

OCU Group

# Consultation and Responses - Redacted

Beaufort Horizontal Directional Drilling



GoBe Ref: 19421

Date: February 2026

COMMERCIAL IN CONFIDENCE

**GoBe**  
APEM Group

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| Revision | Date     | Status | Author:    | Checked by:      | Approved by: |
|----------|----------|--------|------------|------------------|--------------|
| 1.0      | Feb 2026 | Final  | APEM Group | GoBe Consultants | Vodafone     |



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## Cyfoeth Naturiol Cymru / Natural Resources Wales



**From:** [REDACTED]@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 28 May 2025 14:38  
**To:** [REDACTED], Vodafone  
**Cc:** Marine Area Advice and Management Team; [REDACTED]  
**Subject:** RE: Vodafone Cable Landing Infrastructure, Newgale Beach

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Hello [REDACTED]

As mentioned on the phone last week I have discussed this with colleagues and believe we may be able to answer your questions without entering into a DAS (we are able to do this with straightforward requests than don't require significant time to provide advice).

Please note that the content of any advice provided by NRW is advisory only and that it shall not be deemed to bind or in any other way restrict NRW in performing its statutory functions. The advice is from the Statutory Nature Conservation Body side of NRW and not the regulatory function (Marine Licensing Team or otherwise).

I discussed the questions you raised with Specialists on Coastal Processes, Benthic Ecology, Water Quality and the local Environment Team (Terrestrial).

In short there were no huge alarm bells ringing specifically at the prospect of plan A (temporary coffer dam on the beach) as opposed to plan B (the longer HDD right under the intertidal). Nor were there similar huge alarms bells regarding the use of a temporary access trackway across the shingle bank.

There was some high level advice suggested for consideration / inclusion in your application (NB\* this is not an exhaustive list).

- Newgale is a designated Bathing Water and any impact to bathing water quality during the bathing water season (May-September) would be a significant concern.
- Any general water quality impacts should be considered.
- A CEMP should be prepared using best practice pollution prevention.
- Evidence should be provided that 2m burial depth is sufficient to ensure the assets are not exposed – particularly after big storms.
- Consideration should be made of any temporary impacts around the coffer dam (eg wave interaction, sediment interruption, wave interaction and scour pockets) and any public safety impacts.
- More information on marine and coastal physical process assessments is available [here](#)
- The area around the coffer dam and the temporary trackway should be restored to their prior state after the project.
- I believe you're already aware – but the Newgale Coastal Adaptation Project was also mentioned as something you need to be aware of.

I think that covers the questions you were asking, but if I'm wrong and you'd like more detailed advice, that will need a DAS agreement. If that's the case please get in touch ASAP to discuss.

Adam

[REDACTED]  
**Uwch Gyngorydd Morol** / Senior Marine Advisor  
**Tim Cyngor a Rheoli Ardal Morol** / Marine Area Advice and Management Team  
**Rhif ffon** [REDACTED]  
**Dyddiau gweithio dydd Mawrth-dydd Gwener** / Working days Tuesday-Friday  
**Rhagenwau Fe/e** / Pronouns He/Him



**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



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naturalresources.wales**

**From:** [REDACTED]@vodafone.com>

**Sent:** 09 May 2025 11:36

**To:** [REDACTED]@cyfoethnaturiolcymru.gov.uk>

**Cc:** Marine Area Advice and Management Team <marine.advice@cyfoethnaturiolcymru.gov.uk>;

**Subject:** RE: Vodafone Cable Landing Infrastructure, Newgale Beach

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**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi [REDACTED],

Please find attached form and I have reattached the previous documents for completeness.

If you would like to discuss at all, please feel free to call.

Best wishes,

[REDACTED]

---

From: [REDACTED] <[REDACTED]@cyfoethnaturiolcymru.gov.uk>

Sent: 09 May 2025 10:27

To: [REDACTED] <[REDACTED]@vodafone.com>

Cc: Marine Area Advice and Management Team <marine.advice@cyfoethnaturiolcymru.gov.uk>; [REDACTED]

[REDACTED]

Subject: FW: Vodafone Cable Landing Infrastructure, Newgale Beach

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Hi [REDACTED]

I'm happy to have a call with you to discuss this, however I'm effectively a case manager, and would not be able to answer the questions asked in your email. In order to do that I would have to involve receptor specialists (Coastal Processes, Benthic Ecology and Water Quality). That would take the scope of the work beyond what we are able to offer for free non-statutory pre-application advice, and would have to be charged for under a Discretionary Advice Service (DAS) agreement.

If you'd like to proceed with a DAS agreement please fill in the attached form. We will use that information to produce a quote. If you agree the quote and send us a signed version that will form our contract.

If you'd like to discuss any of this please give me a call.

[REDACTED]

[REDACTED]

**Uwch Gyngorydd Morol** / Senior Marine Advisor

**Tim Cyngor a Rheoli Ardal Morol** / Marine Area Advice and Management Team

**Rhif ffon** [REDACTED]

**Dyddiau gweithio dydd Mawrth-dydd Gwener** / Working days Tuesday-Friday

**Rhagenwau Fe/e** / Pronouns He/Him



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**From:** [REDACTED] <[REDACTED]@vodafone.com>

**Sent:** 06 May 2025 15:56

**To:** Marine Area Advice and Management Team <[marine.advice@cyfoethnaturiolcymru.gov.uk](mailto:marine.advice@cyfoethnaturiolcymru.gov.uk)>

**Cc:** [REDACTED]

**Subject:** Vodafone Cable Landing Infrastructure, Newgale Beach

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Good afternoon Marine Advisory Team,

Vodafone are planning to install new Telecoms infrastructure at Newgale beach West Wales. We have consulted with The Marine Licensing team at Natural Resource Wales on the licensing requirements but as we are requesting feedback on the engineering solution have been directed to submit a consultation request to the Marine Advisory team at NRW. Please could we request feedback on the below installation activities from the NRW Advisory team? We would be happy to arrange a call at your soonest convenience to discuss.

Below is a brief overview of the activities and attached are some documents describing specific elements of the build which we would appreciate your review of prior to the meeting. I have also attached a presentation given to the Marine Licensing Team which provides additional background on how we have reached the engineering solution as it is, as well as a potential alternative we would like some feedback on.

Vodafone (under it's wholly owned entity Apollo Submarine Cable System Limited) are responsible for installing cable Landing Infrastructure connecting Newgale Beach to a cable Landing Station at Brawdy Industrial Estate. The infrastructure is comprised of 4 ducts connected by a series of chambers. The initial section of cable infrastructure is planned to be installed just seaward of the High Tide Mark on Newgale beach and it is this section that we require a license from Natural Resource Wales. In this section, four HDPE ducts of 150mm internal diameter will be installed, terminating in a concrete headwall placed 2m below the beach surface. The ducts will be installed via HDD and a cofferdam will be required to enable this installation and to allow the placement of the concrete foot into position. A temporary trackway over the shingle bank will be required to allow safe access to the beach for all equipment and plant. I have attached documents describing the HDD, the cofferdam design and the concrete foot and the below diagram is a schematic of the layout.



Specifically we would like feedback on the following;

1. Do NRW have any concerns with the use of a cofferdam on the beach at Newgale?
2. Do NRW have any concerns with the use of a temporary access trackway at Newgale?
3. Do NRW have any preference between installing the ducts terminating at the top of the beach (with use of Cofferdam) against the longer HDD terminating the ducts offshore?

Best wishes,



[Redacted]  
Principal Submarine Cable Engineer  
Submarine Engineering  
[Redacted]  
[Redacted]

[vodafone.com](http://vodafone.com)

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**Ready?**

**From:** [REDACTED]@vodafone.com>  
**Sent:** 08 August 2025 15:43  
**To:** [REDACTED]  
**Subject:** RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Thank you [REDACTED], appreciate the guidance.

Best wishes,

**From:** [REDACTED]@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 08 August 2025 10:41  
**To:** [REDACTED]  
**Subject:** RE: Q24156: Beaufort Introduction to NRW

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Good morning [REDACTED],

With regards to Freshwater West, I'm unsure which case you're referring to. HDD is in essence an exempted activity (i.e., bored tunnels do not require a marine licence as per [The Marine Licensing \(Exempted Activities\) \(Wales\) Order 2011](#)); however, a licence is required for any deposits within the tunnel (e.g. ducts, cables, etc).

As mentioned previously, a marine licence does not absolve you from the need for further consents, or licences, as necessary to enable the full completion of your project. We therefore would not delineate at the LWM, and you would still be required to engage with the PCNPA as appropriate.

Kind regards,

[REDACTED] [Trwyddedu Morol](#) / Senior Marine Licensing Officer  
[Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu](#) | Evidence, Policy and Permitting Directorate

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**From:** [REDACTED] <[REDACTED]@vodafone.com>

**Sent:** 07 August 2025 09:30

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi [REDACTED]

Thanks for your response. If we elect to go for Option B, which means between MHWMS and MLWMS the installation will be just the HDD, could we assume that a similar model will be followed as was for the cables at Freshwater West and the NRW and PCNPA will delineate at the LWM?

Best wishes,

**From:** [REDACTED] <[REDACTED]@cyfoethnaturiolcymru.gov.uk>

**Sent:** 06 August 2025 10:36

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Q24156: Beaufort Introduction to NRW

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Good morning [REDACTED],

Overlapping jurisdictions between the LPA and Marine Licensing Team is something we encounter frequently, particularly for projects such as this. A Marine Licence is required if you intend to carry out any construction, deposit or removal activities taking place below Mean High

Water Springs (MHWS) and therefore, will be required for this project. However, a marine licence does not absolve you from applying for further consents or licences as necessary to enable the full completion of your project.

We will consult with the Pembrokeshire Coast National Park Authority (PCNPA) as part of the marine licence determination process, and they will provide comment, but that doesn't remove the need for you to discuss the application with them and follow the planning process, as necessary.

