



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Gwynt Glas Offshore Wind Farm

Case Reference: EN0110036

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to
Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment)
Regulations 2017

06 August 2026

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APPENDIX 1: STATUTORY BODIES FORMALLY CONSULTED

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

1. INTRODUCTION

- 1.0.1 On 26 June 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Gwynt Glas Offshore Wind Farm Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Gwynt Glas Offshore Wind Farm (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110036/documents>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with relevant statutory bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'statutory bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those statutory bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Advice notes | National Infrastructure Planning \(planninginspectorate.gov.uk\)'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section 1.5)

ID	Ref	Description	Inspectorate's comments
211	Section 1.5.1	Project design envelope approach	The Inspectorate notes the intention to apply a 'project design envelope approach'. This is employed when there is a need to seek flexibility to address uncertainty. The applicant should make every attempt to refine the range of options including for onshore cable routeing, wind turbines, wind turbines substructures, inter-array cables, offshore export cables and the width of the offshore cable corridor, including at landfall. The ES should clearly explain which elements of the proposed development have yet to be finalised and provide reasoning for this. The Inspectorate advises that flexibility in design should only be sought where necessary, in the interests of a proportionate ES based on the most realistic and refined design envelope possible. The ES should assess the worst case that could potentially be built out in accordance with the authorised development of the Development Consent Order (DCO) being applied for.
212	Paragraph 103	Potential changes in red line boundary after scoping	Scoping Report states that the onshore scoping boundary will be refined as the EIA progresses and the locations of the landfall, export cable corridor, onshore transmission station(s) and grid connection cable corridor are identified. It is not clear if this refers to the refinement of the red line boundary within the current onshore scoping boundary or the potential to extend the red line boundary after scoping. If the red line boundary extends beyond the red line boundary presented in figure 1.1.1 then the applicant should consider whether all the comments in the Scoping Opinion remain applicable or whether this represents a materially different project. At the time of application, any proposed development parameters should not be so wide-ranging as to represent effectively different developments. It should be noted that if the proposed development materially changes prior to submission of the DCO application, the applicant may wish to consider requesting a new Scoping Opinion.

ID	Ref	Description	Inspectorate's comments
213	Paragraph 81	Dynamic inter-array cable	The Scoping Report outlines three types of dynamic inter-array cables which are being considered for the proposed development. The ES should provide details of the type of dynamic inter-array cable chosen, together with information specifically relating to the potential impacts arising from the use of the cable and how impacts have been assessed. Supporting figures should be provided in the ES to aid understanding.
214	Section 1.5.3.1.4 and paragraphs 93 to 95	Cable burial/protection (offshore)	If flexibility is sought regarding cable burial depth and any external cable protection, the assessment should be based on the relevant worst case, with a clear justification as to why this is considered to be the relevant worst case. The ES should detail the maximum volume of material required for cable protection and explain how this has been quantified. This information must cover the lifespan of the project, including installation, any additional protection or material replenishment that may be required, and the decommissioning process. The Inspectorate considers that an outline version of the Cable Burial Risk Assessment (CBRA) and Cable Specification and Installation Plan (CSIP) should be submitted with the application. The applicant's attention is drawn to comments from NRW (appendix 2 of this Opinion) regarding an outline Scour and Cable Protection Plan (SCPP).
215	Section 1.5.3.2.1 and paragraphs 105 to 110	Landfall electrical infrastructure	The Scoping Report states that trenchless solutions, open trench surface lay and a combination shallow water cable installation using a shallow draft vessel or jack up barge with trenchless solutions are currently being considered for landfall. The ES should describe and assess the option(s) in this regard, including effects during construction, O&M and decommissioning. Impacts associated with the anticipated changes at the coastal landfall site throughout the lifetime of the proposed development (including both vertical change in beach profile and the effects from coastal retreat) should be assessed where significant effects are likely. The ES should describe how cable burial and siting of associated infrastructure will be managed throughout the lifespan of the proposed development. The alternatives chapter of the ES should describe the main reasons for the option(s) chosen, including a comparison of the environmental effects.

ID	Ref	Description	Inspectorate's comments
21.6	Section 1.5.3.2.2 and paragraphs 112 to 113	Onshore export cable	As the locations of the landfall and onshore components have yet to be confirmed, it is not yet clear whether any temporary or permanent crossings of watercourses, major roads and/or railways would be required. The Scoping Report explains that onshore export cables would generally be installed in trenches which are then backfilled and that there would be a need for onshore trenchless crossing techniques such as horizontal directional drilling (HDD) to avoid specific features such as rivers. The ES should identify the locations and types of all such crossings within the onshore export cable corridor, as well as the nature of any associated construction works (for example, dewatering, trenching and HDD). Where reliance is placed on the use of a specific method to mitigate significant effects, the applicant should ensure that such commitments are appropriately defined and secured in the DCO.
21.7	Section 1.5.4.1 and paragraph 116	Unexploded ordnance (UXO) clearance	The Inspectorate notes the intention to seek consent for UXO clearance (if required) through a future marine licence application, and that the effects of UXO clearance would be considered at a high level in the ES for the proposed development. The Inspectorate is content with this approach, which should be based on the worst case in terms of UXO parameters (numbers and weight) and the method for clearance. The ES should also address any cumulative effects from the construction of the proposed development and UXO clearance.
21.8	Table 1.5.6	Construction compounds	The ES should confirm the locations and sizes of the temporary and main construction compounds and where possible, show detailed layouts. Any mitigation measures proposed to avoid or minimise impacts relating to the use of compounds should be described in the ES and secured in the DCO.
21.9	Section 1.5.5 and paragraph 122	Construction port location and operations and maintenance (O&M) base	The applicant should make effort to identify the location of the port and O&M base, where possible, and assess any associated likely significant effects. In the event that the locations have not been confirmed, the ES should make effort to assess the likely significant effects associated with relevant assumptions and a worst-case scenario.

ID	Ref	Description	Inspectorate's comments
21.10	Section 1.5.8	Construction programme	The indicative construction programme for the proposed development indicates that there is potential for a phased approach to construction, with each phase anticipated to span approximately three to four years with overlapping periods of activity. The ES should describe the construction programme, and any phasing in delivery, including the expected duration and overlap of different components to enable an assessment of the effects on the basis of a worst-case scenario.
21.11	Section 1.5.7	Decommissioning plan	The Scoping Report outlines the sequence of events for decommissioning which are quite high level, at this stage. The Scoping Report states that a Decommissioning Plan will be prepared during detailed design. The ES should provide a description of the activities and works which are likely to be required during decommissioning of the proposed development, including the anticipated duration. The Decommissioning Plan should also be secured in the DCO.
21.12	Table 1.8.2	Embedded mitigation	The ES refers to a number of documents which would be submitted with the DCO, in which details of the embedded mitigation used for the proposed development would be set out. The Inspectorate notes several instances where the Scoping Report refers to plans as embedded mitigation but fails to set out the actual embedded mitigation and commitments contained within these plans. Outline plans should be provided at the time of application and the mitigation included in these supporting documents should be outlined in the ES, together with information regarding their effectiveness. Where additional mitigation is required, the ES should set this out and include details of what this entails.
21.13	Section 1.8.5	Mitigation and monitoring	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, if possible, with relevant stakeholders and the ES should explain how they would be secured in the DCO. To ensure the EIA process is proportionate and front-loaded, the relevant control and management plans submitted with the application should clearly identify and explain in

ID	Ref	Description	Inspectorate's comments
			detail the avoidance and mitigation measures that are already known, deliverable, and not dependent on further pre-construction surveys.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 1.8)

ID	Ref	Description	Inspectorate's comments
221	Section 1.3 and paragraph 25	Purpose of the ES	The Scoping Report states that as well as being prepared to support a request for a Scoping Opinion from the Secretary of State, it will also support scoping with Natural Resources Wales (NRW) in relation to a marine licence (ML) application. The applicant is reminded that a DCO examination can only examine matters pertaining to the DCO application. It should therefore ensure that the ES clearly identifies matters relevant to each separate application and that the methods of securing mitigation through either requirements in the DCO or conditions in the ML are clearly identified.
222	Section 1.8.2	Third-party data	Third party data is proposed to be used to support the baseline for a number of assessments throughout the ES. Where third party data is used, the ES should clearly set this out and identify any limitations associated with such data and include the age of the data and the timing of any surveys. The ES should also clearly detail the age of the third-party data used, the timings of any surveys, how this information relates to the location of the proposed development, and explain how any third-party data used is sufficiently robust to inform the assessment.
223	Section 1.8.4	Significance of effect	The Scoping Report explains how significance of effects would be defined and that significance levels will be defined for each aspect, which will include specific aspect-based guidance. However, not all chapters are clear on what level of effect would constitute a significant effect nor set out any aspect specific levels of magnitude/receptor sensitivity. The ES should explain clearly how significance has been determined for each

ID	Ref	Description	Inspectorate's comments
			aspect chapter or explain clearly how the methodology aligns with the significance of effects set out in the overarching methodology.
224	Section 1.8.8 and paragraphs 209 and 210	Cumulative effects assessment (CEA)	Paragraph 210 of the Scoping Report states "...only projects which are reasonably well-defined, and sufficiently advanced to provide information on which to base a meaningful and robust assessment would be included in the CEA." As set out in the Inspectorate's Advice on CEA, an assessment should be provided for all Tier 1 and Tier 2 other developments, where possible. For other developments falling into Tier 3, the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a high level. The assessment should be carried out with reasonable effort and should be clearly documented in the ES, for example using the format presented in Matrix 2 of the Inspectorate's Advice on CEA. Paragraph 210 further details that, where possible, the applicant intends to use as-built project parameter information (if available) as opposed to consented parameters to reduce over precaution in the CEA. The Inspectorate considers that a version of the CEA should be presented based on consented impact values only, except for cases where as-built parameters are legally secured. The applicant's attention is drawn to comments from Natural England (NE) (appendix 2 of this Opinion) in this regard.
225	Tables 2.1.3, 2.2.5, 2.3.5, 2.4.3, 2.5.5, 2.6.6, 2.7.4, 2.8.4, 2.9.9, 2.10.7, and 2.11.4	Transboundary impacts	The Inspectorate notes that the Scoping Report discusses transboundary effects for each aspect. The Inspectorate notes that it has an ongoing duty in relation to consideration of transboundary effects and will undertake a separate transboundary screening exercise on behalf of the SoS under Regulation 32 of the EIA Regulations following adoption of the Scoping Opinion. As that exercise has yet to be undertaken, the Inspectorate is not in a position to agree to scope out all proposed transboundary effects at this stage. The Inspectorate recommends that

ID	Ref	Description	Inspectorate's comments
			where Regulation 32 applies, the ES should identify whether the proposed development has the potential for significant transboundary effects and if so, what these are and which European Economic Area (EEA) States would be affected.
226	Section 1.7.3 and paragraph 178	Cross border impacts	The Inspectorate notes that the proposed development is located predominantly in Welsh waters with a section of the offshore scoping boundary extending into English waters. Figures should be provided with the application which identify Welsh, English and Irish Waters to inform the assessment of cross border impacts that may arise from the proposed development.
227	n/a	Offshore Wind Environmental Standards (OWES)	In line with section 2.8.83 of the National Policy Statement (NPS) for Renewable Energy (EN-3), Defra is due to publish OWES specifically for Round 5 in late summer 2026. The Inspectorate advises the applicant to adopt the relevant OWES and best practice measures into the design of the proposed development. The Inspectorate also advises that the ES must clearly explain how the proposed development complies with the OWES guidance and NPS EN-3, or alternatively, the grounds on which deviation from them is justified. Any deviations must be robustly justified, evidence-based, and proportionate. The Inspectorate advises that this explanation should be presented in a tabular format, outlining each of the OWES measures and any of the best practice measures adopted. It should outline where they have been included within the application documents (including ES chapters and management plans), and where they have been secured within the DCO.
228	n/a	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing

ID	Ref	Description	Inspectorate's comments
			sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.
229	n/a	Structure of the ES and aspect chapters	To ensure the EIA process is proportionate and consistent, the Inspectorate advises the applicant to structure the ES in line with Table 1 Annex B of the Evidence Review Note (ERN): Environmental Impact Assessment (OWEKH, 2025). The Inspectorate also advises the applicant to structure each of the technical aspect chapters within the ES in line with Table 2 Annex B of the same ERN.
2210	n/a	Consistency of EIA terminology	To ensure consistency across the EIA process, the Inspectorate advises the applicant to adopt clear and consistent terminology throughout the ES, including in relation to impacts, effects, significance, and timescales. EIA terminology should be aligned across all aspect chapters, while allowing for the use of topic- or sector-specific terminology where this is appropriate and necessary. Where such terminology is used, it should be clearly defined and cross-referenced to the relevant EIA terminology to

ID	Ref	Description	Inspectorate's comments
			aid understanding and avoid any conflation or inconsistent interpretation of terms.
2211	n/a	ES non-technical summary	To ensure the EIA process is accessible to a non-technical audience, the Inspectorate advises the applicant to prepare the non-technical summary of the ES in line with Effective Non-Technical Summaries for Environmental Impact Assessment (IEMA, 2023). The non-technical summary should clearly and concisely explain what is proposed, what the proposed development's environmental impacts are anticipated to be, and how those impacts will be managed.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Marine Geology, Oceanography and Physical Processes including Water Quality

(Scoping Report Section 2.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Section 2.1.4.2 and paragraph 255	Accidental spills or leaks of chemicals from vessels or equipment (all phases)	The Scoping Report proposes to scope out changes to marine water and sediment quality from spills and leaks associated with the movement and presence of vessels and equipment related to the proposed development on the basis that pollution controls would be set out within the Marine Pollution Contingency Plan (MPCP), which would be included within the final Project Environmental Management Plan (PEMP). Paragraph 255 further states that an Outline PEMP would be provided as part of the DCO application and would be further developed in consultation with key stakeholders for approval post-consent. In the absence of specific measures, commitments and procedures relied upon to avoid likely significant effects, the Inspectorate does not agree to scope this matter out for all phases. As such, the ES should provide an assessment of these matters where significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. Outline plans, including the proposed mitigation measures and commitments, should be provided at the application stage to support the assessment of likely significant effects (or the scoping out of this matter where agreement has been reached).
3.1.2	Section 2.1.5.1.1 and 2.1.5.3 and table 2.1.3	Impacts on waves and tidal currents (construction and decommissioning)	The Scoping Report seeks to scope this matter out noting that the impact of the physical presence of construction plant and offshore infrastructure upon wave and tidal current regimes would increase incrementally as the proposed development is constructed, with the greatest potential impacts resulting from the completed development, negating the need for a construction and decommissioning assessment. The Inspectorate acknowledges that the most severe impacts are likely to occur from the completed development. However, considering the potential phasing of construction

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			activities over 3-4 year phases with potential overlapping activities and cumulative effects with nearby projects, the Inspectorate does not consider that suitable evidence or justification has been provided for the scoping out of this matter during the construction and decommissioning phases. The Inspectorate considers that this matter should be scoped in for further assessment during the construction and decommissioning phases, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
31.3	Section 2.1.5.1.7 and 2.1.5.3 and table 2.1.3	Impacts on water column stratification influencing nutrient fluxes and primary production (construction and decommissioning)	The Scoping Report notes that this impact begins in construction and continues through to decommissioning and proposes that to avoid duplicating assessments, the full extent of this impact would be assessed in the O&M stage section, with an acknowledgment that they span the duration of the proposed development's lifetime. The Inspectorate acknowledges that the most severe impacts are likely to occur from the completed development. However, considering the potential phasing of construction activities over 3-4 year phases with potential overlapping activities and cumulative effects with nearby projects, the Inspectorate does not consider that suitable evidence or justification has been provided for the scoping out of this matter during the construction and decommissioning phases. The Inspectorate considers that this matter should be scoped in for further assessment during the construction and decommissioning phases, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
31.4	Section 2.1.5.2.5 and table 2.1.3	Impacts on contaminant concentrations due to changes in suspended sediment concentrations (SSCs) (O&M)	The Scoping Report seeks to scope this matter out on the basis that the volumes of material to potentially be disturbed during the O&M stage are such that significant contamination release and associated effects on water quality are not predicted. In the absence of refined design options at present, further information on the nature of potential contaminants, and the presence of the Milford Haven Industrial Sea Disposal site overlapping the array scoping boundary, the Inspectorate considers that this matter should be scoped in for further assessment during the O&M phase or the ES should

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
3.15	Section 2.1.5.6 and table 2.1.3	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3.16	Section 2.1.1 and paragraph 219	Study area	The Scoping Report proposes a 15km study area and states this is to encompass all potential direct and indirect effects. Paragraph 219 further states that this distance is also in line with the maximum tidal excursion used in the screening criteria provided in the MCZ Principles of The Crown Estate's MCZ Assessment for Celtic Sea FLOW Plan (NIRAS, 2023). The Inspectorate does not consider that suitable justification has been provided for the proposed study area. The ES should justify the extent of the study area, with reference to a Zone of Influence (Zol) defined by the spatial extent of the relevant physical processes and the potential impact pathways. The applicant's attention is drawn to NRW's and NE's responses to consultation (appendix 2 of this Opinion) with regard to the need to demonstrate that hydrodynamic connectivity, residual sediment transport pathways and associated morphological responses do not extend beyond the proposed Zol and for the Zol to consider potential changes to the wave regime due to array blockage effects for the project alone and acting cumulatively with other nearby projects. The applicant should seek to agree the study area with relevant statutory bodies.
3.17	Section 2.1.3	Data sources	The Inspectorate notes the age of the datasets proposed to inform the baseline conditions (such as Cefas (2016)). The ES must provide a justification as to the validity

ID	Ref	Description	Inspectorate's comments
			of the baseline data used in the assessment with reference to the date, seasonal period and geographic coverage of the data. Effort should be made to agree the approach to baseline characterisation with relevant statutory bodies and the approach should be sufficiently justified in the ES.
3.1.8	Table 2.1.1	Project specific surveys	The Inspectorate notes that the project specific geophysical, geotechnical, and benthic surveys for the offshore export cable are due to be completed in 2027 whilst the site-specific benthic surveys for the array scoping boundary were undertaken in 2025, and the Crown Estate Surveys for round 5, were undertaken in 2024. The applicant's attention is drawn to comments from NE (appendix 2 of this Opinion) regarding the time gap between characterisation surveys and construction and the need for benthic pre-construction surveys to be no older than 2 years. The applicant should agree the approach to project specific surveys with relevant statutory bodies, and the approach should be sufficiently justified in the ES.
3.1.9	Section 2.1.4.1 and paragraphs 247 to 249	Numerical modelling	The Scoping Report confirms that numerical modelling will be undertaken, including sediment dispersion modelling, modelling of impacts on the tidal regime and modelling of impacts on the wave regime. The applicant is advised to agree the detailed assessment methodologies, including modelling, with relevant statutory bodies. The modelling should explain any assumptions made including, the parameters, data sources, and any calibration/validation against previous models. It should also clearly state whether cumulative impacts from other projects have been included. The applicant's attention is drawn to NRW's response to consultation (appendix 2 of this Opinion) regarding the need to revise the Zol and assessment area should the hydrodynamic and sediment transport modelling indicate measurable effects beyond 15km.
3.1.10	Section 2.1.5.2.3	Coastal change processes	The Inspectorate notes that morphological change at the coast has been scoped in but considers that limited detail has been provided regarding the assessment of this matter.

