

APPLICATION FOR A MARINE LICENCE FOR MARINE WORKS

Marine Works include, but are not limited to, coast defences, beneficial uses of dredged materials, subsea cables, pontoons, jetties, land reclamation, grab samples and outfall pipes under the Marine and Coastal Access Act 2009

Please read the notes carefully before completing the form.

- The Marine Licensing Team (MLT) administers Part 4 of the Marine and Coastal Access Act 2009 on behalf of the Licensing Authority, the Welsh Ministers.
- The completed application form must be accompanied by a location plan and, where appropriate, descriptive drawing(s) and any supporting environmental assessments.
- Please submit applications to the **Permit Receipt Centre** via the details at the top of this form. For applications larger than 20MB, we would advise that you contact us to determine the most appropriate method for submitting your application.
- Please submit marine licence applications, including this form and all supporting documents, **at least 4 months before the licence is required.**

Some projects may raise matters that require a significantly longer time for consideration. These are most likely to be:

- Projects that fall **within** The Marine Works (Environmental Impact Assessment) Regulations 2007 – as amended requiring an Environmental Statement
 - Large scale projects with substantial volumes of material being deposited or excavated
 - Works requiring an Appropriate Assessment to be conducted under The Conservation of Habitats and Species Regulations 2017.
- Information should be provided about the anticipated **duration of the entire project** in respect of works below/seaward of Mean High Water Spring (MHWS). Where appropriate, planned phasing of the work for which consent is sought must be detailed. For projects lasting more than one calendar year, planned phasing details must be given for each 12 month period.

A licence fee is payable in respect of an application. Details of fees can be found on our web pages.

Please note applications will not be processed without the correct relevant fee or invoicing details.

- Payments can be made via Cheque, BACS or credit/debit card.
 - Cheques should be crossed and made payable to **Natural Resources Wales.**
 - For BACS payments ensure you provide the reference number (not remittance number)

Further information on payment methods can be found on our web pages.

- **All activities need to comply with the Water Framework Directive (WFD). The framework and guidance can be found on the Natural Resources Wales website,**

<http://naturalresources.wales>. The results of your WFD assessment must be attached to your marine licence application.

- Please answer all questions. If any information is not available at the time of application please indicate in the relevant section, giving reasoning in a covering letter. Outstanding details must be submitted as soon as possible. Any delay in forwarding details is likely to result in delays in determining your application.

Your application may not be considered complete and therefore not processed until key information has been submitted. Your application may be returned if you fail to submit outstanding information within given timescales.

- Please note any licence may have conditions that must be discharged before works can commence. This will take additional time.
- If you have any queries with regards to completing this application please contact the MLT: marinelicensing@naturalresourceswales.gov.uk

How your application will be processed by the MLT:

- Submit all application to the **Permit Receipt Centre** via the details at the top of this form.
- Checked and acknowledged by the MLT within 21 days of receipt of application and payment
- If the application is complete and no further information is needed at this time, your application will be placed in a work queue to be assigned a permitting officer
- If the application is not complete, further information will be request and need to be provided before the application can be considered as complete
- Our **4 months** service level for determining non-EIA applications will begin from the date the **completed** application is received (*Please note some projects may take significantly longer than 4 months to determine due to their nature*)
- EIA projects may take significantly longer due to their scale and complexity. Therefore we encourage early engagement with the MLT
- Your application and supporting documents will be sent to for an initial consultation period of 28 days (*42 days for EIA projects*)
- For the majority of projects, a public notice must be advertised. Public consultation will be 28 days (*49 days for EIA projects*). For EIA projects a second public notice will be required. The MLT will advise on how this should be done.
- Responses to consultation will be considered and additional information requested at this time, if necessary.
- A decision on your Marine Licence Application will be made

All information submitted may be referred to within a licence, therefore all works must be in accordance with this information, unless otherwise agreed with NRW acting on behalf of the Licensing Authority during the determination process.

It is the responsibility of the applicant to obtain any other consents/authorisations that may be required.