Kind regards,

Uwch Swyddog Trwyddedu Morol / Senior Marine Licensing Officer  
Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

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From: [redacted] <[redacted]@vodafone.com>

Sent: 05 August 2025 20:51

To: [redacted]

Subject: RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

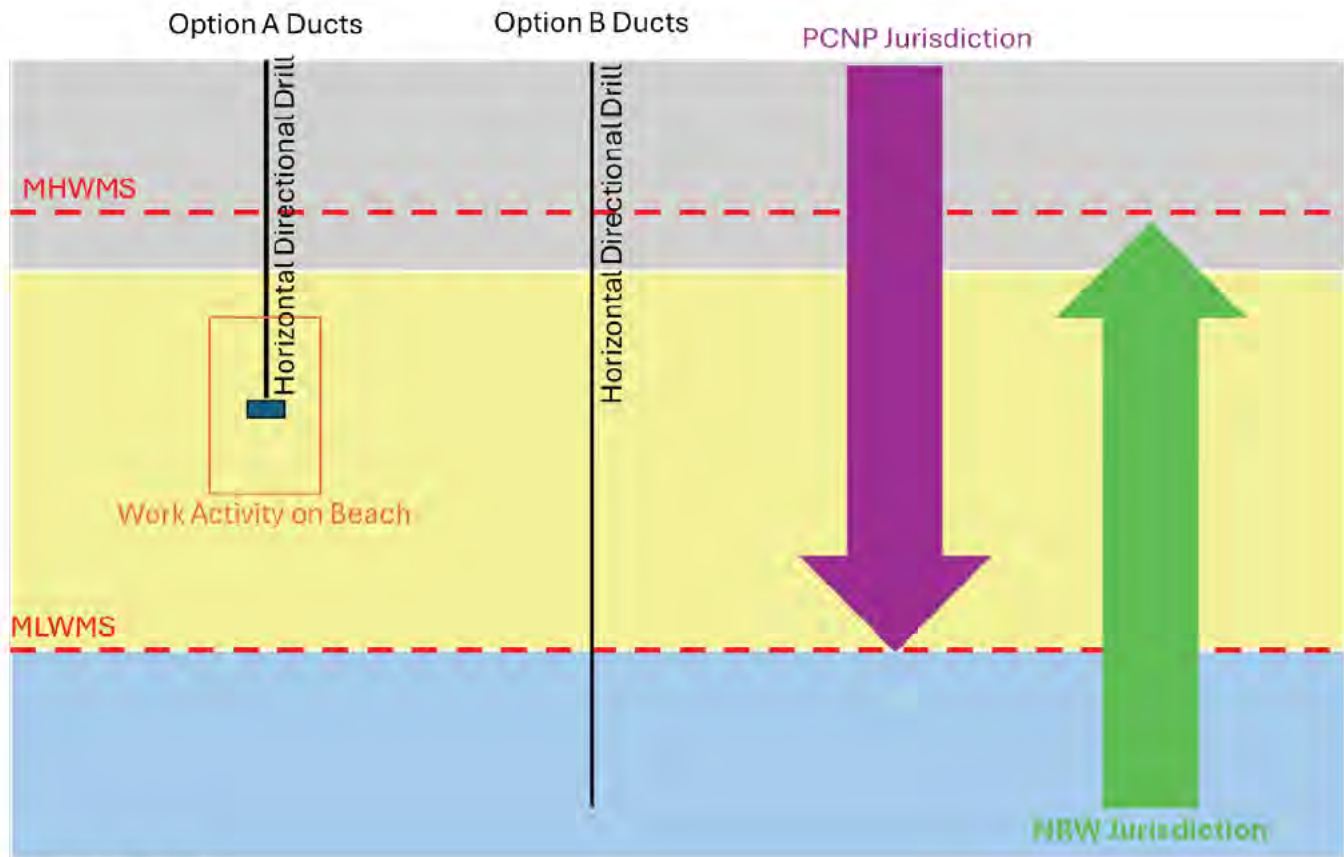
**Caution:** This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Dear [redacted],

We have recently held a call with Pembrokeshire Coast National Park to update them on the Vodafone Infrastructure build at Newgale. The planning officer stated that they will require planning permission for any works landward of the Mean Low Water Mark. This overlaps with the area which NRW will require us to obtain a marine license for (everything seaward of Mean High Water Springs). They also indicate that for a previous cable landing at freshwater West, NRW and PCNP delineated their jurisdictions at the MLWM. Our concern is that in this area we may be required to obtain permits from two regulators for the same activities, which could produce different

opinions and ultimately result in additional work for all parties. Please could you provide your guidance on your understanding of the matter?

Noting initially this question relates to the building of Vodafone's landing infrastructure (ducts and headwall) which may either be installed in the intertidal zone (from MHWMS to 30-40m seaward) or if the HDD is extended, just involves the directional drill traversing MHWMS to MLWM subsurface. I have made the below schematic to hopefully help the understanding of the situation.



Thanks in advance,



[Redacted text]

From: [Redacted] <[Redacted]@cyfoethnaturiolcymru.gov.uk>

Sent: 20 May 2025 16:10

To: [Redacted]

Subject: RE: Q24156: Beaufort Introduction to NRW

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Good afternoon [Redacted]s,

The only reason there would be a restriction on works during the summer holidays is if a consultee raised a valid concern. For example, if NRW Advisory wanted to avoid the nesting bird period.

For Band 1 licences, we only formally consult NRW Advisory, but we do notify the LPA as well. This means they are still able to provide comments if required. It may be worth discussing your project with them prior to submitting an application, just to ensure they have no concerns given that it'll be peak holiday season.

So you're aware, as part of a Band 1 application, you will also need to provide correspondence from Trinity House, the MCA as well as the Welsh Archaeological Trust / Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW). Further information can be found here: [Natural Resources Wales / Apply for a band 1 marine licence](#)

Kind regards,

Uwch Swyddog Trwyddedu Morol / Senior Marine Licensing Officer  
Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

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From: [REDACTED] <[\[REDACTED\]@vodafone.com](mailto:[REDACTED]@vodafone.com)>

Sent: 20 May 2025 14:55

To: [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi [REDACTED],

A follow up question on a band 1 marine license. We may have to conduct some further survey work which would consist of some nearshore hydrographic and seismic profiling and some topographic work on the beach which we

understand will require Band 1 licenses. Would there be any restrictions performing this work in the summer holidays? In general no exclusion zones or road closures would be needed.

Many thanks,

From: [REDACTED] <[\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)>

Sent: 06 May 2025 17:00

To: [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

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Good afternoon [REDACTED],

No problem at all.

- 1) It's difficult for us to say which method would result in a quicker determination, as it is largely dependent on the comments received during consultation.

As discussed on the call, the use of a cofferdam and installation of infrastructure on the beach may require greater environmental consideration, when compared to HDD, due to the nature of the works. As such, during consultation, we may receive comments from NRW Advisory or other consultees that need addressing, and this will result in a longer determination time. However, if you seek advice from NRW Advisory prior to submitting your application, as you have done, then any concerns regarding the use of the cofferdam may be addressed in advance, thus streamlining the consultation process.

I'd caveat this by saying that although HDD may seem more 'simple', unforeseen issues could still be raised by technical consultees or members of the public, so there is no guarantee it would be quicker.

Ultimately, what is likely to result in a quicker determination time is early stakeholder engagement, as you're doing, to ensure that any potential issues are considered, and suitable amendments or mitigation can be implemented.

- 2) Maria was referring to the fact that Band 3 licence applications tend to be more complex and as such, applicants often involve consultants that have experience of the marine licensing process, which can help streamline the determination process.

With Band 2 applications, as they cover a wide range of activities, we can still receive fairly complex applications where consultants are involved, but we can also receive smaller scale projects from individuals who have little to no experience of the marine licensing process. This can delay determination as they submit incomplete applications or provide insufficient detail.

So, although Band 3s don't have an SLA, given that they often involve people who have experience of the licensing process, the time taken to process them isn't considerably different as applications tend to be of a higher standard.

Hopefully that helps to answer your questions, but if there's anything else you're unsure of, please let me know.

Kind regards,

Uwch Swyddog Trwyddedu Morol / Senior Marine Licensing Officer  
Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

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From: [REDACTED] <[REDACTED]@vodafone.com>

Sent: 06 May 2025 15:51

To: [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Thanks [REDACTED], appreciate the discussion today.

We did have two follow up questions apologies;

1. If both Plan A (cofferdam) and Plan B (longer HDD/no cofferdam) applied for Band 3 licenses, would there be any difference in license processing time or would they be similar?
2. Maria mentioned, and advantage of Band 3 license would be increased consultancy, was this by NRW or meaning consultancy on our side?

Many thanks for your time again,

From: [REDACTED] <[REDACTED]@cyfoethnaturiolcymru.gov.uk>

Sent: 06 May 2025 15:42

To: [REDACTED]

**Subject: RE: Q24156: Beaufort Introduction to NRW**

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Good afternoon [REDACTED],

Thank you for taking the time to speak with us earlier this afternoon.

As discussed on the call, please find below a list of our consultees and contact addresses. There have been a few amendments since the last time you received the list.

- Cadw [REDACTED] [@gov.wales](#)
- Chamber of Shipping [REDACTED] [@ukchamberofshipping.com](#),  
[REDACTED] [@ukchamberofshipping.com](#)
- Environmental Public Health Wales [publichealth.environment@wales.nhs.uk](#),  
[chemicalscardiff@ukhsa.gov.uk](#)
- JNCC [REDACTED] [@jncc.gov.uk](#)
- Local Biodiversity Officer Pembrokeshire [ecology@pembrokeshire.gov.uk](#)
- Local Harbour Authority [REDACTED] [@abports.co.uk](#)
- Local Planning Authority: Pembrokeshire CC [planningenquiries@pembrokeshire.gov.uk](#)
- Local Planning Authority: Pembrokeshire Coast National Park Authority  
[Devplans@pembrokeshirecoast.org.uk](#)
- Local Ports: Milford Haven, Pembroke Dock and Haverfordwest [mwl@mhpa.co.uk](#),  
Fishguard [REDACTED] [@pembrokeshire.gov.uk](#)
- Maritime & Coastguard Agency [navigationsafety@mcga.gov.uk](#)
- MoD - Safeguarding Defence [DIO-Safeguarding-Offshore@mod.gov.uk](#)
- National Federation of Fishermen's Organisations [nffo@nffo.org.uk](#), [REDACTED] [@nffo.org.uk](#)
- NERL Safeguarding [NATSSafeguarding@nats.co.uk](#)
- Royal Commission on Historic Monuments Wales [REDACTED] [@rcahmw.gov.uk](#)
- Royal Society for the Protection of Birds (RSPB) [REDACTED] [@rspb.org.uk](#)
- Royal Yachting Association [planning@rya.org.uk](#)
- Trinity House [navigation@trinityhouse.co.uk](#)
- Welsh Archaeological Trusts [REDACTED] [@dyfedarchaeology.org.uk](#)
- Welsh Fisherman Association [REDACTED] [@wfa-cpc.co.uk](#)

Finally, just to confirm, we invoice a month in arrears so I will create the invoice for this at the beginning of June. This will then be finalised and sent to our finance team who will pass it on to you ready for payment.

