noise, SSC) had been included within the cumulative assessment and that quantitative values had been used to contextualise impacts on herring and sandeel. The Applicant reiterated that effects remain small, temporary, and localised, and therefore are not considered significant. No further comments were raised by NRW A on this matter.

7.14.12 Following the submission of quantitative values for predicted disturbance; updated modelling outputs using SELcum thresholds; and the additional clarifications provided, NRW MLT is satisfied that Fish and Shellfish have been adequately assessed and any impacts are not considered significant.

## 7.15 Marine Mammals

7.15.1 Potential effects of the Project on Marine Mammal receptors were assessed within Chapter 21: Marine Mammals of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Underwater noise generated during pre-construction surveys, UXO clearance, and offshore installation activities;
- Potential behavioural disturbance, temporary/permanent auditory effects;

- Disturbance associated with increased vessel activity within the offshore development area and export cable corridor;

Operation and Maintenance Phase

- Underwater noise and disturbance from routine maintenance vessel activity;
- Potential barrier effects and changes in movement patterns associated with the presence of floating infrastructure and mooring systems;
- Collision risk with vessels and entanglement risk associated with mooring lines and cables;
- EMF effects associated with subsea cables;

Decommissioning Phase

- Temporary disturbance and underwater noise associated with vessel activity and removal of infrastructure, broadly comparable to construction effects.

7.15.2 The ES concludes that, with implementation of mitigation measures secured through a Marine Mammal Management Plan (MMMP), effects on marine mammals would be temporary, localised and of low magnitude, resulting in no significant effects. Population modelling undertaken for key species confirmed no population-level consequences. Cumulative and transboundary effects were also assessed and found to be not significant.

7.15.3 Consultation responses were received from NRW A and JNCC in relation to the Marine Mammals chapter of the ES.

7.15.4 Across both the initial consultation and the subsequent consultations on further information, NRW A and JNCC raised a number of overlapping concerns relating to the reliance on post-consent mitigation; underwater noise assessment assumptions and mitigation; cumulative and in-combination assessment; UXO clearance; and the assessment and management of entanglement risk associated with Floating Offshore Wind (FLOW) infrastructure.

7.15.5 NRW A and JNCC both maintained that the project relies heavily on post-consent mitigation to support conclusions of no significant effect at EIA scale and no adverse effect on site integrity (AEoSI) at HRA scale. In particular, both bodies emphasised the importance of ensuring that mitigation relied upon in the assessments is secured through robust licence conditions, with written agreement from the Statutory Nature Conservation Bodies (SNCBs) prior to discharge.

7.15.6 The Applicant responded by submitting an updated outline MMMP. The outline MMMP confirms the commitment to prepare a final, detailed MMMP once the final project design has been confirmed, and to agree this in writing prior to the commencement of any Licensed Activities.

7.15.7 NRW A confirmed that they welcome the amendments made to the outline MMMP and consider that, subject to the MMMP being secured as a condition of the Marine Licence and agreed with NRW A prior to discharge, material concerns have been resolved. JNCC similarly welcomed the Applicant's strengthened commitments, whilst noting that final mitigation detail must be confirmed post-consent. This will be secured through the inclusion of licence conditions.

- 7.15.8 NRW A and JNCC raised extensive concerns regarding the assessment of underwater noise, including piling source level derivation, use of auditory weighting functions, treatment of SELcum, interpretation of disturbance metrics, and inconsistencies between worst-case piling durations presented.
- 7.15.9 The Applicant clarified modelling assumptions, confirmed use of Southall *et al.* (2019) auditory weighting functions, and demonstrated that even when extrapolating piling duration beyond the originally modelled worst-case, predicted population-level effects remain negligible based on Interim Population Consequences of Disturbance (iPCoD) outputs.
- 7.15.10 The updated outline MMMP now explicitly commits to considering both Peak Sound Pressure Levels (SPL<sub>peak</sub>) and SELcum when defining mitigation zones and determining the need for additional measures. It also confirms that noise abatement and deterrent measures (such as bubble curtains and acoustic deterrent devices) will be actively considered as part of the final MMMP, rather than being discounted at application stage.
- 7.15.11 JNCC acknowledges this commitment and confirmed that they support this commitment to consider best practice mitigation, particularly where SELcum-based injury ranges exceed those that can be mitigated by visual and acoustic monitoring alone. NRW A likewise confirmed that, subject to appropriate conditioning, underwater noise impacts can be ruled out.
- 7.15.12 NRW A and JNCC both noted that UXO clearance, if required, would be subject to a separate Marine Licence application. Both highlighted the updated Government Joint Position Statement on UXO clearance and the requirement for low-order techniques to be the default approach. The Applicant confirmed that any UXO clearance would be undertaken in accordance with the policy and guidance in force at the time of application and that a dedicated MMMP would accompany any UXO Marine Licence application. NRW A and JNCC confirmed that this approach is acceptable.
- 7.15.13 NRW A and JNCC raised concerns surrounding the entanglement risk, particularly given the novel nature of FLOW infrastructure. Both bodies emphasised the importance of monitoring, removal of entangled debris, and adaptive management, and highlighted secondary and tertiary entanglement risks involving derelict fishing gear.
- 7.15.14 The updated outline MMMP includes a commitment to routine inspection of mooring lines and floating cables, removal of marine debris, and reporting requirements. Both NRW A and JNCC welcomed this commitment but noted that the outline MMMP remains high-level.
- 7.15.15 NRW A confirmed that, subject to a licence condition requiring agreement of the final entanglement monitoring and mitigation approach in writing prior to offshore works, they consider this issue adequately addressed. JNCC also agreed that AEoSI can be ruled out in relation to entanglement, provided a robust and effective monitoring and mitigation plan is formally agreed within the final MMMP. This will be secured through licence conditions.

- 7.15.16 NRW A and JNCC both raised concerns that certain impact pathways such as underwater noise, barrier effects and entanglement had been scoped out of cumulative and in-combination assessment, and that some projects were classified at lower tiers or excluded due to data limitations.
- 7.15.17 NRW A acknowledged that Mona, Morgan and Morecambe were listed as Tier 4 projects in the Applicant's cumulative assessment as at the time the Marine Mammals Chapter of the ES and RIAA were finalised, these projects were only expected to be submitted for application. However, full assessment information for these projects is now publicly available, and given the elapsed time NRW A advised that the list for the in-combination assessment is revisited to ensure a full and robust assessment. These projects were included in the in-combination assessment of the HRA, however the conclusions remained unchanged. NRW A agreed with this conclusion.
- 7.15.18 JNCC also stated that Llŷr 2 and Valorous are missing from the other plans/projects in-combination assessment for marine mammals. The Applicant noted that this was due to the limited data available on these projects. NRW MLT are satisfied that if these projects reach application stage, they will be required to carry out an in-combination assessment with Llŷr, and would be able to carry out a more meaningful assessment than would be possible at this stage.
- 7.15.19 Entanglement risk, particularly secondary and tertiary entanglement involving derelict fishing gear, was consistently highlighted by both NRW A and JNCC as an impact pathway of increasing relevance in a cumulative context, given the clustering of FLOW demonstrator projects (including Llŷr, Erebus and White Cross) and their proximity to harbour porpoise SACs.
- 7.15.20 JNCC in particular emphasised that, while the spatial footprint of individual demonstration projects is small relative to the wider marine mammal management units, the combined presence of multiple floating arrays and mooring systems could increase entanglement risk if not effectively managed. NRW A similarly advised that conclusions of no AEOSI relied on the effective implementation of monitoring and debris removal commitments. This will be considered post consent through the submission of a final MMMP which will be agreed in writing with both NRW A and JNCC.
- 7.15.21 Potential barrier effects arising from the presence of multiple floating arrays and associated mooring systems was raised as a concern. JNCC expressed concern that evidence from fixed-foundation wind farms cannot be directly extrapolated to floating infrastructure, and that cumulative barrier effects remain an area of scientific uncertainty. In response, the Applicant updated their outline MMMP on 27 April 2026 to include a commitment to carry out appropriate monitoring which will be detailed in full within the final MMMP to be discharged post consent, subject to agreement in writing with JNCC. JNCC confirmed this addressed their concerns.
- 7.15.22 Concerns relating to cumulative underwater noise effects were raised by both NRW A and JNCC particularly in relation to piling activities occurring across multiple

offshore wind projects within overlapping timeframes. The Applicant's cumulative assessment considered worst-case overlapping construction scenarios at the Marine Mammal Management Unit (MMMU) scale and informed the population-level appraisal using iPCoD outputs, supplemented by professional judgement regarding the spatial and temporal separation of activities. NRW A and JNCC raised concerns regarding the reliance on a ten-day piling duration within the noise modelling; however, both bodies accepted that extrapolation of the modelling outputs demonstrates that even under extended piling scenarios the proportion of affected harbour porpoise and seal populations would remain below thresholds indicative of population-level effects. The updated outline MMMP also includes a clear commitment to consider SELcum alongside SPLpeak when defining mitigation zones and selecting mitigation measures. Both NRW A and JNCC welcomed this commitment

7.15.23 Whilst NRW MLT acknowledge that the conclusions of no significant effect for a number of impact pathways relies heavily on a final MMMP being submitted post consent, there is no reason to believe that the MMMP cannot be agreed in consultation with NRW A and JNCC and this can be secured through licence conditions. With this condition being attached to the Marine Licence, and following the additional clarifications and updates to the outline MMMP, NRW MLT is satisfied that an appropriate assessment has been carried out which concludes no significant effect on marine mammals as presented within the ES. .