Application Form Structure

1. Project Description and Cost
2. Applicant Details
3. Details of Agent, Contractor, Vehicles and/or Vessels used to carry out works
4. Environmental Impact Assessment (EIA)
5. Licensable Period
6. Project Description
7. Methods Statement
8. Materials of Project
9. Beach Replenishment, Land Reclamation or Salt Marsh Feeding
10. Temporary Works
11. Dredge and Disposal of Dredge Material
12. Protected Sites
13. Other Consents
14. Statutory Powers
15. Public Register
16. Application Fee
17. Declaration

Check List

Please ensure that you have included all the necessary information before you submit your application. **If any of the below are not completed in the application form, the application is likely to be considered incomplete and may be returned to you**

Item	Yes (✓)
The applicant is a legal entity?	✓
The declaration is signed by the applicant?	✓
Is the application fee correct?	✓
Are the grid references/coordinates correct?	✓
Do the coordinates match map locations?	✓
Have all the relevant supporting documents been submitted?	✓
Has a clear methodology been provided in the application form?	✓
Has Protected sites information been included?	✓
Has a Water Framework Directive (WFD) assessment been submitted?	✓
Are all the continuation sheets for application questions appended with correct corresponding numbers?	✓

Should you have any queries regarding your application please contact the MLT via marinelicensing@naturalresourceswales.gov.uk

1. Project Description and Cost

1 (a). Project Name

Milford Haven – Pembroke 132kV Reinforcement Scheme

1(b). Please provide a brief description of the proposed project, including location

A new 132kV link between Golden Hill substation and Milford Haven Substation is required in order to address capacity constraints and also enhance network resilience, ensuring compliance with security of supply standards and supporting future network developments, including potential renewable generation connections and increased electrification demand. The Milford Haven Grid to Golden Hill bulk supply point (BSP) project will see a new 9km 132kV underground cable circuit connecting Milford Haven BSP to Golden Hill BSP. This will terminate onto the existing 132kV overhead circuit at Golden Hill, enabling the reconfiguration necessary to link Milford Haven to Pembroke through the newly installed cable circuit. Failure to reinforce this network could lead to significant constraints on the Pembroke area's energy infrastructure, potentially limiting future industrial growth and increasing the risk of outages during peak demand. The new circuits will improve contingency planning, reduce customer minutes lost (CMLs), and ensure long-term network reliability. NGED would have preferred to utilise the highway as far possible to install the new circuit, however the A477 bridge that crosses the Westfield Pill is not able to accommodate the proposed cable.

After extensive engineering options appraisal, the only method to cross the section of Westfield Pill is via trenchless HDD method. The drill has been designed to cross the Westfield Pill at a depth of 15-20m below the bed in bedrock to mitigate against any impacts on the water course and surrounding environment. The launch and reception locations have also been set back away from the environmental receptors.

1(c). Please provide an estimated gross cost of the project (Inc. materials and labour) for works that fall below/seaward of Mean High Water Springs (MHWS)

Approximately £2.2 million

2. Applicant Details

To whom the licence will be issued. *This must be a legal entity such as an individual, registered company/ charity or public body.*

Title

Mr

Full Name

David Obrian

Company or Trading
Name

National Grid Electricity Distribution

Company Registration
Number (if applicable)

09223384

Name of Contact or individual (if different)	Justin Taylor
Position in Company	Environmental Lead
Address inc. postcode (provide registered Company address if applicable)	Worcester Depot, Blackpole Road, Worcester, WR4 9TB
Telephone Number	07423108072
Email Address	jtaylor@nationalgrid.co.uk

3. Details of Agent, Contractor, Vehicles and/or Vessels used to carry out works

3(a). Agent Details

This is who we will correspond with unless otherwise informed. If no agent we will contact the applicant.

Title		Full Name	
Company or Trading Name			
Company Registration Number (if applicable)			
Name of Contact or individual (if different)			
Position in Company			
Address (Inc. postcode)			
Telephone Number			
Email Address			

3(b). Does the Applicant wish to be included in all correspondence? Yes ☒ No ☐

3(c). Contractor Details

In order for contractors to benefit from the licence permission, details must be provided.
Any details not provided with application must be confirmed before operations commence.

Contractor Company or Trading Name	Address
OCU Group	Artemis House, 8 Greek Street, Stockport, SK3 8AB

3(d). Will the works require the use of vessels? Yes ☐ No ☒

3(d) (i). Vessel Details (if applicable and available)

In order for contractors to benefit from the licence permission, details must be provided.
Any details not provided with application must be confirmed before operations commence.

Operator	Name of Vessel	Type of Vessel	Vessel Registration Number	Country of Registration
Not Applicable				

3(e). Will the works require the use of vehicle? Yes ☐ No ☒

3(e) (i). Vehicle Details (if applicable and available) to be used below MHWS

In order for contractors to benefit from the licence permission, details must be provided.
Any details not provided with application must be confirmed before operations commence.