If you have any further questions, please don't hesitate to contact me.

Kind regards,

[REDACTED]  
Uwch Swyddog Trwyddedu Morol / Senior Marine Licensing Officer  
Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

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From: [REDACTED] <[REDACTED]@vodafone.com>

Sent: 01 May 2025 21:00

To: [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi [REDACTED]

That time works great thanks. I previously sent an agenda through, is it ok for you?

1. Presentation of the Vodafone Planned Infrastructure and Build Activities
2. Confirmation of License Band to be applied for
3. Feedback on Installation Activities (if acceptable to NRW/any concerns etc)
4. Alternative Solutions

Best wishes,

[REDACTED]

From: [REDACTED] <[REDACTED]@cyfoethnaturiolcymru.gov.uk>

Sent: 01 May 2025 14:24

To: [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

This email originated from outside of the organisation: Be cautious about the sender, attachments and links. If uncertain use [Report Message](#) button.

Good afternoon [REDACTED],

Thank you very much for providing the project documents and invoicing details.

I'll be the case officer for this and was wondering whether you'd be free for a meeting on **Tuesday 6<sup>th</sup> May at 14:00**? My colleague, Maria, will also be attending. If that date/time doesn't work for you, let me know and we can arrange an alternative.

Once confirmed, I'll send over a Teams invite.

Kind regards,

[REDACTED]  
Uwch Swyddog Trwyddedu Morol / Senior Marine Licensing Officer  
Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



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[cyfoethnaturiol.cymru](http://cyfoethnaturiol.cymru)  
[naturalresources.wales](http://naturalresources.wales)

From: [REDACTED] <[\[REDACTED\]@vodafone.com](mailto:[REDACTED]@vodafone.com)>

Sent: 24 April 2025 16:10

To: Marine Licensing <[marinelicensing@cyfoethnaturiolcymru.gov.uk](mailto:marinelicensing@cyfoethnaturiolcymru.gov.uk)>

Cc: [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

**Caution:** This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Hi [REDACTED],

Apologies for the delayed response in getting back to you. We have been pulling together the required documentation for yourselves.

Our Agenda for the call would be as follows;

1. Presentation of the Vodafone Planned Infrastructure and Build Activities
2. Confirmation of License Band to be applied for
3. Feedback on Installation Activities (if acceptable to NRW/any concerns etc)
4. Alternative Solutions

Below is a brief overview of the activities and attached are some documents describing specific elements of the build we would appreciate your review of prior to the meeting.

Vodafone (under it's wholly owned entity Apollo Submarine Cable System Limited) are responsible for installing cable Landing Infrastructure connecting Newgale Beach to a cable Landing Station at Brawdy Industrial Estate. The infrastructure is comprised of 4 ducts connected by a series of chambers. The initial section of cable infrastructure is planned to be installed just seaward of the High Tide Mark on Newgale beach and it is this section that we require a license from Natural Resource Wales. In this section, four HDPE ducts of 150mm diameter will be installed, terminating in a concrete headwall placed 2m below the beach surface. The ducts will be installed via HDD and a cofferdam will be required to enable this installation and to allow the placement of the concrete foot into position. A temporary trackway over the shingle bank will be required to allow safe access to the beach for all equipment and plant. I have attached documents describing the HDD, the cofferdam design and the concrete foot and the below diagram is a schematic of the layout.



We would like to arrange a call with NRW to discuss the attached documents as soon as possible, please could you indicate if you would have availability w/c 5<sup>th</sup> May? I will also follow with the details for the invoice to be addressed. As with the payment last time, we won't arrange a PO but will pay invoice directly once received.

Best wishes,



From: Marine Licensing <[marinelicensing@cyfoethnaturiolcymru.gov.uk](mailto:marinelicensing@cyfoethnaturiolcymru.gov.uk)>

Sent: 01 April 2025 13:03

To: [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

This email originated from outside of the organisation: Be cautious about the sender, attachments and links. If uncertain use [Report Message](#) button.

Good Afternoon [REDACTED],

Before we can set up a meeting we would ask that you provide a short agenda, or any specific queries you may have toward the licensing process. This may help ensure adequate time is given, and help inform the allocation of case officers as well as confirming that this is advice we are able to provide.

You will also need to provide invoicing details prior to us setting up a pre application file:

- Customer Name
- For the Attention Of
- Purchase Order Number
- Address for invoice: Telephone Number
- Email address

Charges would cover any potential preparation, any meetings as well as follow up work.

It is difficult to provide you with any estimated costs without having site of the documents you wish for us to review or what the meeting will entail. Our cost as you've stated below is £120/hr and this includes any time spent prior to and after any meeting.

Kind Regards,

[REDACTED]  
Swyddog Uwch (Trwyddedu Morol) / Senior Officer (Marine Licensing)

Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



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**cyfoethnaturiol.cymru  
naturalresources.wales**

---

From: [REDACTED]@vodafone.com>

Sent: 01 April 2025 10:31

To: Marine Licensing <[marinelicensing@cyfoethnaturiolcymru.gov.uk](mailto:marinelicensing@cyfoethnaturiolcymru.gov.uk)>; [REDACTED]

Subject: RE: Q24156: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi Marine Licensing Team,

We have now completed our engineering design and would like to present the solution in advance of submitting the permitting documents. Would it be possible to arrange a call with your team in the next couple of weeks to discuss the various aspects? We should be able to provide some documentation in advance for review also.

I understand we may have to pay the pre-application fee of £120/hour which I have approval for but would need a guide on the amount it will likely be so happy to discuss this upfront also.

Many thanks,

---

From: Marine Licensing <[marinelicensing@cyfoethnaturiolcymru.gov.uk](mailto:marinelicensing@cyfoethnaturiolcymru.gov.uk)>

Sent: 19 November 2024 15:16

To: [REDACTED]

Subject: Q24156: Beaufort Introduction to NRW

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P'nawn da [REDACTED],

Diolch am eich neges. For your records we've assigned this discussion the reference Q24156.

Many thanks for the details below. Chris Munro (BRM) has been in touch to discuss the borehole work and the access issues; we'll keep an eye out for the new application you've mentioned and take things from there.

All the best for the paternity leave.

Yr eiddoch yn gywir,

[REDACTED]

Swyddog Trwyddedu Morol / Marine Licensing Officer  
Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu / Evidence, Policy and Permitting Directorate

[REDACTED]  
[REDACTED]  
[REDACTED]

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



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From: [REDACTED]@vodafone.com>  
Sent: 15 November 2024 07:30  
To: [REDACTED] Marine Licensing  
<[marinelicensing@cyfoethnaturiolcymru.gov.uk](mailto:marinelicensing@cyfoethnaturiolcymru.gov.uk)>  
Cc: [REDACTED]  
Subject: RE: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

**Caution:** This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Hi [REDACTED] & Marine Licensing team,

I understand you have now been contacted by Red Penguin who are the permitting agent for the Beaufort Submarine Cable Landing in Newgale. I wanted to confirm/clarify that Red Penguin are responsible for obtaining the License to install the fibre optic submarine cable, and, Vodafone will be applying for a Band 2 license to install the terrestrial infrastructure that I described below (approx.30m of ducts and a concrete headwall) at the top of Newgale Beach. There will be separate applications for the terrestrial infrastructure installation and for the submarine cable installation.

We have nearly completed the surveys for the terrestrial infrastructure and you may have seen the band 1 license we obtained to perform a bore hole survey on the beach at Newgale (submitted by our contractor BRM). Due to access issues we are having to look at alternative ways to get the survey onto the beach and you will see an additional Band 1 license application submitted detailing an alternative to crossing the shingle bank. So you are aware, once the surveys are complete, we aim to submit the Band 2 License application for the terrestrial infrastructure in the new year.

I will be on paternity leave from next week until January next year, so if you have any queries or require any additional information, please contact my colleagues cc'd here. Similarly, they may be in touch with further updates and potential queries as our surveys & designs are finalised.

Best wishes,

[REDACTED]

---

From: [REDACTED], Vodafone  
Sent: Friday, June 21, 2024 1:51 PM  
To: [REDACTED]

Subject: RE: Beaufort Introduction to NRW

Many thanks [REDACTED]

Rhys

---

C2 General

From: [REDACTED] <[\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)>  
Sent: 21 June 2024 13:13  
To: [REDACTED]

Subject: RE: Beaufort Introduction to NRW

External Email: Be cautious about the sender email address, attachments and links. If uncertain use **Report Message** button.

Hi,  
I would assume it is the Local Planning Authority but worth asking the National Parks.

Regards,

[REDACTED]

---

From: [REDACTED] <[\[REDACTED\]@vodafone.com](mailto:[REDACTED]@vodafone.com)>  
Sent: Friday, June 21, 2024 1:01 PM  
To: [REDACTED]

Subject: RE: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Many thanks [REDACTED] and well noted with regards to Marine Licensing email address. One further question which would help us greatly, are you aware of who's jurisdiction is immediately landward of the mean highwater spring mark? I will check with National Parks also in any case.

Best wishes,

[REDACTED]

C2 General

From: [REDACTED] <[\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)>

Sent: 21 June 2024 12:53

To: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Subject: RE: Beaufort Introduction to NRW

External Email: Be cautious about the sender email address, attachments and links. If uncertain use **Report Message** button.

Hello [REDACTED],

Thank you for your email. In the future, could you please send your general marine licensing queries to our Inbox, this is a dedicated inbox for this kind of queries.

The activity you describe is marine licensable from the mean highwater spring mark and will require a Band 2 marine licence. Please see links below to our webpages:

- [Natural Resources Wales / Activities that need a marine licence](#)
- [Natural Resources Wales / Applying for a marine licence](#)
- [Natural Resources Wales / Marine licence application forms](#)
- [Natural Resources Wales / Marine licence fees](#)

Regards,

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@vodafone.com](mailto:[REDACTED]@vodafone.com)>

Sent: Friday, June 21, 2024 9:49 AM

To: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Subject: RE: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

**Caution:** This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Good morning [REDACTED],

Apologies it has been so long since we last spoke, the project has been going through various contracting phases and we are now preparing documentation to begin a permitting application.