## 7.16 Marine Ornithology

7.16.1 Potential effects of the Project on Marine Ornithological receptors were assessed within Chapter 22: Marine Ornithology of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary disturbance and displacement of seabirds arising from construction vessel activity, installation of floating platforms, moorings and anchors, and offshore construction works;
- Short-term effects associated with underwater noise generated during offshore installation activities, with particular consideration given to diving seabird species;
- Indirect effects resulting from short-term, localised changes in prey availability due to seabed disturbance and sediment mobilisation;

### Operation and Maintenance Phase

- Potential displacement and barrier effects associated with the presence of floating wind turbine generators, mooring lines, anchors and associated infrastructure within the array area;
- Collision risk with turbine blades assessed for relevant seabird species using collision risk modelling;
- Entanglement risk associated with floating mooring infrastructure;
- Potential attraction to navigational and aviation lighting, and creation of incidental roosting opportunities on floating structures;
- Indirect effects associated with longer-term changes to prey distribution and availability;

### Decommissioning Phase

- Temporary disturbance and displacement of seabirds associated with vessel activity and removal of offshore infrastructure, similar in nature and extent to construction effects.

7.16.2 The ES concludes that, with the incorporation of embedded mitigation and best-practice management measures, effects on marine ornithology would be minor or negligible, localised, temporary and reversible, with no significant adverse effects predicted for any seabird species, either alone or in combination with other plans or projects. Population modelling demonstrated no adverse population-level effects, including for species associated with nearby designated sites. Cumulative and transboundary effects were also assessed and found to be not significant. A range of embedded mitigation and management measures have been incorporated through the Project Environment Management Plan (PEMP) and associated plans, including vessel management, pollution prevention and lighting controls.

7.16.3 Consultation responses were received from NRW A, JNCC, and the RSPB in relation to the Marine Ornithology chapter of the ES.

7.16.4 Across the first and second consultation rounds, NRW A and JNCC generally agreed that the project-alone assessments in the ES were robust, noting that survey coverage, species apportioning, displacement analysis, and collision risk modelling had been adequately undertaken. Both NRW A and JNCC confirmed that, for the project alone, significant effects could be ruled out for all assessed features. This included acceptance of the Applicant's population modelling for Guillemot, Puffin, and Gannet at key colonies, allowing both NRW A and JNCC to conclude no impact when the project is considered alone.

7.16.5 NRW A and JNCC raised significant concerns about the adequacy of the Applicant's cumulative and in-combination assessments. Their comments noted that a number of relevant projects within the species' Biologically Defined Minimum Population Scale (BDMPS) regions and within colony foraging ranges had not been included or had been treated as contributing zero impact despite available data. NRW A advised that the Applicant should incorporate cumulative impact figures and Population Viability Analysis (PVA) outputs from the Mona offshore wind assessment, which covered the same major SPAs and BDMPS regions, and should undertake colony-specific apportioning for in-combination totals for Lesser Black-Backed Gull (LBBG) and Puffin at Skomer, Skokholm and the Seas off Pembrokeshire (SSSP) SPA. JNCC similarly reported that without the missing in-combination totals and associated PVA metrics, they could not advise on effects for certain SPA features.

7.16.6 Given the stage of the determination process, NRW A undertook its own cumulative and in-combination analysis, drawing directly on Mona's fully-gap-filled project tables and PVA outputs. NRW A confirmed that, with this additional assessment work, conclusions of no significant cumulative effect for all Welsh SPAs could be reached. JNCC's final advice, issued following review of the Applicant's updated clarifications, likewise confirmed that remaining gaps had been resolved sufficiently to conclude no significant effects on key SSSP SPA features, including Manx shearwater, Puffin, LBBG and the wider assemblage.

- 7.16.7 Both NRW A and JNCC reiterated that thorough cumulative and in-combination assessments should have been carried out and incorporated within the ES.
- 7.16.8 NRW MLT recognise that there deficiencies in the cumulative and in-combination assessment carried out by the Applicant. However are satisfied following NRW A undertaking its own cumulative and in-combination analysis, that no significant cumulative effects are anticipated.
- 7.16.9 NRW A and JNCC also raised concerns regarding entanglement risk associated with floating mooring systems. Both bodies agreed that while the Applicant had committed to regular inspection of moorings and cables, the mitigation must explicitly include removal of entangled debris and be secured as a licence condition, with an obligation to report annually on entanglement observations and removals. They advised that such monitoring is essential given the demonstrator nature of the project and the sector-wide importance of gathering evidence on floating wind mooring interactions. The Applicant subsequently updated their draft Project Environment Management Plan (PEMP) commitments to reflect this requirement and will be subject to final approval post consent.
- 7.16.10 Both bodies agreed that subject to the above mitigation the project-alone effects are not significant and will not adversely affect the integrity of relevant European sites, and that cumulative and in-combination conclusions are now sufficiently robust.
- 7.16.11 During determination, the Applicant looked to reduce the tip height of the turbines from 325.5m to 300m to address concerns raised surrounding visual impacts. NRW A and JNCC requested clarity on whether the Applicant's commitment to limit maximum tip height to 300m from 325.5m above Highest Astronomical Tide (HAT) would influence Collision Risk Models (CRM) inputs. The Applicant confirmed that the reduction in tip height does not alter any CRM parameters, namely air gap and rotor radius, and therefore does not change collision predictions.
- 7.16.12 The RSPB raised a number of concerns. They raised concerns regarding the adequacy of baseline characterisation for nocturnally active species, particularly Manx shearwater and Balearic shearwater, and did not consider that the digital aerial surveys sufficiently captured diel patterns, resulting in potential underestimation of presence and associated collision or displacement risk. RSPB also questioned the application of Gannet macro-avoidance rates, that the method used may not sufficiently reflect breeding-season behaviour, variation between individuals, or potential habituation effects. NRW MLT recognise that both NRW A and JNCC as the SNCBs consider that the baseline characterisation to be acceptable, and in accordance with available guidance produced by the SNCB. NRW MLT are therefore satisfied with the assessment completed.
- 7.16.13 Subject to a Project Environment Management Plan (PEMP) being submitted post consent for approval, which can be secured through licence conditions, NRW MLT are satisfied that an appropriate assessment has been carried out and concludes no significant impact on Marine Ornithology as presented in the ES.

## 7.17 Seascape, Landscape and Visual Impact Assessment (SLVIA)

7.17.1 Potential effects of the Project on Seascape and Landscape were assessed within Chapter 23: SLVIA of the ES. The following impact pathways were identified and assessed:

### Construction Phases

- Temporary changes to perceptual aspects of seascape and views resulting from increased vessel activity within the array area and Offshore Export Cable Corridor (OfECC);
- Temporary visual presence of installation or removal activities and associated vessels within the offshore environment;
- Short-term disturbance to views during transportation of Wind Turbine Generators (WTGs) and associated infrastructure;

### Operation and Maintenance Phase

- Indirect effects on perceptual aspects of seascape and landscape character arising from the presence of WTGs at distances greater than 35 km from the Pembrokeshire coast;
- Changes to views experienced by recreational users, residents and visitors from coastal locations, islands and offshore routes due to the visibility of WTGs on the distant horizon;
- Night-time visual effects associated with aviation lighting on WTGs, including potential effects on dark sky characteristics;
- Effects on users of the Pembrokeshire Coast Path where theoretical visibility of WTGs is present;

### Decommissioning Phase

- Temporary effects broadly similar in nature to construction impacts, limited to vessel activity and short-term presence during removal of offshore infrastructure.

7.17.2 The ES concludes that, due to the offshore location of the Wind Turbine Generators (WTGs), the substantial separation distance from the coast, the large-scale and simple seascape context, and the limited proportion of views affected, the magnitude of change would generally be small or negligible. Effects are therefore considered to be minor adverse and not significant. Visual effects from representative viewpoints, the Pembrokeshire Coast Path and night-time viewpoints were also assessed as minor adverse or negligible and not significant. Embedded mitigation has been incorporated into the Project design, including siting the array area over 35 km offshore, a balanced turbine layout, and the adoption of dual-intensity aviation lighting with a Lighting Management Plan to minimise night-time effects. No additional mitigation was identified as necessary. Cumulative, inter-related and transboundary effects were assessed, including in combination with existing, consented and proposed offshore wind developments in the Celtic Sea. The ES concludes that cumulative effects would remain minor adverse or negligible and not significant, with offshore wind farms occupying a small and distant component of the wider seascape.

7.17.3 Consultation responses were received from the Pembrokeshire Coast National Park Authority (PCNPA) and NRW A in relation to the SLVIA chapter of the ES.

7.17.4 Consultation responses from both the PCNPA and NRW A raised significant concerns with the assessments carried out on visual impacts. It was the PCNPA

view that, while individually some impacts may not be considered as significant, there are adverse effects across a large area of the National Park. The PCNPA had serious concerns relating to the assessment and disagreed with the views presented by the Applicant. It was therefore their view that there would be an adverse effects on the special qualities of the National Park and objected to the proposed development.

- 7.17.5 Similar Concerns were also raised by NRW A that there has been the underestimation of some seascape and visual effects on receptors within the National Park. NRW A did not agree with the approach taken for the Seascape, Landscape and Visual Impact Assessment, and considered that this had led to a number of effects being under reported.
- 7.17.6 As a result of further information submitted directly to PCNPA by the Applicant, the PCNPA withdrew their objection to the development following a commitment from the Applicant to reduce the height of the turbines to 300m from 325.5m. The PCNPA still maintained concern regarding the outcomes of the SLVIA and it remains their view that there would be an adverse effects on the special qualities of the National Park as a result of the proposed development.
- 7.17.7 NRW A welcome the commitment to reduce the turbine blade tip height from 325.5m to 300m, however, further reduction in tip height would be required to reduce the visual impact to an acceptable level. As such, NRW A have advised that a reduction in blade tip height to 270m would likely reduce impacts within the Pembrokeshire Coast National Park (PCNP) to a level NRW A consider would be acceptable level. The PCNPA agrees with NRW A that reducing the blade tip height to 270m would reduce the landscape and visual impacts on the PCNP and would result in less significant effects for the PCNP.
- 7.17.8 The Applicant was unable to commit to lowering the maximum turbine height to 270m, stating that the minimum height that the turbine height could be capped at was 300m.
- 7.17.9 The Applicant maintains their position that the proposed development would not have an adverse effect on the National Park seascape, landscape and special qualities, however both PCNPA and NRW A disagree and consider that the project would lead to adverse impacts. NRW MLT are in agreement with the PCNPA and NRW A that the proposed development would have an adverse effect on the special qualities of the National Park.
- 7.17.10 Policy SOC\_07 of the Welsh National Marine Plan (WNMP) states that *'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'*.
- 7.17.11 As detailed above the Applicant has looked to reduce the impacts as much as possible by reducing the turbine height from 325.5m to 300m, however could not commit to reducing the turbine height to 270m as requested by consultees.