Operator	Type/Description of Vehicle
No vehicles or vessels below MHWS	

3(f). If the contractor or vessels or vehicles are not known at the application stage, when do you expect to provide these details?

These details will need to be confirmed prior to the licence and operations commencement

No vehicles, vessels or plants will be used below MHWS.

4. Environmental Impact Assessment (EIA)

Certain projects, due to their scale, location and/or nature, may require an EIA under the Environmental Impact Assessment Directive (Directive 85/337/EEC – as amended). If a project qualifies under EIA, an Environmental Statement (ES) must be prepared and submitted with the application.

Projects that fall within Annex I of the Directive automatically require an EIA. Projects that fall within Annex II of the Directive are assessed on a case-by-case basis for the requirement for an EIA to be undertaken.

4(a). Do you consider the works to be under the Environmental Impact Assessment Directive (Directive 85/337/EEC – as amended)? Yes ☐ No ☒

4(a) (i) If Yes, which Annex does the proposal fall under? Annex I ☐ Annex II ☐

4(a) (ii) Which number(s) within the Annex does the proposal relate to?

Not Applicable

4(b). Have you applied for a screening or scoping opinion from the MLT under the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)? Yes ☐ No ☒

4(b) (i). If Yes, please provide the reference number

Not Applicable

4(c). Has an Environmental Impact Assessment been undertaken? Yes ☐ No ☒

4(c)(i). If Yes, has an Environmental Statement been submitted to support this Marine Licence application? Yes ☐ No ☐

4(d). If an Environmental Impact Assessment has been undertaken, but an ES has not been submitted, please provide an explanation

Not Applicable

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

5. Licensable Period

Determination of applications will be based on the works taking place during these dates. Please ensure you have included an adequate contingency period. If works are not completed by the Requested Licence Expiry Date you may be required to submit a new application. *Including a contingency period within your original application does not impact on Licence Fee*

Start Date September 2026

Requested Licence Expiry Date September 2029

Please ensure you submit your application for a Marine Licence **at least 4 months** prior to the intended start date. Some projects, such as EIA projects, will take significantly longer to determine.

6. Project Description

6(a). Please give a description of the proposed project.

This should include the purpose of the project, estimated timescales of construction and operation, and broken down by the phases of works, if applicable.

Details should include, but not be limited to, dimensions of project, quantity of material being deposited and removed.

A new 132kV link between Golden Hill substation and Milford Haven Substation is required in order to address capacity constraints and enhance network resilience, ensuring compliance with security of supply standards and supporting future network developments, including potential renewable generation connections and increased electrification demand.

The Milford Haven Grid to Golden Hill bulk supply point (BSP) project will see a new 9km 132kV underground cable circuit connecting Milford Haven BSP to Golden Hill BSP. This will terminate onto the existing 132kV overhead circuit at Golden Hill, enabling the reconfiguration necessary to link Milford Haven to Pembroke through the newly installed cable circuit.

Failure to reinforce this network could lead to significant constraints on the Pembroke area's energy infrastructure, potentially limiting future industrial growth and increasing the risk of outages during peak demand. The new circuits will improve contingency planning, reduce customer minutes lost (CMLs), and ensure long-term network reliability.

NGED would have preferred to utilise the highway as far possible to install the new circuit, however the A477 bridge that crosses the Westfield Pill is not able to accommodate the proposed cable.

After extensive engineering options appraisal, the only method to cross the section of Westfield Pill is via trenchless HDD method. The drill has been designed to cross the Westfield Pill at a depth of 15-20m below the bed in bedrock to mitigate against any impacts on the water course and surrounding environment. The launch and reception locations have also been set back away from the environmental receptors.

Ground conditions are expected to consist of sandstone through the majority of the proposed bore hole, with the maximum bore depth reaching 36.06m below ground level (BGL) and a depth of 15-20m below the riverbed.

The working area on site will include, but not be limited to:

- A drilling area of approximately 77m by 50m at the entry point – minimum of 50m wide with flexible shape
- A working area of approximately 45m by 45m at the exit point– subject to local conditions
- An entry launch pit of approximately 3m by 3m by 1.2m deep per hole
- An exit reception pit of approximately 3m by 3m by 1.2m deep per hole
- A sheet pile wall providing ground support and thrust resistance – installed by a CAT 313.

These are identified as trailing rods. During this process a tractor and tanker will be used to extract excess drill fluid from the reception pit and transport back to the launch side for recycling. The pipe will be sealed to prevent any contamination from drill fluids or other materials during the installation activity and while welded and laid out ready for installation.