ID	Ref	Description	Inspectorate's comments
			The Inspectorate considers that the ES should provide an assessment of the potential for future, rapid, erosion of the cliffs where there is potential for likely significant effects to occur. The potential for any infrastructure to be exposed to coastal processes during the operational phase, or decommissioning, should be considered in order to reduce the need to carry out mitigation. The applicant is also advised to consider the implications of coastal change (including beach profile variability, sediment transport and projected coastal erosion) on the chosen landfall siting and construction methodology. All permanent landfall infrastructure, including the Transition Joint Bay (TJB), should be located sufficiently far inland to account for current and future coastal erosion. Reference should be made to the relevant Shoreline Management Plan (SMP).
3.1.11	Section 2.5.1.2	Sandwave clearance and effects on cable/scour protection on sandwave recovery	The Inspectorate considers that the ES should provide evidence on sandwave characteristics, migration rates and their role within the wider sediment transport system to demonstrate whether cable burial depths are sufficient and whether additional cable protection may be required. If the proposed cable route or scour protection features intersect sandwaves, their recoverability following clearance should be assessed, together with the potential implications for sediment transport, seabed morphology and other environmental receptors such as benthic habitats and fish. The applicant's attention is drawn to comments from NRW (appendix 2 of this Opinion) regarding post-construction hydrographic and bathymetric monitoring to assess sandwave recovery and improve understanding of the long-term effects of sandwave clearance on physical processes.
3.1.12	Table 1.8.2	Seabed preparation	Table 1.8.2 of the Scoping Report describes seabed preparation such as seabed levelling or sand wave levelling. Limited reference has been provided to these techniques in the subsequent aspect chapters of the Scoping Report. The ES should assess any likely significant secondary effects that these techniques may have on changes to the current/flow regime, wave regime and sediment transport regime and any morphological changes. Impacts from dredging and disposal of material should also be assessed, where significant effects are likely to occur. Any disposal

ID	Ref	Description	Inspectorate's comments
			method should be described and should include the estimated volume of material to be disposed.
3.1.13	Section 2.1.4.3 and table 2.1.2	Receptors	Table 2.1.2 sets out the relevant receptors proposed for inclusion in the assessment which are within the 15km ZoI. Table 2.1.2 does not identify or assess the St Gowan Shoal feature of the Pembrokeshire Marine Special Area of Conservation (SAC) or the Helwick Sandbank feature of the Carmarthen Bay and Estuaries SAC. The ES should ensure that suitable justification for the receptors included in the assessment has been provided. Where possible, receptors should be agreed with relevant statutory bodies. The applicant's attention is drawn to NE and NRW's response to consultation (appendix 2 of this Opinion) regarding the need to consider additional receptors due to potential changes to the wave regime from the project alone and cumulatively with other nearby projects and the need for the ES to include a detailed geomorphological characterisation of the project area to enable a robust understanding of sandwave migration and sediment transport around protected sandbank features.
3.1.14	Section 2.1.5	Impacts to waves from cable protection in shallow water	The ES should provide an assessment of wave effects resulting from nearshore cable protection where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. The assessment should be informed by the CBRA. The applicant's attention is drawn to NRW's response to consultation (appendix 2 of this Opinion) in this regard.
3.1.15	Section 2.1.5	Cable landfall site identification	The applicant's attention is drawn to NRW's response to consultation (appendix 2 of this Opinion) regarding the need to robustly characterise and assess each landfall option and the requirement for each landfall and cable route option being designed where possible to avoid designated sites and minimise effects on protected features.
3.1.16	Section 2.1.4.1	Effects of vertical mixing	The ES should provide an assessment of the potential effects of the proposed development on vertical mixing, stratification and thermocline dynamics where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. The

ID	Ref	Description	Inspectorate's comments
			applicant's attention is drawn to comments from NRW (appendix 2 of this Opinion) in this regard.
3.1.17	Table 1.8.2	Effects of material relocation and disposal	The ES should clearly explain how material relocation and disposal proposals have taken account of potential effects on seabed morphology, sediment transport pathways, scour and habitat distribution.
3.1.18	Section 2.1.5	Climate change	Limited consideration has been given to the effects of climate change on marine geology, oceanography, and physical processes. The ES should ensure that climate change effects such as sea level rise, increased storminess, seabed sediment mobilisation, storm surge level, and increases in sea surface temperatures, are considered and assessed in relation to marine geology, oceanography, and physical processes using the best available information.
3.1.19	Section 2.1.5	Wind energy extraction	Consideration has not been given within the Scoping Report to impacts on marine physical processes and wider marine ecosystem from wind energy extraction due to the presence of array infrastructure. The ES should provide an assessment of this matter where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. The applicant's attention is drawn to comments from NE (appendix 2 of this Opinion) in this regard.
3.1.20	Section 2.1.5.2.3 and paragraph 268	Impacts on sediment transport processes and morphological change at the coast	The Inspectorate considers that potential impacts on adjacent coastlines and coastal morphology due to wave blockage effects associated with the array should be scoped in for further assessment. The applicant's attention is drawn to comments from NE (appendix 2 of this Opinion) in this regard.
3.1.21	Section 2.1.5.5 and	Cumulative effects	The CEA should include consideration of changes to hydrodynamics, geology, sediments and sediment transport, morphology, and morphodynamics from the

ID	Ref	Description	Inspectorate's comments
	paragraph 281		proposed development and potential changes arising from any other relevant projects or activities.
3.122	Table 2.1.1	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development that relates to marine geology, oceanography, and physical processes, will be shared with the relevant Local Environmental Records Centre(s), The Crown Estate's Marine Data Exchange, and any other relevant environmental recording schemes. The ES should also clearly describe how this data-sharing will be secured in the DCO.

3.2 Benthic Habitat

(Scoping Report Section 2.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Section 2.2.5.1.4, 2.2.5.2.5 and table 2.2.5	Pollution events resulting from the accidental release of pollutants from vessel traffic (all phases)	The Scoping Report proposes to scope this matter out on the basis that the risk of pollutant release would be managed through the production of a PEMP which would include details of marine pollution prevention and associated contingency plans within the MPCP and that any chemicals used would be in accordance with relevant guidelines, suitable for use in the marine environment and in compliance with the MARPOL 73/78. In the absence of specific measures, commitments and procedures relied upon to avoid likely significant effects, the Inspectorate does not agree to scope this matter out for all phases. As such, the ES should provide an assessment of these matters where significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. Outline plans, including the proposed mitigation measures and commitments, should be provided at the application stage to support the assessment of likely significant effects (or the scoping out of this matter where agreement has been reached).
322	Section 2.2.5.1.5, 2.2.5.2.7 and table 2.2.5	Introduction of marine Invasive Non-Native Species (INNS) from vessel traffic (all phases)	The Scoping Report proposes to scope this matter out on the basis that by employing biosecurity measures secured through the PEMP (in line with the regulations and guidance listed in Scoping Report paragraph 317), significant effects are unlikely to occur. In the absence of specific measures, commitments and procedures (such as a biosecurity risk assessment) relied upon to avoid likely significant effects, the Inspectorate does not agree to scope this matter out for all phases. As such, the ES should provide an assessment of these matters where significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. Outline plans, including the proposed mitigation measures and commitments,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			should be provided at the application stage to support the assessment of likely significant effects (or the scoping out of this matter where agreement has been reached).
323	Section 2.2.5.1.6, 2.2.5.2.9 and table 2.2.5	Disturbance from noise and vibration (all phases)	The Inspectorate does not agree that significant effects relating to underwater noise on benthic receptors is unlikely. The Scoping Report does not provide information to demonstrate that noise would be localised or evidence of the level of background noise that is currently present. In the absence of confirmed construction, O&M and decommissioning details the Inspectorate considers that this matter should be scoped in for further assessment, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
324	Section 2.2.5.2.10 and table 2.2.5	Sediment heating from subsea cables (all phases)	The Scoping Report proposes to scope this matter out on the basis that the small magnitude of predicted temperature elevations, rapid dissipation, and consistent findings of non-significant effects in comparable offshore EIAs (including Erebus Offshore Wind Farm; White Cross Offshore Windfarm and Llŷr FLOW Project), operational heat effects are considered negligible for benthic receptors. The Scoping Report further notes that heat loss from cables is minimised through embedded design measures including conductor sizing, armouring, cable burial depth and optimisation of transmission efficiency. The Inspectorate agrees to scope this matter out during construction and decommissioning but does not consider that suitable evidence and justification has been provided at this point in time to scope out the O&M phases. The Inspectorate considers that this matter should be scoped in for further assessment during the O&M phases, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. Should agreement be reached the ES should set out any embedded mitigation relied upon to avoid likely significant effects and explain how these are secured in the DCO.
325	Section 2.2.5.1	Colonisation of introduced substrate	The Scoping Report notes that impacts associated with this matter span across all phases of the proposed development and proposes that the full extent of these impacts would be

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and paragraph 310 and table 2.2.5	by marine INNS (construction and decommissioning)	assessed in the O&M phase section, with a clear acknowledgment that they span the duration of the development's lifetime. The Inspectorate considers that all impacts to benthic habitats and associated receptors should be assessed at the relevant stages of development and therefore does not agree to scope this matter out during the construction and decommissioning phases.
326	Section 2.2.5.1 and paragraph 310 and table 2.2.5	Permanent habitat loss (construction and decommissioning)	The Scoping Report notes that impacts associated with this matter span across all phases of the proposed development and proposes that the full extent of these impacts would be assessed in the O&M stage section, with a clear acknowledgment that they span the duration of the development's lifetime. The Inspectorate considers that all impacts to benthic habitats and associated receptors should be assessed at the relevant stages of development and therefore does not agree to scope this matter out during the construction and decommissioning phases.
327	Table 2.2.5	Interactions of electromagnetic fields (EMF) (construction and decommissioning)	The Inspectorate agrees to scope out impacts from EMF during construction and decommissioning as the cables would not be live and therefore there would be no pathway for effect.
328	Section 2.2.5.6 and table 2.2.5	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
329	Table 2.2.1 and figure 2.2.3	Mitigation	The Inspectorate notes that the export cable corridor overlaps and runs adjacent to designated sites that protect benthic habitats. Depending on the findings of the proposed benthic surveys (and potentially pre-construction surveys), the Inspectorate considers that it may be necessary for mitigation measures to be put in place to prevent or minimise impacts on features of conservation importance, particularly if impacts occur in sites designated to protect benthic and intertidal features.
3210	Section 2.2.2.3 and paragraph 299	Non-protected habitats	The Scoping Report states that the offshore scoping boundary contains UK Biodiversity Action Plan (UK BAP) habitats which are not afforded protected status. For clarity, the ES should assess impacts to the wider benthic assemblage where there is potential for likely significant effects to occur.
3211	Table 2.2.1	Habitat alteration	The Scoping Report does not identify 'habitat alteration' as a potential effect of the proposed development. The introduction of hard substrates may consequently result in new and different biological communities in a predominantly soft sediment environment. The ES should consider the potential effect of habitat alteration, where likely significant effects could occur.
3212	Section 2.2.3 and paragraph 304 and table 2.2.4	Site-specific survey data	The Scoping Report describes site-specific benthic surveys that have been carried out to inform the baseline. The Inspectorate notes that site-specific benthic surveys for the array scoping boundary were undertaken in 2025, and the Crown Estate Surveys for round 5, were undertaken in 2024. The applicant's attention is drawn to the Inspectorate's comments at ID 3.1.8. The ES should either demonstrate the adequacy of the baseline data has been agreed with relevant statutory bodies (with supporting information) or present a detailed justification as to why it is considered adequate. The applicant should ensure the baseline is adequately understood for the purposes of impact assessment, and development of any necessary mitigation measures thereafter. The Inspectorate advises that effort should be

ID	Ref	Description	Inspectorate's comments
			made to agree the scope and method of any future survey work with relevant statutory bodies.
3213	Table 2.2.4	Geophysical surveying of the offshore export cable scoping boundary	The Inspectorate notes that geophysical surveys undertaken by The Crown Estate for round 5 did not include the offshore export cable scoping boundary and no geophysical surveys of this area are proposed within the Scoping Report. Geophysical surveying should be undertaken throughout the offshore export cable scoping boundary and the results from these surveys should subsequently be ground-truthed to produce biotope mapping. The applicant's attention is drawn to NE's response (appendix 2 of this Opinion) in this regard.
3214	Section 1.5.3.2.1 and paragraph 108	HDD drilling fluid	Paragraph 108 details that the export cables could be installed through the intertidal zone using trenchless methods (such as HDD). There are limited references in the benthic habitat aspect chapter to the potential for HDD drilling fluid break out and the potential effects this could have on benthic receptors (such as through smothering). Accidental spillages are noted to be scoped out based on control measures. For the avoidance of doubt, the ES should clearly describe any mitigation measures relied upon to control and manage the risk of HDD drilling fluid breakout and explain how the delivery of these measures would be secured in the DCO.
3215	Table 2.2.4	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development that relates to benthic habitat will be shared with the relevant Local Environmental Records Centre(s), The Crown Estate's Marine Data Exchange, and any other relevant environmental recording schemes. The ES should also clearly describe how this data-sharing will be secured in the DCO.

3.3 Fish and Shellfish Ecology

(Scoping Report Section 2.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 2.3.5	Permanent habitat loss (construction and decommissioning)	The Scoping Report notes that impacts associated with this matter span across all phases of the proposed development and proposes that the full extent of these impacts would be assessed in the O&M stage section, with a clear acknowledgment that they span the duration of the development's lifetime. The Inspectorate considers that all impacts to fish and shellfish receptors should be assessed at the relevant stages of development and therefore does not agree to scope this matter out during the construction and decommissioning phases.
332	Table 2.3.5	Introduction of hard substrate (construction and decommissioning)	The Scoping Report does not explain why effects from the introduction of hard substrate can be scoped out of construction or the decommissioning phases. Whilst the Inspectorate agrees this matter can be scoped out for the construction phase due to the introduced substrate not yet being present, this is not applicable to the decommissioning phase. Considering the potential for colonisation on the introduced substrate (for example on installed infrastructure) and with the potential to act as fish aggregating devices, this has potential to cause significant effects should they then be removed at decommissioning. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out from assessment for the decommissioning phase. As such, the ES should provide an assessment of these matters where significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
333	Paragraph 395 and table 2.3.5	Underwater noise and vibration (O&M)	The Scoping Report seeks to scope out injury and mortality effects from further assessment in the EIA and states that operational underwater noise effects are generally low intensity and ongoing. The Inspectorate notes that behavioural disturbance resulting from operational noise is scoped in. The Inspectorate does not consider that suitable evidence and justification has been provided at this point in time to support the scoping out of this matter. The Inspectorate considers that this matter should be scoped in for further assessment during the O&M phase, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
334	Section 2.3.5.2.9 and table 2.3.5	Heat impacts from cables (all phases)	As the cable would not be in operation during the construction or decommissioning phases, the Inspectorate agrees that an assessment of heat impacts can be scoped out of assessment for these phases of the proposed development. Section 2.3.5.2.9 of the Scoping Report states that no measurable behavioural or ecological effects on demersal fish or benthic-dwelling shellfish species have been identified and refers to evidence from modelling and post-consent monitoring from other offshore wind farms to confirm this. This does not specify whether impacts from sandeel who bury into the seabed or impacts to benthic spawning fish eggs have been assessed. The route of the export cable is not yet known, so it is not clear whether there may be impacts to these receptors. The Inspectorate considers that this matter should be scoped in for further assessment during the O&M phase, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
335	Table 2.3.5	EMF impacts from cables (construction and decommissioning)	The Inspectorate agrees to scope out impacts from EMF during construction and decommissioning as the cables will not be live and therefore there would be no pathway for effect.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
336	Section 2.3.5.5 and table 2.3.5	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
337	Section 2.3.1 and figure 2.3.1	Study area	The study area for the fish and shellfish assessment uses International Council for the Exploration of the Sea statistical rectangles as shown on figure 2.3.1. It is assumed that rectangles 32E4, 32E5, 31E4 and 31E5 were selected as they are located where the array area and cable corridor are proposed. However, it is unclear why 30E4 is selected as no part of the proposed development is located within it. It is also unclear why the study area for fish and shellfish does not reflect that which is set out for the commercial fisheries assessment, or why a buffer zone from the scoping boundary of where impacts may occur has not been utilised. The ES should justify the extent of the study area, with reference to a ZOI where impacts may occur, and seek to agree the study area with relevant statutory bodies where possible.
338	Table 2.3.3	Data sources	The Inspectorate notes the age of the datasets proposed to inform the baseline conditions. The ES must provide a justification as to the validity of the baseline data used in the assessment with reference to the date, seasonal period and geographic coverage of the data. Effort should be made to agree the approach to baseline characterisation with relevant statutory bodies and the approach should be sufficiently justified in the ES. The applicant's attention is drawn to comments from NRW (appendix 2 of this Opinion) in this regard.
339	Section 2.3.2.7	Relevant receptors	Section 2.3.2.7 of the Scoping Report provides details regarding designated marine and coastal sites which are considered to be relevant to the assessment of fish and shellfish.

ID	Ref	Description	Inspectorate's comments
	and table 2.3.2		These are summarised along with the distances between them and the proposed development in table 2.3.2. The ES should include a figure which shows the designated sites listed in table 2.3.2 relative to the boundary of the proposed development. The applicant's attention is also drawn to comments from NRW and NE (appendix 2 of this Opinion) in relation to additional receptors which will require consideration within the assessment.
3.3.10	Sections 2.3.1 and 2.3.2.5	Study area - migratory fish	It is not clear if a specific study area is set to assess impacts on migratory fish. The ES should explain the study area which will be applied to assess impacts on migratory fish species which may be affected by the proposed development.
3.3.11	Table 1.8.2 and paragraph 410	Mitigation	Table 1.8.2 of the Scoping Report details examples of embedded mitigation which may be utilised to avoid significant effects on fish and shellfish species. These include cable routing to avoid spawning grounds and micro-siting to avoid sensitive habitat types. The ES should describe the effectiveness of embedded mitigation measures in avoiding significant effects. Where additional mitigation is required, this should be documented in the ES, together with the mechanisms by which it is secured, any monitoring required, and associated reporting and adaptive management processes.
3.3.12	Section 2.3.4	Modelling and suitability assessments	The applicant's attention is drawn to NRW's response (appendix 2 of this Opinion) regarding site specific noise modelling specific to fish receptors and the need for habitat suitability assessments for herring and sandeels. The Inspectorate advises the applicant to agree the approach to these modelling and suitability assessments for marine fish with NRW.
3.3.13	Section 2.3.5	Impact pathways	The Inspectorate notes that secondary entanglement, vessel interaction (increased risk of collision) and changes to prey resource have been scoped in for marine mammals and/or bird receptors. These pathways are also of relevance to fish receptors and therefore should be scoped in for fish. The applicant's attention is drawn to comments from NRW and NE (appendix 2 of this Opinion) in this regard.

ID	Ref	Description	Inspectorate's comments
33.14	Section 2.3.5	Pollution impacts	The ES should provide an assessment of the potential impacts from accidental release or pollution events to fish where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
33.15	Table 1.8.2	Vessel Management Plan	The Inspectorate considers that the Vessel Management Plan is also relevant to the fish and shellfish ecology aspect for relevant species such as basking shark, and cross-references should be made, as appropriate, in the ES.
33.16	Table 2.3.3	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development that relates to fish and shellfish, will be shared with the relevant Local Environmental Records Centre(s), The Crown Estate's Marine Data Exchange, and any other relevant environmental recording schemes. The ES should also clearly describe how this data-sharing will be secured in the DCO.

3.4 Marine Mammals and Marine Turtles

(Scoping Report Section 2.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Paragraph 454 and table 2.4.3	Auditory injury resulting from underwater noise (O&M)	The Inspectorate does not consider that suitable evidence and justification has been provided at this point in time to support the scoping out of auditory injury resulting from underwater noise during O&M. Noting the responses from NE and NRW (appendix 2 of this Opinion) in relation to this matter, the Inspectorate considers that this matter should be scoped in for further assessment during the O&M phase, or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
34.2	Paragraphs 447 and 456 and table 2.4.3	Barrier effects from underwater noise (all phases)	The Scoping Report seeks to scope out barrier effects from underwater noise, citing the Llyr Floating Wind Farm in its reasoning. However, the Inspectorate notes that the Llyr Floating Wind Farm is of a smaller scale and with a much shorter construction period. With regards to the O&M phase, the Inspectorate agrees that barrier effects are unlikely to be significant and therefore this may be scoped out. However, the Inspectorate considers that a construction period of up to six years could result in barrier effects from underwater noise. In the absence of suitable justification, the Inspectorate does not agree to scope out barrier effects from underwater noise during construction and decommissioning. As such, the ES should provide an assessment of these matters where likely significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
34.3	Paragraph 457 and table 2.4.3	Disturbance at seal haul-out sites (O&M)	This matter is proposed to be scoped out on the basis that the port which would be used during the O&M phase is not anticipated to be located near to the seal haul-out sites

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			around Pembrokeshire. However, the location of the port facilities is not yet known, and no information has been provided which identifies known seal haul-out locations. In the absence of relevant baseline information and explanation of the anticipated extent of impacts from activities during the O&M phase, the Inspectorate cannot agree to scope this matter out. The Inspectorate expects the ES to provide an assessment of impacts and resulting effects on seal haul-out sites, or robust evidence to support the conclusion that significant effects are unlikely during the O&M phase. The applicant should make effort to agree the evidence required in the ES with relevant statutory bodies.
344	Table 2.4.3	Secondary entanglement (construction and decommissioning)	No justification is provided in the Scoping Report as to why impacts from secondary entanglement will not result in significant effects during the construction and decommissioning phases. The Inspectorate considers that there is also potential for entanglement to occur during the construction phase. In the absence of a justification, the Inspectorate does not agree to scope this matter out and considers that the ES should provide an assessment of these matters where significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. The Inspectorate considers that primary and tertiary entanglement risk should also be scoped in for further assessment for all phases of the proposed development.
345	Paragraphs 452 and 461 and table 2.4.3	Changes to water quality – increased suspended sediments (all phases)	The Scoping Report seeks to scope out this matter on the basis that any changes to water quality would be localised and short lived. The Scoping Report also states that marine mammals are not sensitive to changes in turbidity of the water column as they rely on sound for navigation and hunting. The Inspectorate notes that potential for changes in water quality to affect prey would be assessed through the prey assessment. The Inspectorate agrees that impacts of increased suspended sediment is unlikely to result in significant effects on marine mammals and considers that this matter can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.6	Paragraphs 452 and 461 and table 2.4.3	Changes to water quality – accidental contamination (all phases)	The Scoping Report seeks to scope out this matter on the basis that any changes to water quality would be localised and short lived. It is noted that data from benthic surveys to determine levels of sediments contamination is not yet available. At this stage, the Inspectorate does not agree to scope this matter out. The ES should provide an assessment, based on the outcome of the benthic surveys to determine the level of potential for accidental contamination.
34.7	Paragraph 462 and table 2.4.3	Barrier effects from the physical presence of the wind farm (all phases)	In the absence of suitable justification and considering the location of the Bristol Channel Approaches SAC, and the potential for the proposed development to act as a barrier to marine mammal movement, the Inspectorate does not agree to scope out barrier effects from underwater noise during all phases. As such, the ES should provide an assessment of these matters where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
34.8	Paragraph 463 and tables 2.4.3	Effects from EMF (all phases)	The Scoping Report proposes to scope this matter out on the basis that the referenced documentation in the Scoping Report from other offshore wind farms indicate that significant effects on marine mammals due to direct effects of EMF are unlikely. The Inspectorate notes the existing evidence from other offshore wind farms but considers that floating offshore wind developments introduce a new exposure pathway through unburied cables suspended within the water column, the potential effects of which are not yet fully understood. As such, the ES should provide an assessment of these matters where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
34.9	Paragraph 467	Cumulative effects	The Scoping Report states that the CEA will consider displacement due to cumulative underwater noise impacts on prey species. It would also consider displacement due to the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			presence of offshore vessels and maintenance activities during the O&M stage. All other impacts are to be scoped out of the ES. It is not clear what other impacts would be scoped out of the ES. Therefore, the Inspectorate considers that the ES should provide details of the other impacts which have been scoped out, together with evidenced justification for scoping them out.
34.10	Paragraph 427	Impacts on turtles	No records of turtles have been recorded in the site-specific surveys which were undertaken from September 2023 until August 2025. Further assessment is currently being undertaken to establish the presence of turtles in the study area; however, the Scoping Report states that it is likely that impacts on turtles will be scoped out. Based on the lack of turtles reported in the study area, the Inspectorate considers that if the most recent surveys also do not confirm the presence of turtles in the study area, it is satisfied this matter may be scoped out.