7.17.12 The Applicant submitted ‘*ORML2465 251120 Strategic Need for the Llŷr Project*’ on 30 January 2026, which NRW MLT consider provides a convincing case for proceeding despite impacts on seascapes remaining. The Llŷr Project is a test and demonstration floating offshore wind development that responds directly to UK and Welsh policy priorities on net zero, energy security and sustainable economic growth. It aligns strongly with the Wales National Marine Plan, by maximising renewable energy generation while addressing environmental, social and cumulative impacts. The project’s primary benefit is its role as a catalyst for the emerging floating offshore wind sector. By deploying commercial-scale turbines, Llŷr will look to de-risk technology, validate designs and accelerate cost reductions while increasing investor confidence and enabling future gigawatt-scale projects. Llŷr also supports key national strategies, including the UK Clean Power 2030 Action Plan and longer-term net zero targets. It contributes to the need to significantly expand low-carbon electricity generation while improving energy security and reducing long-term energy costs. Economically, the project delivers substantial regional and national benefits. It will stimulate supply chain development, create employment in Pembrokeshire and across Wales. Importantly, Llŷr will also enable improved understanding of environmental interactions at a manageable scale, allowing mitigation measures to be tested before large-scale rollout. This supports sustainable development goals under the Well-being of Future Generations (Wales) Act and Future Wales 2040.

7.17.13 The Applicant has also produced a proposal for an enhancement scheme ‘*ORML2465 260123 Llŷr Landscape Enhancement Scheme Principles*’, submitted on 20 January 2026. Whilst NRW A are of the opinion that the proposed fund size is unlikely to be sufficient to enable any meaningful landscape enhancements relating to the special qualities of the National Park, the PCNPA have accepted the enhancements schemes proposed fund size.

7.17.14 The Welsh National Marine Plan (WNMP) encourages opportunities to enhance seascape, and consider therefore welcome the commitment to a landscape enhancement scheme. As any enhancement works would predominantly take place landward of MHWS, NRW MLT are satisfied that this can be secured by PEDW through the Section 36 of the Electricity Act 1989 determination process and financial contribution being secured by way of a Section 106 planning obligation legal agreement.

7.17.15 Whilst NRW MLT disagree with the conclusions presented within the Seascape, Landscape and Visual Impact Assessment of the ES, NRW MLT are satisfied that the application can proceed in line with the Policy SOC\_07 of the WNMP.

## **7.18 Marine Archaeology and Cultural Heritage**

7.18.1 Potential effects of the Project on Marine Archaeology and Cultural Heritage were assessed within Chapter 24: Marine Archaeology and Cultural Heritage of the ES.

The following impact pathways were identified and assessed:

### Construction Phase

- Direct physical disturbance of the seabed associated with installation of anchors and mooring systems, cable trenching, cable protection, pre-lay grapnel runs, seabed preparation and sandwave levelling;
  - Potential indirect effects on buried or partially exposed archaeological and paleo-environmental deposits arising from sediment disturbance, redistribution and changes to sediment cover;
  - Localised effects at the landfall associated with Horizontal Directional Drilling (HDD) works;
  - Risk of interaction with unidentified or previously unknown archaeological features;
- Operational and Maintenance Phase
- Localised direct disturbance associated with inspection, maintenance or repair of subsea infrastructure;
  - Potential indirect effects related to longer-term sediment dynamics around subsea infrastructure, including potential exposure or re-burial of assets;
  - Accidental disturbance during vessel anchoring or maintenance works;
- Decommissioning Phase
- Temporary and localised seabed disturbance associated with the removal of infrastructure and potential reinstatement activities, broadly comparable in nature to construction effects.

7.18.2 The ES concludes that, with the implementation of embedded mitigation measures, including Archaeological Exclusion Zones (AEZs), Written Schemes of Investigation (WSI) and a Protocol for Archaeological Discoveries (PAD), all potential effects on marine archaeology and cultural heritage would be reduced to negligible. No significant adverse effects are predicted for designated or undesignated heritage assets. The assessment recognises that marine cultural heritage assets are finite and non-renewable; however, through avoidance, micro-siting and preservation in situ, the Project will not result in unacceptable harm. Where necessary, further archaeological assessment of post-consent survey data will be undertaken to refine mitigation measures.

7.18.3 Consultation responses were received from the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW), Cadw and Welsh Archaeological Trust (WAT) in relation to the Marine Archaeology and Cultural Heritage chapter of the ES.

7.18.4 The RCAHMW are in agreement with the mitigation suggested within Chapter 24 of the ES relating to maritime archaeology.

7.18.5 The RCAHMW noted that the proposed Offshore Export Cable Corridor (OfECC) has changed since the original survey work was undertaken, therefore there is a section of the route for which survey and archaeological appraisal has not yet been undertaken. RCAHMW, agree with the mitigation proposed within the ES survey work to the same standard as the rest of the scheme will be required along this passage and must be completed prior to the scheme commencing. As part of this, the RCAHMW state that this should include the archaeological interpretation and assessment of the data, as has been done for the rest of the survey work. This should result in an updated version of Volume 6: Appendix 24B, including updated AEZs being submitted for review and approval in consultation with the RCAHMW.

- 7.18.6 CADW also noted that as a section of the route of the OfECC has changed that the survey and archaeological appraisal of this section will need to be completed before any construction work commences.
- 7.18.7 Cadw have also acknowledged that views of the proposed turbines may be possible from designated historic assets, however, in these views they will be seen on the horizon at a distance and will not have any impact on the settings of the designated historic assets.
- 7.18.8 RCAHMMW also agreed with the proposed mitigation, specifically the submission of a WSI and PAD and reiterated that this will need to be submitted for review and approval in consultation with the RCAHMMW. The PAD and WSI should be informed by the survey work and archaeological assessment noted above. has been completed, reviewed and approved in consultation with the RCAHMMW as it is likely to be informed by the findings of that work.
- 7.18.9 The pre-HDD geotechnical investigation associated with the cable landfall will require a full archaeological/geoarchaeological assessment, sampling, and appropriate dating programme due to the nationally important nature of the submerged forest remains at Freshwater West. RCAHMMW have advised that a separate WSI is prepared for this, that should be tailored and specific to that work, and will need to be reviewed and approved in consultation with RCAHMMW prior to that element of the project commencing. RCAHMMW also noted that this element of the scheme has high potential for knowledge enhancement, and therefore comply with WNMP Policy Soc\_05.
- 7.18.10 WAT provided representation in relation to impacts to the historic environment of the foreshore/intertidal zone, deferring to the RCAHMMW on potential offshore impacts.
- 7.18.11 WAT were satisfied that the historic environment has been adequately safeguarded as part of this scheme and that all appropriate mitigation measures have been undertaken to date, however reiterate that they expect to be further consulted on the mitigation strategy (PAD and WSI) for the construction phase post consent. Cadw also request the submission of a PAD and WSI post consent ahead of any work commencing. NRW MLT consider it appropriate to secure the requirements for a WAT, PAD to be produced and adhered to, approval of such plans would be made in consultation with WAT, Cadw and the RCAHMMW.
- 7.18.12 The PAD, WSI and AEZ should be information by the survey previously undertaken, and survey that will be undertaken of the amended route. NRW MLT is satisfied that all mitigation measures necessary to conclude no significant effect on Marine Archaeology and Cultural Heritage can be secured through licence conditions.

## **7.19 Shipping and Navigation**

- 7.19.1 Potential effects of the Project on Shipping and Navigation were assessed within Chapter 25: Shipping and Navigation of the ES , supported by a Navigational Risk Assessment (NRA). The following impact pathways were identified and assessed:

### Construction Phase

- Temporary displacement of vessels arising from safety zones around installation activities, construction vessels and cable installation works;
- Increased collision risk between third-party vessels and project vessels;
- Reduced access to local ports and harbours, including temporary effects on routing to and from the Port of Milford Haven;
- Temporary alterations to established vessel routing associated with construction activities within the array area and Offshore Export Cable Corridor (OfECC);

### Operational and Maintenance Phase

- Long-term presence of floating turbines, mooring systems and subsea infrastructure resulting in vessel displacement and minor route deviations;
- Increased collision and allision risk associated with vessels transiting in proximity to floating structures and mooring lines;
- Reduced under-keel clearance and potential anchor interaction with subsea cables;
- Impacts on search and rescue capability and emergency response arrangements, addressed through embedded mitigation and post-consent plans;

### Decommissioning Phase

- Temporary displacement and navigational effects associated with vessel activity and the removal of infrastructure, similar in nature and extent to construction effects.

7.19.2 The ES concludes that, with embedded mitigation measures, including safety zones, appropriate lighting and marking, cable burial, guard vessels, traffic monitoring, and compliance with Convention on the International Regulations for Preventing Collisions at Sea (COLREGs), all risks to shipping and navigation would be reduced to As Low As Reasonably Practicable (ALARP) and assessed as broadly acceptable or tolerable with mitigation. No unacceptable risks to navigational safety, emergency response capability, or access to ports are predicted.

7.19.3 Consultation responses were received from the Maritime & Coastguard Agency (MCA), Trinity House (TH), Royal Yachting Association (RYA) and UK Chamber of Shipping (CoS) in relation to the Shipping and Navigation chapter of the ES.