When the bore hole has been reamed out to the correct diameter the reamer is sent back down the bore one or two more times to ensure that the hole is clear of any large objects and that the slurry in the hole is well mixed.

The footprint includes:

- Along borehole (BH) length: 663.68 metres (m)
- A launch pit approximately 3.0m wide x 3.0m long x 1.2m deep will be required for each drill inside the launch site compound
- A reception pit 3.0m x 3.0m x 1.2m deep will be required for each drill at Exit Point.

Footprint associated with HDD and MHWS springs only:

- BH diameter: 712 millimetres (mm)
- BH length: 102.1m (within MHWS)
- BH total area: $102.1\text{m} \times 0.712\text{m} = 72.695\text{m}^2$

Under normal operations, there will be no deposit of material onto the seabed.

Breakout of the material (frac-out) is unlikely due to the geology. Engineers estimate a risk of 1-5% risk, with the potential for a small volume of material (maximum 1 cubic meter) to be discharged at the surface. Quantity will be minimal in reference to the water body area, with no impacts anticipated.

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

6(b). Please detail the location of the proposed construction project.

These should be Latitude and Longitude coordinates (WGS84) in decimal degrees to 5 decimal places (e.g. Lat 52.12345 Long -4.12345), defining the extent of the project.

The location of the HDD will connect the HDD Launch and Reception locations, provided below. The approximate coordinates of the HDD associated within the MHWS area is also provided.

ID	Easting	Northing
HDD1 Launch	196445.745	206157.350
HDD1 Reception	197076.974	206002.269
West MHWS HDD boundary	196711.32	206092.11
East MHWS HDD boundary	196810.40	206067.76

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

6(c). The following must be provided with the completed application form:

- (i) a suitably scaled extract of an Ordnance Survey Map or Admiralty Chart with location of project, complete with **North Arrow** and **Scale**
- (ii) construction plans and sectional drawings showing those proposed works below/seaward of MHWS, which should give details of the materials to be used (for beach replenishment the quantity, particle size and source of material to be deposited and deposit location is also required).
- (iii) a descriptive schematic drawing and suitably scaled location plan which show the full extent of the project clearly in relation to the surrounding area and features.

Please list below **all supporting documents** that have been submitted with this application, including suitable documents/maps/drawing titles and reference numbers.

- Map with location of project, complete with North arrow and scale. Please see:
 - Reference: 4567-DWG-HDD1 Rev 5
- Construction plans and sectional drawings showing those proposed works below/seaward of MHWS – Please see:
 - *Method Statement and Risk Assessment Westfield Pill HDD Rev 2* for Method Statement
 - *HDD lost fluid Procedure (OCU-HS-S1-FRM-025 Break out plan - Westfield Pill)*
 - 4567-DWG-HDD1 Rev 5 for sectional drawing for works below MHWS
 - PAC L – SDS
 - OCMA Safety Data Sheet
 - SODA ASH MSDS
 - *RSK Biocensus (2026), 'PEMBROKE 132KV CABLE REINFORCEMENT Habitats Regulations Assessment - Information to Inform an Appropriate Assessment'*.
- A descriptive schematic drawing and suitably scaled location plan which show the full extent of the project clearly in relation to the surrounding area and features. Please see:
 - Reference: 4567-DWG-HDD1 Rev 5
- Copy of email correspondence during pre-application discussions
 - Ref: RE_PA2602- NRW Marine enquiry - NGED Cleddau Bridge section
- Biosecurity Management Plan
 - 81778_NGED_eng-marine-inns-biosecurity-ra-and-management-plan_Rev02
- WFD Assessment
 - 81778_NGED_Milford Haven - Pembroke 132kV Reinforcement Scheme_Water Framework Directive Assessment_Rev02 (1)
- Welsh National Marine Plan Signposting
 - 81778_NGED_welsh-national-marine-plan-signposting-en-only_Rev02

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

The applicant should note that these drawings/plans may be copied to others as part of the MLT's consultation procedures. If they are subject to copyright, it is the **responsibility of the applicant to obtain the necessary approvals to reproduce the documents.**

7. Methods Statement

7(a). Please provide a detailed method statement for the works

This must include methods for all works including temporary structures or deposits such as jetties, cofferdams, moorings or landing stages to be constructed seaward of MHWS

The attached Method Statement and Risk Assessment Westfield Pill HDD Rev 1 for Method Statement provides full details of the project and is summarised below.