ID	Ref	Description	Inspectorate's comments
34.11	Table 1.8.2	Marine Mammal Mitigation Protocol (MMMP)	The Scoping Report refers to the production of a MMMP which would be produced to reduce the risk of permanent threshold injury to marine mammals, from underwater noise as a result of the proposed development. The ES should outline the mitigation measures which would be included in the MMMP and describe how the MMMP will be secured in the DCO.
34.12	Table 1.8.2	Vessel Management Plan	The Inspectorate considers that the Vessel Management Plan is also relevant to the marine mammals and marine turtles aspect and cross-references should be made, as appropriate, in the ES.

ID	Ref	Description	Inspectorate's comments
34.13	Section 2.4.5	Potential impacts	Auditory injury as a result of underwater noise is identified as a potential impact on marine mammals. The Scoping Report refers to underwater noise modelling which will be undertaken to understand and assess impacts. The ES should present details of Permanent Threshold Shift (PTS) and Temporary Threshold Shift (TTS) impact ranges and the number of marine mammals predicted to be at risk from impact pathways scoped in for assessment of underwater noise. The applicant should seek to agree the approach to the assessment of PTS and TTS-onset on marine mammals with relevant statutory bodies. The applicant's attention is drawn to comments from NE (appendix 2 of this Opinion) regarding the need for noise modelling of piling with and without noise abatement being applied.
34.14	Section 2.4.5.2.2	Disturbance from underwater noise	Underwater noise disturbance impacts associated with 'cable snaps' should be included in the underwater noise impact assessments during operation where there is potential for likely significant effects to occur or the ES should demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
34.15	Paragraph 472	Mitigation measures	The Scoping Report identifies primary and secondary mitigation measures but does not expand on reasons as to why the mitigation measures have been identified as either primary or secondary measures. The ES should explain the reasoning for this and also state how mitigation measures would be secured in the DCO.
34.16	Section 2.4.4	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development that relates to marine mammals and turtles, will be shared with the relevant Local Environmental Records Centre(s), The Crown Estate's Marine Data Exchange, and any other relevant environmental recording schemes. The ES should also clearly describe how this data-sharing will be secured in the DCO.

3.5 Offshore Ornithology

(Scoping Report Section 2.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 2.5.5	Disturbance and displacement impacts due to presence of wind turbines (construction and decommissioning)	While these effects will principally occur during operation, the Scoping Report does not explain why they would not also occur during other phases of the development as structures and cables are being installed or removed. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope out these matters from the assessment. As such, the ES should provide an assessment of these matters where significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
35.2	Table 2.5.5	Barrier effects due to presence of wind turbines (construction and decommissioning)	The Scoping Report does not explain why barrier effects are to be scoped out of construction or the decommissioning phases. While these effects will principally occur during operation, the Scoping Report does not explain why they would not also occur during other phases of the development as structures and cables are being installed or removed. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. As such, the ES should provide an assessment of these matters where significant effects may occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
35.3	Table 2.5.5	Collision impacts with turbines (construction and decommissioning)	The Inspectorate acknowledges that this potential impact is associated with the presence of operational wind turbines and agrees to scope this matter out of the construction and decommissioning phases.
35.4	Table 2.5.5	Combined collision and displacement impacts to gannet, due to turbine	On the basis that this impact would only occur during the O&M phase, the Inspectorate is content that this matter can be scoped out of further assessment for the construction and decommissioning stages.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		presence (construction and decommissioning)	
355	Table 2.5.5	Entanglement (construction and decommissioning)	The Scoping Report does not explain why this effect would not occur during the construction and decommissioning phases. However, the Inspectorate acknowledges that this potential impact is associated with the presence of operational development and therefore agrees to scope this matter out for the construction and decommissioning phases.
356	Table 2.5.5	Transboundary impacts (construction and decommissioning)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
357	Paragraph 487	Assessment of Sites of Special Scientific Interest (SSSIs)	Paragraph 487 states that a separate assessment for SSSIs which form part of a seabird Special Protection Area (SPA) will not be undertaken, as the effects on qualifying seabirds would be addressed through the Habitats Regulations Assessment (HRA) process. The Inspectorate considers that a separate assessment should be undertaken as the SSSIs may have different qualifying species from the SPAs and the EIA regulations include different tests to the HRA process.
358	n/a	Highly Pathogenic Avian Influenza (HPAI)	The Scoping Report does not explain whether any of the baseline data which will be used to inform the assessment includes information regarding seabird populations which have been affected by HPAI. The ES should explain whether impacts of HPAI have informed the baseline and how this has been accounted for.
359	Section 2.5.1.2 and	Study area	The Scoping Report states that the regional study areas for guillemot and herring gull may differ from the standard biologically defined minimum population scales (BDMPS) regions. The Inspectorate considers that BDMPS non-breeding season regions should be used for

ID	Ref	Description	Inspectorate's comments
	paragraph 479		these species. Agreement on the approach to defining study areas should be agreed with relevant statutory bodies. The applicant's attention is drawn to responses from NRW and NE (appendix 2 of this Opinion) in this regard.
35.10	Figure 2.5.1 and table 2.5.3	Carmarthen Bay SPA	The Inspectorate notes that figure 2.5.1 shows the offshore export cable scoping boundary overlapping with the Carmarthen Bay SPA, however, this site has not been included in table 2.5.3 as a relevant receptor. Carmarthen Bay SPA should be added to table 2.5.3 as a relevant receptor. The ES should ensure that suitable justification for the receptors included in the assessment has been provided. Where possible, receptors should be agreed with relevant statutory bodies.
35.11	n/a	Baseline data sources and guidance	The applicant's attention is drawn to comments from NRW and NE (appendix 2 of this Opinion) which identify additional baseline data sources and guidance documents. The ES should be informed by these sources as relevant to the assessment.
35.12	Table 2.5.2	Seasonal definitions	The assessment should use the seasonal definitions provided by SNCBs within the Offshore Wind Seabird Assessment Tool (OWSAT). The applicant's attention is drawn to comments from NRW and NE (appendix 2 of this Opinion) in this regard.
35.13	Section 2.5.5.5	Cumulative effects	The CEA should consider the potential for impacts during construction and decommissioning of the proposed development to act cumulatively with impacts during the O&M phase of existing projects in the region.
35.14	Section 2.5.4	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development that relates to offshore ornithology, will be shared with the relevant Local Environmental Records Centre(s), The Crown Estate's Marine Data Exchange, the Seabird Monitoring Programme, and any other relevant environmental recording schemes. The ES should also clearly describe how this data-sharing will be secured in the DCO.

ID	Ref	Description	Inspectorate's comments
3.5.15	Table 2.5.3 and section 2.5.4	Southwest guillemot and razorbill compensatory sites	The Inspectorate advises the applicant to ensure that its environmental assessments consider potential impacts on guillemot and razorbill colonies at compensatory sites proposed or being delivered as part of Round 4 offshore wind farm developments, such as the Five Estuaries Offshore Wind Farm.

3.6 Commercial Fisheries

(Scoping Report Section 2.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
362	Table 2.6.5	Receptors	Table 2.6.5 of the Scoping Report sets out the relevant receptors for the commercial fisheries assessment. Whilst the exclusion of certain receptors is self-explanatory, rationale has not been provided. The ES should ensure that suitable justification for the receptors included in the assessment has been provided. Where possible, receptors should be agreed with relevant statutory bodies.
363	Section 2.6.2 and paragraph 534 and 535	Baseline	The Scoping Report acknowledges assumptions and limitations with the quantitative data sets expected to inform the ES. Paragraph 534 notes that landings by EU vessels into EU ports is identified as a data gap for scoping and would be addressed following submission of the scoping report. Paragraph 535 notes that for the purposes of the Scoping Report, a five-year period from 2020 to 2024 has been utilised. It is further noted that this period contains atypical conditions due to the COVID-19 pandemic and trade changes which may have influenced fishing activity and landing patterns. The Scoping Report proposes to draw on a longer-term dataset of at least a ten-year period of landings data to provide a robust baseline. The ES should clearly state the limitations associated with any data used. Efforts should be made to agree the data sources with relevant statutory bodies and outcomes should be evidenced within the ES.

ID	Ref	Description	Inspectorate's comments
364	Table 2.6.1 and 2.6.2	Assessment methodology	The Scoping Report identifies the data sources that would be used to inform the baseline and describes the criteria that would be used to determine the sensitivity of receptors and magnitude of impacts. Table 2.6.2 details that vessel traffic surveys would take place in the offshore scoping boundary in 2027 but does not provide any further information. The methodologies used must be described and their use justified with reference to appropriate guidance and/or agreement with relevant statutory bodies. The applicant is encouraged to ensure that they seek advice from all relevant stakeholders with expertise on this aspect, including the appropriate Inshore Fisheries and Conservation Authorities (IFCAs).
365	Paragraph 562	Impact of the dynamic inter-array cable	The Scoping Report outlines a number of design elements, such as foundation type and mooring type, are still being developed and therefore at this stage, it is not known what reduction in access to, or exclusion from, fishing grounds within the array area may be. The Inspectorate highlights that the type of inter-array cable chosen should be included within the assessment, particularly if a dynamic inter-array cable is chosen, and any reduction and/or exclusion of access should be clearly defined, proportionate, and justified.
366	Section 2.6.6	Mitigation measures	The Scoping Report does not state whether the applicant intends to time any of the proposed construction and O&M activities to avoid key periods relating to commercial fishing activities. The ES should consider the potential of the proposed development to disrupt fishing activities (including restriction of access) during key periods for fisheries, during both the construction and O&M phases, and any likely significant effects should be reported within the relevant assessments of the ES.

3.7 Shipping and Navigation

(Scoping Report Section 2.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.7.2	Section 2.7.1	Offshore export cable buffer	The Scoping Report defines the study area for the offshore export cable as 3 nautical miles (nm) from the area in which the offshore export cable could be located. No justification is given as to why this study area has been chosen. The ES should clearly justify why the final extent of the study area reflects the Zol of the proposed development, with reference to potential receptors and pathways of effect. Where possible, the study area should be agreed with relevant statutory bodies.
3.7.3	Section 2.7.5	Impact to existing aids to navigation	The ES should include an assessment of impacts to existing onshore and offshore aids to navigation. The applicant's attention is drawn to the consultation response from Trinity House (appendix 2 of this Opinion) in this regard.
3.7.4	Sections 2.7.5.1.4 and 2.7.5.1.10	Cable laying & protection	The ES should assess and consult upon the impacts of cable laying works and subsequent cable protection, including impacts upon the approaches to ports and harbours. The applicant's attention is drawn to the consultation responses by the Maritime and Coastguard Agency (MCA) and Trinity House (appendix 2 of this Opinion) in this regard.
3.7.5	Paragraph 641	Cumulative impacts spatial scope	The Scoping Report intends to define the search area for cumulative projects as 50 nm from the proposed development (noting that consideration would be given beyond this area for any potential transboundary impacts). The justification for this buffer area, is that

ID	Ref	Description	Inspectorate's comments
			it aligns with feedback from stakeholders on previous navigation risk assessments. However, no specific projects have been listed, nor have any potential cumulative schemes been located. The scope of the cumulative study area utilised in the ES should be based upon the Zol and receptor/cumulative scheme location. Where possible, the study area should be agreed with relevant statutory bodies. As set out in the MCA's response (appendix 2 of this Opinion), the cumulative assessment should include consideration of other Offshore Wind Leasing Round 5 Project Development Areas (PDAs) in the Celtic Sea.
3.76	n/a	EMF	The Inspectorate notes a high voltage direct current (HVDC) cable may be implemented as part of the proposed development. The ES should consider the effect of EMF deviation on ships compasses and, if an HVDC cable is to be used, a desk-based compass deviation study should be undertaken. The applicant's attention is drawn to the MCA's consultation response (appendix 2 of this Opinion) in this regard.

3.8 Aviation and Radar

(Scoping Report Section 2.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Paragraph 676	Impacts to civil and military secondary surveillance radars (SSRs) (all phases)	The Scoping Report states that the Civil Aviation Authority (CAA) advises that, at distances greater than 10km from the radar source, wind turbines have a lesser impact on SSRs than PSRs. Paragraph 676 states that the nearest SSR is located 110.3km away from the array scoping boundary and therefore the proposed development would have no impact on SSRs. The Inspectorate agrees on the basis of this information that this matter can be scoped out of further assessment from the ES.
38.2	Paragraph 702 and table 2.8.4	Impacts to civil and military primary surveillance radars (PSRs) (decommissioning)	The Scoping Report proposes to scope this matter out on the basis that wind turbines would not be rotating during the decommissioning phase. On the basis that all wind turbines would not be rotating during the decommissioning phase, the Inspectorate is content that this matter can be scoped out of further assessment for the decommissioning phase.
38.3	Paragraph 697 and table 2.8.4	Cumulative impact to military and civil PSRs (construction and decommissioning)	The Inspectorate is content that this matter can be scoped out of further assessment during the decommissioning phase on the basis that the wind turbines would not be rotating. However, paragraph 697 states that there is potential for wind turbines in one phase to be rotating during the construction stage of another phase. Therefore, the Inspectorate is not content for this matter to be scoped out during the construction phase.

ID	Ref	Description	Inspectorate's comments
38.4	Table 1.8.2	Aviation lighting and marking	The Inspectorate notes that aviation lighting and marking are proposed as embedded mitigation to aviation and radar. The applicant should seek to agree the specification of any aviation lighting with relevant statutory bodies.

ID	Ref	Description	Inspectorate's comments
385	Paragraph 694	Approach to assessment	The Scoping Report states that the assessment will be supported by further desk-based studies, including radar line of sight modelling to identify sensitive receptors. There does not appear to be any criteria presented to identify how significant effects will be determined. The ES should provide clarity on how the assessment has been undertaken, taking account of relevant guidance and aspect specific methodology. The applicant is directed to ID 2.2.3 regarding the approach to assessment.
386	Section 2.8.6	Mitigation measures	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, if possible, with relevant statutory bodies and the ES should explain how they would be secured in the DCO. The applicant's attention is drawn to comments from the Ministry of Defence (appendix 2 of this Opinion) regarding the mitigation measures and consultation requirement.

3.9 Infrastructure and Other Users

(Scoping Report Section 2.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Paragraph 735 and table 2.9.9	Impacts to offshore oil and gas operations (all phases)	The Scoping Report proposes to scope this matter out on the basis that no existing or proposed oil and gas extraction infrastructure, or active licence blocks, have been identified within the study area. Based on this information, the Inspectorate agrees that this matter can be scoped out of further assessment for the ES.
392	Paragraph 736 and table 2.9.9	Impacts to carbon capture and storage (all phases)	The Scoping Report proposes to scope this matter out on the basis that no carbon capture and storage sites have been identified within the study area. Based on this information, the Inspectorate agrees that this matter can be scoped out of further assessment for the ES.
393	Paragraph 765 and table 2.9.9	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
394	Paragraph 717 and figure 2.9.1	Study area	Paragraph 717 states that the study area comprises an initial 50km radius from the proposed development's scoping boundary, however, this does not align with the infrastructure and other users study area shown in figure 2.9.1 which covers only the offshore scoping boundary. The Scoping Report does not explain why this extent has been selected. The ES should provide a justification for the extent of the study area and explain why it is considered to reflect the Zol for the proposed development.

ID	Ref	Description	Inspectorate's comments
395	Section 2.9.4	Approach to assessment	Paragraph 740 states that the “the EIA would be based on existing data and supplementary information gathered through consultation”. There is no information presented about the methodology that will be used to assess impacts, nor is any criteria presented to identify how significance of effect will be determined. The ES should be clear on how the assessment has been undertaken, taking into account relevant guidance, and using an aspect specific methodology where possible. The applicant is directed to ID 2.2.3 regarding the approach to assessment.
396	Paragraphs 726 and 727 and tables 2.9.8 and table 2.9.9	Impacts on munition points and unexploded ordnance (UXO)	Table 2.9.8 identifies munition points and UXO as relevant receptors for the infrastructure and other users assessment. However, section 2.9.5 does not describe the potential impacts on these receptors or explain how such impacts will be assessed. Accordingly, the ES should include an assessment of this matter (the methodology used must be described and its use justified with reference to appropriate guidance and/or agreement with relevant statutory bodies) or evidence demonstrating agreement with relevant statutory bodies and the absence of likely significant effects.
397	Paragraph 743	Impacts to ports and harbours (all phases)	The Scoping Report states that the potential impacts on ports and harbours will be considered within the Shipping and Navigation chapter. The Inspectorate is content with this approach. The ES should clearly signpost where impacts relating to ports and harbours have been considered. The ES should also provide sufficient clarification and cross-referencing, including consideration of any potential in-combination effects on infrastructure and other users.

3.10 Offshore Archaeology and Cultural Heritage

(Scoping Report Section 2.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Section 2.10.4.2 and paragraph 815	Direct impacts on the cultural significance of heritage assets located outside the application boundary (all phases)	The Scoping Report proposes to scope this matter out on the basis there would be no pathway for direct disturbance, damage or alteration to heritage outside the application boundary. The Inspectorate agrees that this matter can be scoped out of the assessment.
3.10.2	Section 2.10.4.2, 2.10.5.2, 2.10.5.3 and table 2.10.7	Direct impacts on the cultural significance of known and potential heritage assets within the application boundary (O&M and decommissioning)	The Scoping Report proposes to scope this matter out on the basis that direct impacts on the cultural significance of known and potential heritage assets within the application boundary would not occur during O&M and decommissioning as disturbance would have already occurred during construction. Paragraph 816 states that known heritage assets would continue to be avoided through the implementation of archaeological exclusion zones (AEZ) throughout the lifetime of the proposed development. The Inspectorate agrees that this matter can be scoped out of the assessment.
3.10.3	Section 2.10.4.2 and paragraph 817 and table 2.10.7	Impacts on the cultural significance of heritage assets resulting from changes to their setting (construction and decommissioning)	The Scoping Report proposes to scope this matter out on the basis that impacts on the cultural significance of heritage assets resulting from changes to their setting from construction and decommissioning of the proposed development would be temporary and of a relatively short duration and as a result they would not give rise to significant effects in relation to this matter. The Inspectorate agrees that this matter can be scoped out of the assessment for the construction and decommissioning phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.104	Section 2.10.4.2 and paragraph 813 and 818 and table 2.10.7	Impacts on the cultural significance of heritage assets resulting from changes to their setting (O&M)	The Scoping Report proposes to scope this matter out on the basis that the array scoping boundary is located approximately 42km off the Welsh Coast and 56km from the nearest English Coastline with wind turbines being visible as distant elements of the background of a small number of views from heritage assets and as such, there would be no change to their setting. Noting the potential intervisibility of the proposed development and heritage assets, the lack of assessment to support the conclusions of no likely significant effects and the results of pre-scoping consultation with relevant statutory bodies to support the conclusions, the Inspectorate does not agree to scope out impacts on the cultural significance of heritage assets resulting from changes to their setting during O&M. As such, the ES should provide an assessment of these matters where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
3.105	Section 2.10.5.6 and table 2.10.7	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3.106	Section 2.10.1 and figure 2.10.1	Study area	Some of the potential impacts to be assessed result from changes to marine physical processes. The study area to be used for the offshore archaeology and cultural heritage assessment is different to that proposed for the assessment of marine physical processes. The ES should provide a justification for the reduced extent of the study area used in the marine archaeological assessment, in light of the potential for impacts from physical processes over a wider geographic extent.