7.19.4 The CoS stated that outdated information had been used to represent the cumulative projects. The CoS considered that given the Crown Estate released to the public in December 2023 its intent to proceed with three finalised Project Development Areas (PDAs) for Celtic FLOW, that these areas should have been used in the assessment. However, the CoS acknowledged that the three final PDAs have the same footprint as the four PDAs as presented in the Navigational Risk Assessment (NRA). Given that the final PDA footprint is confined to those areas considered within the NRA, there is no impact on the overall findings of the assessment.

7.19.5 The CoS raised concerns about anchor snagging risk and the intended mitigations proposed by the Applicant, specifically whether the 1.2 m target burial depth as informed by the Cable Burial Risk Assessment (CBRA) is sufficient for the size of vessel and anchors expected. The Applicant acknowledged these concerns raised about anchor snagging and, confirmed that post consent CBRA will take account of this to inform the appropriate degree of burial required.

- 7.19.6 The CoS welcomed confirmation that Under Keel Clearance (UKC) information will be provided but requested clarification on how UKC associated with buoyant inter-array cables will be shown on nautical charts. The Applicant notes that there is no under keel clearance risk to mariners, as no vessel requiring more than 25m UKC would safely navigate within 50-100m of a turbine. At this distance, such vessels would already be at risk of blade allision, so they are not expected to operate in that area.
- 7.19.7 The options for mooring layouts extend up to 800-1000m from turbines. The CoS requested clarity on how such mooring spreads would be charted, and whether any anchors or cables could fall outside the licensable area. The Applicant stated that the final mooring layout depends on the floating platform technology selected and that figure 6.5 of the NRA represents a worst-case indicative layout only. The Applicant confirmed that no anchors, cables or other mooring apparatus will be placed outside the licensable area.
- 7.19.8 The CoS requested clarity on how the final layout would be confirmed and consulted upon. As committed in Vol. 6: Appendix 4C – Post-Consent Environmental Management Plan Log, the Project (Array) Layout Plan will detail the final turbine, cable and mooring configuration. This plan will be prepared in accordance with Marine Guidance Note (MGN) 645. The Project (Array) Layout Plan will need to be submitted and approved by NRW MLT in consultation with CoS, MCA and TH, and this will be secured through licence conditions.
- 7.19.9 Given turbine spacing of 1,140m is comparable to some mooring spread options, the CoS requested clarification as to whether certain mooring options are feasible within the array area, and whether shared moorings are being considered. The Applicant confirmed that mooring and anchoring systems will not be shared between turbines and that each turbine will have its own independent mooring arrangement. Final spatial configuration will be addressed through the post-consent Project (Array) Layout Plan, ensuring all infrastructure remains within the licensable area.
- 7.19.10 The RYA raised a clarification request regarding the minimum blade tip clearance for recreational boaters and whether the required 22m clearance is maintained under all tidal conditions. The Applicant confirmed that because the turbines are floating, the rotor–water clearance remains constant regardless of tidal state; therefore, the minimum 22m blade tip clearance is always maintained.
- 7.19.11 The MCA, Trinity House and UK Hydrographic Office (UKHO) raised no concerns regarding the NRA carried out and were content with the conclusions presented within the ES relating to the Shipping and Navigation Chapter. However, mitigation measures were requested which NRW MLT deem appropriate to secure through the Marine Licence. These include:
- Production and adherence to an Aids to Navigation Management Plan (AtNP);
  - A requirement to notify relevant organisations and marine users prior to commencement and completion of any phase of Licensed Activities and upon completion;
  - Production and adherence to an Emergency Response Cooperation Plan (ERCoP);

- Requirement that the devices are regularly inspected and maintained, including cables, with the requirement for the Licence Holder to inform the relevant authorities including the MCA and Trinity House in case of damage to, destruction or decay of any devices or exposure of cables on or above the seabed;
- Requirement that all structures in the Marine Licensable Activities are coloured in a manner to ensure safety to navigation, this is to be yellow from at least highest astronomical tide to a height as directed by Trinity House and the remainder in grey;
- Requirement that navigational safety is not compromised including the identification of any cable protection that exceeds 5% reduction of navigable depth;
- CBRA to determine appropriate burial depth for the subsea cable and to determine where additional protection is necessary;
- Prior approval of a Design Plan in consultation with the MCA and Trinity House to ensure navigation safety has appropriately been considered;
- Prior approval of Navigation Monitoring which includes a requirement that hydrographic surveys final data is supplied to the UKHO and MCA for the updating of nautical charts and publications and to include a cable route survey post-construction;
- Production and adherence to a Marine Pollution Contingency Plan (MPCP);
- Production and adherence to a Vessel Management Plan (VMP);
- Following completion of construction, the requirement for a Post Construction As-Built Report detailing the as built plans, and co-ordinates of the location of each offshore platform constructed and export cable routes;
- Rock protection is only used where adequate burial cannot be achieved and that exact locations are reported; and
- A requirement to ensure third party verification of moorings arrangements.

7.19.12 Subject to the submission of a Project (Array) Layout Plan and adherence to the mitigation detailed in section 7.19.11, NRW MLT is satisfied with the conclusions presented within the ES relating to the Shipping and Navigation chapter and that all impact pathways have been adequately assessed.

## 7.20 Commercial Fisheries

7.20.1 Potential effects of the Project on Commercial Fisheries were assessed within Chapter 26: Commercial Fisheries of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary loss or restriction of access to fishing grounds within the construction area and along the Offshore Export Cable Corridor (OfECC);
- Displacement of fishing activity and increased competition on adjacent fishing grounds;
- Temporary disturbance to fish and shellfish resources resulting from seabed disturbance, vessel activity and increased turbidity;
- Increased steaming time and operational costs associated with route deviations;

### Operational and Maintenance Phase

- Long-term loss of access to fishing grounds within the operational array area;
- Ongoing displacement of static gear fisheries, particularly potting activity;
- Disturbance associated with maintenance activities and vessel movements;
- Potential risk of gear interaction with subsea infrastructure;

### Decommissioning Phase

- Temporary effects on access and displacement during removal of infrastructure, similar in nature but shorter in duration than construction impacts.

7.20.2 The ES concludes that effects on commercial fisheries would be minor or negligible for the majority of fleets and minor to moderate adverse for the UK potting fleet prior to mitigation. With the implementation of embedded mitigation, including a Fisheries Liaison and Co-existence Plan (FLCP), appointment of a Fisheries Liaison Officer (FLO), cable burial, safety zones and advance notification procedures, all residual effects would be minor adverse or negligible, and not significant. Cumulative, inter-related and transboundary effects were assessed and found not to result in significant additional impacts when considered in combination with other offshore wind developments.

7.20.3 Consultation responses were received from the NFFO and WFA as a joint response in relation to the Commercial Fisheries chapter of the ES.

7.20.4 Concerns were raised relating to the adequacy of baseline data, the assessment of displacement and exclusion impacts, and the cumulative effects assessment in the Celtic Sea.

7.20.5 NFFO and WFA acknowledged that the baseline description of fishing activity was generally well presented, including the use of fisheries-based qualitative data. However, concerns were raised that no site-specific commercial fisheries surveys had been undertaken. They stated that the desk-based approach may not capture the full extent of fishing activity, particularly for small inshore vessels, and therefore conclusions derived from the baseline should be treated with caution. They also highlighted that future spatial restrictions from additional developments in the Celtic Sea should form part of the baseline consideration. The Applicant emphasised that multiple data sources had been used to compile a robust understanding of fishing activity and that the limitations of individual datasets had been explicitly acknowledged within the ES. The Applicant also highlighted that existing spatial management measures and reasonably foreseeable future activities were considered within the cumulative assessment and confirmed a commitment to develop a FLCP in collaboration with NFFO, WFA and other stakeholders.

7.20.6 NFFO and WFA raised significant concerns that impacts on inshore fleets, particularly those deploying static gear, had been underrepresented in the ES. It was indicated that the export cable installation would severely impact small-scale operators, yet the ES assessed effects on all receptors as negligible. They stated that the assessment failed to distinguish between smaller, less resilient operators and the broader fleet, resulting in an aggregation that masks localised impacts. The Applicant confirmed that the ES had identified a potentially significant adverse impact on the local potting fleet during the construction phase, noting the temporary loss of access and need for gear removal. To address this, the Applicant committed to delivering additional measures through the FLCP, to be informed by stakeholder engagement, including evidence-based mitigation aligned with the Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) guidance. The Applicant reiterated that inshore static gear impacts were considered in full and that significant effects had been recognised within the ES.

7.20.7 NFFO and WFA objected to the ES conclusion that mobile gear fleets are less vulnerable to displacement, noting that “mobile” refers to the catching method—not the fleet’s operational flexibility. They argued that mobile gear operators face constraints on where they can operate and that the ES incorrectly assumes high ability to relocate. Concerns were also raised that while the ES recognises the potential for displacement for static gear fleets, it does not adequately assess the increased risk of gear conflict resulting from displacement. The Applicant clarified that the ES adopted the same definition of mobile gear as NFFO and agreed that operational ranges differ between fleet segments. The ES considered that trawl fleets active in the area generally have moderate to high alternative fishing grounds, provided sufficient notice is given. The Applicant acknowledged the potential for significant displacement for static gear fleets and confirmed that mitigation for displacement and operational interactions would be developed through the FLCP, aligned with industry guidance.