Ground conditions are expected to consist of sandstone through the majority of the proposed bore hole, with the maximum bore depth reaching 36.06m below ground level (BGL) and a depth of 15-20m below the riverbed. To maintain bore integrity, the HDD bore path will sustain a 400m radius vertical gradient and drilling fluid additive will be used to allow for effective removal of cuttings during fluid “flush” throughout the process.

The working area on site will include, but not be limited to:

- A drilling area of approximately 77m by 50m at the entry point – minimum of 50m wide with flexible shape
- A working area of approximately 45m by 45m at the exit point – subject to local conditions
- An entry launch pit of approximately 3m by 3m by 1.2m deep per hole
- An exit reception pit of approximately 3m by 3m by 1.2m deep per hole
- A sheet pile wall providing ground support and thrust resistance – installed by a CAT 313.

Prior to works, a Temporary Works Design will be issued, the area will be inspected by a supervisor, a permit-to-dig will be completed, and all underground services will be identified and clearly marked. All safety procedures will be undertaken and monitored by supervisors on-site; including, 5m minimum exclusion zone during excavation, a banksman, full PPE use, and the use of STOP WORKS protocol in the event of excessive vibration, instability, or unsafe conditions occurring.

The work will begin with the installation of a pilot bore; allowing a controlled pressure injection of drilling fluid throughout the pilot drilling process. Following this, drilling will be carried out continuously in intervals subject to drill rod length, equivalent to one length of drill pipe until the drilling head exits the ground at the exit reception pit. After that reaming will commence and be repeated using incremental size reamers to increase the bore diameter as necessary.

During the reaming process, drilling fluid is pumped under pressure through the drill string to the reamer. As the drill rig pulls the reamer back towards it, the drill pipe is attached continuously behind the reamer for subsequent reaming and pipe pulling operations. These are identified as trailing rods. During this process a tractor and tanker will be used to extract excess drill fluid from the reception pit and transport back to the launch side for recycling.

When the bore hole has been reamed out to the correct diameter the reamer is sent back down the bore one or two more times to ensure that the hole is clear of any large objects and that the slurry in the hole is well mixed.

The pipe will be sealed to prevent any contamination from drill fluids or other materials during the installation activity and while welded and laid out ready for installation.

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

7(b). Do you intend to undertake activities that could generate underwater noise?

This include piling, use of explosives, geophysical, acoustic deterrent devices and multibeam echosounders.

Yes ☒ No ☐

7(b) (i). If Yes, what type(s) of activities will be undertaken?

The HDD works may produce a small amount of noise and vibration. However, the activity will be undertaken 15-20 m below the seabed and is considered to be non-intrusive, unless in the unlikely event of a breakout. There will not be any piling, use of explosives, geophysical, acoustic deterrent devices and multibeam echosounders

While typical drilling operations (e.g. engines, thrusters, drilling) will generate low-level operational noise and vibration, this will take place at the launch and reception compounds located approximately 280m east and west from the Milford Haven Inner waterbody.

A full assessment is provided within the supporting WFD Assessment.

7(b) (ii). If Yes, approximately how many days will the activity be undertaken for?

The proposed schedule of works will take place between 01/09/2026 and 01/09/2029. During this time, the HDD process will be undertaken to pull the duct into the borehole over approximately 6 months; with a maximum of 7 days per week on-site, equating to a maximum of 182 days for the HDD works. The cable will then be pulled into the existing duct during the second half of 2028, with final completion planned for September 2029.

If Yes, you will be required to complete an additional form that will be provided.

7(c). Please state the measures to be taken to:

(i) Minimise risk to the marine environment

The non-intrusive nature of HDD works reduces the physical impact to the marine environment, species and benthic habitat. The HDD works will be undertaken 15-20 m below the seabed and no direct risk to the marine environment is foreseen. In the unlikely event of a breakout, the mitigation measures within the breakout plan (please see *OCU-HS-S1-FRM-025 Break out plan - Westfield Pill*) will be followed. Methods used at water crossings include:

- Operatives not to encroach beyond exclusion rope at the top of the crossing
- Once breakout identified the drill will stop.
- Bore stabiliser to be deployed to stem the flow of the breakout.
- Breakout incident to be reported immediately to management so that the relevant authority will be informed.

(ii) Prevent undue interference to others

The non-intrusive nature of HDD works reduces the disturbance and interference to other users. The HDD works will be undertaken 15-20m below the seabed and no interference to other users is foreseen.