ID	Ref	Description	Inspectorate's comments
3.10.7	Section 2.10.4.3, paragraphs 821 to 830	Assessment approach	The Scoping Report sets out impacts that have potential for significant adverse effects on offshore archaeology and cultural heritage but for which standard mitigation measures are available. Paragraph 823 states that as set out by ERN: Marine Historic Environment (OWEKH, 2026) with these commitments, lengthy reporting is not required in an impact assessment chapter to determine likely effects as the EIA section would concisely summarise the marine historic environment baseline, including sufficient detail to demonstrate how mitigations, commitments and requirements would prevent significant effects. The Inspectorate welcomes this approach and expects to see all the referenced information contained within the ES, and the avoidance and mitigation measures secured in the DCO.
3.10.8	Table 1.8.2	AEZ	Table 1.8.2 details that AEZs would be implemented to protect any known and identified marine archaeological receptors of high archaeological interest. From the information contained within the Scoping Report it is unclear how the archaeological interest and importance of features would be evaluated. The ES must clearly explain the rationale used to determine the archaeological interest and importance of marine archaeological receptors.
3.10.9	Section 2.10.2	Assessment criteria	The Scoping Report does not describe how the value of receptors has been defined and no information has been provided to define the magnitude of change or impact to receptors. Moreover, the Scoping Report does not explain how the value of receptors and magnitude of change would be used to determine effect significance. This should be clearly set out in the ES with reference to relevant guidance.

3.11 Seascape, Landscape and Visual Impact Assessment

(Scoping Report Section 2.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Section 2.11.1	Seascape, landscape and visual effects as a result of the array beyond 60km	The Scoping Report proposes to scope out seascape, landscape and visual effects as a result of the array area beyond 60km on the basis that the blade tip zone of theoretical visibility (ZTV) indicates that the visibility of the proposed development from land would become restricted and very dispersed at distances beyond 60km and states that based on 'White, Michaels and King (2019) Stage 1 Ready Reckoner, for turbines up to 301-350m tip height', visual magnitude of effects is likely to be low beyond 44km offshore. On this basis, the Inspectorate agrees to scope out this matter from further assessment.
3.11.2	Table 2.11.4	Potential impacts on landscape character, special qualities of landscape designations and views experienced by visual receptors resulting from the offshore cable corridor (O&M)	The Scoping Report proposes to scope these matters out on the basis that following installation, below sea level cables would not significantly impact seascape, landscape or visual receptors. The Inspectorate notes that vessel movements associated with the O&M phase would be temporary in nature and agrees this matter can be scoped out as significant effects are unlikely to occur.
3.11.3	Table 2.11.4	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
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3.11.4	Section 2.11.4.4 and paragraph 912	Definition of worst-case scenario	It is noted that the assessment will be based on the Project Design Envelope (PDE), which is “intended to identify key design parameters... setting out a realistic ‘worst-case scenario’ for different elements within the windfarm site.” The ZTV used in the Scoping Report is based on the maximum height to blade tip that would be allowed under the proposed DCO. The applicant should consider if relying on one scenario will be sufficient to capture the full range of effects. Subject to agreement with statutory bodies, the ES should present assessments based on a scenario using the largest turbines allowed under the DCO and one where the maximum number of turbines is constructed. The applicant’s attention is drawn to comments from NRW (appendix 2 of this Opinion) with regard to understanding the worst-case scenario.
3.11.5	Figure 2.11.5	Viewpoints	Figure 16.3 of the Scoping Report shows the viewpoint locations for the Seascape, Landscape and Visual Impact Assessment (SLVIA). The locations are shown as being largely at coastal areas or a few miles inland, however, the ZTV shading clearly shows that the blade tip would be visible much further inland. Additional viewpoints should be included where necessary to ensure impacts from long reaching views have been assessed at relevant representative viewpoints. The Inspectorate notes the intention to agree the list of viewpoints with relevant consultees. The ES should include confirmation of the consultation undertaken, together with evidence of agreement regarding the final viewpoints selected. Where any disagreement remains, an explanation as to how the final selection was made with reference to the relevant guidance, should be provided. The ES should also include a plan to illustrate the location of viewpoints in relation to the proposed development. Consideration should be given to the production of night-time visualisations to support the assessment of effects from lighting requirements.
3.11.6	Figure 2.11.4	Dark skies assessment	Figure 2.11.4 displays several dark sky sites within the 60km offshore SLVIA study area. It is unclear from the Scoping Report text if a dark skies assessment will be undertaken. The Inspectorate considers that the ES should provide a dark skies assessment for these sites where significant effects may occur.

3.12 Terrestrial Ecology and Onshore Ornithology

(Scoping Report Section 3.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.122	Paragraph 947	Impacts to intertidal receptors (all phases)	The Scoping Report states that the potential impacts on intertidal receptors will be considered within the benthic habitat chapter. The Inspectorate is content with this approach. The ES should clearly signpost where impacts relating to intertidal receptors have been considered. Suitable cross-referencing between the terrestrial ecology, onshore ornithology aspect chapter and benthic habitat aspect chapter should be included in the ES.
3.123	Section 3.1.1	Study area	The Scoping Report proposes a study area consisting of the onshore scoping boundary plus a buffer area of 5km. The ES should ensure the study area for each ecological receptor reflects the proposed development's potential ZOI rather than being based on a fixed distance and takes account of any impact risk zones identified for designated sites. Clear justification should be provided to support any distances applied. Efforts should be made to agree the study area(s) with relevant statutory bodies.
3.124	Section 3.1.4	Approach to impact assessment	There does not appear to be any criteria presented in section 3.1.4 to identify how significant effect will be determined. The ES should provide clarity on how the assessment has been undertaken, taking into account relevant guidance and aspect specific methodology. The applicant is directed to ID 2.2.3 regarding the approach to assessment.
3.125	Paragraph 964	Ecological guidelines	The Inspectorate advises the applicant to also consider the following guidelines and best-practice advice during data collection and EIA:

			- Badger Protection: Best Practice Guidance for Developers, Ecologists and Planners (Wales) (Badger Trust, 2023) - UK Bat Mitigation Guidelines: A Guide to Impact Assessment, Mitigation and Compensation for Developments Affecting Bats (Reason, P.F. and Wray, S., 2025) - Good Planning Practice for Invertebrates: Mitigation (Buglife, 2015)
3.126	Paragraphs 113 and 970	HDD drilling fluid	The Inspectorate notes that there is potential for HDD to be used where watercourses or sensitive habitats are crossed by the onshore export cables. Any impacts on aquatic environment and water resource receptors from mud toxicity and bentonite breakout during HDD works which are likely to result in significant effects should be assessed in the ES. The ES should clearly describe any mitigation measures relied upon to control and manage the risk of HDD drilling fluid breakout and explain how the delivery of these measures would be secured in the DCO.
3.127	Paragraph 962	Badger surveys	While the Inspectorate considers it appropriate for the Preliminary Ecological Appraisal (PEA) to initially confirm the presence of badgers, a PEA does not obfuscate the need for a full species-specific badger survey. Should badgers be confirmed to be present through the PEA, the Inspectorate considers that separate surveys should be undertaken for badgers (e.g. badger walkover surveys or bait marking surveys) to ensure the survey effort is appropriately targeted and carried out at the most suitable time of year. This would help to ensure that potential effects on badger setts, paths, and foraging areas can be adequately assessed and mitigated for.
3.128	Paragraph 966	Sensitive receptors	Paragraph 966 identifies the terrestrial ecological and ornithological receptors relevant to the assessment. However, it does not set out how sensitive receptors will be identified. This should be made clear in the ES and agreed with relevant statutory bodies.
3.129	Table 3.1.3	Site-specific surveys	The Inspectorate notes that table 3.1.3 of the Scoping Report anticipates the timing and scope of the proposed site-specific surveys. The applicant should seek agreement from relevant statutory bodies regarding the scale, extent, and timing of these surveys to ensure the ecological baseline is robust. Evidence of this consultation should be provided within the application documents. The ES should also describe any assumptions, limitations, and uncertainties associated with the surveys. The applicant is directed to the comments of

			NRW (appendix 2 of this Opinion) regarding the timing, scope and requirement of site-specific surveys of the proposed development.
3.1210	Table 3.1.3	Overwintering bird surveys	Table 3.1.3 details that overwintering bird surveys are anticipated to be undertaken between October to March in 2026/27 and 2027/28 and states that two survey years are proposed however this may be refined to one year following the review of year one data and in consultation with key stakeholders. The applicant is directed to comments from NRW (appendix 2 of this Opinion) regarding overwintering bird surveys for the proposed development. The applicant should make effort to agree the scope and adequacy of surveys with relevant statutory bodies, including NRW.
3.1211	Table 3.1.3	Roosting bat surveys	The Inspectorate notes NRW's comments that the study area supports a diverse range of bat species, including horseshoe bat species and other rare bat species such as barbastelle. Given the variety of bat species present and the range of structures they use, the roosting bat surveys should cover not only terrestrial areas but also the foreshore and coastal environments. Survey timings should remain flexible to ensure that all potential roost types can be adequately assessed. The applicant is directed to the comments of NRW (appendix 2 of this Opinion) in this regard.
3.1212	Table 3.1.3	Water vole and otter surveys	The Inspectorate notes NRW's comments that there are variations in the survey methodologies and optimal survey periods for otter and water vole. Given the differing ecological requirement of these species, a combined survey proposed in the Scoping Report may not provide sufficient information to adequately assess their presence and use of the site. The Inspectorate considers that separate surveys should be undertaken for otter and water vole to ensure that survey effort is appropriately targeted and carried out at the most suitable time of year for each species. This would help to ensure that potential effects can be adequately assessed. The applicant is directed to the comments of NRW (appendix 2 of this Opinion) in this regard.

3.1213	Section 3.1.6	Mitigation measures	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, if possible, with relevant statutory bodies and the ES should explain how they would be secured in the DCO.
3.1214	n/a	Artificial lighting	The ES should identify any temporary and permanent artificial lighting requirements, including the likely intensity and extent of light spill. Particular consideration should be given to potential effects on new and retained green infrastructure, including bat roosts, bat flight paths, and other light-sensitive ecological receptors, together with any proposed mitigation measures. An assessment should be provided, where significant effects are likely to occur. The applicant's attention is drawn to the NRW's comments (appendix 2 of this Opinion) in this regard.
3.1215	n/a	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development that relates to terrestrial ecology and onshore ornithology, will be shared with the relevant Local Environmental Records Centre(s) and any other relevant environmental recording schemes. The ES should also clearly describe how this data-sharing will be secured in the DCO.
3.1216	Paragraph 966	Migratory bats	The Inspectorate notes that the Scoping Report has not considered the potential for impacts on migratory bats during all phases of the proposed development. The Inspectorate notes that Natural England Commissioned Report NECR562 <i>Assessing migration of bat species and interactions with offshore wind farms in British waters</i> highlights risks of impacts in relation to collisions, barrier effects, and barotrauma to migratory bats. The Inspectorate considers that the ES should provide an assessment of this matter where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies. The ES should also include and clearly detail any proposals for post-construction monitoring of migratory bats within and in proximity to the proposed array area.

3.1217	Paragraph 973	Habitat fragmentation and species isolation	The ES should identify any temporary and permanent fencing requirements, including the likely height, design, extent, and location. Consideration should be given to potential effects on fauna from new temporary and permanent fencing required as part of the construction, O&M, and decommissioning phases of the proposed development. An assessment should be provided, where significant effects are likely to occur. In line with NPS EN-3 Paragraph 2.10.75, the Inspectorate also advises that construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site, where it is appropriate to do so. The ES should clearly describe how this will be secured in the DCO.
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3.13 Geology and Land Quality

(Scoping Report Section 3.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Paragraph 1055 and table 3.2.7	Impacts to groundwater, surface waters and ecological habitats along the onshore export cable corridor and at the landfall from contamination (O&M)	The Scoping Report proposes to scope this matter out on the basis that the O&M phase would not involve the storage of materials or use of materials that could cause spillages. Given the nature of the proposed development and the information provided in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment.
3.13.2	Paragraph 1056 and table 3.2.7	Physical impacts on geologically designated sites (operation)	The Scoping Report states that direct impacts to geologically designated sites through maintenance activities could occur, but it is unlikely to occur related to operational activities, such as inspections of above ground infrastructure. The Inspectorate notes that direct impacts to geologically designated sites during maintenance would be assessed as part of the ES. The Inspectorate is content with this approach.
3.13.3	Paragraph 1058 and table 3.2.7	Impacts due to historical mining (O&M)	The Scoping Report proposes to scope this matter out on the basis that any required remedial measures for geology and land quality as a result of the interaction of the proposed development with historical mining would have been carried out during the construction stage. The Inspectorate notes that effects on geology and land quality arising from the interaction of the proposed development with historical mining during construction would be assessed as part of the ES. The Inspectorate agrees that this matter can be scoped out for the O&M phase on the basis that further impacts to human health, controlled waters, land stability, buildings and infrastructure are unlikely to lead to additional likely significant effects.

3.134	Paragraph 1059 and table 3.2.7	Impacts to the built environment (O&M)	The Scoping Report proposes to scope this matter out on the basis that any required remedial measures would have been carried out during the construction stage. The Inspectorate notes that effects on the built environment during construction would be assessed as part of the ES. Given the nature of the proposed development and the information provided in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment in the ES.
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ID	Ref	Description	Inspectorate's comments
3.135	Section 3.2.1	Study area	The Scoping Report proposes study area buffers for different receptors; however, the ES should explain the basis on which the final study area has been selected. This should be informed by an understanding of the predicted Zol of the proposed development and the nature of the potential effects, rather than being based solely on generic geographical buffer distances. Clear justification should be provided to support any distances applied. Efforts should be made to agree the study area(s) with relevant statutory bodies.
3.136	Paragraph 1033	Approach to impact assessment	There does not appear to be any criteria presented in section 3.2.4 to identify how significant effects will be determined. The ES should provide clarity on how the assessment has been undertaken, taking into account relevant guidance and aspect specific methodology. The applicant is directed to ID 2.2.3 regarding the approach to assessment.
3.137	Section 3.2.5	Receptors	Paragraph 1035 identifies receptors that may be sensitive to changes in ground conditions and land quality. However, the Scoping Report does not clearly identify the specific sensitive receptors to be considered in the assessment, nor does it explain the methodology by which these receptors have been identified. The ES should provide a robust justification as to how sensitive receptors have been identified and how this has been agreed with relevant statutory bodies.

3.14 Flood Risk and Hydrology

(Scoping Report Section 3.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 3.3.7 and paragraph 1122	Direct disturbance of surface water bodies (O&M)	The Scoping Report proposes to scope this matter out on the basis that post-construction, there would be no mechanisms through which elements of the proposed development could directly disturb water bodies. The Inspectorate agrees that significant direct impacts during the O&M phase are unlikely and agrees this matter may be scoped out of the ES.
3.14.2	Table 3.3.7 and paragraph 1123	Increased sediment supply (O&M)	The Scoping Report proposes to scope this matter out on the basis that there would be no mechanisms through which elements of the proposed development could increase sediment supply to water bodies. The Inspectorate agrees that impacts during the O&M phase are unlikely to be significant, and therefore this matter may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.14.3	Section 3.3.1	Study area	The Scoping Report states that the study area for the flood risk and hydrology assessment is defined by the onshore scoping boundary. The Scoping Report does not justify why potential impacts from the proposed development will not stray past the onshore scoping boundary despite there being potential for hydrological connectivity. There are a number of uncertainties at this stage regarding the location of onshore infrastructure and the route of the onshore export cable(s). The Inspectorate considers that the study area should be refined to account for hydrological connectivity to relevant receptors to ensure a worst-case scenario is assessed. The applicant should seek to agree the extent to the study area with relevant statutory bodies.

3.144	Section 3.3.4	Methodology	The flood risk and hydrology chapter does not explain whether it will follow the methodology as set out in section 1.8 of the Scoping Report. This aspect chapter does not appear to present any criteria to identify how a significant effect will be determined. The ES should provide clarity on how the assessment has been undertaken, considering relevant guidance and aspect specific methodology.
3.145	Paragraph 1127	Cumulative impacts	The Scoping Report states that the assessment of cumulative effects will include other projects within 1km of the onshore development area. The ES should justify why a 1km extent for cumulative effects is appropriate for impacts to flood risk and hydrology. The ES should consider whether there is potential for cumulative effects beyond 1km due to potential for hydrological connectivity.
3.146	Paragraph 1600	Climate change calculations	Reference to UK Climate Projections is included in the climate change aspect chapter but not in the flood risk and hydrology aspect. The assessment in the ES for flood risk should take into account the potential impacts of climate change using the latest UK Climate Projections (UKCP18). Effort should be made to agree the climate change model and future flood risk allowance baseline with relevant statutory bodies, including the EA and the lead local flood risk authority.
3.147	Section 3.3.3 and paragraph 1104	Watercourse crossings	The ES should provide a complete watercourse crossing schedule and should describe the nature of any proposed works within or in proximity of sensitive watercourses. Information should be provided regarding the location, scale, and dimensions of any proposed watercourse crossings/instream structures, as well as the nature of any associated construction works. The ES should consider the potential of such works to negatively impact watercourses within the study area, including the ecological status of any watercourses protected under the Water Framework Directive. The applicant's attention is drawn to comments from NRW (appendix 2 of this Opinion) in this regard.
3.148	Section 3.3.4.1	Effects on groundwater receptors	NRW (appendix 2 of this Opinion) have requested the provision of surveys and risk assessments to inform the assessment of groundwater receptors. Effort should be made

			to agree the extent of baseline information and the assessment approach required with relevant statutory bodies, including NRW.
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3.15 Land Use

(Scoping Report Section 3.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Table 3.4.2 and paragraph 1161	Soil degradation and erosion (O&M)	The Scoping Report seeks to scope this matter out on the basis that deterioration is most likely to occur during construction works, such as along access routes and construction compounds. Reinstatement would take place post-construction and therefore no significant effects are anticipated during O&M. On this basis, the Inspectorate agrees this matter may be scoped out of the ES.
3.15.2	Table 3.4.2 and paragraph 1162	Soil characteristic and productivity (all phases)	The Scoping Report seeks to scope out impacts to soil characteristics and productivity as a result of cable heat emissions, stating that the electrical system would be designed to minimise heat loss in order to avoid any effects on crops. As cables would not be live during construction and decommissioning, the Inspectorate agrees this may be scoped out for these phases. Section 1.5.3.2.2 of the Scoping Report provides information regarding the onshore export cables but does not explain what the anticipated cable depth would be. At this stage, the Inspectorate does not agree to scope this matter out during the O&M phase. The ES should include this information and provide an assessment where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
3.15.3	Table 3.4.2 and paragraph 1164	Disruption to existing utilities (O&M)	On the basis that disruption to existing utilities would only occur during construction and decommissioning, the Inspectorate agrees to scope this matter out for the O&M phase.

ID	Ref	Description	Inspectorate's comments
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3.154	Section 3.4.1	Study area	The study area consists of the onshore scoping boundary only and no justification for this, or reference to existing guidance, is provided. The ES should justify the extent of the study area for the land use aspect chapter and seek to agree this with relevant statutory bodies where possible.
3.155	Section 3.4.2.2	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Effort should be made to avoid and minimise temporary and permanent loss of BMV land. Consideration should also be given to the use of BMV land in the applicant's discussion of alternatives.