7.20.8 NFFO and WFA raised concerns regarding the Applicant’s use of the Hywind Scotland trial as evidence for potential co-location, arguing that the study demonstrated limited and economically unviable levels of fishing activity. They welcomed that the ES had assessed exclusion during the operational phase but were concerned that the significance conclusions remained unchanged between a “return to fish” scenario and complete exclusion for the project’s 30-year lifetime. They highlighted that static gear fleets could experience annual losses in the order of approximately £10,000 per vessel, and that no defined long-term mitigation had been proposed. The Applicant reiterated that the assessment was carried out on a precautionary basis, assuming that fishing would not resume within the array area during operation. The Applicant also recognised the potential for significant impacts on potting fleets and reaffirmed the commitment to develop the FLCP in collaboration with NFFO, WFA and others to agree appropriate long-term mitigation. The Applicant maintained that the assessment remained robust and proportionate.

7.20.9 NFFO and WFA stressed that the Llŷr project would contribute to an increasing spatial squeeze on fisheries. They stated that cumulative and in-combination effects were underrepresented and that the methodology used was not fit for purpose when the project contributes to large-scale regional exclusion but the ES still concludes no significant effect. The Applicant responded that the cumulative assessment followed established good practice and used all information available at the time of preparation. The Applicant maintained that both the ES and baseline report appropriately considered future fishing patterns and potential baseline evolution. The concerns regarding spatial squeeze are acknowledged but it is considered that the cumulative effects assessment accurately represented the project’s contribution relative to other developments.

7.20.10 No responses were received from the NFFO or WFA regarding the Applicants response to their initial concerns, therefore it was assumed they had no further comments to make.

7.20.11 Subject to a FLCP being submitted post consent, which will be secured through licence conditions. Additionally, as discussed in section 7.14 above, no significant impact is predicted on populations of fish and shellfish. NRW MLT is

satisfied with the conclusions presented within the ES relating to the Commercial Fisheries chapter and that all impact pathways have been appropriately considered.

## 7.21 Aviation and Radar

7.21.1 Potential effects of the Project on Aviation and Radars were assessed within Chapter 27: Aviation and Radar of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- No construction phase impact pathways were identified, as WTG blades would not be rotating and effects would be temporary and limited to short-term vessel and crane activity. Construction effects were therefore scoped out of detailed assessment;

### Operational and Maintenance Phase

- Radar clutter effects on civil and military radar systems, including en-route and air defence radar, arising from rotating WTG blades;
- Increased air traffic controller workload associated with potential radar interference;
- Physical obstruction risks to civil aircraft, military low-flying aircraft and search and rescue helicopters;
- Potential interaction with aviation lighting requirements affecting night-time operations;

### Decommissioning Phase

- Similar to the construction phase, no impact pathways were identified.

7.21.2 Embedded mitigation includes mandatory aviation lighting and marking of WTGs, a Lighting and Marking Management Plan (LMMP), notification of WTG locations and heights to aviation authorities, and stakeholder liaison throughout the Project lifecycle. No monitoring is proposed. Cumulative, inter-related and transboundary effects were assessed and found to be minor adverse or negligible and not significant, with no impacts extending beyond UK airspace.

7.21.3 Consultation responses were received from the MoD and NERL Safeguarding in relation to the Aviation and Radar chapter of the ES.

7.21.4 The MoD and NERL Safeguarding raised concerns surrounding the impacts the wind turbines within the array area will have on radars and objected to the proposed development.

7.21.5 The MoD raised concerns with the wind turbines within the array area due to the unacceptable impact they will cause to military radar. The proposed turbines would be located approximately 72.6km from and will degrade aviation safety by causing unacceptable interference to the Air Traffic Control radar at MoD Hartland Point. For MoD to remove its objection and replace it with licence conditions, the MoD requested that the Applicant submit an outline radar mitigation proposal. An outline plan was submitted by the Applicant on 30 January 2026 and the MoD were satisfied with its content. The MoD therefore withdrew their objection subject to a Air Traffic Control Radar Mitigation Scheme (ATCRMS) being submitted for approval prior to commencement of Licensed Activities. The ATCRMS will be reviewed and approved in consultation with the MoD.

7.21.6 The MoD also state that other than for the purpose of testing radar mitigation, no wind turbine erected as part of this development should be permitted to rotate its rotor blades about its horizontal axis until the Performance results of the ATRMS have been submitted to and approved. These results will be reviewed and approved in consultation with the MoD.

7.21.7 The MoD also raised concerns that the turbines would introduce a physical obstruction to low flying aircraft operating in the area. The MoD therefore requested that the Applicant submits an Aviation Lighting Scheme for approval. NRW MLT consider that this will be secured through licence conditions to be submitted for approval prior to the commencement of Licensed Activities, and can be incorporated into the LMMP. The LMMP would be reviewed by the Licensing Authority and approved in consultation with the MoD prior to commencement of activities.

7.21.8 NERL Safeguarding considered that the proposed development is anticipated to have an unacceptable impact for the Swanwick Centre Air Traffic Control Centre and Burrington Radar. NERL Safeguarding did however confirm that they are confident that agreement can be reached with the Applicant surrounding appropriate radar mitigation. These impacts will need to also be addressed and mitigated through a Primary Radar Mitigation Scheme which will be submitted post consent for approval. The Scheme would be reviewed by the Licensing Authority and approved in consultation with NERL Safeguarding prior to commencement of activities.

7.21.9 Subject to a ATRMS, Primary Radar Mitigation Scheme and an LMMP, which will include the Aviation Lighting Scheme, being submitted for approval post consent, , NRW MLT is satisfied that Aviation and Radar have been adequately assessed and any impacts are not considered significant and can be appropriately mitigated.

## 7.22 Other Sea Users

7.22.1 Potential effects of the Project on Other Sea Users were assessed within Chapter 28: Other Sea Users of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary disruption to marine tourism and recreation, including recreational boating and fishing, arising from construction vessel activity and safety zones;
- Short-term interaction with other offshore developments and subsea infrastructure;
- Potential disruption to military practice areas where the Offshore Export Cable Corridor intersects the Castlemartin danger areas;
- Risk of damage to third-party assets, including subsea cables, during installation activities;

### Operation and Maintenance Phase

- Minor disruption associated with maintenance vessel movements and intermittent safety zones;
- Long-term presence of offshore infrastructure influencing recreational access patterns;

### Decommissioning Phase

- Temporary effects broadly similar to construction, limited in duration and spatial extent.

7.22.2 The ES concludes that, prior to mitigation, moderate to minor significant effects could arise in relation to military practice areas and third-party assets due to their high sensitivity. With the implementation of embedded and additional mitigation, including a Communications Protocol with the MoD, proximity and crossing agreements for third-party assets, Notices to Mariners, 500 m safety zones, guard vessels, compliance with COLREGS and SOLAS, CEMP and other management plans, all residual effects would be minor or negligible and not significant. Cumulative, inter-related and transboundary effects were assessed in relation to nearby offshore developments and infrastructure and were found not to result in significant cumulative impacts.

7.22.3 Consultation responses were received from the MoD in relation to the Other Sea Users chapter of the ES.

7.22.4 MoD raised concerns surrounding the cable being located within the Castlemartin danger areas and objected to the proposed development. The MoD concerns related to the potential for being liable should the ranges firing activities lead to damage to the cable. and the MoD also had concerns that the proposed Licensed Activities could cause disruption to range operations and therefore affect military training and Defence outputs.

7.22.5 Concerns were raised by the MoD regarding the cable travelling through the Castlemartin Training Area, specifically range danger areas D113A and D113B where live firing from the range out into sea occurs. MoD considered that the presence of a cable running through the range would not be compatible with range activities. A cable, or any type of infrastructure, within a danger area where live firing takes place would be at risk of damage from projectiles or fragments fired from the range. MoD have concerns that they may be liable in a claim for nuisance and/or negligence for damage to the cable caused by the military undertaking firing activities of Ordnance, Munitions and Explosives (OME) into the danger area or caused by historic OME. The Applicant has proposed cable protection mechanisms and stated they will accept liability for any damaged caused by Castlemartin firing activities. The MoD agreed with this proposal and NRW MLT are satisfied that this can be secured through the submission of a Cable Mitigation Scheme to be submitted for approval prior to commencement of Licensed Activities within range danger areas D113A and D113B. The Cable Mitigation Scheme will be reviewed and approved in consultation with the MoD. It is also anticipated that the Cable Mitigation Scheme will only be approved if the Applicant has reached a legal liability agreement with the MoD prior to submission of the Cable Mitigation Scheme.

7.22.6 The MoD consider survey, installation and maintenance works for the project within the danger areas would lead to periods of disruption to range operations and therefore affect military training and defence outputs. To address this the Applicant has agreed with the MoD to produce a Communications Protocol prior to commencement of Licensed Activities within range danger areas D113A and D113B. The Communication Protocol will be reviewed and approved in consultation with the MoD prior to commencement of works within the danger areas. Conditions

will also be required to ensure The MoD and Castlemartin Training Area are notified prior to commencement and following completion of any phase of Licensable Activities.

7.22.7 Subject to a suitable Cable Mitigation Scheme and Communications Protocol being implemented, which will be secured through licence conditions, NRW MLT is satisfied that Other Sea Users have been adequately assessed and any impacts are not considered significant.

## 7.23 Climate

7.23.1 Potential effects of the Project on Climate Change were assessed within Chapter 29: Climate Change of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary greenhouse gas emissions associated with the manufacture, transport and installation of offshore infrastructure;

### Operational and Maintenance Phase

- Long-term generation of renewable electricity resulting in displacement of electricity generated from fossil fuel sources;

### Decommissioning Phase

- Temporary greenhouse gas emissions associated with removal of infrastructure and vessel activity, similar in nature but shorter in duration than construction impacts.

7.23.2 The assessment also considered the resilience of the Project to future climate change, including sea level rise, changing wind and wave regimes and increased storm frequency.

7.23.3 The ES concludes that the Project has been designed to be resilient to projected future climate conditions, with no material climate-related risks to Project integrity or operation. The proposed Project, with a generating capacity of up to 100 MW, would generate approximately 355 GWh of renewable electricity per annum, resulting in the avoidance of over 150,000 tonnes of carbon dioxide emissions each year compared with non-renewable electricity generation. Overall, the ES concludes that adverse climate effects would be negligible, while the Project would result in a major beneficial, significant effect due to its contribution to decarbonisation.