We have some further queries regarding licensing of a certain aspect of the project and was wondering if you may be able to advise. We previously spoke about the marine License required for the installation of the submarine cable however prior to the marine cable landing, we will need to install some infrastructure sub surface at the top of the beach in Newgale. Most of this infrastructure (manholes & ducts) will be installed within carriage way, however a small section will be installed at the top of the beach (just below HWM). Please see below diagram – the line in blue shows the path the ducts will be installed along, completely subsurface. The ducts will be installed a directional drill, and the concrete headwall will be installed 2m deep via excavation. Once installed, there will be no visible infrastructure as it will all be subsurface. If you are able to, please could you advise if this activity, the installation of ducts and headwall, would fall under NRW licensing jurisdiction or National Park Wales?



Appreciate any indicative advice you can give. If you require additional info I would be happy to provide and understand if we need to utilise the NRW consultancy fee structure.

Best wishes,

[REDACTED]

C2 General

**From:** [REDACTED], Vodafone

**Sent:** 06 April 2023 16:35

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Beaufort Introduction to NRW

Hi [REDACTED],

Thank you for yours, [REDACTED] time earlier and for the details below, these contacts will be extremely helpful. Below are also some minutes/notes from the meeting, please let us know if we have recorded anything incorrectly (thank you Connor).

### **Beaufort NRW Introductory Meeting 14:00 6<sup>th</sup> April 23**

#### **NRW Participants:**

[REDACTED] – Lead Specialist Officer in the Marine Licensing team (NRW)  
[REDACTED] – Senior Marine Advisor (NRW)  
[REDACTED] – Marine Licensing Officer

#### **Vodafone Participants**

[REDACTED]

Introductions made between the Vodafone and NRW team.

- Licensing and Advisory groups representatives for the NRW on the call.
- Similar to the MMO and Natural England split in England.

#### **Project Background**

- SW Wales to Kilmore Quay – fibre submarine optic cable.
- Driver is replace the aging systems in the area – capacity demand has grown and the tech has advanced.
- Project has changed recently from a design to Oxwich Bay & a branch into Bude, UK, and now due to technology constraints, the branch to Bude has been removed and the Welsh landing moved west to create a more direct link.
- Planned install Q2&Q3 2025.

#### **Q - [REDACTED] (NRW) – what are the constraints to the cable route design outside of the Welsh landings?**

A – [REDACTED] - The route is not yet fixed, other than a short length in Irish TW etc. We have more surveys planned outside of the Irish TW. Current RPL in the presentation gives a more direct, generic link, which follows a similar route to the Greenlink interconnector cable. Other hazards have been identified at a higher level in the area such as areas of mobile seabed.

#### **Marine Survey**

- VF has experience tailoring survey scopes to fit in with environmental surveys. For Beaufort, what is required survey wise across the SAC(s) – what species are protected etc. and ow can we adjust our surveys to mitigate any of the impacts. This is a portion of the information the Vodafone requires.
- We will also complete DTS works to identify hazards, to inform the survey route process.

#### **Pre-installation Operations, Installation Activities, Post Installation Activities**

Refer to slide deck (Page 5-8)

**Q – [REDACTED] (NRW) – Are you aware if any dredging would be required for the project?**

A – [REDACTED] – Beaufort will not need to complete any dredging. Beaufort will avoid sand wave clearance. Plough operations will be tailored to avoid any clearance activities and a submarine telecom cable does not have the same electrical constraints that a power cable has regarding sediment cover. Aim for the Beaufort cable is for 100% burial. Cable will be surface laid over rocks if plough burial is not possible, but we will not be conducting any hard engineering solutions for the cable over these sections.

#### **Marine License Application Process (Slide 9)**

- Project will be > £1 Million, this project will fall into 'Band 3'
- NRW consultancy scope? For marine licensing it will be an hourly cost (this does not need to be a set price/time). It is open.
- On the NRW advisory side, discretionary advice service (certain amount of a free advice – 4 hours). Before further support is required, i.e. with benthic and environmental topics and resources, and this is paid.

Vodafone would like to understand that the landing we choose for the survey and installation operation is suitable, and viable for the permitting process.

This is high level as it stands, Vodafone would like to start engaging with the advisory groups to help inform us what landing we will proceed with.

Timelines for this application for a marine licence? There is no time that is officially given. It depends on the quality of the application. There are tables on the NRW website for the typical time. Green link took a little over a year. 8 months sounds reasonable for the projects size?

- Submission (engagement with the stakeholders is recommended)
- 'Duly making process' (NRW will review for 21 days), the approve or reject the application
- Consultation (notice online, newspaper etc.) period lasts for 28 days (public and targeted to specific authorities)
- All consultation info will be absorbed and reviewed.
- Drafting of the license documents.

Environmental appraisal. VF should be familiar with this process and the level of information is generally understood. What needs to be understood is the particulars of the SAC etc.

**Stakeholder lists to be sent by NRW (lists created from OFW interest). Users of the sea etc.**

**Q – [REDACTED] - Are there any fundamental differences between the process in England and the process in Wales?**

NRW - it is very similar, NRW work under the same legislations as those in England. But, there are Environmental Acts specific to Wales, which will need covering the environmental appraisal. (Environmental Act Wales, Future Generations Wales, Wales Marine Plan)

Regarding obtaining a screening and scoping opinion, Telecom cables do not fall in EIA regulations, so the answer is no within 12NM. Any further protection (mattress) would require additional licence.

**Q – [REDACTED] - Application for the TW, are we expected to provide anything further offshore in the EEZ? What is the guidance for the project?**

NRW - NRW will consult with stakeholders, and they can comment on the RPL outside of the TW limit during the consultation period. But NRW will focus on the 12NM.

Licence from the Crown Estate should allow for emergency repairs, as this is critical infrastructure. What is the situation in Wales? It is understood that Wales follows the same process in England.

Licence is required for the geotechnical works for the marine survey. This will be required from the Crown Estate and also the NRW. Responsibility for all operational permits will be with the survey contractor. This has been achieved previously for Beaufort.

## Welsh Landing Selection (Slide 10)

Pembrokeshire coastline has been identified. 3 landings identified from a very high level interpretation. Full DTS to be completed (onshore, offshore and inshore constraints)

Vodafone will benefit with more directed questions, coordinates and potentially RPLs.

NRW - SAC features could be POI's for the cable and its application (bedrock, tidal features etc.) NRW require some more specific information to help. What is our methodology for installation etc.? What protected areas are in the RPL's path. This will help NRW, to help Vodafone in their recommendations for Vodafone's application.

**How to get this information...? Emma will send the initial info to access the advice hotline in the NRW to help start streamline our landing process.**

**Q – [REDACTED] - Offshore Newgale there is research area with scientific instruments, and anchoring restrictions. Who runs this area in St Brides's Bay? It is charted on the UKHO Admiralty charts.**

The instruments don't often need a licence according to the NRW. NRW team unsure of this areas purpose.

Best wishes,

[REDACTED]

C2 General

**From:** [REDACTED] <[\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk)>

**Sent:** 06 April 2023 16:24

**To:** [REDACTED]

**Subject:** RE: Beaufort Introduction to NRW

**This is an external email. Do you know who has sent it? Can you be sure that any links and attachments contained within it are safe? If in any doubt, use the Report Message button in your Outlook client to report this mail.**

Hello [REDACTED],

Thank you for the opportunity to hear about the Beaufort cable project. As promised over the call below is the list of our main consultees besides The Crown Estate and NRW Advisory:

- MoD - Safeguarding Defence [DIO-Safeguarding-Offshore@mod.gov.uk](mailto:DIO-Safeguarding-Offshore@mod.gov.uk)
- Local Biodiversity Officer Pembrokeshire [REDACTED] [\[REDACTED\]@pembrokeshire.gov.uk](mailto:[REDACTED]@pembrokeshire.gov.uk)
- Local Harbour Authority [REDACTED] [\[REDACTED\]@abports.co.uk](mailto:[REDACTED]@abports.co.uk)
- Local Ports (Milford Haven [REDACTED] [\[REDACTED\]@mhpa.co.uk](mailto:[REDACTED]@mhpa.co.uk) , Pembroke Dock, Haverfordwest [REDACTED] [\[REDACTED\]@carmarthenshire.gov.uk](mailto:[REDACTED]@carmarthenshire.gov.uk) , Fishguard [REDACTED] [\[REDACTED\]@pembrokeshire.gov.uk](mailto:[REDACTED]@pembrokeshire.gov.uk), etc)
- Royal Yachting Association [planning@rya.org.uk](mailto:planning@rya.org.uk)
- Trinity House [navigation@trinityhouse.co.uk](mailto:navigation@trinityhouse.co.uk)
- Maritime & Coastguard Agency [navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)
- Local Planning Authority: Pembrokeshire CC [planningenquiries@pembrokeshire.gov.uk](mailto:planningenquiries@pembrokeshire.gov.uk)
- Local Planning Authority: Pembrokeshire Coast National Park Authority [Devplans@pembrokeshirecoast.org.uk](mailto:Devplans@pembrokeshirecoast.org.uk)
- Royal Society for the Protection of Birds (RSPB) [REDACTED] [\[REDACTED\]@rspb.org.uk](mailto:[REDACTED]@rspb.org.uk)
- Cadw [REDACTED] [\[REDACTED\]@gov.wales](mailto:[REDACTED]@gov.wales)
- Royal Commission on Historic Monuments Wales [REDACTED] [\[REDACTED\]@rcahmw.gov.uk](mailto:[REDACTED]@rcahmw.gov.uk)
- Chamber of Shipping [REDACTED] [\[REDACTED\]@ukchamberofshipping.com](mailto:[REDACTED]@ukchamberofshipping.com) , [REDACTED] [\[REDACTED\]@ukchamberofshipping.com](mailto:[REDACTED]@ukchamberofshipping.com)
- NERL Safeguarding [NATSSafeguarding@nats.co.uk](mailto:NATSSafeguarding@nats.co.uk)
- Welsh Archaeological Trusts [REDACTED] [\[REDACTED\]@dyfedarchaeology.org.uk](mailto:[REDACTED]@dyfedarchaeology.org.uk)

- National Federation of Fishermen's Organisations [nffo@nffo.org.uk](mailto:nffo@nffo.org.uk)
- Welsh Fisherman Association  [\[REDACTED\]@wfa-cpc.co.uk](mailto: [REDACTED]@wfa-cpc.co.uk)
- JNCC  [\[REDACTED\]@jncc.gov.uk](mailto: [REDACTED]@jncc.gov.uk)

Information in relation to applying to a marine licence can be found on our website [Natural Resources Wales / Applying for a marine licence](#)

- A Band 1 marine licence might fit some of your survey work. The list of eligible activities is here: [Natural Resources Wales / Marine licensing low risk activities \(band 1\)](#) Sediment sampling of minor nature can be classed as a Band 1 activity. If the works are a Band 1 an [online application](#) form will be needed. Please be aware that Band 1 licences can be issued for a duration of up to 1 year, and cannot be varied, extended or renewed. The fixed fee application fee for a B1 marine licence is of £600 and the Service Level Agreement (SLA) of 6 weeks.
- A Band 2 marine licence will be needed if you intend to carry out works for over a year or carry out activities that are not listed in the band 1 eligible activities. More information can be found here: [Natural Resources Wales / Applying for a marine licence](#). The fixed fee for a B2 marine licence is £1920 and the SLA is 4 months from the date of receipt of a complete application.
- Band 3 marine licences are for projects with an estimated cost of over a £1 million and/or requiring construction and dredging, or are EIA projects. This type of marine licence application has no SLA associated and are charged by the hour (£120 per hour) so invoicing details will be required. Some estimates on determination time for B3 licence can be seen here: [Natural Resources Wales / Applying for a marine licence](#)

You can also find the Welsh National Marine Plan signposting document [here](#) which you will need to submit with your application to help you demonstrate how your proposed activities are in line with the marine plan. This is not required for Band 1 activities.