3.16 Onshore Archaeology and Cultural Heritage

(Scoping Report Section 3.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Table 3.5.3 and paragraph 1222	Physical impacts to designated heritage assets (O&M and decommissioning)	The Scoping Report seeks to scope this matter out on the basis that effects would largely occur during the construction phase. The Inspectorate considers that the onshore elements of the proposed development have the potential to alter drainage patterns within and adjacent to the boundary of works, which may result in physical impacts. Furthermore, it is unclear whether hydrological changes will extend into the operational phase or occur in relation to heating effects from electrical infrastructure. The Inspectorate considers that impacts on archaeological and heritage assets from alterations to drainage patterns, changes to groundwater flows and levels, and from the movement of contaminants or pollutants should be assessed, where there is potential for likely significant effects to occur. This should consider the potential for hydrological effects from both drying out and inundation. Cross references to the flood risk and hydrology ES chapter should be considered.
3.16.2	Table 3.5.3 and paragraph 1222	Physical impacts to known and unknown non-designated historic assets (O&M and decommissioning)	The Scoping Report seeks to scope this matter out on the basis that effects would largely occur during the construction phase. The Inspectorate considers that the onshore elements of the proposed development have the potential to alter drainage patterns within and adjacent to the boundary of works, which may result in physical impacts. Furthermore, it is unclear whether hydrological changes will extend into the operational phase or occur in relation to heating effects from electrical infrastructure. The Inspectorate considers that impacts on non-designated archaeological and heritage assets from alterations to drainage patterns, changes to groundwater flows and levels, and from the movement of contaminants or pollutants should be assessed, where significant effects are likely to occur. This should consider the potential for hydrological effects from both drying out and inundation. Cross references to the flood risk and hydrology ES chapter should be considered.

ID	Ref	Description	Inspectorate's comments
3.16.3	Section 3.5.1 and figure 3.5.1 and paragraph 1208	Study area	The study area is described in section 3.5.1 as being the extent of the onshore scoping boundary and is shown on figure 3.5.1. However, section 3.5.1 also explains that the study area will be refined to include non-designated heritage assets within 500m of the scoping boundary and up to 3km to assess impacts from the onshore transmission station(s). The Inspectorate considers that the assessment for impacts on archaeology and cultural heritage should be based on a Zol which identifies relevant receptors which may be affected by the proposed development, noting that this may extend beyond the distances outlined in the Scoping Report. The final study area should be clearly explained and justified, and plans should be provided which present the study area and any buffer zones. The applicant should make efforts to agree the approach with relevant statutory bodies.
3.16.4	n/a	UXO	UXO and possible disturbance is not mentioned in the Scoping Report for the onshore scheme. The ES should confirm through baseline characterisation whether there is potential to impact UXO and where this is the case, provide an assessment where there is the potential for likely significant effects to occur or explain how such receptors would be avoided.
3.16.5	n/a	Data sources and assessment approach	The applicant's attention is drawn to comments from CadW (appendix 2 of this Opinion) with regard to data sources and assessment approach. The applicant should seek to agree the scope of the assessment and sources of baseline information with relevant statutory bodies, including CadW.

3.17 Landscape Visual Impact

(Scoping Report Section 3.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	Table 3.6.3 and paragraph 1289	Potential physical effects on existing landscape elements of the landfall, onshore export cable corridor (O&M)	Paragraph 1289 states this matter will be scoped in for the O&M phase, however in tables 3.6.3 and 5.1.1 this matter is scoped out. The ES should clarify whether this matter is scoped in or out. Where it is scoped in, the ES should provide an assessment where there is potential for likely significant effects to occur.
3.17.2	Table 3.6.3 and paragraph 112 and section 1.5.7	Potential impact on landscape character resulting from the landfall and onshore export cable corridor (O&M)	The Scoping Report seeks to scope out impacts on landscape character during the O&M phase from the landfall and onshore export cables on the basis that these cables would be buried underground. Paragraph 112 states that the working width of the cable corridor would be up to 250m wide and 60km long, but it is unclear whether any easement required would result in permanent landscape changes. The Inspectorate does not agree to scope this matter out at this stage and considers that the ES should provide an assessment of this matter where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
3.17.3	Table 3.6.3	Potential impact on the special qualities of landscape designations resulting from the landfall and onshore export cable corridor (O&M)	The Scoping Report seeks to scope out impacts on the special qualities of landscape designations during the O&M phase from the landfall and onshore export cables on the basis that these cables would be buried underground. Paragraph 112 states that the working width of the cable corridor would be up to 250m wide and 60km long, but it is unclear whether any easement required would result in permanent landscape changes. The Inspectorate does not agree to scope this matter out at this stage and considers that the ES should provide an assessment of this matter

			where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
3.17.4	Table 3.6.3	Potential impact on views experienced by visual receptors resulting from the landfall and onshore export cable corridor (O&M)	The Scoping Report seeks to scope out impacts on views experienced by visual receptors from the landfall and onshore export cables on the basis that these cables would be buried underground. Paragraph 112 states that the working width of the cable corridor would be up to 250m wide and 60km long, but it is unclear whether any easement required would result in permanent landscape changes. The Inspectorate does not agree to scope this matter out at this stage and considers that the ES should provide an assessment of this matter where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.

ID	Ref	Description	Inspectorate's comments
3.17.5	Figure 3.6.1 and paragraph 1240	Study area	The onshore study area is shown on figure 3.6.1 of the Scoping Report. Paragraph 1240 states that the study area for the onshore transmission station(s) is the onshore scoping boundary plus a 5km buffer area. The onshore scoping boundary is described as having a 3km buffer zone. Figure 3.6.1 only shows one study area, and it appears that this is the 3km buffer zone. The ES should ensure that figures included are representative of the study areas and associated buffer zones they are describing.
3.17.6	Section 3.6.6	Mitigation	The Scoping Report provides very high-level detail regarding mitigation measures. No specific mitigation measures are discussed. The applicant is directed to ID 2.1.12 regarding mitigation.
3.17.7	Paragraph 1280	Viewpoints	It is acknowledged that due to the uncertainties regarding locations of the onshore infrastructure, locations for onshore viewpoints have not yet been defined. The Scoping Report states that viewpoints will be agreed in consultation with stakeholders. The ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoints which are selected. Where any disagreement remains, an explanation as to how the final selection was made should be provided.

3.17.8	Paragraph 1277 and table 3.6.2	Cultural heritage receptors	The Scoping Report states that historic environment assets will be included in the landscape and visual impact assessment (LVIA). No information is included regarding historic environment assets in table 3.6.2 which outlines other relevant receptors for the LVIA. The ES should also include heritage specific receptors (and viewpoints), as appropriate, to support the heritage assessment. Suitable cross-referencing between the LVIA aspect chapter and cultural heritage aspect chapter should be included in the ES.
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3.18 Traffic and Transport

(Scoping Report Section 3.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.18.1	Section 3.7.5.2 and table 3.7.7	Pedestrian severance and delay (O&M)	The Scoping Report seeks to scope out impacts during the O&M phase given that the onshore transmission station(s) would only be visited periodically to carry out checks and maintenance, and subject to very low vehicle demand. No anticipated quantity of vehicle visits has been provided to substantiate this. The Inspectorate agrees to scope out these O&M phase matters subject to confirmation of anticipated vehicle types and the likely number and routeing of vehicle movements required for operation of the proposed development, including maintenance of offshore components. Where possible, reference should be made to relevant thresholds, as identified in appropriate guidance, and agreement should be reached with relevant statutory bodies.
3.18.2	Section 3.7.5.2 and table 3.7.7	Amenity (O&M)	
3.18.3	Section 3.7.5.2 and table 3.7.7	Fear and Intimidation (O&M)	
3.18.4	Section 3.7.5.2 and table 3.7.7	Road safety (including consideration of hazardous loads) (O&M)	
3.18.5	Section 3.7.5.2 and	Driver delay (capacity) (O&M)	

	table 3.7.7		
3.186	Section 3.7.5.2 and table 3.7.7	Driver delay (highway constraints) (O&M)	
3.187	Section 3.7.5.2 and table 3.7.7	Driver delay (road closures) (O&M)	
3.188	Section 3.7.5.2 and table 3.7.7	Abnormal loads (O&M)	
3.189	Section 3.7.5.2 and table 3.7.7	Inter-relationship impacts (O&M)	There is discrepancy within the Scoping Report between section 3.7.5.4, which seeks to scope in inter-relationship impacts, and table 3.7.7 which seeks to scope out inter-relationship impacts during the O&M phase. The Inspectorate considers that this matter can be scoped out from the assessment subject to confirmation of anticipated vehicle types and the likely number and routing of vehicle movements required for operation of the proposed development, including maintenance of offshore components as requested in ID 3.18.1.
3.18.10	Section 3.7.5.2 and	Cumulative impacts (O&M)	There is discrepancy within the Scoping Report between section 3.7.5.5, which seeks to scope in cumulative impacts, and table 3.7.7 which seeks to scope out cumulative impacts during the O&M phase.

	table 3.7.7		The Inspectorate is content to scope out cumulative effects at the O&M phase.
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ID	Ref	Description	Inspectorate's comments
3.18.11	Section 3.7.1	Study area	The Scoping Report states that the study area for this aspect chapter will equate to the onshore scoping boundary. The ES should justify the spatial extent of the study area with reference to the Zol of the proposed development, and potential impacts to specific relevant receptors, including the strategic and local highway network. Where possible, the chosen study area should be agreed with relevant statutory bodies. The applicant's attention is also drawn to the consultation response of Neath Port Talbot County Borough Council (appendix 2 of this Opinion) in this regard.
3.18.12	Paragraph 1338	Hazardous loads and road safety assessment	To ensure a proportionate assessment, rather than undertaking a separate hazardous loads assessment, the Scoping Report seeks to include additional analysis within the road safety assessment. This would include reviewing types of vehicles historically involved in collisions to understand whether vehicles transporting hazardous loads may be at greater risk. The Inspectorate is content with this approach, provided the ES clarifies the expected quantities of potential hazardous loads, identifies the potential for any likely significant effects and highlights where the routing of vehicles carrying hazardous loads may have to be amended in the light of conclusions drawn from the collision data.
3.18.13	n/a	Abnormal Indivisible Loads (AILs)	The Scoping Report does not set out the routes for AILs during construction. The ES should detail the routes for AILs (where relevant) along with the anticipated vehicle weights, lengths, widths and heights and the anticipated quantity of AILs. The applicant's attention is drawn to the Welsh Government's consultation response (appendix 2 of this Opinion) in this regard.

3.18.14	Section 3.7.2.2	Rail network	The Scoping Report states that the West Wales Line runs through the traffic and transport study area, connecting to the south-western coast of Swansea. A number of smaller stations are located on this line. No information is presented as to whether the proposed development may result in impacts to the operation of the rail network. The ES should include an assessment of the potential impact on the rail network, including the potential impacts of any construction or diversion activities on public transport, where there is potential for likely significant effects to occur. The applicant's attention is drawn to comments from Network Rail (appendix 2 of this Opinion) in this regard.
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3.19 Noise and Vibration

(Scoping Report Section 3.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.19.1	Section 3.8.5.1.4 and paragraphs 1408 and 1409 and table 3.8.4	Road traffic vibration (construction and decommissioning)	The Scoping Report proposes to scope out this impact during construction and decommissioning of the proposed development on the basis that roads in good condition do not provide a pathway for additional vehicles to cause an impact, and heavy goods vehicles (HGVs) introduced by the construction phase using roads with surface irregularities would generate vibration at a similar level to that caused by existing HGV movements. Paragraph 1409 further states that the potential increase in exposure to perceptible vibration would not affect the peak particle velocity (PPV) experienced at receptors like it would for noise. In the absence of information such as expected number and type of vehicle movements for each phase of the proposed development, vehicle routing, road condition and the presence of sensitive receptors, the Inspectorate is not in a position to scope this matter from the assessment. As such, the ES should provide an assessment of this matter where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
3.19.2	Section 3.8.5.1.5 and paragraph 1410	Noise and vibration from the construction of offshore infrastructure (construction)	The Scoping Report proposes to scope out this impact on the basis that the closest distance from the array scoping boundary to shore is around 42km, and therefore due to propagation over this distance the noise emissions would not have the potential to exceed the criteria for the onset of significant effects at the onshore noise and vibration sensitive receptors (NVSRs). On this basis and given that noise associated with construction of offshore midpoint compensation would be scoped into the EIA, the Inspectorate agrees to scope this matter out.

3.193	Section 3.8.5.2.1 and paragraph 1413	Noise impacts from buried infrastructure (O&M)	The Inspectorate agrees that operation of the buried infrastructure is unlikely to generate noise or vibration on a scale that would result in significant effects. This matter can therefore be scoped out.
3.194	Section 3.8.5.2 and paragraphs 1414 and 1416 and table 3.8.4	Operational traffic noise and vibration	Limited justification has been provided for the scoping out of operational traffic noise and vibration. However, given that vehicle flows associated with the operation of the proposed development are likely to be infrequent, the Inspectorate agrees that significant effects in respect of road traffic noise and vibration are unlikely to occur. The Inspectorate agrees to scope out these O&M phase matters subject to confirmation of anticipated vehicle types and the likely number and routing of vehicle movements required for the operation of the proposed development, including maintenance of offshore components. Where possible, reference should be made to relevant thresholds, as identified in appropriate guidance, and agreement should be reached with relevant statutory bodies.
3.195	Section 3.8.5.2.3 and paragraph 1415	Vibration impacts from operation of the onshore transmission station(s) and infrastructure in the onshore transmission station(s) zone	The Scoping Report proposes to scope out an assessment of vibration associated with the operation of the onshore transmission station(s) and infrastructure in the transmission stations zone on the basis that plant with the potential to be sources of vibration would be designed to minimise vibration transmitted into the ground. Furthermore, paragraph 1415 states that vibration levels are anticipated to be negligible at source and would not be expected to give rise to significant effects at an NVSR. The Inspectorate agrees that vibration from plant during O&M is unlikely to result in significant effects and is content that this matter can be scoped out of further assessment.
3.196	Section 3.8.5.2.5 and	Noise and vibration impacts from the operation of the offshore infrastructure	The Scoping Report proposes to scope this matter out on the basis that due to the distance from the array scoping boundary to the shore, noise emissions would not have the potential to exceed the criteria for the onset of significant effects at the onshore NVSRs.

	paragraph 1417		The Inspectorate agrees that the operation of offshore infrastructure is unlikely to result in likely significant effects on onshore NVSRs and agrees to scope this matter out of further assessment.
3.19.7	Section 3.8.5.4 and paragraph 1420 and table 3.8.4	Interrelationship impacts on vibration receptors (O&M)	The Scoping Report proposes to scope this matter out on the basis of the rationale described in ID 3.19.5. On this basis, the Inspectorate agrees to scope this matter out of further assessment.
3.19.8	Section 3.8.5.5 and paragraph 1421 and table 3.8.4	Cumulative impacts on vibration receptors (O&M)	The Scoping Report proposes to scope this matter out on the basis of the rationale described in ID 3.19.5. On this basis, the Inspectorate agrees to scope this matter out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.19.9	Section 3.8 and paragraph 1373	Ecological receptors	The Inspectorate notes that there is limited reference within this section of the Scoping Report to other receptor types which may be sensitive to noise and vibration, such as ecological receptors. The Inspectorate welcomes the consideration of noise and vibration effects on ecological receptors within Scoping Report section 3.1 (terrestrial ecology and onshore ornithology). The sensitivity of ecological receptors to noise and vibration should be clearly defined and the ES should clearly explain any assumptions made regarding the assessment of likely significant effects arising from noise and vibration on ecological receptors. The onshore noise and vibration ES assessment should cross-refer to the findings of other relevant ES assessments, such as terrestrial ecology and onshore ornithology, to avoid duplication.

3.20 Air Quality

(Scoping Report Section 3.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3201	Section 3.9.1 and paragraph 1432	Offshore air quality impacts (all phases)	The Inspectorate agrees that offshore air quality impacts can be scoped out of the ES on the basis that they are anticipated to be short-term, intermittent and localised over open sea with no relevant human exposure or ecological receptors sensitive to air pollution within relevant distances.
3202	Section 3.9.5.1.2 and paragraph 1445	Construction traffic emissions	The Scoping Report proposes to undertake an initial screening exercise to determine if a detailed assessment of road traffic emissions is required. Paragraph 1445 further states that if the screening criteria are exceeded, a detailed road traffic emissions assessment may be required. The Inspectorate agrees that vehicle traffic emissions can be scoped out of the assessment, provided the ES confirms the anticipated vehicle types and likely number of vehicle movements required for all phases of the proposed development (with reference to thresholds within guidance) to justify this position.
3203	Section 3.9.5.2 and paragraph 1449 and table 3.9.2	Air quality impacts including dust, road traffic and odour emissions (O&M)	The Inspectorate has considered the information in the Scoping Report and agrees that significant effects are unlikely. However, the information on the likely emissions to air during O&M and the receptors which could be affected is very limited. The Inspectorate considers that back-up generators, and other equipment has the potential to result in air quality effects during the O&M phase. The Inspectorate would expect the ES to provide a reasoned justification supported by evidence to demonstrate why a detailed assessment is not required. Cross-reference should be made to the assessments of effects on ecology and on human health.
3204	Section 3.9.5.4 and	Inter-relationship impacts (O&M)	Limited justification has been provided for the scoping out of this matter. However, the Inspectorate agrees that significant effects are unlikely. As detailed in ID 3.20.3, the Inspectorate would expect the ES to provide a reasoned justification supported by

	paragraph 1452 and table 3.9.2		evidence to demonstrate why a detailed assessment is not required. Cross-reference should be made to the assessments of effects on ecology and on human health.
3205	Section 3.9.5.5 and paragraph 1453 and table 3.9.2	Cumulative impacts (O&M and decommissioning)	Limited justification has been provided for the scoping out of this matter during the O&M phase. However, the Inspectorate agrees that significant effects during O&M are unlikely. As detailed in ID 3.20.3, the Inspectorate would expect the ES to provide a reasoned justification supported by evidence to demonstrate why a detailed assessment is not required. Cross-reference should be made to the assessments of effects on ecology and on human health. The Inspectorate notes that paragraph 1454 scopes this matter in during decommissioning whereas table 3.9.2 scopes it out. For the avoidance of doubt, the ES should include an assessment of this matter during decommissioning where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.

ID	Ref	Description	Inspectorate's comments
3206	Section 3.9.3 and paragraph 1440	Baseline survey data	The Scoping Report states that it is expected there would be sufficient data available from monitoring undertaken by the relevant local authorities and as such, it is not proposed to collect any primary data (i.e. a project-specific air quality survey) for the assessment. Effort should be made to agree the requirement for any additional baseline survey data with relevant statutory bodies. The assessment in the ES should be carried out with reference to a robust baseline position reflecting the relevant study area, including an understanding of relevant pollutant concentrations. Where required further monitoring should be conducted to supplement available data taken from the local authorities monitoring.
3207	Paragraph 1434	Study area	The Scoping Report proposes a dust and PM emissions study area for ecological receptors during construction of within 200m of the onshore development area and within

			50m of trackout routes used by construction vehicles on the public highway, extending up to 250m from the onshore development area site exit(s). The Inspectorate advises that ecological receptors are assessed up to 500m from the site entrance (rather than 250m) in accordance with relevant guidance. The applicant is directed to comments from NRW (appendix 2 of this Opinion) in this regard.
3208	Paragraph 1434 and table 3.9.2	Non-road mobile machinery (NRMM) impacts to ecological receptors	Table 3.9.2 only refers to human receptors in relation to the assessment of the impact of emissions from plant and machinery. The assessment should include ecological receptors where there is potential for likely significant effects to occur.

3.21 Population and Human Health

(Scoping Report Section 4.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321.1	Tables 4.1.4, 4.1.5 and 4.1.6	Diet and nutrition (all phases)	The Scoping Report proposes to scope this matter out on the basis that the proposed development would not have a material impact on access to food, diet or nutrition during the construction, O&M and decommissioning phases. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES.
321.2	Tables 4.1.4, 4.1.5 and 4.1.6	Relocation (all phases)	The Scoping Report proposes to scope this matter out on the basis that the proposed cable route would seek to avoid residential dwellings, therefore, relocation effects are considered insignificant. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES.
321.3	Tables 4.1.4, 4.1.5 and 4.1.6	Community safety (all phases)	The Scoping Report proposes to scope this matter out on the basis that the site would be subject to security measures that deter the potential for any anti-social behaviour and/or crime during construction and the proposed development would not materially influence community safety during the O&M phase. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES, provided that outline of the measures to manage security and safety risks to the public are described within the ES and secured in the DCO.
321.4	Tables 4.1.4, 4.1.5 and 4.1.6	Community identity, culture, resilience and influence (all phases)	The Scoping Report proposes to scope this matter out on the basis that visual impacts associated with the proposed development during the construction, O&M and decommissioning phases would be temporary, subjective and would only impact a small proportion of the population.

			Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.
321.5	Tables 4.1.4, 4.1.5 and 4.1.6	Social participation, interaction and support (all phases)	The Scoping Report proposes to scope this matter out on the basis that the proposed development would predominantly be built on agricultural land, and is not anticipated to permanently impact social participation, interaction and support. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.
321.6	Tables 4.1.4, 4.1.5 and 4.1.6	Education and training (all phases)	The Scoping Report proposes to scope this matter out on the basis that although there is potential for education and training opportunities as part of the proposed development, this would be addressed by the socio-economics assessment where appropriate and necessary. The Inspectorate is content with this approach to scope this matter out of the population and human health assessment provided appropriate cross-referencing is made within the ES to where the assessment of effects is provided.
321.7	Tables 4.1.4 and 4.1.6	Climate change mitigation and adaption (construction and decommissioning)	The Scoping Report proposes to scope this matter out on the basis that due to the long latency period associated with climate change impacts, the impact on construction stage assessment conclusions is not required to be considered. Given the nature of the proposed development and on the basis that implications of climate change mitigation and adaption during the O&M phase would be considered, the Inspectorate agrees that this matter can be scoped out from the construction and decommissioning phases.
321.8	Tables 4.1.4, 4.1.5 and 4.1.6	Water quality or availability (all phases)	The Scoping Report proposes to scope this matter out on the basis that potential health impacts from water resources including water quality and water supply infrastructure would be assessed within the flood risk and hydrology chapter in the ES. No further health assessment is considered necessary. The Inspectorate is content with this approach to scope this matter out of the population and human health assessment provided appropriate cross-referencing is made within the ES to where the assessment of effects is provided.

321.9	Tables 4.1.4, 4.1.5 and 4.1.6	Land quality (all phases)	The Scoping Report proposes to scope this matter out on the basis that the potential health impacts from ground conditions (such as exposure to contaminated land) would be included as part of geology and land quality scope for the ES. No further health assessment is considered necessary. The Inspectorate is content with this approach to scope this matter out of the population and human health assessment provided appropriate cross-referencing is made within the ES to where the assessment of effects is provided.
321.10	Tables 4.1.4, 4.1.5 and 4.1.6	Radiation (all phases)	The Scoping Report proposes to scope this matter out on the basis that no significant sources of ionising or non-ionising radiation (including EMF) would be introduced during construction or decommissioning, and that embedded mitigation measures would be implemented into the design to ensure the cables are set an appropriate distance from any permanent receptor locations and comply with public EMF exposure limits. Given the nature of the proposed development and the information provided, the Inspectorate agrees that radiation effects may be scoped out of the ES, both alone and cumulatively, on the basis that the ES can demonstrate all electrical infrastructure will remain below negligible levels in line with relevant guidelines.
321.11	Tables 4.1.4, 4.1.5 and 4.1.6	Built environment (all phases)	The Scoping Report proposes to scope this matter out on the basis that neither the construction nor O&M phases of the proposed development would materially alter the existing built features of the neighbourhood environment that contribute to health. In addition, the proposed cable route would seek to avoid community infrastructure, thereby preventing the permanent loss of community resources and amenities. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES.
321.12	Tables 4.1.4, 4.1.5 and 4.1.6	Wider societal infrastructure and resources (all phases)	The Scoping Report proposes to scope this matter out on the basis that the proposed development would not impact wider societal infrastructure until operation and would contribute to energy infrastructure development and a low carbon economy. The Scoping Report states that these matters will be addressed within the relevant aspect chapters

			and, therefore, it is not considered necessary to provide additional analysis from a population and human health perspective. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that impacts on wider societal infrastructure and resources during the construction and decommissioning phases can be scoped out of the ES. The Inspectorate is content for impacts on wider societal infrastructure and resources during the O&M phase to be scoped out of the population and human health assessment, provided that appropriate cross-referencing is included within the ES to the relevant assessments where these effects are considered.
321.13	Tables 4.1.5 and 4.1.6	Physical activity (O&M)	The Scoping Report proposes to scope this matter out on the basis that once operational, onshore elements of the proposed development would not materially influence access to PRoW or open space for physical activity as land required for construction would be reinstated to its previous use. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES. The ES should clearly explain the reinstatement proposals and demonstrate how these would be secured through the DCO.
321.14	Tables 4.1.5 and 4.1.6	Risk taking behaviour (O&M)	The Scoping Report proposes to scope this matter out on the basis that the workforce associated with the O&M phase would remain in-situ during the day, with limited potential to influence risk taking behaviours. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES.
321.15	Tables 4.1.5 and 4.1.6	Housing (O&M)	The Scoping Report proposes to scope this matter out on the basis that workers are anticipated to be sourced locally during the O&M phase, therefore there would be no changes expected on housing demand and need. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES.

321.16	Tables 4.1.5 and 4.1.6	Open space, leisure and play (O&M)	The Scoping Report proposes to scope this matter out on the basis that once operational, onshore elements of the proposed development would not materially influence access to PRoW or open space for leisure and play as land required for construction would be reinstated to its previous use. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES. The ES should clearly explain the reinstatement proposals and demonstrate how these would be secured through the DCO.
321.17	Tables 4.1.5 and 4.1.6	Transport modes, access and connections (O&M)	The Scoping Report proposes to scope this matter out on the basis that the main traffic movements anticipated during the O&M phase of the proposed development would be associated with staff and maintenance movements. However, it is not anticipated this would lead to a substantial change that would give rise to significant adverse effects on health and wellbeing (such as severance, pedestrian and cyclist amenity, fear and intimidation and risk of road traffic accidents/injury). The Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out of the ES.
321.18	Tables 4.1.5 and 4.1.6	Air quality (O&M)	The Scoping Report proposes to scope this matter out on the basis that it is anticipated that O&M phase traffic would not have a material impact on air quality and the infrastructure constituting the proposed development would not generate any emissions. As set out in ID 3.20.3, the Inspectorate does not consider that it has sufficient information to scope out air quality effects on human health during the O&M phase. The ES should provide sufficient evidence to demonstrate that operational activities, including the use of back-up generators and other equipment, would not result in significant air quality effects with the potential to affect human health. Appropriate cross-referencing should be made to the air quality aspect chapter where the assessment of these effects is undertaken to avoid duplication.

321.19	Tables 4.1.5 and 4.1.6	Health and social care services (O&M)	The Scoping Report proposes to scope this matter out on the basis that the operational stage workforce of the proposed development is expected to commute on a daily basis, with existing housing provision sufficient for the future operational workforce. As such, there would be no material impact on access to health and social care services. Given the nature of the proposed development and the information provided within the Scoping Report, the Inspectorate agrees that this matter may be scoped out of the ES.
321.20	Paragraph 1496	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
321.21	Section 4.1.1	Study area	The Scoping Report states that the human health assessment would be informed by the study areas, Zol, and receptors impacted or potentially impacted by other aspect chapters. The extent of the study area for the human health assessment is unclear from the information provided within the Scoping Report. The ES should provide a detailed justification of the study area(s) applied, supported by evidence of the likely geographical extent of the impacts identified from the proposed development.
321.22	Paragraph 1488	Sensitive receptors	Paragraph 1488 identifies local population in the population and human health study area is the primary receptor. However, this is a broad receptor group, and the ES should provide further detail on the specific population groups and sensitive receptors that may be affected by the proposed development. This may include, where relevant, residents, children and young people, older people, people with existing health conditions, users of healthcare and educational facilities and users of community facilities. The assessment should also explain how these receptors have been identified and their sensitivity to the predicted health impact pathways associated with the proposed development.

3.22 Socio-economics

(Scoping Report Section 4.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3221	Paragraph 1538 and table 4.2.2	Impacts associated with the loss or, disruption to or pressure on local services and offshore activities (O&M)	The Scoping Report proposes to scope this matter out on the basis that impacts associated with the loss of, disruption to or pressure on local services and offshore activities during O&M would be negligible. In the absence of estimated worker numbers associated with the O&M phase for all potential design options, the Inspectorate is not in a position to agree to scope this matter out from assessment. The ES should provide an assessment of these matters where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.
3222	Paragraph 1538 and table 4.2.2	Impacts to Welsh language (O&M)	The Scoping Report proposes to scope this matter out on the basis that impacts to the Welsh language during O&M would be negligible. The Inspectorate agrees that this matter can be scoped out.
3223	Paragraph 1538 and table 4.2.2	Disturbance to social infrastructure (O&M)	The Scoping Report proposes to scope this matter out on the basis that disturbance to social infrastructure during O&M would be negligible. Considering the locations of the onshore transmission station(s), onshore export cable corridor and landfall are not selected yet, the Inspectorate is not in a position to agree to scope out this matter out from assessment at this stage. The ES should provide an assessment of these matters where there is potential for likely significant effects to occur or demonstrate the absence of likely significant effects with evidence of agreement from relevant statutory bodies.

3224	Paragraph 1544	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.
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ID	Ref	Description	Inspectorate's comments
3225	Section 4.2.4.3	Receptors	Paragraph 1529 identifies receptors that may be sensitive to changes in employment, GVA, and demographics. However, the Scoping Report does not clearly identify the sensitive receptors to be considered in the assessment, nor does it explain the methodology by which these receptors have been identified. The ES should provide a robust justification as to how sensitive receptors have been identified and agreed with relevant statutory bodies.

3.23 Tourism and Recreation

(Scoping Report Section 4.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
323.1	Section 4.3.5.2 and table 4.3.2	Disruption to recreational activities (O&M)	The Scoping Report seeks to scope out disruption to recreational activities and the tourism industry during the O&M phase on the basis that as the onshore export cable will be buried, there will be reduced activity associated with the offshore export cable and the onshore transmission station(s) will be located at a relative distance from sensitive receptors.
323.2	Section 4.3.5.2 and table 4.3.2	Disruption to the tourism industry (O&M)	The Inspectorate notes that the locations of the onshore transmission station(s) have not yet been confirmed and neither have specific sensitive tourism/recreation receptors been identified within the Scoping Report. In the absence of such information or clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters out of assessment at this stage. For the avoidance of doubt, it is noted that offshore tourism and recreation effects, including during the O&M, are scoped into assessment within chapter 2.9 infrastructure and other users. Suitable cross-referencing between chapters 2.9 infrastructure and other users and 4.3 tourism and recreation should be included within the ES.
323.3	Section 4.3.5.4 and 4.3.5.5 and table 4.3.2	Inter-relationship impacts (O&M)	There is a discrepancy within the Scoping Report between paragraph 1580, which seeks to scope in inter-relationship impacts, and table 4.3.2 which seeks to scope out inter-relationship impacts during the O&M phase. The Inspectorate notes that the locations of the onshore transmission station(s) have not yet been confirmed and neither have specific sensitive tourism/recreation receptors been identified within the Scoping Report. In the absence of such information or clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out of assessment at this stage.

			The ES should include an assessment of this matter or evidence demonstrating agreement with relevant statutory bodies and the absence of likely significant effects.
3234	Section 4.3.5.6 and table 4.3.2	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3235	Section 4.3.1	Study area	The Scoping Report sets out definitions for various components of the proposed study area. Reference is made to an "offshore study area as defined in section 2.9 infrastructure and others users". It is assumed that this is reference to the 'infrastructure and other users study area' rather than the 'offshore export cable scoping boundary' as set out in figure 2.9.1, however, this should be made clear within the ES. The final study area utilised in the ES should be made clear and demarcated on a figure attached to the ES chapter. Where possible, the study area should be agreed with relevant statutory bodies.
3236	Section 4.3.2	Baseline	The Scoping Report sets out that the baseline will include tourism and recreation assets, accommodation providers, recreational trails and core paths. The ES should include a list of specific assets, providers, trails and paths and, where possible, this list of receptors should be agreed with relevant consultees.

3.24 Climate Change Resilience

(Scoping Report Section 4.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
324.1	Section 4.4.5.7 and table 4.4.7	Cumulative impacts (all phases)	The Scoping Report seeks to scope out an assessment of potential cumulative impacts, given that the proposed development is isolated from other projects and the cumulation of several infrastructure projects in the same geographical area would not impact the climate related risks posed to those individual infrastructure projects. The Inspectorate is content with this approach.
324.2	Section 4.4.5.7 and table 4.4.7	Transboundary impacts (all phases)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

ID	Ref	Description	Inspectorate's comments
324.3	Paragraph 1594	Significance of effects	Whilst the Scoping Report sets out how climate risk will be calculated; it provides no explanation as to how significance will be determined. In addition to the identification of climate risks, the ES should include an appraisal of the significance of impacts. This should include setting out the criteria against which a judgement can be made as to whether an effect can be deemed significant or not significant, in line with relevant guidance.

3.25 Greenhouse Gas Emissions

(Scoping Report Section 4.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
325.1	Section 4.5.5.4 and table 4.5.3	Avoided emissions from the supply of renewable energy to UK electricity transmission network (construction and decommissioning)	The Scoping Report seeks to scope this matter out. Whilst justification is not explicitly provided, it is assumed that the development will not be supplying renewable energy during the construction and decommissioning phases. On this basis, the Inspectorate is content to scope this matter out of further assessment.
325.2	Section 4.5.5.4 and table 4.5.3	Inter-relationship impacts (all phases)	The Scoping Report seeks to scope out inter-relationship impacts because the receptor for the greenhouse gas (GHG) emissions assessment is the global atmosphere, which is not directly affected by any other EIA topics. On the basis that the ES does not identify any further impacts to the global atmosphere, the Inspectorate is content to scope this matter out of further assessment.
325.3	Section 4.5.5.4 and table 4.5.3	Cumulative impact (all phases)	The Scoping Report seeks to scope out cumulative impacts because the impacts of the proposed development's GHG emissions are global and cumulative by nature (all developments which emit GHG contribute to global atmospheric change), and this would be taken into account in defining the receptor sensitivity of the global atmosphere as high. The Inspectorate is content with this approach and agrees this matter may be scoped out of the ES.
325.4	Section 4.5.5.4 and table 4.5.3	Transboundary impacts (all phase)	The Inspectorate is not able to agree to scope this matter out until it has undertaken its own transboundary screening. See the Inspectorate's comments at ID 2.2.5 of this Opinion.

325.5	Table 4.5.2	Emission sources from refurbishment (O&M)	The Scoping Report seeks to scope out assessment of emissions from these sources during the O&M phase, because the development is unlikely to undergo refurbishment during its operational lifetime. The Inspectorate agrees that emissions from refurbishment activities would likely be minimal and are unlikely to lead to significant effects. On this basis the Inspectorate agrees that this matter can be scoped out of further assessment.
325.6	Table 4.5.2	Emission sources from energy-use, water use and other processes (O&M)	The Scoping Report seeks to scope out an assessment of emissions from these sources during the O&M phase because energy and water requirements, and emissions from other operation processes are likely to be minimal at this stage of the process. Furthermore, energy will be sourced by the development's own electricity generation. Whilst the Inspectorate is content to scope this matter out of further assessment, it is not clear what is meant by emissions "from other processes". This should be defined within the ES and where it may result in likely significant effects, this should be assessed.
325.7	Table 4.5.2	Emission sources from the user's utilisation of infrastructure (O&M)	The Scoping Report seeks to scope out an assessment of emissions from end-user's utilisation of infrastructure during the O&M phase because the end-users would not directly interact with the infrastructure. It is also not considered relevant to assess downstream emissions from the end uses of electricity because the operational GHG intensity of renewable energy is zero. The Inspectorate consider that it is beyond the ability of the ES to meaningfully assess how renewable electricity generated by the proposed development will be used by end users, and therefore what downstream GHGs may be emitted as a consequence. The Inspectorate therefore agrees with this approach and these matters may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
325.8	n/a	n/a	n/a

3.26 Major Accidents and Disasters

(Scoping Report Section 4.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
326.1	Section 4.6 and paragraph 1669	Major accidents and disasters	The Scoping Report proposes to scope out a standalone major accidents and disasters aspect chapter on the basis that potential accident risks would be appropriately addressed through topic-specific risk assessments within the relevant technical sections of the ES. Paragraph 1668 details the technical sections of the ES which would address any potential accidents, risks and topic-specific risk assessments. The Inspectorate has considered this approach and agrees that a standalone chapter is not necessary on the basis that the information relating to major accidents and disasters will be provided elsewhere in the ES. Each ES chapter should clearly state where it has considered major accidents and disasters within the relevant technical assessments. The Inspectorate would expect an overarching section in the ES which explains how potential impacts have been identified and where in the ES the assessment of their effects is presented.

ID	Ref	Description	Inspectorate's comments
326.2	n/a	n/a	n/a

APPENDIX 1: STATUTORY BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED STATUTORY BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Welsh Ministers	Welsh Government
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Kidwelly Town Council
	Llanddarog Community Council
	Llanelli Rural Council
	Llangyndeyrn Community Council
	Trimsaran Community Council
	Pontyberem Community Council
	Manorbier Community Council
	Carew Community Council
	Jeffreyston Community Council
	Kilgetty/Begelly Community Council
	Amroth Community Council
	Tenby Town Council
	Angle Community Council
	Stackpole and Castlemartin Community Council
	Lampeter Velfrey Community Council
	Clunderwen Community Council
	Crymych Community Council
	Hundleton Community Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Pembroke Town Council
	Lamphey Community Council
	Pembroke Dock Town Council
	Cosheston Community Council
	Martletwy Community Council
	Penally Community Council
	St. Florence Community Council
	Templeton Community Council
	Llawhaden Community Council
	Narberth Town Council
	Llanddewi Velfrey Community Council
	St. Mary Out Liberty Community Council
	East Williamston Community Council
	Saundersfoot Community Council
	Cynwyl Elfed Community Council
	Eglwyscummin Community Council
	Llanddowror and Llanmiloe Community Council
	Pembrey and Burry Port Town Council
	Llansteffan and Llanybri Community Council
	St. Clears Town Council
	Llangynog Community Council
	St Ishmaels Community Council
	Llandyfaelog Community Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Carmarthen Town Council
	Llangunnor Community Council
	Llanarthne Community Council
	Llanboidy Community Council
	Cilymaenllwyd Community Council
	Llanwinio Community Council
	Meidrim Community Council
	Trelech a'r Betws Community Council
	Newchurch and Merthyr Community Council
	Abernant Community Council
	Pendine Community Council
	Henllanfallteg Community Council
	Llangynin Community Council
	Laugharne Township Community Council
	Llangain Community Council
	Bronwydd Community Council
	Abergwili Community Council
	Whitland Town Council
	Burton Community Council
Natural Resources Wales	Natural Resources Wales
Natural England	Natural England
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England

SCHEDULE 1 DESCRIPTION	ORGANISATION
Royal Commission on Ancient and Historical Monuments of Wales	Royal Commission on Ancient and Historical Monuments of Wales
The Joint Nature Conservation Committee	Joint Nature Conservation Committee
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
Trinity House	Trinity House
The relevant Highways Authority	Pembrokeshire County Council
	Carmarthenshire County Council
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The National Health Service Trusts (Wales)	Public Health Wales NHS Trust
The National Health Service Trusts (Wales)	Welsh Ambulance Services University NHS Trust
The National Health Service Trusts (Wales)	Velindre University NHS Trust
The relevant local health board (Wales)	Swansea Bay University Health Board
	Hywel Dda University Health Board
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	South Wales Police
The relevant police authority	Dyfed-Powys Police
The relevant fire and rescue authority	Mid and West Wales Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant NHS Trust	Public Health Wales NHS Trust
	Welsh Ambulance Services University NHS Trust
	Velindre University NHS Trust
The relevant local health board (Wales)	Swansea Bay University Health Board
	Hywel Dda University Health Board
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Dock and Harbour authority	Trust Port of Saundersfoot
	Pembrokeshire County Council
	Carmarthenshire County Council
Lighthouse	Trinity House
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	Natural Resources Wales
The relevant water and sewage undertaker	Dwr Cymru (Welsh Water)
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	CNG Services Ltd
	Energy Assets Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Blue Gem Wind Ltd
	Vattenfall Wind Power Limited
	Llyr Floating Wind Limited
	White Cross Offshore Windfarm Limited
The relevant electricity distributor with CPO Powers	E.ON UK Network Assets Ltd
	National Grid Electricity Distribution (South Wales) Limited
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited

STATUTORY UNDERTAKER	ORGANISATION
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Grid Line Power Networks
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Cyngor Sir Gâr - Carmarthenshire County Council
Cyngor Sir Penfro - Pembrokeshire County Council
Cyngor Sir Ceredigion - Ceredigion County Council
Cyngor Sir Powys - Powys County Council
Cyngor Castell-nedd Port Talbot - Neath Port Talbot Council
Cyngor Abertawe - Swansea Council
Arfordir Penfro / Pembrokeshire Coast National Park
Bannau Brycheiniog / Brecon Beacons National Park

TABLE A4: THE MARINE MANAGEMENT ORGANISATION

Section 42(1)(a) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 42(2).