7.23.4 No consultation responses were received in relation to the Climate Chapter of the ES.

7.23.5 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Climate chapter and as a renewable energy development the Project would have an overall beneficial impact on climate change.

## 7.24 Major Accidents and Disasters

7.24.1 Potential effects of the Project in relation to Major Accidents and Disasters were assessed within Chapter 30: Major Accidents and Disasters of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Vulnerability to natural hazards, including coastal flooding, flooding from surface water, storms and gales, heatwaves, cold and snow, reduced visibility, wildfires, ground instability and space weather, with the potential to affect site safety, programme delivery and environmental protection measures;
- Risk of man-made accidents associated with construction activities, including accidental spills or releases of fuels, oils or drilling fluids, fire or explosion, UXO encounters, and failures of equipment or temporary works;
- Risks to shipping and navigational safety associated with construction vessel activity, including potential collisions, allisions or interaction with third-party vessels;
- Risk of accidents during abnormal indivisible load movements and increased traffic during onshore construction works;
- Potential impacts arising from the proximity of existing industrial and energy infrastructure;

#### Operation and Maintenance Phase

- Ongoing vulnerability of Project infrastructure to natural hazards, including extreme weather events, flooding and meteorological conditions, and the implications for structural integrity and safe operation;
- Risk of accidental releases or pollution incidents associated with operational vessels, offshore infrastructure or maintenance activities;
- Navigational risks associated with the long-term presence of offshore structures and associated marine traffic;
- Risks relating to loss or failure of utilities, telecommunications, cyber-security incidents or emergency response capability affecting safe operation;

#### Decommissioning Phase

- Temporary risks broadly comparable to those identified during construction, associated with removal of infrastructure, increased vessel activity, handling of materials and reinstatement works;
- Continued exposure to natural hazards during decommissioning activities, with similar vulnerability and response measures to those applied during construction.

7.24.2 The ES concludes that, following the application of embedded design controls, standard industry practices and compliance with relevant legislation and guidance, the risks associated with major accidents and disasters would be low to medium and not significant across all phases of the Project. No scenarios were identified that could reasonably result in catastrophic or severe environmental effects. The Applicant has incorporated embedded mitigation and good-practice measures, including design specifications, safety systems, adherence to maritime and aviation safety requirements, emergency preparedness and response arrangements, and the preparation of management plans such as the; Construction Environment Management Plan (CEMP), Project Environment Management Plan (PEMP), Marine Pollution Contingency Plan (MPCP) and Emergency Response Cooperation Plan (ERCoP). These measures reduce both the likelihood and potential consequences of major accidents and disasters to as low as reasonably practicable.

7.24.3 Other than the comments discussed within the individual topic chapters above, no other consultation responses were received in relation to the Major Accidents and Disasters Chapter of the ES.

7.24.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Major Accidents and Disasters chapter.

## 7.25 Inter-related Effects Assessment

7.25.1 Potential Inter-related Effects of the Project were assessed within Chapter 31: Inter-related Effects Assessment of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary combined effects on seascape and landscape character and visual receptors arising from the presence and interaction of offshore construction activity, installation vessels, onshore construction works and temporary infrastructure;
- Spatial and temporal interaction between seabed disturbance, temporary increases in SSC and sediment deposition, and potential secondary effects on benthic habitats, fish and shellfish receptors and marine mammals;
- Interaction between underwater noise from piling, UXO clearance or other construction activities, increased vessel activity and temporary disturbance or displacement of marine mammal and ornithological receptors;
- Localised interaction between construction activities, sediment dynamics and marine archaeological receptors, including potential exposure or burial of assets;

### Operation and Maintenance Phase

- Combined effects on seascape and landscape character, views and perceptual receptors arising from the long-term presence of wind turbine generators in combination with any remaining onshore infrastructure;
- Localised interaction between subsea infrastructure (including anchors, moorings and cables), physical processes and benthic habitats over the operational lifetime of the Project;
- Interaction between operational vessel activity, existing marine users and shipping and navigation receptors;

### Decommissioning Phase

- Temporary and localised inter-related effects similar in nature to those identified during construction, associated with removal of infrastructure, increased vessel activity, seabed disturbance and short-term changes to sediment dynamics during reinstatement.

7.25.2 The ES concludes that potential inter-related effects during construction and decommissioning would be temporary, localised and of low magnitude, with embedded mitigation and management measures ensuring that these effects would not be significant either individually or in combination. Operational inter-related effects are assessed as limited and not significant, reflecting the constrained spatial extent of project infrastructure, the distance of the offshore array from sensitive coastal receptors, and the absence of ongoing high-magnitude impact pathways during routine operation. The assessment also concludes that inter-related effects are not exacerbated by cumulative interactions with other plans or projects in a manner that would result in effects of greater significance than those already identified within the individual topic chapters. No transboundary inter-related effects were identified.

7.25.3 Other than the comments discussed within the individual topic chapters above, no other consultation responses were received in relation to the Inter-Related Effects Assessment Chapter of the ES.

7.25.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Inter-related Effects Assessment chapter.

## 7.26 Residual Effects

7.26.1 Potential Residual Effects of the Project were assessed within Chapter 32: Residual Effects of the ES. The following impact pathways were identified and assessed:

### Construction Phase

- Temporary residual effects on landscape, seascape and visual receptors associated with construction activities, compounds and installation works;
- Localised residual effects on water, sediment and ecological receptors associated with temporary disturbance, sediment mobilisation and construction activity;
- Minor residual effects on recreation, Public Rights of Way (PRoW) and local amenity arising from temporary access restrictions and construction presence;
- Temporary residual effects relating to noise, vibration, traffic and air quality, managed through adherence to control measures and environmental management plans.
- Construction phase residual beneficial effects in relation to socio-economics, including employment creation and economic activity;

### Operation and Maintenance Phase

- Long-term residual effects on seascape and landscape character and views;
- Residual effects on marine physical processes, water quality, benthic habitats, fish and shellfish, marine mammals and ornithological receptors;
- Beneficial socio-economic effects associated with operation and maintenance employment and supply-chain activity;

### Decommissioning Phase

- Residual effects during decommissioning are assessed to be comparable to or less than construction effects, reflecting the temporary nature of removal works and reinstatement activities.

7.26.2 The ES identifies that, overall, the Project would result in a limited number of significant residual effects. These are confined primarily to construction-phase landscape and visual effects at specific receptors, construction-phase noise effects at a limited number of sensitive locations, and significant moderate beneficial residual effects associated with employment creation and wider economic activity. All significant residual adverse effects are localised, time-limited and effectively controlled through mitigation measures secured via licence and consent conditions. Following the application of embedded and additional mitigation measures, the Project would not give rise to widespread or unacceptable residual environmental effects, with the majority of residual effects assessed as negligible to minor and not significant, and beneficial socio-economic effects persisting beyond construction into the operational phase.

7.26.3 Other than the comments discussed within the individual topic chapters above, no other consultation responses were received in relation to the Residual Effects Chapter of the ES.

7.26.4 NRW MLT is therefore satisfied with the conclusions presented within the ES relating to the Residual Effects chapter.

## 8. Mitigation or monitoring measures to be taken

### 8.1 Features or measures to avoid, prevent, reduce or offset likely significant effects

- 8.1.1 In reaching the Conclusion about Environmental Impact (Regulation 21A of the Regulations), NRW MLT must have consideration of any features of the project, or proposed measures, to avoid, prevent, reduce or offset any likely significant adverse environmental effects (regulation 21A (1)(f)).
- 8.1.2 NRW MLT considers that the following features of the project, or measures included within the project proposal, as described in the application form, ES and other supporting information, would avoid, prevent, reduce or offset any likely significant adverse environmental effects:
  - 8.1.2.1 The onshore export cable will be placed underground and reinstatement of above ground vegetation as part of construction will be carried out to remove the visual effects of the onshore export cable during operation.
  - 8.1.2.2 The onshore substation has been positioned outside the Pembrokeshire Coast National Park (PCNP) and in an area already influenced by development, this helps to minimise potential effects on the PCNP and other sensitive landscapes.
  - 8.1.2.3 Turbines have been positioned 35km off the Pembrokeshire Coast and limited in height to 300m to reduce visual impacts on the PCNP and other sensitive landscapes.
  - 8.1.2.3 Adherence to Lighting Plans to reduce impacts on sensitive species, visual impacts, and to ensure navigation and aviation safety.
  - 8.1.2.4 Adherence to a Construction Environment Management Plan (CEMP) to ensure a range of measures are implemented to reduce impacts across a number of receptors during construction activities.
  - 8.1.2.5 Horizontal Directional Drilling (HDD) technology will be used onshore to avoid physical impacts on heritage assets, and at landfall to avoid disturbance of sensitive habitats (e.g. dune system) and reduce impacts on the beach and bathing waters.
  - 8.1.2.6 Non-toxic drilling fluid will reduce impacts to the marine environment.
  - 8.1.2.7 Archaeological Exclusion Zones (AEZs) will be developed and applied to ensure in-situ preservation of identified marine archaeological and cultural heritage assets.
  - 8.1.2.8 All works will be undertaken in accordance with the project-specific Written Schemes of Investigation (WSI) and a Protocol for Archaeological Discoveries (PAD) to ensure the implementation of marine archaeological mitigation.
  - 8.1.2.9 The onshore export cable will avoid higher quality agricultural land to ensure that the maximum productive farmable area remains operational.