I think this is everything you need. Do let me know if you require any other information.

Best regards,

[REDACTED]

---

From: [REDACTED] [@vodafone.com](mailto: [REDACTED]@vodafone.com)>

Sent: 04 April 2023 16:22

To: Marine Licensing <[marinelicensing@cyfoethnaturiolcymru.gov.uk](mailto:marinelicensing@cyfoethnaturiolcymru.gov.uk)>; Marine Area Advice and Management Team <[marine.advice@cyfoethnaturiolcymru.gov.uk](mailto:marine.advice@cyfoethnaturiolcymru.gov.uk)>; [REDACTED]

**Subject:** RE: Beaufort Introduction to NRW

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni nac atodiadau agored oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi all,

I have attached a presentation before Thursday's call. It includes an overview of our project activities to give some background as well as some of the questions we have. Look forward to discussing on Thursday. Steve, thanks for your call yesterday, as we discussed, we will focus on the permitting process and then go on to discuss our landing site discussion questions, but likely there'll be some cross over of questions. I am sure the presentation won't cover all you questions as well but happy to cover anything you need on the call.

Best wishes,

[REDACTED]

-----Original Appointment-----

From: [REDACTED], Vodafone

Sent: 29 March 2023 18:28

To: [REDACTED]

Subject: Beaufort Introduction to NRW

When: 06 April 2023 14:00-15:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

Dear all,

Call to formally introduce the Beaufort project and discuss permitting considerations. Below is a tentative agenda, we can add/edit as appropriate.

#### Agenda

- Project introduction & status
- NRW advice scope & cost estimate
- Permitting process
- Landing site evaluation & considerations
- potential monitoring and data requirements

Best wishes,

[REDACTED]

## Microsoft Teams meeting

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[teams@vroom.vodafone.com](mailto:teams@vroom.vodafone.com)

[REDACTED]

[Alternate VTC instructions](#)

**Or call in (audio only)**

[REDACTED]

[REDACTED]

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## National Federation of Fishermen's Organisations



[REDACTED]

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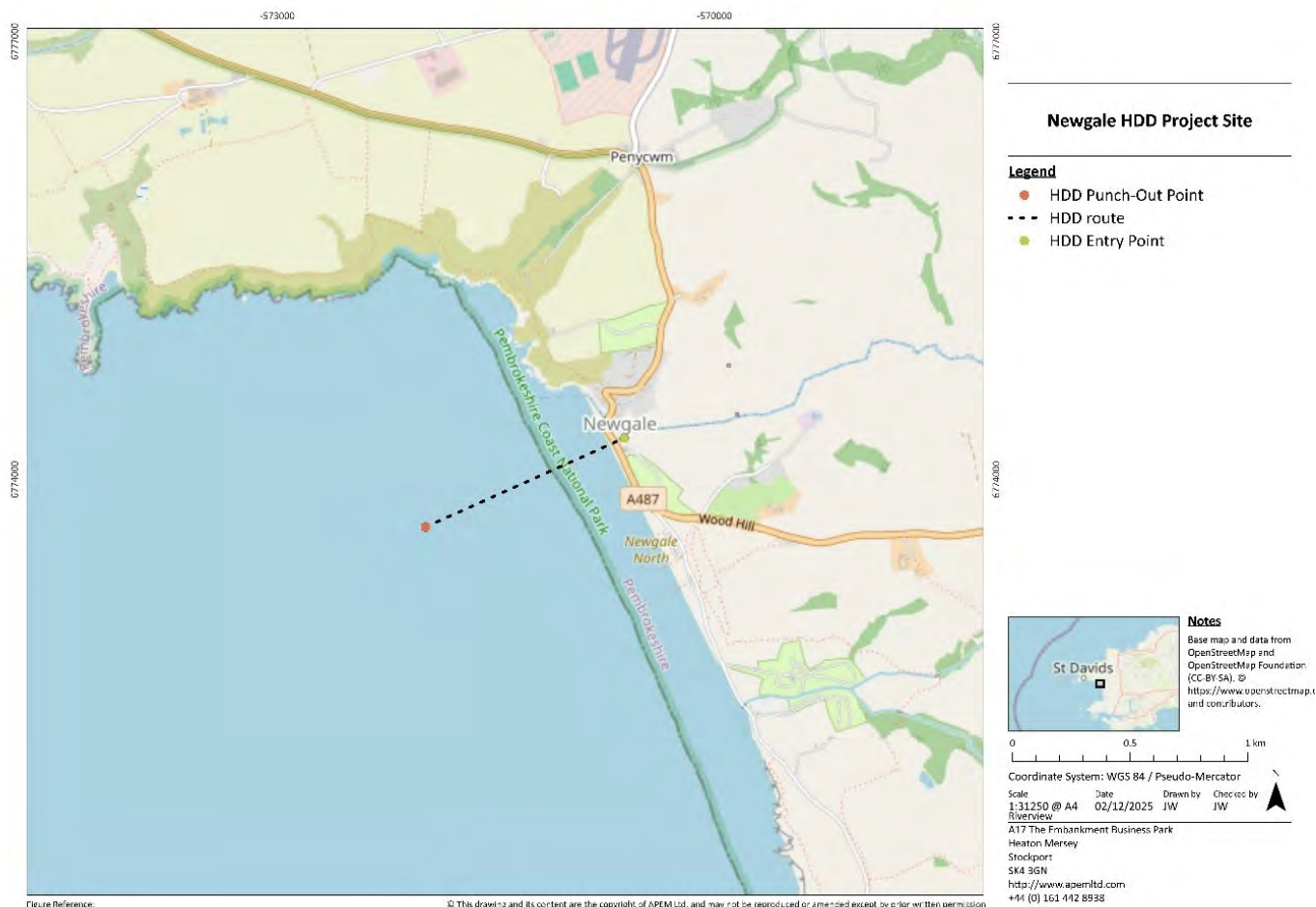
**From:** [REDACTED]@apemltd.co.uk>  
**Sent:** 22 December 2025 12:04  
**To:** nffo@nffo.org.uk  
**Cc:** [REDACTED]  
**Subject:** Newgale HDD Works - National Federation of Fisherman's Organisations Consultation

Good afternoon,

I am writing on behalf of the APEM Group, who have been contracted by OCU Group (with Vodafone as the end client) to prepare and submit a Band 3 marine licence application for horizontal directional drilling (HDD) works at Newgale. These works are preparatory enabling activities for a future subsea cable installation project which will be consented separately at a later date.

As part of the licence application process for the HDD works, we have been advised to consult with the National Federation of Fishermen's Organisations regarding the proposed offshore works. We are therefore writing to formally notify you of the planned activities and to provide an opportunity for you to comment or raise any objections.

The works are scheduled to commence on the 5<sup>th</sup> of October 2026. The proposed HDD route originates at Newgale Surf Shack Car Park, (off the A487 Nolton and Roach, Newgale, Pembrokeshire; nearest postal code SA62 6AS; nearest grid reference being SM 84831 22185). The onshore section of the work (from Newgale Surf Shack car park to Mean High Water Springs (MHWS)) falls within the administrative boundary of Pembrokeshire Coast National Park (PCNP). PCNP has confirmed that planning permission is required for the proposed works and we will be seeking this alongside the marine licence application. From this onshore site, the HDD will extend seaward to a subsea punch-out location approximately 920 m from shore as illustrated on the figure below. The exact location of the punch-out point will be confirmed using a Remotely Operated Vehicle (ROV) once the drill has 'punched through'. Following this, a dive vessel will be mobilised to recover the Bottom Hole Assembly (BHA) using air bags, after which a bellmouth will be fitted to the drillpipe. A marker buoy will be attached to a clump weight to indicate the exit location.



We would welcome any feedback you may have on the proposed works, including any concerns, objections, or information on potential interactions with fishing activity in the area. If you wish to provide comments, please respond by the 28<sup>th</sup> of February 2026 so that we can ensure your views are appropriately reflected within the licence submission.

Thank you for your time and engagement. Please feel free to contact me directly should you require further information.