ORGANISATION
The Marine Management Organisation

TABLE A5: NON-PRESCRIBED STATUTORY BODIES

ORGANISATION
Cadw
Welsh Language Commissioner
Trafnidiaeth Canolbarth Cymru
Royal National Lifeboat Institution
Devon County Council
Torridge District Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

STATUTORY BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Blue Gem Wind Ltd
Devon County Council
Dwr Cymru Welsh Water
Fulcrum Pipelines Limited
Health and Safety Executive
Historic England
Joint Nature Conservation Committee (JNCC)
Llangyndeayrn Community Council
Marine Management Organisation (MMO)
Maritime and Coastguard Agency (MCA)
Ministry of Defence (MoD)
National Gas Transmission
National Grid Electricity Transmission
NATS Safeguarding
Natural England
Natural Resource Wales
Neath Port Talbot County Borough Council
Network Railway Infrastructure Limited
Pembrokeshire County Council
Royal Commission on Ancient and Historical Monuments of Wales
Sphere Energy Connect
The Coal Authority
Torridge District Council
Trinity House

UK Health Security Agency
Velindre University NHS Trust
Welsh Government

From: [REDACTED]@bluegemwind.com>

Sent: 17 July 2026 10:05

To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>

Cc: [REDACTED]@bluegemwind.com>

Subject: Ref: EN0110036 Gwynt Glas EIA Scoping Opinion Consultation - Blue Gem Wind Ltd Response

You don't often get email from [REDACTED]@bluegemwind.com. [Learn why this is important](#)

Dear [REDACTED],

Thanks for consulting Blue Gem Wind Ltd as part of the Gwynt Glas EIA Scoping Opinion consultation. Please accept this as confirmation that we have no comments to make.

Cofion,

[REDACTED]



[REDACTED] [REDACTED]@bluegemwind.com

Consenting Manager

Mob : [REDACTED]

Bridge Innovation Centre, Pembrokeshire Science and Technology Park, Pembroke Dock, Wales, SA72 6UN

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From: [REDACTED]@devon.gov.uk>
Sent: 06 July 2026 12:33
To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>
Subject: RE: EN0110036 - Gwynt Glas Offshore Wind Farm - EIA Scoping and Consultation

You don't often get email from [REDACTED]@devon.gov.uk. [Learn why this is important](#)

Dear [REDACTED]

Thank you for notifying Devon County Council of the above project.

The County Council does not have any comments on the proposal, other than ensuring the appropriate consultation takes place with North Devon UNESCO Biosphere – this designated area may extend into the Offshore Export Cable Scoping Boundary.

The applicant may also wish to consider consultation with the North Devon Fisherman's Association and the Landmark Trust in respect of Lundy.

Thanks,

[REDACTED]

[REDACTED] [REDACTED]

Planning Development Manager

Climate Change, Environment and Transport
Devon County Council
Room 120, County Hall, Exeter, EX2 4QD

Tel. [REDACTED]

Email: [REDACTED]@devon.gov.uk

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The Planning Inspectorate

Date: 13/07/2026
Our Ref: PPA0010216

Dear Sir/Madam

Grid Ref: 228126 208816

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Gwynt Glas Offshore Wind Farm Limited (the applicant) for an Order granting Development Consent for the Gwynt Glas Offshore Wind Farm (the proposed development)

We welcome the opportunity to comment on the above proposal and would offer the following standing advice which should be taken into account within any future application:

This site is likely to be crossed by public sewers and watermain. In accordance with the Water Industry Act 1991, Dŵr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. No part of any building will be permitted within the protection zones of the public assets. The distance specified for the protection zones is indicative and based on industry standard guidelines, and can be provided upon receipt of detailed site layout plans. However, the depth of the assets will need to be verified on site which may infer a greater protection zone. For completeness, we recommend the developer refer to their title deeds to confirm if there are any covenants or restrictions associated with the asset(s) crossing the proposed development site.

Our strong recommendation is that your site layout takes into account the location of the assets crossing the site and should be referred to in any master-planning exercises or site layout plans submitted as part of any subsequent planning application. Further information regarding Asset Protection is provided in the attached Advice & Guidance note.

We trust that you'll find our comments of assistance for the purposes of this EIA scoping opinion, and we respectfully reserve the right to comment further on any matters and issues arising from ongoing and future consultation. We look forward to continuing our engagement on the project prior to and during the submission of an application to the Planning Inspectorate.

If you have any questions about the above response, please contact [REDACTED] who is the Development Planning Officer for Carmarthenshire at developer.services@dwrcymru.com or on 0800 917 2652. They will be happy to assist you further.

Please quote our reference number in all communications and correspondence.

Yours faithfully,

[REDACTED]
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.

From: FPL - Conx Request <ConnectionRequest@fulcrum.co.uk>
Sent: 30 June 2026 08:33
To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>
Subject: RE: EN0110036 - Gwynt Glas Offshore Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Good Morning

We can confirm Fulcrum Pipelines Limited do not have any existing pipes or equipment on or around the above site address.

Please note that other gas transporters may have plant in the area which could be affected by your proposed works.

We will always make every effort to help you where we can, but Fulcrum Pipelines Limited will not be held responsible for any incident or accident arising from the use of the information associated with this search. The details provided are given in good faith, but no liability whatsoever can be accepted in respect thereof.

If you need any help or information simply contact Fulcrum on 03330 146 455.

In case of an emergency please phone 0800 111 999.

Kind regards,



FPL - Conx Request

e: ConnectionRequest@fulcrum.co.uk | w: www.fulcrum.co.uk

a Fulcr ,4 Europa ,Sheffield Busine ,Sheffi ,S9 1 ,T: 03330 14
: um Court ss Park eld XE 6 466

Tell us how we're doing:

We'd really appreciate feedback on your experience with us today. So, please tell us how we're doing by emailing feedback@fulcrum.co.uk

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email - gwyntglas@planninginspectorate.gov.uk

Dear [REDACTED]

Date: 13 July 2026

**PROPOSED GWYNT GLAS OFFSHORE WIND FARM (the project)
PROPOSAL BY GWYNT GLAS OFFSHORE WIND FARM LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 26 June 2026 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

CEMHD5 Contribution to Consultation:

1. With reference to the redlined ***Onshore Scoping Boundary*** shown on ***Figure 1.1.1 Location of the Gwynt Glas Offshore Wind Farm*** [[https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110036-000004- Gwynt%20Glas%20OWF%20EIA%20Scoping%20Report%20\(Part%201%20of%203\).pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110036-000004- Gwynt%20Glas%20OWF%20EIA%20Scoping%20Report%20(Part%201%20of%203).pdf)] sections of the proposed development fall within HSE public safety consultation zones associated with a number of Major Accident Hazard Pipeline(s) and Major Accident Hazard Installation(s).
2. It would appear that the location of Control Room(s), Construction Compound(s) and the like are yet to be fixed, consequently HSE is currently not in a position to provide an indication of its' statutory Land Use Planning advice. However, as a general point HSE will not advise against a proposed development, providing the proposed development does not introduce populations, either permanent or temporary, into any of HSE's public safety consultation zones which are assigned to individual Major Accident Hazard Installation(s) and/or Major Accident Hazard Pipeline(s). For more information, please refer to HSE's Land Use Planning Methodology, which can be found at <https://www.hse.gov.uk/landuseplanning/methodology.htm>
3. Please note if at any time a new Major Accident Hazard Pipeline, is introduced or existing Pipeline(s) are modified prior to the determination of a future application, then the HSE reserves the right to revise its advice.
4. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

5. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in both The Planning (Hazardous Substances) Regulations 2015.
6. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Explosives Inspectorate response:

The scoping boundary presented within the documentation passes through an explosive licenced site, although this is not clear from the plans provided, nor is the location of any onshore infrastructure identified.

It is therefore not possible to provide definitive advice on this development. However as a guide HSE would have no comment to make provided that related infrastructure such as electrical substations were located outside Class D separation of the explosive areas or any structure which would meet the definition of a vulnerable building is outside of Class E Separation distances.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

[Redacted Signature]

[Redacted Name]

CEMHD4 NSIP Consultation Team

Privacy Notice details

English

Privacy information

HSE staff will process your data as part of our work primarily for the purpose of inspections and investigations, interventions and assessments in support of law enforcement.

Please see <https://www.hse.gov.uk/help/privacy.htm> for more details.

Welsh

Gwybodaeth preifatrwydd

Bydd staff HSE yn prosesu'ch data fel rhan o'n gwaith yn bennaf at ddiben arolygiadau ac ymchwiliadau, ymyriadau ac asesiadau i gefnogi gorfodi'r gyfraith.

Gweler <https://www.hse.gov.uk/help/privacy.htm> am ragor o fanylion

██████████
Associate EIA Advisor
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

Your Ref: EN0110036

15th July 2026

Dear ██████████,

Gwynt Glas Offshore Wind Farm EIA Scoping Report consultation

We acknowledge receipt of the letter received from Todd Brumwell (Senior Environmental Advisor, Planning Inspectorate), dated 26th June 2026 regarding consultation with us on the EIA Scoping Report prepared by Gwynt Glas Offshore Wind Farm Ltd in support of an Order granting Development Consent under the Planning Act 2008 (as amended).

We have therefore reviewed the Scoping Report (pursuant to the Infrastructure Planning (EIA) Regulations 2017 and the Marine Works (EIA) Regulations 2007 (as amended)) and we understand from paragraph 178, that "...a small section of the Offshore Scoping Boundary extends into English waters." Furthermore (paragraph 812), states that the "...Array Scoping Boundary is located c.56km from the nearest English coastline (Lundy Island)." However, it was noticeable that Figure 1.1.1 which illustrates the proposed scoping boundary did not include the marine planning boundary between Wales and England, which would have been helpful.

In consideration of the limited interaction from this proposed project, as may occur with the historic environment (as defined by the National Policy Statement for Energy EN-1 and the UK Marine Policy Statement) located within English jurisdiction, we defer to our colleagues in Cadw and the Royal Commission on the Ancient and Historic Monuments of Wales for all further advice regarding this EIA Scoping Report and any subsequent Development Consent application.

Yours sincerely,

██████████

Dr ██████████
Head of Marine Planning

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN
United Kingdom

JNCC Reference: OIA-11660
PINS Reference: EN0110036
Date: 23 July 2026

By email: gwyntglas@planninginspectorate.gov.uk

To whom it may concern,

Gwynt Glas Offshore Wind Farm Development Consent Order Application – Gwynt Glas Offshore Wind Farm Limited – Environmental Statement Scoping Opinion (Ref: EN0110036)

Thank you for consulting the Joint Nature Conservation Committee (JNCC) on the Gwynt Glas Offshore Wind Farm Development Environmental Statement Scoping Opinion from Gwynt Glas Offshore Wind Farm Limited (hereafter referred to as the Applicant), which we received on 29 June 2026.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). We have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters and defer to comments provided by Natural Resources Wales Advisory (NRW-A) and Natural England (NE) for aspects relating to inshore waters, where appropriate.

The advice below relates to marine ornithology, marine mammals, and offshore benthic ecology. JNCC understands that the Habitats Regulations Assessment (HRA) and Marine Conservation Zone (MCZ) Assessment were not included in the Regulation 11 Notification. However, both Screening Reports were available on the Planning Inspectorate website and therefore, we have included comments on these documents in our response. The following documents were reviewed in providing this response:

Environmental Impact Statement (Ref: PRJ00101-XRHD-PRJ-COS-REP-000001):

- Section 1: Introduction
 - Section 1.1 – Development Background

- Section 1.2 – The Applicant
- Section 1.3 – Purpose of this Document
- Section 1.4 – Policy and Legislative Context
- Section 1.5 – Development Description
- Section 1.6 – Site Selection
- Section 1.7 – Consultation
- Section 1.8 – EIA Methodology
- Section 2: Offshore
 - Section 2.1 – Marine Geology, Oceanography and Physical Processes including Water Quality
 - Section 2.2 – Benthic Habitat
 - Section 2.3 – Fish and Shellfish Ecology
 - Section 2.4 – Marine Mammals and Marine Turtles
 - Section 2.5 – Offshore Ornithology
- Section 5: Conclusion
 - Section 5.1 – Summary
- Appendix A – Designated Sites for Nature Conservation

Habitat Regulations Assessment (HRA) Screening Report (Ref: PRJ00101-XRHD-PLN-COS-REP-000027):

- Section 1: Introduction
 - Section 1.1 – Development Background
 - Section 1.2 – Need for the Development
 - Section 1.3 – Development Infrastructure Overview
 - Section 1.4 – Purpose of this Document
- Section 2: Habitats Regulations Assessment
 - Section 2.1 – Legislative Framework
 - Section 2.2 – HRA Stages
- Section 3: A Review of the Existing HRAs
 - Section 3.1 – Overview
 - Section 3.2 – Summary
- Section 4: Consideration of In-Combination Effects
- Section 5: Conclusion
- Appendix A: Screening of European Sites

Marine Conservation Zone (MCZ) Screening Assessment (Ref: PRJ00101-XRHD-PLN-COS-REP-000028):

- Section 1: Introduction
 - Section 1.1 – Development Background
 - Section 1.2 – Need for the Development
 - Section 1.3 – Development Infrastructure Overview
 - Section 1.4 – Purpose of this Document
- Section 2: MCZA Screening Methodology
 - Section 2.1 – Legislative Framework

- Section 2.2 – MCZA Stages
- Section 2.3 – Cumulative Effects
- Section 3: Is the Activity Within or Near to an MCZ?
- Section 4: Screening of Impacts on Protected Features
 - Section 4.1 – Skomer MCZ
 - Section 4.2 – North-West of Lundy MCZ
 - Section 4.3 – Lundy MCZ
 - Section 4.4 – Bideford to Foreland Point MCZ
- Section 5: Cumulative Effects
- Section 6: Screening Summary

Environmental Impact Assessment Scoping Report

1.1 General Comments

The Gwynt Glas Offshore Wind Farm Development has provided a Scoping Boundary which does not directly overlap with any offshore Marine Protected Areas (MPAs). We defer to our colleagues at NRW and NE for comments on inshore sites with which the Scoping Boundary intersects.

Throughout the EIA Scoping Report, the Applicant has provided numerous supporting Figures which JNCC has found very useful. Given the remit of the Statutory Nature Conservation Bodies (SNCBs) we would like to request that supporting Figures in all future documents associated with this application include the territorial limit that delineates between the various jurisdictions to aid in our provision of advice.

There is no requirement for developers to distinguish between effects occurring in the inshore area (within 12nm), and those occurring within the offshore area (beyond 12nm). Nevertheless, JNCC considers it good practice for project assessments to identify, delineate and present effects occurring within and beyond the 12 nm boundary and will generally request this distinction. This distinction enables the nature, extent, magnitude, and significance of impacts that would be experienced in different parts of the marine area to be easily identified. In turn, this assists consultees (including JNCC and other statutory bodies such as NRW) to fulfil their statutory duties by advising competent/public authorities on the nature conservation implications of the proposals in hand when making decisions whether or not to grant consent.

JNCC understand that the final design of the proposed development will be refined following the granting of consent, and the Applicant has used a Project Design Envelope (PDE) approach which defines the maximum extents and characteristics of the development that could realistically be constructed. We recommend that the Applicant provides a clear breakdown of both permanent and temporary disturbance for each individual component of the proposed development, including all infrastructure associated with the Offshore Array and Offshore Export Cable corridor. The area of disturbance for each component should be quantified with supporting calculations, or it should be clearly stated how the values have

been derived. Additionally, when presenting total seabed impacts, we advise that any overlap in activities is accounted for to reduce the risk of double-counting.

We recommend that the Applicant review both the “*Marine cabling activities in Wales: information to support environmental assessments*” guidance developed by NRW, as well as the “*Nature conservation considerations and environmental best practice for subsea cables for English Inshore and UK Offshore waters*” guidance developed by NE and JNCC. These documents will provide more specific guidance for the Offshore Export Cable corridor.

The Applicant has highlighted that each Project Development Area (PDA) within the Leasing Round 5 process was allocated a connection to the onshore electricity network by the National Energy System Operator (NESO). PDA-1 (the Proposed Development) was allocated a connection using HVAC technology to Carmarthenshire. JNCC understand that the offshore export cable is covered by the Holistic Network Design (HND) plan undertaken by the NESO, specifically the PDA-1 to Carmarthenshire cable route. We seek clarity as to why the Applicant has not included the proposed route by NESO in its Scoping Report. If the Applicant is considering alternative routes, JNCC recommend that the transmission operator informs NESO and provides a justification opposed for the route proposed as opposed to that included in the HND in terms of impacts to designated sites. This will help the NESO Plan stay current and demonstrate impacts from the planned development.

We note in Section 1.8.8, paragraph 210 of the Scoping Report the Applicant states that:

“...as-built project parameter information (if available) as opposed to consented parameters to reduce over-precaution (inaccuracies) in the CEA [Cumulative Effects Assessment]”

We strongly advise that the consented parameters be used to inform the CEA. There is uncertainty regarding whether the as-built parameters of Offshore Wind Farms are legally secured, and hence whether future works may result in a greater impact. Therefore, we consider that the consented parameters provide an appropriate level of precaution.

1.1.1 Offshore Wind Environmental Standards (OWES)

In line with Section 2.8.83 of the National Policy Statement for Renewable Energy (EN-3), Defra is soon to publish Offshore Wind Environmental Standards (OWES) specifically for Leasing Round 5. JNCC, Natural England and Natural Resources Wales have all contributed to the development of the OWES through membership of the project steering group and technical input to the standards.

There are seven Offshore Wind Environmental Standards coming into effect during the lifespan of this project, six of which (1-5 and 7) fall within JNCC’s remit and include:

OWES 1 – Export cable burial to reduce electromagnetic field (EMF) effects on sensitive species.

OWES 2 – Adoption of Vessel Traffic Management Plans to avoid disturbance to seabirds and marine mammals in sensitive or higher-density areas.

- OWES 3** – Avoidance of excess lighting to protect seabirds, whilst ensuring compliance with aviation and navigation regulatory requirements.
- OWES 4** – Adherence to published SNCB and Regulator best practice advice.
- OWES 5** – Use of NE's Offshore Wind Seabird Assessment Tool (OWSAT) to support the developer's Preliminary Environmental Information Reports (PEIRs) during pre-application, and final submissions at application.
- OWES 6** – Agreement of an Archaeological Written Scheme of Investigation (WSI) with NRW (in consultation with Royal Commission on the Ancient and Historical Monuments of Wales, RCAHMW, and Cadw) in Welsh waters and the Marine Management Organisation (MMO, in consultation with Historic England) in English waters, and a commitment to submitting all heritage information to the Marine Data Exchange (MDE) according to the timetable set out in the WSI.
- OWES 7** – Following a benthic impact framework for cable routing, avoiding sensitive areas or mitigating impacts to benthic habitats where avoidance is not possible.

As well as these OWES measures, Defra is planning on promoting **three further Best Practice Measures (BPM)** to complement the OWES measures. These measures reflect additional desirable best practice mitigation approaches and are strongly encouraged for adoption by Leasing Round 5 developers but are not mandatory.

- BPM 1** – To regularly monitor mooring lines and inter-array cables for any entanglement of marine species and entanglement risks, and to remove any entanglement risks identified, such as marine debris and derelict fishing gear.
- BPM 2** – Minimum turbine air gap of 25m to reduce seabird collisions.
- BPM 3** – Adoption of Site Integrity Plans (SIP) for array areas within 20km of the Bristol Channel Approaches/Dynesfeydd Môr Hafren Special Areas of Conservation (SAC) to protect harbour porpoise from underwater noise.

JNCC has contributed to the development of the OWES through the Defra-led programme and considers that their implementation has the potential to reduce environmental impacts and promote greater consistency in offshore wind development. In line with EN-3, JNCC expect Applicants to adopt all OWES measures into their project design and detail how their application complies with the OWES guidance in any documentation submitted as part of the application. Whilst the BPM are not mandatory, JNCC will continue to advise that they are adopted as mitigation measures as they will be an important step in reducing environmental impact and provide valuable data to support EIA assessments.

JNCC acknowledges that the OWES guidance is not yet published and so cannot be considered by the Applicant at this time. However, we recommend that OWES measures are considered fully and referenced in all documentation moving forward. Gwynt Glas have been involved in the development of the OWES through stakeholder engagement with Defra and have had the opportunity to shape the OWES during multiple consultations, therefore we hope they are amenable to adopting the OWES measures (and BPM) into their project.

1.2 Benthic ecology (offshore) comments

Do you agree with the proposed Benthic Habitat Study Area and that it is sufficient to capture the relevant impacts?

We note that the Benthic Habitat Study Area is informed by the Zone of Influence defined in Section 2.1 Marine Geology, Oceanography and Physical Processes including Water Quality. This includes the Offshore Scoping Boundary with a buffer of 15km, based on the maximum tidal excursion. JNCC agrees that this is appropriate for benthic subtidal ecology. We defer to our colleagues at NRW for comments on the Study Area for the intertidal component.

