



NRW Permitting Service consideration of public representations under Schedule 5 of the Marine Works (EIA) Regulations 2007

Application Reference	ORML1957
Applicant Name	Pembrokeshire Coastal Forum
Project name, location and general description	<p>The Marine Energy Test Area (META) Project consists of eight marine test sites within the Milford Haven Waterway and adjacent waters. Consent is sought for the META project for a duration of up to 15 years. This consent will be for META Phase 2 marine testing areas only; Warrior Way, Dale Roads, and East Pickard Bay.</p> <p>Scaled and full-scale marine energy device testing will be enabled at the META project. Testing will not be grid-connected. Testing activities which will be supported at the META project are:</p> <ul style="list-style-type: none">• Scale wave device testing;• Scale tidal device testing;• Full scale wave device testing;• Micro tidal device testing;• Testing of Remotely Operated Vehicle (ROV) or other monitoring equipment;• Site preparation methodologies;• Installation and decommissioning methodologies;• Salvage methodologies; &• Tow, float and mooring solution testing for floating offshore wind balance of plant technology.
Details of Public Advertisement	Public notice advertising the Project was placed in the Western Telegraph on 26th February 2020 (42 days notice) and in the Western Telegraph on 4th March 2020 (35 days notice).
Location of documents available to the public	The application documents were made available to the public between 9am-5pm at Cardiff Permitting Service, Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff CF24 0TP and they could also be requested from Natural Resources Wales Marine Licensing Team, Ty Cambria, 29 Newport Road, Cardiff, CF24 0TP.

	Online on NRW public register.
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Representation 1	
Name of person making representation	Milford Harbour Users Association (MHUA)
Date representation made	18/03/2020
<p>Summary of concerns:</p> <ol style="list-style-type: none"> 1. The representation is supportive of local renewable energy projects that contribute to the sustainable development of the local economy and employment and have previously engaged with META consultations being pleased to note that some of their suggested amendments have been incorporated. 2. The representation goes on to raise concerns specifically relating to the Warrior Way site and interaction with the watersports users which use the designated water sports area regularly. Concerns are raised that these users may not have access to AIS and may not be fully represented within the navigational risk assessment. The representation goes onto acknowledge that the applicant has recognised some of the constraints/risks of this site and have reduced the maximum number of test deployments at any time from two to one. This is a sensible change and should make the proposals realistic and manageable at this site, provided that any deployment is accompanied by viable aids to navigation. However, concerns remain that marker buoys for the site could become ‘targets’ for leisure users rather than hazards to avoid. The representation recognises that the detailed method of safely enforcing the Warrior Way exclusion zones may be beyond the necessary scope of the Marine Licence but ask that the applicant and the Port Authority engage actively with users as deployments take place to ensure that safety measures are as effective as possible and do not, in themselves, become new hazards. 	
<p>NRW Permitting Service Consideration of this representation:</p> <ol style="list-style-type: none"> 1. (a) NRW consider that this representation is capable of being dealt with through Schedule 5. No action required- this representation is supporting the Project at East Pickard Bay and Dale Roads 2. (a) NRW consider that this representation is capable of being dealt with through Schedule 5. (b) NRW consider that this representation is relevant to the EIA Consent Decision (d) NRW PS do not consider that the representation gives rise to a dispute to resolve a question of fact for the reasoning set out below. Therefore, NRW PS will have such regard for this representation when considering the EIA consent decision. 	

NRW PS have recognised that the navigational safety of the Project is highly dependent upon informing and educating recreational users. NRW PS considers that these concerns can be sufficiently addressed using appropriate conditions in any Marine Licence issued. NRW PS have also advised the applicant to liaise directly with MHUA going forwards in addition to any mitigation requirements specific to navigational safety.