- 8.1.2.10 The onshore export cable and access tracks will be positioned to the edge of fields, in field boundaries, or through less productive areas of individual fields to ensure that the maximum area of productive land remains in agricultural use during the construction period.
- 8.1.2.11 Adherence to a Construction Traffic Management Plan (CTMP) to ensure appropriate mitigation measures are implemented to reduce the impacts on traffic and transport.
- 8.1.2.12 Adherence to a Construction Dust and Air Quality Management Plan to ensure appropriate mitigation measures are implemented to manage construction dust and reduce the impacts air quality.
- 8.1.2.13 Adherence to a Decommissioning Environmental Management Plan (DEMP) to ensure appropriate mitigation measures are implemented during decommissioning activities to reduce impacts across a number of receptors.
- 8.1.2.14 Offshore Export Cable Corridor (OfECC) has been chosen to avoid sensitive features including Turbot Bank and St Gowan Shoal.
- 8.1.2.15 Cable burial has been chosen as the preferred cable protection method to minimise the requirement for surface laid protection.
- 8.1.2.16 All material that is dredged from the seabed will be disposed of close to the dredge location to ensure material is retained within the local sediment transport system.
- 8.1.2.17 Adherence to a Cable Specification and Installation Plan (CSIP) to ensure measures are implemented during cable laying to reduce impacts across a number of receptors.
- 8.1.2.18 Adherence to a Water Quality Pollution Management Plan (WQPMP) to ensure appropriate measures are implemented to protect the water environment.
- 8.1.2.19 Adherence to a Cable Burial Risk Assessment (CBRA) to ensure a range of measures are implemented to reduce impacts across a number of receptors.
- 8.1.2.20 Micro-siting for the offshore export cable will be utilised to avoid sensitive habitats, more specifically reef features.
- 8.1.2.21 Adherence to a Biosecurity Risk Assessment and Management Plan to ensure appropriate mitigation measures are implemented to reduce impacts as a result of introduction and the spread of invasive non-native species (INNS).
- 8.1.2.22 Adherence to a Project Environment Management Plan (PEMP) which will detail the methods to avoid, minimise and mitigate potential environmental effects during the operational stage of the proposed Project across a number of receptors, including marine ornithology.

- 8.1.2.23 Adherence to a Marine Pollution Contingency Plan (MPCP) to ensure measures are implemented to protect personnel working on the proposed Project and to safeguard the marine environment.
- 8.1.2.24 Should impact piling be required, impact resulting from underwater noise has been reduced through the implementation of soft-start and ramp up procedures in line with guidance, as well as commitment to only carry out piling at one location at a time.
- 8.1.2.25 Adherence to a Marine Mammal Management Plan (MMMP) to ensure a range of measures are implemented to reduce impacts on marine mammals.
- 8.1.2.26 Adherence to a Fisheries Liaison and Co-existence Plan (FLCP) which will detail the planned approach to fisheries liaison which will include mitigation measures relevant to commercial fishing activity, as well as ensuring structured liaison between the Applicant and fishing industry to minimise effects on commercial fisheries.
- 8.1.2.27 A Project (Array) Layout Plan will be developed prior to construction. The plan will set out the layout of the Array Area so it is compliant with relevant guidance.
- 8.1.2.28 Adherence to a Vessel Management Plan (VMP) to ensure safe navigation that will include the commitment to best practice vessel handling protocols. As well as ensuring navigation safety the adopted measures will also minimise the potential for any impact on marine wildlife as a result of vessel traffic.
- 8.1.2.29 Each wind turbine will have a minimum clearance between sea level and the lowest position of the blade of 22m to minimise impacts on navigation.
- 8.1.2.30 Adherence to an Emergency Response Cooperation Plan (ERCoP) to ensure appropriate measures are implemented in response to an emergency.

## **8.2 Mitigation or monitoring required to be attached to the consent (Regulation 22 (c)-(e))**

- 8.2.1 In reaching the EIA Consent Decision required under Regulation 22, NRW MLT must have consideration of the requirement for any mitigation measures or monitoring required to be attached to the consent.
- 8.2.2 Section 7 outlines where NRW MLT considers that there is a requirement for mitigation and/or monitoring, and sets out the measures we consider necessary to address potential impacts identified through the EIA process. These are summarised below:
- 8.2.2.1 Licence conditions will be required to ensure Pre Construction Ecological and Archaeological Surveys are carried out prior to commencement of Licensed Activities, the results of the survey should inform mitigation requirement incorporated into a number of other Project Plans. The survey specification will

need to be submitted to and approved by the Licensing Authority prior to commencement.

- 8.2.2.2 Licence conditions will be required to ensure the Project (Array) Layout Plan is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.3 Licence conditions will be required to ensure a Cable Specification and Installation Plan (CSIP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.4 Licence conditions will be required to ensure a Cable Burial Risk Assessment (CBRA) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.5 Licence conditions will be required to ensure a Cable Mitigation Scheme and Communications Protocol is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities within range danger areas D113A and D113B.
- 8.2.2.6 Licence conditions will be required to ensure a Construction Environment Management Plan (CEMP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.7 Licence conditions will be required to ensure a Project Environment Management Plan (PEMP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.8 Licence conditions will be required to ensure a Lighting and Marking Management Plan (LMMP) (which will include the Aviation Lighting Scheme) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.9 Licence conditions will be required to ensure an Air Traffic Control Radar Mitigation Scheme (ATCRMS) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.10 Licence conditions will be required to ensure that other than for the purpose of testing radar mitigation, no wind turbine erected as part of this development is permitted to rotate its rotor blades about its horizontal axis until the Performance results of the Air Traffic Control Radar Mitigation Scheme (ATCRMS) have been submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.11 Licence conditions will be required to ensure a Primary Radar Mitigation Scheme is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.

- 8.2.2.12 Licence conditions will be required to ensure a Water Quality Pollution Management Plan (WQPMP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.13 Licence conditions will be required to ensure a Marine Pollution Contingency Plan (MPCP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.14 Licence conditions will be required to ensure an Emergency Response Cooperation Plan (ERCoP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.15 Licence conditions will be required to ensure a Marine Mammal Management Plan (MMMP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.16 Licence conditions will be required to ensure an Otter Mitigation Plan is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.17 Licence conditions will be required to ensure a Biosecurity Risk Assessment and Management Plan (BRAMP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.18 Licence conditions will be required to ensure a Aids to Navigation Management Plan (AtNP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.19 Licence conditions will be required to ensure a Vessel Management Plan (VMP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.20 Licence conditions will be required to ensure Navigational Monitoring is carried out prior to commencement of Licensed Activities and during operations. The monitoring specification will need to be submitted to and approved by the Licensing Authority prior to commencement.
- 8.2.2.21 Licence conditions will be required to ensure a Fisheries Liaison and Co-existence Plan (FLCP) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.22 Licence conditions will be required to ensure a Written Schemes of Investigation (WSI) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.
- 8.2.2.23 Licence conditions will be required to ensure a Protocol for Archaeological Discoveries (PAD) is submitted to and approved by the Licensing Authority prior to the commencement of Licensed Activities.

- 8.2.2.24 Licence conditions will be required to ensure a Post Construction As-Built Report, which will detail the location of infrastructure, is submitted to and approved by the Licensing Authority following the completion of Licensed Activities.
- 8.2.2.25 Licence conditions will be required to ensure a Cable Maintenance Plan is submitted to and approved by the Licensing Authority prior to the commencement of Maintenance Activities.
- 8.2.2.26 Licence conditions will be required to ensure a Decommissioning Environmental Management Plan (DEMP) is submitted to and approved by the Licensing Authority prior to the commencement of Decommissioning Activities.
- 8.2.2.27 Licence conditions will be required to ensure devices are monitored in case of damage. If damage is identified, Trinity House, Maritime and Coastguard Agency, Kingfisher Information Service of Seafish, UKHO and the Licensing Authority and Enforcement Officers will need to be notified.
- 8.2.2.28 Licence conditions will be required to ensure mariners are notified in the event of cable exposure.
- 8.2.2.29 Licence conditions will be required to ensure that rock protection is only used where adequate burial cannot be achieved and that exact locations are reported to the Licensing Authority.
- 8.2.2.30 Licence conditions will be required to ensure all structures are painted yellow (colour code RAL 1023) from at least the waterline height and that the remainder of the structures are painted grey (colour code RAL 7053).
- 8.2.2.31 Licence conditions will be required to ensure any depth reductions resulting from the Works do not compromise safe navigation and that there is no more than 5% reduction in surrounding depth referenced to Chart Datum.
- 8.2.2.32 Licence conditions will be required to ensure floating devices and any devices suspended in the water column must have a Third-Party verification of the mooring arrangements.
- 8.2.2.33 Licence conditions will be required to ensure Trinity House, HM Coastguard, Local Mariners, Fishermen's Organisations, UK Hydrographic Office, The Kingfisher Information Service, The Ministry of Defence, Castlemartin Training Area, Marine Enforcement Officers and the Licensing Authority, are notified prior to the commencement of Licensed Activities and following completion.
- 8.2.2.34 The onshore works fall outside the jurisdiction of the Marine Licence; however, NRW PS are content that a Section 36 and Planning Permission is currently being determined by another consenting authority, PEDW, for the Project and know of no reason why measures proposed and discussed in section 7 could not be secured. Mitigation which has been identified or proposed by the Applicant in relation to the deemed planning permission includes but is not limited to:
- Adherence to a Landscape and Ecological Management Plan (LEMP);
  - Adherence to a Construction Dust and Air Quality Management Plan;

- Adherence to a Construction Traffic Management Plan (CTMP);
- Adherence to a Bat Mitigation Plan; and
- Financial contribution for the implementation of visual enhancement measures secured through a Section 106 planning obligation legal agreement.

8.2.3 In considering the monitoring requirements outlined above we do not consider that these requirements can be met by existing monitoring arrangements.