(iii) Maintain navigational safety, including marking and lighting of works

The non-intrusive nature of HDD works reduces the risk of any navigational safety. The HDD works will be undertaken 15-20m below the seabed and no interference to other users is foreseen. No marking or lighting will be required, owing to the depth of the HDD below the seabed. In the unlikely event of a breakout, any deposits are not foreseen to pose any risk to navigational safety.

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

8. Materials of Project

8(a). Description of materials to be deposited seaward of MHWS (Please tick all that apply)

Timber	☐	Iron/Steel	☐	Concrete	☐	Biocides/other chemicals	☐
Silt	☐	Stone/Rock	☐	Gravel	☐	Plastic/Synthetics	☐
Sand	☐	Other	☒				

If other, please provide a description of materials.

Under normal operations, no material will be deposited on the seabed. In the unlikely event of a breakout, there is potential for the materials used within the drilling fluid to be released. These materials include PAC™-L, Cebogel OCMA and SODA ASH. Please see attached documentation for the material data safety sheets for these materials. The deposit may also include benthic substrate and potential associated contaminants.

8(b). Delivery method of materials to site

If sea delivery, please include details of vessels to be used with a chart of proposed route and transshipment area. If vehicle delivery, please provide the proposed access route.

No sea deliveries will take place. Vehicles and plant will be mobilized to site along the defined routes in the traffic management plan and use dedicated access points and haul roads as per the approved traffic management plan. Delivery drivers will adhere to the highway code at all times on the public highway and Site-specific rules while on the working easement and haul roads.

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

8(c). Will the works involve removals seaward of MHWS?

Yes ☒ No ☐

8(c) (i). Description of materials to be removed seaward of MHWS (Please tick all that apply)

Timber	☐	Iron/Steel	☐	Concrete	☐	Biocides/other chemicals	☐
Silt	☐	Stone/Rock	☐	Gravel	☐	Plastic/Synthetics	☐
Sand	☐	Other	☒				

8(c) (ii). Description of objects/materials to be removed seaward of MHWS
Including quantities to be removed.

The HDD works will involve removal of material at a depth of 15-20m below the seabed.

Footprint associated with HDD below MHWS only:

- BH diameter: 712mm
- BH length: 102.1 metres (m) (within MHWS)
- BH total area: $102.1\text{m} \times 0.712\text{m} = 72.695\text{m}^2$

Above MHWS, the footprint on the eastern and western riverbanks includes:

- Along borehole length: 561.6m
- A launch pit approximately 3.0m wide x 3.0m long x 1.2m deep will be required for each drill inside the launch site compound
- A reception pit 3.0m x 3.0m x 1.2m deep will be required for each drill at exit point.

Under normal operations, there will be no deposit of material onto the seabed. The ground investigation factual report associated with these works indicated that the relevant bedrock is consolidated sandstone with no fissures; reducing the risk of a breakout (a.k.a. frac-out) to 1-5% if a natural fissure was encountered. Such an encounter would result in maximum approximately 1m^3 of material discharged. Quantity will be minimal in reference to the water body area, with no impacts anticipated.

9. Beach Replenishment, Land Reclamation or Salt Marsh Feeding

For works involving any of the above, please provide the following information

9(a). Is the material to be deposited like for like to existing material? Yes ☐ No ☐

9(a)(i) If No for Beach Replenishment please provide justification why?

Not Applicable

9(b). Description of material to be deposited

Please provide the grading specification of materials to be used, if using a range of grain sizes please state the percentage by weight passing. *If unsure, please refer to the Wentworth Scale*

Not Applicable

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

9(c). Source of the material to be deposited

Including dredged or land based stating the origin of material

Not Applicable

9(d). Has the material been chemically analysed?

Yes ☐ No ☐

If material has been analysed, we may request this information to determine the application

9(d) (i) If Yes, is the analysis data been included with the application? Yes ☐ No ☐

10. Temporary Works

10(a). Will there be any temporary deposits below MHWS?

Yes ☒ No ☐

This includes construction materials, removed objects/material, jetties or cofferdams

If **Yes**, please continue with section **10**

10(b). Please provide the location of temporary deposits

Please include a map/chart displaying the location of temporary deposits, if necessary.