Kind regards,

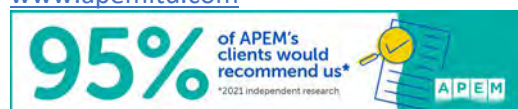
[Redacted Signature]

[Redacted Name]

Marine Consultant  
APEM Limited, Riverview, A17 Embankment Business Park  
Heaton Mersey, Stockport, SK4 3GN

[Redacted Contact Information]

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## Trinity House



[REDACTED]

---

**From:** [REDACTED]@apemltd.co.uk>  
**Sent:** 22 December 2025 12:03  
**To:** enquiries@trinityhouse.co.uk  
**Cc:** [REDACTED]  
**Subject:** Newgale HDD Works - Navigation Safety Query - Trinity House

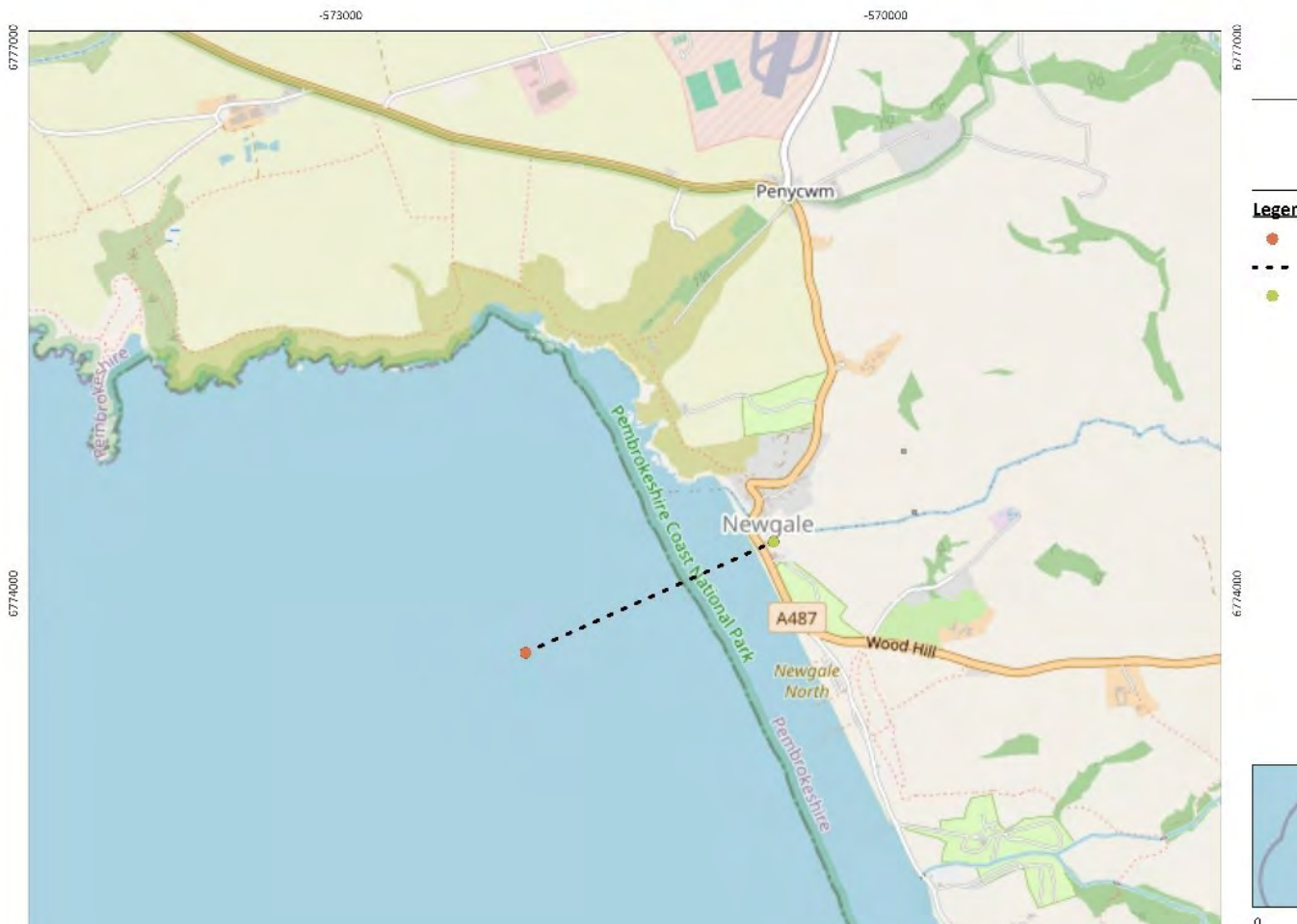
Good afternoon,

I am writing on behalf of the APEM Group, who have been contracted by OCU Group (with Vodafone as the end client) to prepare and submit a Band 3 marine licence application for horizontal directional drilling (HDD) works at Newgale. These works are preparatory enabling activities for a future subsea cable installation project which will be consented separately at a later date.

We are required to consult with Trinity House prior to submission of the marine licence to ensure no impact on the safety of others at sea.

**Project Overview:**

The proposed HDD route originates at Newgale Surf Shack Car Park, (off the A487 Nolton and Roach, Newgale, Pembrokeshire; nearest postal code SA62 6AS; nearest grid reference being SM 84831 22185). The onshore section of the work (from Newgale Surf Shack car park to Mean High Water Springs (MHWS)) falls within the administrative boundary of Pembrokeshire Coast National Park (PCNP). PCNP has confirmed that planning permission is required for the proposed works and we will be seeking this alongside the marine licence application. From this onshore site, the HDD will extend seaward to a subsea punch-out location approximately 920 m from shore as illustrated on the figure below. The exact location of the punch-out point will be confirmed using a Remotely Operated Vehicle (ROV) once the drill has 'punched through'. Following this, a dive vessel will be mobilised to recover the Bottom Hole Assembly (BHA) using air bags, after which a bellmouth will be fitted to the drillpipe. A marker buoy will be attached to a clump weight to indicate the exit location.



We have searched for a relevant harbour authority whom we might need to contact prior to the works but this area does not seem to fall within the jurisdiction of a harbour authority.

It is not envisaged that there will be impacts on the safety of navigation.

Please would you verify whether you have enough information to consider any impact to the safety of others at sea?

Many thanks

[Redacted]

[Redacted]

Marine Consultant  
 APEM Limited, Riverview, A17 Embankment Business Park  
 Heaton Mersey, Stockport, SK4 3GN

[Redacted]

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## Welsh Fisherman's Association



[REDACTED]

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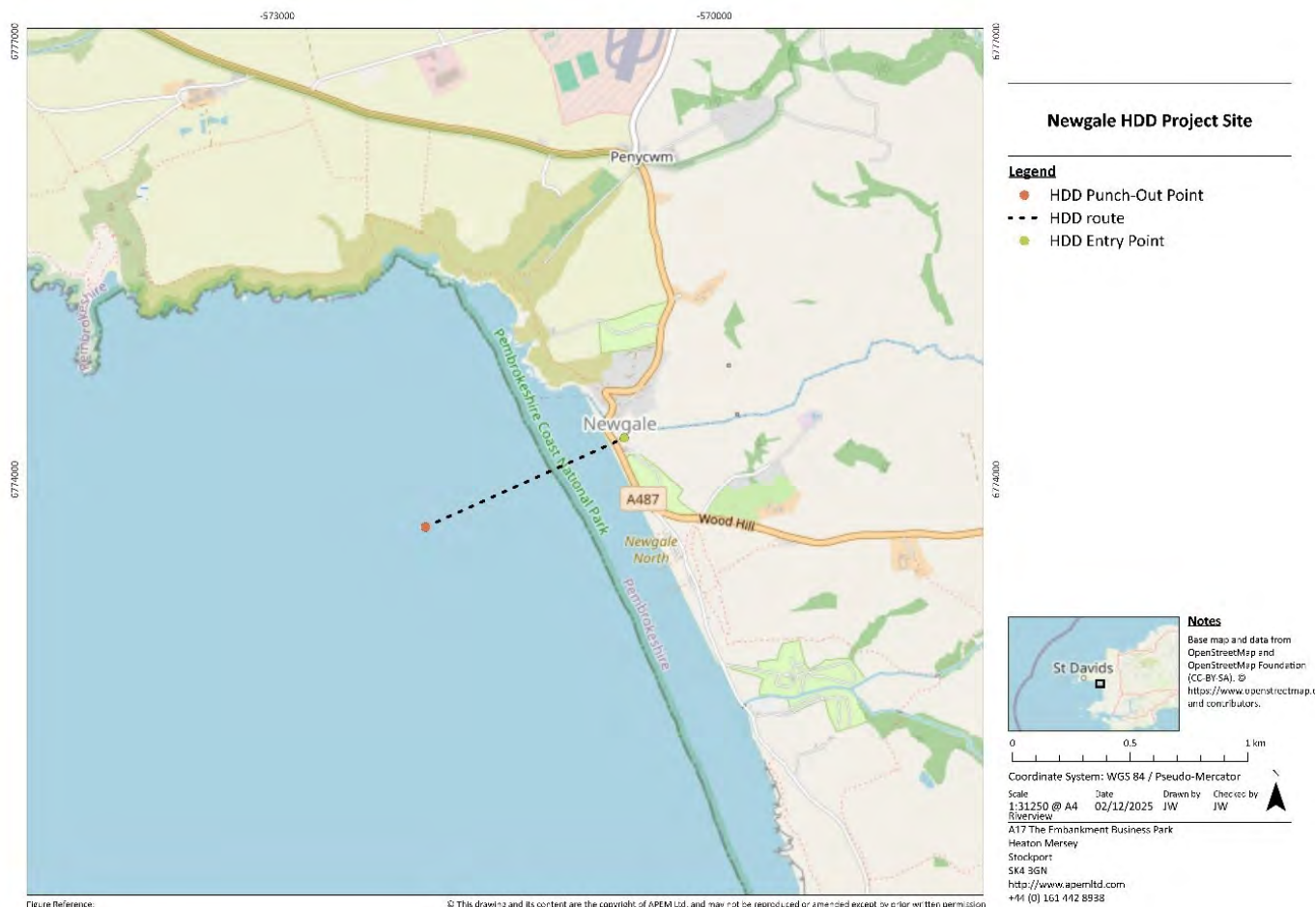
**From:** [REDACTED]@apemltd.co.uk>  
**Sent:** 22 December 2025 12:04  
**To:** [REDACTED]@wfa-cpc.co.uk  
**Cc:** [REDACTED]  
**Subject:** Newgale HDD Works - Welsh Fisherman's Association Consultation

Good afternoon,

I am writing on behalf of the APEM Group, who have been contracted by OCU Group (with Vodafone as the end client) to prepare and submit a Band 3 marine licence application for horizontal directional drilling (HDD) works at Newgale. These works are preparatory enabling activities for a future subsea cable installation project which will be consented separately at a later date.

As part of the licence application process for the HDD works, we have been advised to consult with the Welsh Fishermen's Association regarding the proposed offshore works. We are therefore writing to formally notify you of the planned activities and to provide an opportunity for you to comment or raise any objections.