## 9. Regulation 21A Conclusion about Environmental Impact

9.0.1 In reaching a Conclusion about Environmental Impact, as required by Regulation 21A, NRW MLT has considered the following (Regulation 21A(1)):

- The application for a Marine Licence
- The ES submitted
- Further information provided, as outlined in section 3.3
- The responses to public consultation outlined in sections 4 and 7
- The responses to the technical consultation outlined in sections 6 and 7
- Any comments received from another EEA state, as outlined in section 5 and 7
- Any features of the project, or proposed measures, to avoid, prevent, reduce or offset any likely significant adverse environmental effects as outlined in section 8

9.0.2 NRW MLT, as appropriate authority, has considered the likely significant effects of the project, and reached a conclusion of the likely significant effects of the project with regard to the following (Regulation 21A(2)):

- Population and human health (9.1);
- Biodiversity (9.2);
- Land, soil, water, air and climate (9.3);
- Material assets, cultural heritage and landscape (9.4);
- Risk of major accidents and disasters relevant to the project (9.5); and
- Cumulative impacts and in-combination impacts (9.6).

### 9.1 Population and human health

9.1.1 NRW MLT has considered the potential effects of the Project on population and human health, including those arising from noise, air quality, traffic, socio-economics, recreation and tourism.

9.1.2 During construction, there is the potential for temporary disturbance to local communities arising from increased traffic, noise, dust and visual intrusion associated with onshore works, including the landfall, Onshore Export Cable Corridor (OnECC) and substation. However, these effects are localised, temporary and reversible, and are mitigated through measures including a Construction Environment Management Plan (CEMP), Construction Traffic Management Plan (CTMP), and good practice construction methods.

9.1.3 Operational impacts on population and human health are limited, with negligible traffic generation and no significant noise or air quality effects predicted. The presence of the onshore substation results in minor adverse but not significant effects on nearby receptors, which will reduce further over time due to embedded landscape mitigation.

- 9.1.4 The Project will contribute positively to socio-economic receptors through employment opportunities, support to the local and regional economy, and contribution towards renewable energy generation and climate change objectives.
- 9.1.5 NRW MLT concludes that, subject to the mitigation and conditions secured through the Marine Licence and other consenting regimes discussed in section 8, the Project will not give rise to significant adverse effects on population and human health.

## 9.2 Biodiversity

- 9.2.1 NRW MLT has considered the potential effects of the Project on biodiversity, including terrestrial and marine ecology, designated sites, protected species, and ecological processes.
- 9.2.2 Potential impacts during construction include temporary habitat loss, disturbance to species (including terrestrial species such as bats, otter, dormouse), seabed disturbance, and potential effects on marine mammals, fish, benthic ecology and ornithology. These impacts are largely localised, temporary and reversible.
- 9.2.3 Operational impacts are generally limited to permanent loss of small areas of low ecological value habitat, minor disturbance from infrastructure, and potential collision or displacement risks for marine ornithology.
- 9.2.4 The Applicant has embedded a range of mitigation measures within the Project design and has committed to further mitigation and monitoring secured through conditions, including but not limited to:
- Construction Environment Management Plan (CEMP);
  - Marine Mammal Management Plan (MMMP);
  - Biosecurity Risk Assessment and Management Plan (BRAMP);
  - Cable Burial Risk Assessment (CBRA) and Cable Specification and Installation Plan (CSIP);
  - Project Environment Management Plan (PEMP); and
  - Protected species mitigation plans (including bat and otter mitigation).
- 9.2.5 A HRA has been completed and concluded that, subject to measures detailed above, the Project will not adversely affect the integrity of any European site, either alone or in-combination.
- 9.2.6 NRW MLT is satisfied that subject to appropriate mitigation impact on biodiversity are not significant and consider the Project complies with relevant legislative requirements.

## 9.3 Land, soil, water, air and climate

- 9.3.1 NRW MLT has considered the effects of the Project on land, soil resources, geology, hydrogeology, surface water, groundwater, marine water and sediment quality, air quality and climate.

- 9.3.2 Construction activities have the potential to give rise to temporary effects including soil disturbance, sediment mobilisation, pollution risks to land and water, and dust emissions. These risks are mitigated through the implementation of embedded best practice measures, including pollution prevention measures, soil management, and use of Horizontal Directional Drilling (HDD) at landfall.
- 9.3.3 Operational effects are limited, with no significant impacts identified on soil function, water quality, or air quality. Surface water management at the substation and full reinstatement of land following construction further minimise long-term effects.
- 9.3.4 The WFD assessment concluded that the Project will not cause deterioration in status of any WFD water body nor prevent achievement of good status, subject to adherence to appropriate mitigation measures.
- 9.3.5 The Project contributes positively to climate objectives through the generation of renewable energy, supporting the transition to a low-carbon economy.
- 9.3.6 NRW MLT concludes that, with the implementation of appropriate mitigation the Project will not result in significant adverse effects on land, soil, water, air or climate.

#### **9.4 Material assets, cultural heritage and landscape**

- 9.4.1 NRW MLT has considered effects on material assets, cultural heritage and both terrestrial and seascape landscape character.
- 9.4.2 Potential impacts during construction include temporary disturbance to agricultural land, traffic infrastructure, and the setting of heritage assets, as well as temporary landscape and visual effects. These impacts are short-term and reversible.
- 9.4.3 Operational effects include the permanent presence of the onshore substation and offshore infrastructure. The offshore infrastructure was determined to have an adverse effect however NRW MLT consider it is appropriate to proceed in line with Policy SOC\_07 of the WNMP due to the overriding benefits of the project including through its contribution to energy generation.
- 9.4.4 Marine archaeology impacts are mitigated through pre-construction surveys and implementation of a Written Schemes of Investigation (WSI) and a Protocol for Archaeological Discoveries (PAD) which includes identification of Archaeological Exclusion Zones (AEZs).
- 9.4.5 Impacts on material assets, including commercial fisheries and shipping, have been assessed and are mitigated through project design, navigation risk assessment, and stakeholder engagement.

#### **9.5 Risk of major accidents and disasters relevant to the project**

- 9.5.1 NRW MLT has considered the vulnerability of the Project to major accidents and disasters, including those arising from extreme weather events, pollution incidents,

and accidental damage (e.g. cable exposure, vessel interaction or infrastructure failure).

- 9.5.2 The ES includes an assessment of major accidents and disasters and identifies that, with appropriate design and mitigation measures in place, the likelihood of such events is low.
- 9.5.3 The Applicant has committed to a range of mitigation measures and management plans, including:
- Marine Pollution Contingency Plan (MPCP);
  - Emergency Response Cooperation Plan (ERCoP); and
  - Adherence to relevant safety and navigational requirements.
- 9.5.4 NRW MLT is satisfied that the Project incorporates appropriate design, mitigation and management measures to minimise risks, and that any residual risks are not significant.

## 9.6 Cumulative impacts and in-combination impacts

- 9.6.1 NRW MLT has considered the potential for cumulative and in-combination effects arising from the Project in conjunction with existing, consented and reasonably foreseeable developments.
- 9.6.2 The ES includes a comprehensive assessment of cumulative effects across all environmental topics, including marine ecology, ornithology, landscape, shipping, fisheries and socio-economics.
- 9.6.3 In most cases, cumulative effects are assessed as minor or negligible and not significant. Where moderate cumulative effects are identified in theoretical scenarios, the Project is considered a minor contributor and does not materially alter the overall assessment.
- 9.6.4 The HRA also considered in-combination effects on European sites and concluded no adverse effect on integrity, subject to mitigation.
- 9.6.5 NRW MLT is satisfied that cumulative and in-combination effects have been appropriately assessed and that no significant adverse cumulative impacts will arise. NRW MLT considered that project coming forward in future will be expected to consider their in-combination impact with the Llŷr development.

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Produced By: Joe Thomas

Signed: 

Date: 19 June 2026

Approved by: Emmer Litt

A handwritten signature in black ink, appearing to read 'EJill'.

Signed:

Date: 19 June 2026

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## 10. Regulation 22 EIA Consent Decision

- 10.0.1 The Marine Licensing Team has considered the application ORML2465 and information provided in support of the application and is now in a position to make an EIA consent decision to Llŷr Floating Wind Limited.
- 10.0.2 In accordance with Regulation 22 of the Regulations, NRW MLT, as appropriate authority, have considered:
- The application for a Marine Licence;
  - The ES submitted;
  - Further information provided, as outlined in section 3.3;
  - The Conclusion about Environmental Impact (under Regulation 21A(2)) in section 9, which we consider to be up to date;
  - The responses to public consultation outlined in sections 4 and 7;
  - The responses to the technical consultation outlined in sections 6 and 7 ;
  - Any comments received from another EEA state, as outlined in section 5 and 7; and
  - Whether monitoring of the significant adverse environmental effects of the Project is appropriate (as outlined in section 8), including whether:
    - Existing monitoring can be relied upon;
    - Conditions should be attached to the regulatory approval;
    - Whether conditions to make provision for potential remedial action are required, as outlined in section 8; and
    - Whether any other conditions need to be attached to the regulatory approval, with respect to the likely significant environmental effects of the Project, as outlined in section 8.
- 10.0.3 After conducting a full and comprehensive review of the Project and applying appropriate additional external expertise, we conclude that the environmental impacts of the Project have been adequately identified, described and assessed. Accordingly, we conclude a favourable determination and that EIA consent for the project should be given.
- 10.0.4 We consider the works have been appropriately assessed and adequate mitigation strategies have been incorporated to remove or reduce the potential for impacts of significant effect associated with the development.
- 10.0.5 We consider that the monitoring and mitigation conditions outlined in section 8 should be considered in the regulatory decision.
- 10.0.6 This Written Confirmation of the EIA Consent Decision will be sent to the following, in accordance with Regulation 23 of the Regulations:
- Llŷr Floating Wind Limited;
  - Any person from whom NRW MLT received representation arising from the consultation described in section 4; and
  - All consultation bodies listed in section 6.
- 10.0.7 This Written Confirmation of the EIA Consent Decision is available on the NRW online public register.

Produced By: Joe Thomas



Signed:

Date: 19 June 2026

Approved by: Emmer Litt



Signed:

Date: 19 June 2026

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