Under normal operations, no material will be deposited on the seabed. In the unlikely event of a breakout, there is potential for materials be deposited on the seabed. The location of the potential deposits cannot be confirmed, due to the unplanned nature of this event, but is assumed to be close to the HDD route, if a breakout occurs. The attached document 4567-DWG-HDD1 Rev 5 provides a figure outlining the HDD route. A breakout could potentially occur at any location along the HDD route, although the unplanned nature of this event is anticipated to be unlikely.

10(c). Description of temporary deposits

Although the proposed works are non-intrusive and do not involve dredging, piling, or sediment excavation, there remains a potential for minor, localised sediment disturbance during the unlikely event of a breakout. It is emphasised that during normal, planned operations, no impact on water quality is anticipated due to the non-intrusive nature of the works.

The chemicals used within the drilling works are not listed on the Environmental Quality Standards Directive list and are therefore considered to pose little risk to the water quality, in the event of a breakout. These materials include PAC™-L, Cebogel OCMA and SODA ASH; and Diatomaceous earth for the collection and cleaning during a potential breakout. The Material Safety Data Sheets (MSDS) for these chemicals is provided in accompaniment to this document and licence application; these contain information regarding toxicity the aquatic species and the information (where available) associated with the persistency, biodegradability and bioaccumulative potential.

Environmental information associated with these chemicals includes:

- PAC™-L: this substance is not considered to be persistent, bioaccumulating nor toxic (PBT). This substance is not considered to be very persistent nor very bioaccumulating (vPvB).
- Cebogel OCMA: shall not be classified as hazardous to the aquatic environment. Persistence and degradability and bioaccumulative potential has not been required to be conducted, as the substance is organic.
- SODA ASH: with regards to the sodium carbonate composition of the material, the methods for determining biodegradability are not applicable to inorganic substances and the material does not bioaccumulate
- Diatomaceous earth: a non-combustible, biodegradable and absorbent material that is able to collect waste material from a breakout for disposal; similar materials that may be used are vermiculite, and sand and earth.

Given the small concentrations of these chemicals that would be released in the event of a breakout (in comparison to the volume of the water body) and low environmental risk associated with these chemicals, no negative impacts on the water quality is anticipated from the materials used in the HDD works.

Milford Haven Inner transitional waterbody (GB531006114100) has potential for resuspended sediment to contain Cefas Action list substances, possibly at levels above Cefas Action Level 1 and/or EQSD list substances which could negatively impact the water quality of Milford Haven Inner. In this context, it is also important to note that this waterbody has a chemical status of "Moderate". Factors including BDPE Calc, PAH, Macroalgae and DIN noted as the driving elements of the water body status. While no sediment sampling has been undertaken specifically for these proposed works, existing contamination is likely confined to deeper or undisturbed sediments. Given that no excavation proposed, the risk of mobilising contaminants above background levels is considered minimal.

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

11. Dredge and Disposal of Dredge Material

If you are undertaking Dredge and Disposal activities please also complete the Dredge and Disposal application form and submit together.

11(a). Do you intend to apply for a marine licence to dispose of dredged material to sea as part of the works in this application? Yes ☐ No ☒

12. Protected Sites

Licensing Authorities have a duty to ensure that projects will **not have significant adverse environmental impact**, particularly on any designated **European Site of Conservation Importance - Special Areas of Conservation (SAC) and Special Protection Areas (SPA)**, listed under the Habitats Directive (Council Directive 92/42/EEC on the conservation of natural habitats and of wild fauna and flora). In addition, it is Government Policy that Wetlands of International Importance (Ramsar sites) are also considered as European Sites. There is a duty to take reasonable steps to further the conservation and enhancement of nationally designated sites (Sites of Special Scientific Interest (SSSIs)).

12(a). Have you had pre-application correspondence with NRW, its legacy bodies or Natural England? Yes ☒ No ☐

12(a)(i). If Yes, please provide copies of correspondence with application and state which team(s) you have contacted?

Natural Resources Wales marine licensing team and SSSI team have been consulted regarding the proposed works.

12(b). Are any part of the works located *within* or *likely to affect* a designated conservation site? (SAC, SPA, SSSI or Ramsar) Yes ☒ No ☐

12(b)(i). If Yes, which designated site(s) may be affected?

The proposed works are located approximately 70m south of both the Pembrokeshire Marine/ Sir Benfro Forol Special Area of Conservation and the Milford Haven Waterway Site of Special Scientific Interest, and within the Lower Cleddau Shellfish Waters Protected Area.

12(c). Please provide a description of all mitigation measures proposed to avoid any impact on designated conservation sites.