The works are scheduled to commence on the 5<sup>th</sup> of October 2026. The proposed HDD route originates at Newgale Surf Shack Car Park, (off the A487 Nolton and Roach, Newgale, Pembrokeshire; nearest postal code SA62 6AS; nearest grid reference being SM 84831 22185). The onshore section of the work (from Newgale Surf Shack car park to Mean High Water Springs (MHWS)) falls within the administrative boundary of Pembrokeshire Coast National Park (PCNP). PCNP has confirmed that planning permission is required for the proposed works and we will be seeking this alongside the marine licence application. From this onshore site, the HDD will extend seaward to a subsea punch-out location approximately 920 m from shore as illustrated on the figure below. The exact location of the punch-out point will be confirmed using a Remotely Operated Vehicle (ROV) once the drill has 'punched through'. Following this, a dive vessel will be mobilised to recover the Bottom Hole Assembly (BHA) using air bags, after which a bellmouth will be fitted to the drillpipe. A marker buoy will be attached to a clump weight to indicate the exit location.



We would welcome any feedback you may have on the proposed works, including any concerns, objections, or information on potential interactions with fishing activity in the area. If you wish to provide comments, please respond by the 28<sup>th</sup> of February 2026 so that we can ensure your views are appropriately reflected within the licence submission.

Thank you for your time and engagement. Please feel free to contact me directly should you require further information.

Kind regards,

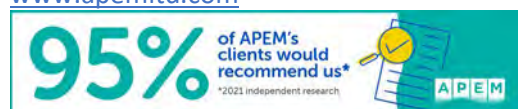
[Redacted Signature]

[Redacted Name]

Marine Consultant  
APEM Limited, Riverview, A17 Embankment Business Park  
Heaton Mersey, Stockport, SK4 3GN

[Redacted Contact Information]

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## Royal Commission on the Ancient and Historical Monuments of Wales



**From:** [REDACTED]@rcahmw.gov.uk>  
**Sent:** 05 January 2026 08:25  
**To:** [REDACTED]; NMR Enquiries  
**Cc:** [REDACTED]  
**Subject:** Re: Newgale HDD Works - Archaeology Query - RCAHMW

**Caution – This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Contact the IT Team if you are unsure**

Dear [REDACTED],

Thanks for your email about the Newgale HDD and apologies for a slow reply - your email arrived after I had gone on leave for Christmas.

On the face of it, there should be no issues from a marine archaeological impact perspective. There is a well documented expanse of prehistoric submerged forest - usually indicated by peat deposits and petrified wood, with potential for associated artefacts all along the beach at Newgale, but, the HDD is likely to go underneath this. As such, some information in the eventual marine licence application relating to the general depth at which the drill route will take place would be helpful.

There was a borehole sample taken on the beach this time last year in relation to the cable, which indicated no evidence of peat deposits in the first 10m, prior to reaching marine clay. I'm assuming that the current planned HDD route is past the borehole location, It would be helpful if the borehole location was included as a means to indicate an absence of archaeological remains in that area of the beach when this comes through to a marine license application and I can respond accordingly.

Happy to discuss any of the above directly if needed.

Yours

[REDACTED]



Comisiwn Brenhinol  
Henebion Cymru  
Royal Commission on the Ancient  
and Historical Monuments of Wales

[REDACTED]

Dysgwir 

**Uwch Ymchwilydd (Arforol) | Senior Investigator (Maritime)**  
Ffordd Penglais, Aberystwyth, SY23 3BU

[REDACTED]

[www.cbhc.gov.uk](http://www.cbhc.gov.uk) | [www.rcahmw.gov.uk](http://www.rcahmw.gov.uk)

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Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn peri oedi  
We welcome correspondence in Welsh and English. Corresponding in Welsh will not lead to any delay.

Yn unol â Rheoliadau Safonau'r Gymraeg (Rhif 2) 2016, mae gennych hawl i gyfathrebu a gohebu â Chomisiwn Brenhinol Henebion Cymru yn eich dewis iaith. Er mwyn sicrhau ein bod yn cyflawni'r hawl, rhowch wybod i ni a ydych yn dymuno derbyn gohebiaeth a/neu alwadau ffôn oddi wrthym yn y Gymraeg. Bydd yr wybodaeth hon yn cael ei chofnodi gennym ni, a byddwn yn defnyddio'r iaith o'ch dewis ym mhob cyfathrebu yn y dyfodol. Diolch.

Under the Welsh Language Standards (No. 2) Regulations 2016, you have the right to communicate and correspond with the Royal Commission on the Ancient and Historical Monuments of Wales in your preferred language. To ensure we uphold this right, please let us know whether you wish to receive correspondence and/or telephone calls from us in Welsh. This information will be recorded by us, and we will use your preferred language in all future communication. Thank you.

---

**From:** [REDACTED]@apemltd.co.uk>

**Sent:** Monday, December 22, 2025 12:03

**To:** NMR Enquiries <nmr.wales@rcahmw.gov.uk>

**Cc:** [REDACTED]

**Subject:** Newgale HDD Works - Archaeology Query - RCAHMW

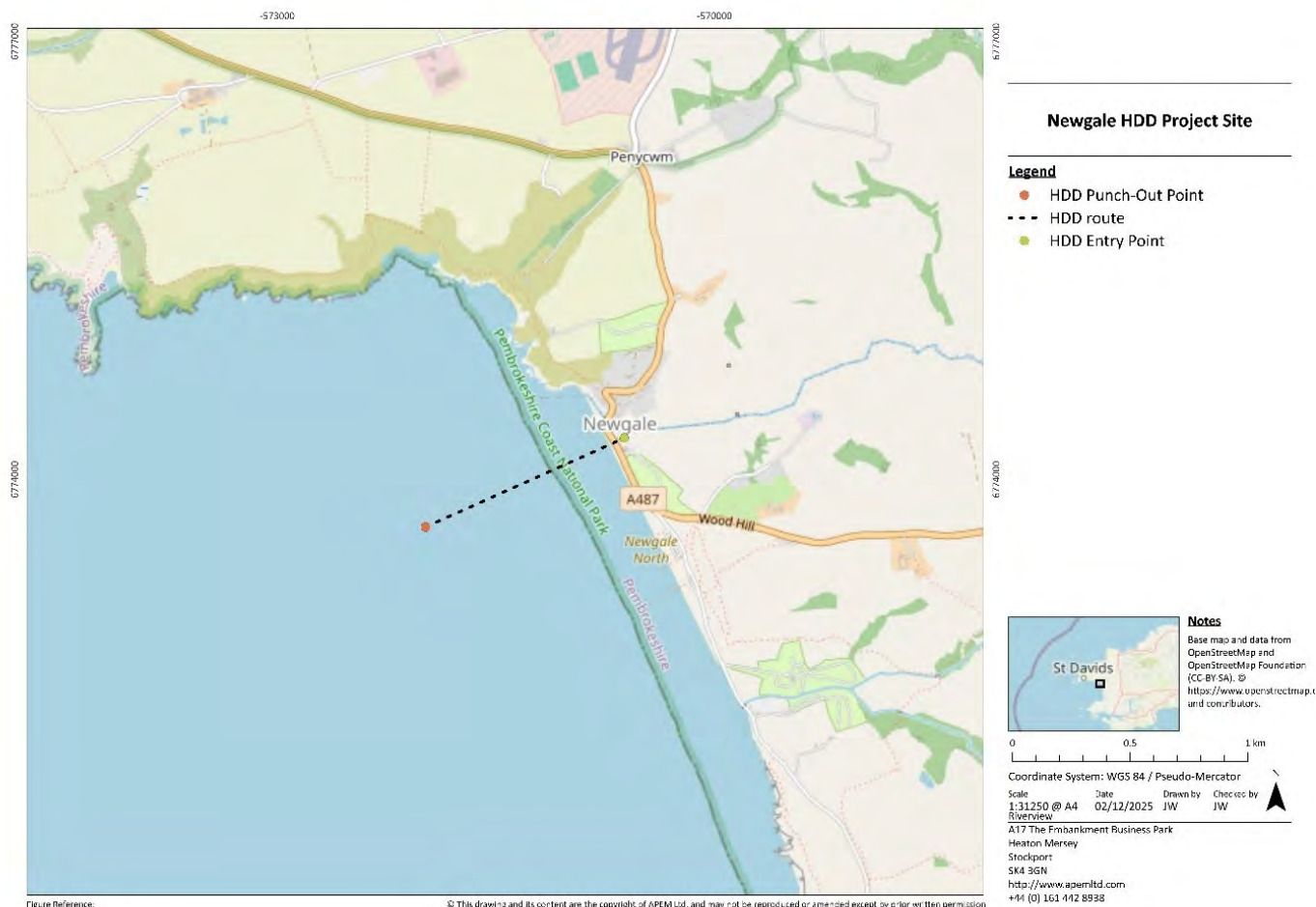
Good afternoon,

I am writing on behalf of the APEM Group, who have been contracted by OCU Group (with Vodafone as the end client) to prepare and submit a Band 3 marine licence application for horizontal directional drilling (HDD) works at Newgale. These works are preparatory enabling activities for a future subsea cable installation project which will be consented separately at a later date.

We are required to consult with you prior to submission of the marine licence to ensure no impact on historical or archaeological areas of significance.

**Project Overview:**

The proposed HDD route originates at Newgale Surf Shack Car Park, (off the A487 Nolton and Roach, Newgale, Pembrokeshire; nearest postal code SA62 6AS; nearest grid reference being SM 84831 22185). The onshore section of the work (from Newgale Surf Shack car park to Mean High Water Springs (MHWS)) falls within the administrative boundary of Pembrokeshire Coast National Park (PCNP). PCNP has confirmed that planning permission is required for the proposed works and we will be seeking this alongside the marine licence application. From this onshore site, the HDD will extend seaward to a subsea punch-out location approximately 920 m from shore as illustrated on the figure below. The exact location of the punch-out point will be confirmed using a Remotely Operated Vehicle (ROV) once the drill has 'punched through'. Following this, a dive vessel will be mobilised to recover the Bottom Hole Assembly (BHA) using air bags, after which a bellmouth will be fitted to the drillpipe. A marker buoy will be attached to a clump weight to indicate the exit location.



Please would you verify whether you have enough information to consider any impact to any historical or archaeological areas of significance?

Kind regards,

[Redacted]

[Redacted]

Marine Consultant  
APEM Limited, Riverview, A17 Embankment Business Park  
Heaton Mersey, Stockport, SK4 3GN

[Redacted]

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## Maritime & Coastguard Agency



**From:** navigation safety <navigationsafety@mcga.gov.uk>  
**Sent:** 16 February 2026 11:38  
**To:** [REDACTED]@apemltd.co.uk  
**Subject:** RE: Newgale HDD Works - Navigation Safety Query - MCGA

**Caution – This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Contact the IT Team if you are unsure**

Dear [REDACTED],

Thank you for the information regarding the proposed Newgale HDD works.