The nature of the HDD project design incorporates embedded avoidance measures, by being non-intrusive. In the unlikely event of a breakout, a lost fluid procedure (breakout plan) document outlines the measures to be taken. Methods used at water crossings include:

- Operatives not to encroach beyond exclusion rope at the top of the crossing
- Once breakout identified the drill will stop
- Bore stabiliser to be deployed to stem the flow of the breakout
- Breakout incident to be reported immediately to management so that the relevant authority may be informed if required.

Designated sites are also considered within the supporting WFD Assessment.

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

12(d). If the works are not located *within* or *likely to affect* a designated conservation site, please indicated the approximate distance to the nearest designated conservation site.

The proposed works are located approximately 70m south of both the Pembrokeshire Marine/ Sir Benfro Forol Special Area of Conservation and the Milford Haven Waterway Site of Special Scientific Interest, and within the Lower Cleddau Shellfish Waters Protected Area. Impacts are considered within the supporting WFD Assessment.

Please note that if the proposed works are in or within 2km of a European Site of Conservation Importance you will have to provide suitable mitigation measure to avoid any impact on designated conservation sites.

13. Other Consents

Please detail all consents that you have applied for or received for these works

Type of Consent	Applied for	To be applied for	Reference Number	Date of Issue and Expiry
Planning Permission under Town and County Planning Act 1990 – From Local Planning Authority (LPA)	N/A			
Name and Address of LPA for location of works				
Land Owners Consent such as The Crown Estate Consent		In progress		
Port Authority or Local Harbour permissions				
Other NRW consents such as Flood Defence or SSSI assent	SSSI assent			
Details of NRW consent	SSSI assent Submitted to pembsdistrictteam@cyfoethnaturiolcymru.gov.uk on 02/06/2026			
Other consents such as Transport and Works Act Order, Section 36 Electricity Act, grant/loan sanction				
Details of other consents				

14. Statutory Powers

14(a).Does the applicant have statutory powers to consent any aspect of the project?
E.g. coast protection authority, dredging powers, statutory undertakers Yes ☒ No ☐

14(a)(i).If Yes, please give details and state the relevant legislation that gives these powers

NGED have statutory powers under the The Electricity Act 1989. The statutory powers provides NGED with permitted development rights for the installation of below ground cables under the The Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO).

15. Public Register

Under The Marine Licensing (Register of Licensing Information)(Wales) Regulations 2011 and the Environmental Impact Assessment Directive (Directive 85/337/EEC – as amended) , all information contained within or provided in support of this application will be placed on the Public Register unless NRW approve of the applicant's reasons for withholding all or part.

15. Is there any information contained within or provided in support of this application that you consider should NOT be included on the Public Register on the grounds that its disclosure:

15(a). Would be contrary to the interest of National Security? Yes ☐ No ☒

15(b). Would prejudice to an unreasonable degree you, or some other person's commercial interest of those of a third party? Yes ☐ No ☒

If **Yes** to either (a) or (b), please provide full justification as to why all or part of the information you have provided should be withheld

Please continue on a separate sheet if necessary. Please tick if you have done this ☐

16. Application Fee

16(a). What are the corresponding fee band for this application? Band 2 ☐ Band 3 ☒

16(b) Band 2 Only

Projects are charged at a fixed fee of £1920. The application will not be processed until the correct fee has been provided.

Please provide the method of payment

Method	Yes (✓)	Reference Number
Cheque		
BACS (not remittance no.)		
World Pay (phone)		

16(c) Band 3 Application only

Band 3 applications are charged at on hourly rate of £120 and are invoiced in arrears. Please complete the details below which will be required for invoicing.

Customer Name	National Grid Electricity Distribution
FAO	Justin Taylor
Purchase order number	P2657608
Address for invoice	Worcester Depot, Blackpole Road, Worcester, WR4 9TB
Telephone Number	07423108072
Email Address	nged.apinvplym@nationalgrid.co.uk

17. Declaration

I declare that to the best of my knowledge and belief that the information given in this application form and supporting documentation is true.

WARNING: It is an offence under the Marine and Coastal Access Act 2009, under which this application is made, to fail to disclose information or to provide false or misleading information and can invalidate any licence granted.

Signature



Date 24-07-2026

Name (in capitals)

DAVID WILLIAM O'BRIEN

Position in Company

Senior Delivery Manager

*Applications cannot be processed unless signed by the **Applicant** (not agent), the applicant must have appropriate level of authority within the company.*

Applications will not be processed unless signed