We note that the works are to drill a pilot hole approximately 6.5 inches in diameter and 6m depth, which will then be drilled out to the exit point approximately 920m offshore. The location of the exit point will be confirmed using a Multibeam Echo Sounder and its location will be identified with a marker buoy, anchored by a clump weight. The works will commence in September 2026 and should take approximately 57 days to complete.

On the understanding that the following takes place, the MCA would have no significant concerns to raise with regards to the safety of navigation and would be satisfied that the risk is relatively low on this occasion:

1. All maritime safety legislation is complied with;
2. Local notification is issued to marine users, including fishermen's organisations, relevant authorities and other local stakeholders, to ensure that they are made fully aware of the activity at least five days before commencement of the works;
3. [Zone28@hmcg.gov.uk](mailto:Zone28@hmcg.gov.uk) must be notified prior to commencement of activities.
4. A notification must be sent to The Source Data Receipt team, UK Hydrographic Office (email: [sdr@ukho.gov.uk](mailto:sdr@ukho.gov.uk)) of commencement of the licensed activities, at least 10 days before commencement of the works. The information supplied must include the start date and end date, a description of the works, positions of the work area (WGS84), and details of any marking arrangements.
5. If using machinery land side in the intertidal area at low tide, ensure suitable bunding and/or storage facilities are installed to contain and prevent the release of fuel, oils, and chemicals associated with plant, refuelling and equipment, into the marine environment.

Please can you confirm that you accept the above risk mitigations?

Kind regards,

[REDACTED]  
Marine Licensing and Consenting  
Advisor  
**UK Technical Maritime Services** [NavigationSafety@mcga.gov.uk](mailto:NavigationSafety@mcga.gov.uk)  
**Navigation**



Maritime &  
Coastguard  
Agency

Mobile: [REDACTED]

**Maritime & Coastguard Agency**  
Spring Place, 105 Commercial Road,  
Southampton, SO15 1EG

**Safer Lives, Safer Ships, Cleaner Seas**

[www.gov.uk/mca](http://www.gov.uk/mca)



---

**From:** [REDACTED]@apemltd.co.uk>  
**Sent:** 10 February 2026 10:00  
**To:** navigation safety <navigationsafety@mca.gov.uk>  
**Subject:** Re: Newgale HDD Works - Navigation Safety Query - MCGA

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Morning [REDACTED]

My apologies for the delay in my reply.

- The methodology for the works involves a HDD rig onshore which will drill a pilot hole, and then drill out to exit point roughly 920 m offshore. The location of this exit point will be confirmed using a Multibeam Echo Sounder and it's location will be identified with a marker buoy, anchored by a clump weight.
- The size of the punch out point is roughly 6.5 inches in diameter and it will be roughly 6 m below LAT.
- The works are due to commence in early September
- The works will take approximately 57 days to complete

We have consulted with the marine licensing team at NRW already and they have raised no concerns. We have contacted Trinity House as well but we are still awaiting a response from them.

Many thanks,

[REDACTED]

[REDACTED]

Marine Consultant

APEM Limited, Riverview, A17 Embankment Business Park  
Heaton Mersey, Stockport, SK4 3GN

[www.apemltd.com](http://www.apemltd.com)



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From: navigation safety <[navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)>  
Sent: 14 January 2026 10:44  
To: [REDACTED] <[\[REDACTED\]@apemltd.co.uk](mailto:[REDACTED]@apemltd.co.uk)>  
Subject: RE: Newgale HDD Works - Navigation Safety Query - MCGA

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Dear [REDACTED],

Thank you for the information for the proposed works. We understand that this is for a “punch out hole” approximately 920m from the shore at the location marked on the map. Can you please advise:

- the methodology for these works,
- the size and depth of the intended punch-out hole,
- when the works will commence and,
- how long the works will take to complete?

Can you please also confirm that you have consulted with the marine licensing team at Natural Resources Wales (NRW) and Trinity House for the marking/lighting?

With these details, we can fully assess the works in regards to the safety of navigation for all marine users and then provide our response.

Many thanks and kind regards,

[REDACTED]  
Marine Licensing and Consenting  
Advisor

UK Technical Maritime Services [NavigationSafety@mcga.gov.uk](mailto:NavigationSafety@mcga.gov.uk)  
Navigation



Maritime &  
Coastguard  
Agency

[REDACTED]  
**Maritime & Coastguard Agency**  
Spring Place, 105 Commercial Road,  
Southampton, SO15 1EG

From: [REDACTED]@apemltd.co.uk>

Sent: 22 December 2025 12:04

To: navigation safety <[navigationsafety@mca.gov.uk](mailto:navigationsafety@mca.gov.uk)>

Cc: [REDACTED]

Subject: Newgale HDD Works - Navigation Safety Query - MCGA

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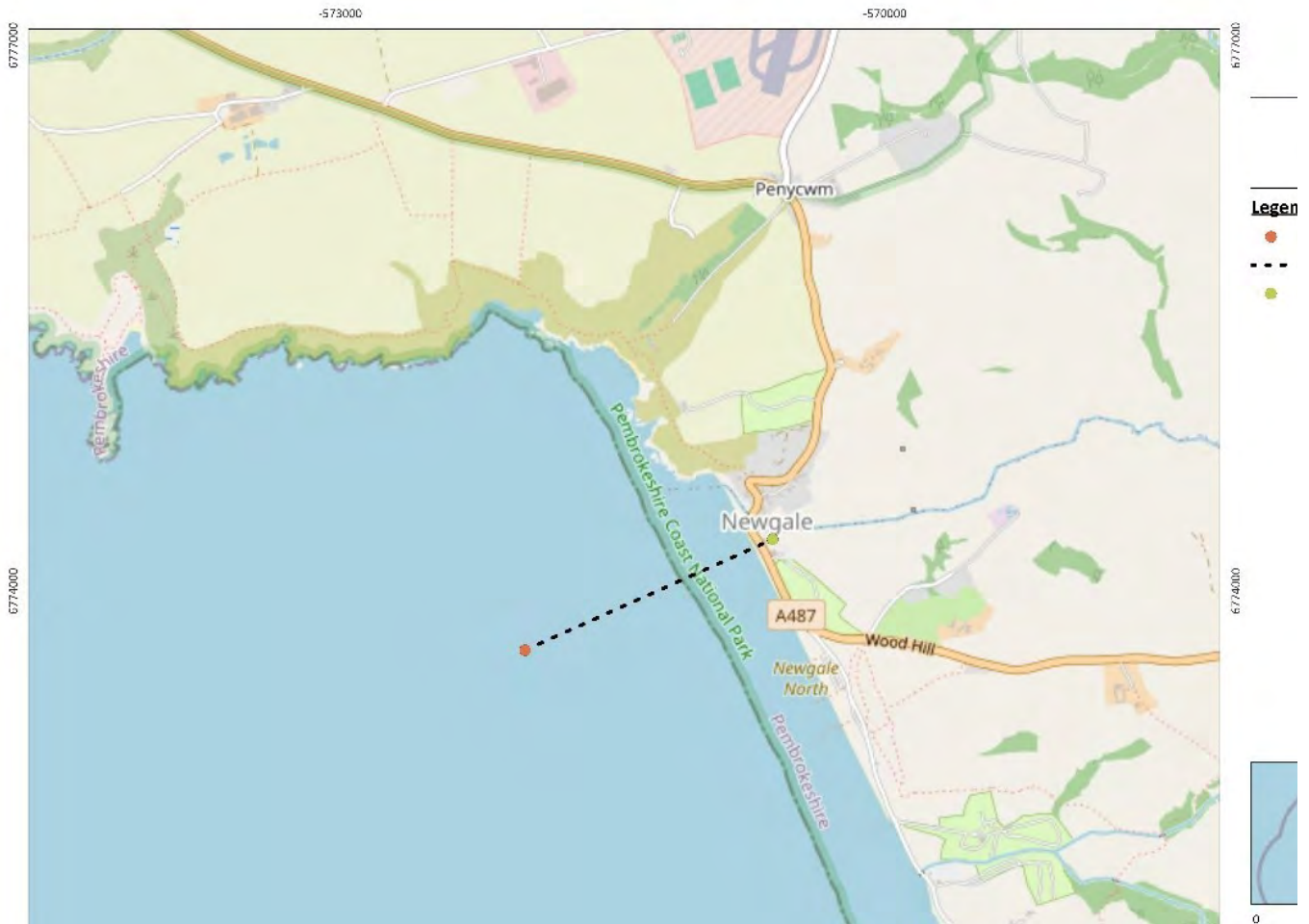
Good afternoon,

I am writing on behalf of the APEM Group, who have been contracted by OCU Group (with Vodafone as the end client) to prepare and submit a Band 3 marine licence application for horizontal directional drilling (HDD) works at Newgale. These works are preparatory enabling activities for a future subsea cable installation project which will be consented separately at a later date.

We are required to consult with the MCA prior to submission of the marine licence to ensure no impact on the safety of others at sea.

#### **Project Overview:**

The proposed HDD route originates at Newgale Surf Shack Car Park, (off the A487 Nolton and Roach, Newgale, Pembrokeshire; nearest postal code SA62 6AS; nearest grid reference being SM 84831 22185). The onshore section of the work (from Newgale Surf Shack car park to Mean High Water Springs (MHWS)) falls within the administrative boundary of Pembrokeshire Coast National Park (PCNP). PCNP has confirmed that planning permission is required for the proposed works and we will be seeking this alongside the marine licence application. From this onshore site, the HDD will extend seaward to a subsea punch-out location approximately 920 m from shore as illustrated on the figure below. The exact location of the punch-out point will be confirmed using a Remotely Operated Vehicle (ROV) once the drill has 'punched through'. Following this, a dive vessel will be mobilised to recover the Bottom Hole Assembly (BHA) using air bags, after which a bellmouth will be fitted to the drillpipe. A marker buoy will be attached to a clump weight to indicate the exit location.



We have searched for a relevant harbour authority whom we might need to contact prior to the works but this area does not seem to fall within the jurisdiction of a harbour authority.

It is not envisaged that there will be impacts on the safety of navigation.

Please would you verify whether you have enough information to consider any impact to the safety of others at sea?

Many thanks

[Redacted]

[Redacted]

Marine Consultant

APEM Limited, Riverview, A17 Embankment Business Park

Heaton Mersey, Stockport, SK4 3GN

[Redacted]

[Redacted]

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