Do you agree with the characterisation of the baseline environment?

We agree with the characterisation of the baseline environment for subtidal Benthic Ecology. Should the Applicant identify features of conservation interest during the surveys which will be used to inform future submissions, we advise that these should be highlighted and consideration given to micro-siting around these features where appropriate.

In relation to environmental DNA (eDNA) surveys (page 105, Table 2.2.4), there is still a lot of research and development ongoing and required to support the application of eDNA methods in offshore benthic habitats, including how presence/absence can be used to assess meaningful change when it does not necessarily equate to abundance data, and how feasible it is to attribute presence to a specific location, as opposed to being swept into a site. Different collection approaches may also be required to ensure full representation from the water column, the seabed and within the seabed sediments.

Have all the relevant data sources been identified in the Scoping Report?

JNCC acknowledge that the Scoping Boundary and ZOI does not overlap with any offshore designated sites for benthic subtidal ecology. However, we advise that for inshore sites, site-specific data may be available via the NRW and NE websites and these may be used as an evidence base layer over any broadscale distribution modelling.

We also recommend using the JNCC Marine Pressures-Activity Database (PAD), to help establish potential environmental impacts. The database, and supporting documents, are available for download via our website: <https://jncc.gov.uk/resources/97447f16-9f38-49ff-a3af-56d437fd1951>.

We note the use of EUSeaMap 2023 but would like to flag that a more recent publication is available for UKSeaMap 2026.

Further data can also be sourced from Marine Recorder Online which can be accessed at <https://jncc.gov.uk/our-work/marine-recorder-online>.

Have all the potential impacts resulting from the Development been identified in the Scoping Report?

All the potential impacts resulting from the Development have been identified in the Scoping Report.

Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?

JNCC defer to our colleagues at NRW and NE for comments regarding impacts within territorial waters.

We agree with the majority of elements which have been scoped into the assessment for Benthic Habitats. However, we do not support the exclusion of “permanent habitat loss” during the construction and decommissioning phases of the proposed development. JNCC are of the view that this impact pathway should be scoped into the construction phase. The deposition of any anchors associated with infrastructure, innovative deepwater solutions, and any required scour protection or cable protection for export cables would be expected to be deployed at the construction phase of the project. Where such activities result in permanent habitat loss of a feature, the impact would be permanent in nature. As such, JNCC considers it appropriate to assess this at the construction stage. Permanent habitat loss should also be scoped in at the decommissioning phase to account for any remediation works (for example at cable cut ends).

We do not agree with scoping out “introduction of marine INNS” from the O&M phase. Studies in the North Sea have shown that infrastructure can act as a stepping stone for invasive non-native species (INNS) and we therefore consider it appropriate to be scoped in for O&M.

We do not agree with scoping out “colonisation of introduced substrate” from the decommissioning phase for the same reasoning as for scoping in permanent habitat loss at decommissioning.

In addition to the above, impacts which we consider to be missing from the Construction and Decommissioning phases include:

- Introduction of artificial structures
- Long term habitat loss/habitat alteration
- Temporary habitat loss/disturbance

In addition to the above, impacts which we consider to be missing from the O&M phase include:

- Changes in physical processes
- Introduction of artificial structures
- Long term habitat loss/habitat alteration
- Temporary habitat loss/disturbance

Do you agree with the approach to the assessment?

We agree with the approach to the assessment. We note that the Applicant has stated that a separate Marine Licence will be applied for Unexploded Ordnance (UXO) investigation and clearance but has been considered in the Scoping Report for completeness. As for all other impacts associated with the development, we request that the Applicant assess a worst-case scenario for benthic impacts from UXO clearance to ensure that all impacts are appropriately considered.

Comments on specific sections

Page 45, Section 1.5.7, paragraph 132

The recently published guidelines by Offshore Energies UK (OEUK, 2024) for 'Designing for Decommissioning of Offshore Wind' states that:

"Assets should be designed to be decommissioned with a technology available at the time of commissioning"

The Examining Authority for Five Estuaries Offshore Wind Farm Limited ([project EN010115](#)) has requested from the Applicant that:

"Decommissioning is required to be assessed in order that the Examining Authority (ExA) and Secretary of State can have regard to the likely significant effects of the whole project over its lifecycle in making a recommendation and determination."

This is in-line with 'The Decommissioning of Offshore Renewable Energy Installations under the Energy Act 2004: Guidance notes for industry' (2019)¹ for England and Wales which sets out that, at the end of a wind farm's operational life, all infrastructure is expected to be fully removed. This can be achieved by following the OEUK 'Designing for Decommissioning of Offshore Wind' guidelines and assessing decommissioning of all infrastructure based on available technologies now and not in the future. JNCC consider that without assessing decommissioning now, it is not possible to determine the likely significant effects of the project as a whole for the offshore environment.

In addition, the RenewableUK 2025 report, 'Developing effective end-of-life policy frameworks for UK offshore wind', states that:

"The removal of all offshore wind farm installations and structures remains technically challenging. For example, proven, commercially available technologies do not yet exist for full monopile foundation removal. Most potential solutions are at an early technology readiness level and need extensive testing before they can be used for largescale offshore projects in varying ground conditions of offshore wind farms."

¹ www.gov.uk/government/publications/decommissioning-offshore-renewable-energy-installations

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, Natural Resources Wales, Natural England and NatureScot. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems.

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Registered Office: JNCC, Monkstone House, City Road, Peterborough, PE1 1JY, UK.

We take this opportunity to reinforce with the Applicant the need to assess all decommissioning activities on current technology and not solely at the time of decommissioning.

Page 164, Table 1.8.2

Within the 'Application of suitable installation methodology' embedded mitigation it states that:

“Application of installation techniques using methods and equipment to minimise sediment suspension.”

JNCC welcomes the minimisation of suspended sediment but questions why the minimisation of benthic impacts is not also considered.

1.3 Marine mammal comments

Do you agree with the proposed Marine Mammals and Marine Turtles Study Area and that it is sufficient to capture the relevant impacts?

JNCC agree with the proposed marine mammals and marine turtles study area and consider it sufficient to capture relevant impacts. Our advice relates to the offshore as this is JNCC's remit, we defer to both inshore agencies, NRW and NE, for matters relating to territorial waters, including potential impacts to inshore MPAs for seals, otters, and bottlenose dolphins.

Do you agree with the characterisation of the baseline environment?

JNCC agree that all relevant species and associated Marine Mammal Management Units (MMUs) have been considered for the assessment. We note the Applicant's decision to provide a qualitative assessment for fin whales as population estimates for this species are not currently known within the proposed project area.

Have all the relevant data sources been identified in the Scoping Report?

JNCC are content with the data sources provided by the Applicant and would expect any additional sources to be included if available prior to the assessment. While we are aware of the surveys completed by The Crown Estate for Licensing Round 5, these have not been made available to NRW-A or JNCC, so we are unable to provide comment on any outputs at this stage. JNCC would welcome any engagement with the Applicant when finalising their site-specific survey methods ahead of their commencement in 2027.

Have all the potential impacts resulting from the Development been identified in the Scoping Report?

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, Natural Resources Wales, Natural England and NatureScot. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems.

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Registered Office: JNCC, Monkstone House,
City Road, Peterborough, PE1 1JY, UK.

In addition to the potential impacts identified, JNCC advise that primary and tertiary entanglement risk are considered within the assessment. While we acknowledge that the focus should be on secondary entanglement risk, we recommend that these other two aspects are considered and presented within the Environmental Impact Assessment (EIA). Primary entanglement is the physical wrapping or hooking of an animal on the mooring lines or cables of Floating Offshore Wind (FLOW) infrastructure. Tertiary entanglement refers to an animal traveling through the site with discarded fishing gear or marine debris attached to their body that causes entanglement to FLOW infrastructure. A recent NE report published in 2024 provides further information to understand that impact further (Genesis 2024).

Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?

Construction phase

JNCC agree with all impacts scoped in and scoped out of the assessment for the construction phase except the decision to scope out changes in water quality and entanglement. We are increasingly concerned with the potential for heavy metals and Persistent Organic Pollutants (POPs) like Polychlorinated Biphenyls (PCBs); and emerging pollutants such as PFAS (poly- and perfluoroalkyl substances) being re-released into the marine environment during offshore construction, especially piling and cable laying. Samples from stranded individuals around the UK confirms that these hazardous substances are widespread in cetaceans, with varying degrees of exposure among species and location. The risk to marine mammals from these substances is chronic, however there are challenges in quantifying the effects and how this is reflected within wider populations. The [UK Cetacean Strategy](#) discusses these hazardous substances under recommendation two and we therefore recommend that Applicants are assessing this impact. We recommend this is also assessed, both as a direct impact to marine mammal species as well as secondary risks to prey species.

JNCC consider the risk of entanglement to begin as soon as the first FLOW turbines and associated infrastructure are installed. We therefore strongly advise that this impact is assessed within the construction phase as well as operational. Please see our comments below for the operation and maintenance (O&M) in relation to entanglement risk.

O&M phase

JNCC agree with the impacts scoped in for the operation and maintenance phases of the project. We welcome the inclusion of secondary entanglement but highlight our comments above in relation to primary and tertiary entanglement being scoped into the assessment.

JNCC disagree with the Applicant's decision to scope out effects from Electro-Magnetic Fields (EMFs). We acknowledge that historically EMF has been screened out of EIA for marine mammals as their ability to detect electric fields has been uncertain and it is assumed any potential impacts are mitigated by burying the cables. However, recent evidence suggests that bottlenose dolphins and harbour porpoise can detect such fields (e.g. Nature,

2023; Teilmann *et al.*, 2022; Vattenfall, 2026) and has resulted in the launch of a new project to investigate this further (EMPACT – TGS, 2024; [Energies Media, 2024](#)). In addition, floating wind farms will require power cables within the water column and the potential impacts from these floating sections of cable are unknown. Depending on the outcomes of this assessment, additional mitigation may be required, for example, design options which would better shield infrastructure within the water column. We also suggest that the Applicant considers emerging work from the [Floating Offshore Wind Environmental Response to Stressors \(FLOWERS\)](#) project recently published by Cefas (2026), particularly the report on EMF (Gill *et al.*, 2025).

We also disagree with the decision to scope out auditory injury from underwater noise during the O&M phase and direct the Applicant to the on-going work of the [Floating Offshore Wind Operational Underwater Noise Monitoring and Mitigation](#) (FLOWN-MIT) project funded by the Offshore Wind Evidence and Change (OWEC) Programme. Evidence from this work indicates that there are operational underwater noise impacts to marine mammals from operational FLOW infrastructure, particularly disturbance, barriers to species movement from underwater noise and potentially auditory injury (Risch *et al.*, 2026). Changes to water quality should also be scoped in for the O&M phase as disturbance to seabed from mooring lines and cables could re-suspend hazardous substances into the water column. Please refer to our comments above regarding the impacts of hazardous substances to marine mammals.

Finally, we advise that barriers to species movement from the physical presence of the project should be scoped into the assessment. As this project will install up to 118 FLOW turbines near a harbour porpoise SAC, this could present a barrier to this species, preventing them from accessing this important habitat. While no cases of entanglement or barriers have been reported from FLOW projects to date, the bathymetric, hydrodynamic and geomorphological characteristics of the Bristol Channel introduces different elements not comparable with existing FLOW projects. Currently there are two FLOW projects in Scotland, however, these are positioned in open water along straight stretches of coastline. The Bristol Channel on the other hand is a funnel with strong tidal flows in and out of the area. Marine mammals will have limited options to avoid multiple FLOW developments when approaching the Bristol Channel Approaches SAC. We also advise that this impact is assessed within the CEA.

Decommissioning

JNCC acknowledge this approach and advise that our recommendations for the construction phase are considered for decommissioning.

CEA

Please see our advice in relation to the scoping in/out of impacts at the construction and O&M stage. We advise that disturbance due to underwater noise, auditory injury due to underwater noise, effects of EMFs, barriers to species movement from the physical presence of the project, change in prey resource, entanglement (secondary and tertiary), and changes to water quality should all be included within the CEA.

Do you agree with the proposed approach to assessment?

We agree with the activities for which underwater noise modelling will be undertaken, including the high-level assessment of UXO clearance, which we note is not to be included in this application as a licenced activity.

We highlight Defra's [Reducing Marine Noise Policy](#) (January 2025), which requires developments in English waters to use best endeavours to apply noise reduction methods when piling. The Welsh Government have also committed to developing a similar policy. Should piling remain within the project design envelope, we highlight that noise modelling for piling will need to be undertaken with and without noise abatement being applied.

We also highlight that JNCC will be publishing recommendations for when undertaking noise assessments for piling and UXO clearance in August, and recommend the Applicant consider these when undertaking their assessment.

We presume JNCC will be a member of the Marine Mammal ETG highlighted in paragraph 440. We welcome this and point the Applicant to our [Discretionary Advice Service](#), to facilitate such consultations.

Mitigation

JNCC note the embedded mitigation measures presented within Table 1.8.2 (Section 1.8 of the EIA Methodology) for marine mammals and marine turtles. We acknowledge a draft Marine Mammal Mitigation Plan (MMMP) will be designed in consultation with stakeholders, including SNCBs.

The proposed draft MMMP focuses only on mitigation for auditory injury and makes no reference to how the project will address the risk of entanglement from FLOW infrastructure during the lifetime of the project. Section 2.4.6.472 of the marine mammal assessment provides no consideration of potential monitoring options to manage and mitigate entanglement risk. As one of the key risks identified for FLOW projects, and with this project potentially installing 118 turbines, we highlight this may be required and strongly advise early engagement with SNCBs to discuss the project's plans to address this issue.

In addition, Table 1.8.2 does not indicate how the project will address the risk of collision with project vessels. We recommend this is outlined within a Vessel Management Plan (VMP) but encourage cross-reference with the MMMP for completeness. Currently Table 1.8.2 lists an outline VMP but does not indicate that this will address marine mammal risks as a relevant topic.

OWEKH Evidence Review Notes (ERNs)

Section 1.8.183 (page 58) of the EIA Methodology states that:

"This principle was first articulated in Institute of Sustainability and Environmental Professionals (ISEP's)5 (2025) Delivering Proportionate EIA strategy and

reaffirmed through initiatives like the Offshore Wind Evidence and Knowledge Hub (OWEKH), which promotes standardised scoping and evidence sharing to streamline assessments while maintaining environmental integrity. OWEKH has cross-governmental support from all UK administrations.”

JNCC and other SNCBs are listed as consultees/attendees of OWEKH noise meetings and understand that the ERN for underwater noise is not yet finalised. We highlight that JNCC will not be formally endorsing the OWEKH ERNs. Therefore, we do not agree with this statement being included in the EIA methodology.

1.4 Marine ornithology comments

Do you agree with the proposed Offshore Ornithology Study Area and that it is sufficient to capture the relevant impacts?

We agree with the majority of the proposed Offshore Ornithology Study Area and that it is sufficient to capture the relevant impacts, with the exception of the non-breeding season region for common guillemot and herring gull, and the breeding season region.

It is recognised that Biologically Defined Minimum Population Scale (BDMPS) could be updated using tracking study data such as that presented in Buckingham *et al.*, (2022), and Natural England conducted a review (Johnston *et al.*, 2025) ‘*to inform methodological refinements and identify contemporary sources of data for use in an update*’. This review included common guillemot as a case study and concluded that a divide beyond east and west waters is likely inappropriate at this stage. We therefore advise that the non-breeding season regional Study Area for common guillemot and herring gull are the relevant BDMPS regions.

For the breeding season, the reference population should consider the breeding population located within the relevant regional BDMPS defined in Furness (2015) that the project sits within, as well as non-breeders and immature birds. The population is likely to originate from a much wider range of colonies (not just Special Protection Area (SPA) colonies) and may include young immature birds spending the summer in their wintering area as well as immatures loosely associated with local colonies (Furness, 2015). As there is a lack of evidence to support calculations of the number of juveniles, immatures, and non-breeding birds that remain in their wintering areas into the breeding season, the breeding population should be derived from the relevant BDMPS tables in Appendix A of Furness (2015) by summing the adult and immature population estimates for all colonies that sit within the relevant regional BDMPS.

Do you agree with the characterisation of the baseline environment?

We agree with the characterisation of the baseline environment.

Have all the relevant data sources been identified in the Scoping Report?

Relevant data sources have been identified in the Scoping Report.

Have all the potential impacts resulting from the Development been identified in the Scoping Report?

All the potential impacts resulting from the Development have been identified in the Scoping Report.

Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?

We agree with the majority of the impacts that have been scoped in (or scoped out) of further assessment, with the exception of displacement and barrier effects during the construction and decommissioning stages.

We advise that displacement from turbines and barrier effects during the construction stage is also scoped into the assessment, due to the potential for displacement to begin once the turbines begin being installed. We advise that displacement from turbines during construction is assessed as 50% of the displacement from turbines during operation.

We advise that displacement from turbines and barrier effects during the decommissioning stage is also scoped into the assessment, due to the potential for displacement to continue as the turbines are being removed. We advise that displacement from turbines during decommissioning is assessed as 50% of the displacement from turbines during operation.

Do you agree with the proposed approach to assessment?

We agree with the proposed approach to assessment. We additionally advise that NE's Offshore Wind Seabird Assessment Tool (OWSAT) is used to complete the offshore ornithology assessment. Please contact NE for further details on this tool.

Comments on specific sections

Page 66, Table 1.8.2

Under the mitigation measure "*Minimum blade tip height (air gap)*", the description is "*Minimum blade clearance of 22m above HAT*", however we advise that the recommended blade clearance due to shipping and navigation (as per Marine Guidance Note 654 (Maritime and Coastguard Agency, 2021)) is in relation to Mean High Water Springs (MHWS), not Highest Astronomical Tide (HAT). We also advise that OWES recommends a minimum blade clearance of 25m above MHWS and recommend that this value be used going forward.

Page 75, paragraph 210

In reference to the Applicant's suggestion to "... use as-built project parameter information (if available) as opposed to consented parameters to reduce over-precaution (inaccuracies) in the CEA", we advise that, for offshore ornithology, the consented parameters are used. There are questions over whether or not as-built parameters for many Offshore Wind Farms are legally secured, and hence whether additional turbines could be installed. Therefore, we recommend the consented parameters provided an appropriate level of precaution.

Page 158, paragraph 479

"The exceptions to this are guillemot Uria aalge and herring gull Larus argentatus, which are considered to remain in the broad vicinity of breeding colonies during the non-breeding season (Buckingham et al., 2022; Wernham et al., 2002) and therefore the non-breeding season regional Study Area for these species are considered to be the same as for the breeding season." We advise that the non-breeding season regional Study Area for common guillemot and herring gull are the relevant BDMPS regions as set out above.

Page 162, Table 2.5.1

Note that we advise that breeding season foraging ranges for razorbill and common guillemot are those within Appendix 1 of Woodward *et al.*, (2019) which excludes data from Fair Isle where foraging range may have been unusually high as a result of reduced prey availability during the study year. Therefore, the foraging range to use for razorbill is 73.8km ± 48.4km = 122.2km and for guillemot is 55.5km ± 39.7km = 95.2km. Note that we also advise specific SPA foraging ranges as shown in the table below.

Species	Exception Applied	Value (±SD)	Total foraging range (km)	Metric
Northern gannet	Forth Islands SPA	590	590	Max
Northern gannet	Grassholm SPA	516.7	516.7	Max
Northern gannet	St Kilda SPA	709	709	Max
Common guillemot	All Northern Isle SPAs	73.2 ± 80.5	153.7	Mean Max + SD
Razorbill	All Northern Isle SPAs	88.7 ± 75.9	164.6	Mean Max + SD

Page 164, Table 2.5.2

We advise that seasons for each species of interest should generally be based on the biological defined seasons from Furness (2015), with some adjustments. We advise that the full breeding season from Furness (2015) are used, and then the non-breeding season definitions are adjusted accordingly to ensure no months are considered in two seasons (see

table above). Please see the seasonal definitions provided on OWSAT for the full advised list.

Page 169, Section 2.5.5.1

We advise that displacement from turbines and barrier effects during the construction stage is also scoped into the assessment, due to the potential for displacement to begin once the turbines begin being installed. We advise that displacement from turbines during construction is assessed as 50% of the displacement from turbines during operation.

Page 171, Section 2.5.5.3, and Table 2.5.5

We advise that displacement from turbines and barrier effects during the decommissioning stage is also scoped into the assessment, due to the potential for displacement to continue as the turbines are being removed. We advise that displacement from turbines during decommissioning is assessed as 50% of the displacement from turbines during operation.

Page 171, paragraph 513

It is noted that “...*the Applicant proposes to utilise ‘gap-filling’ data presented by the Mona, Morgan and Morecambe projects in the cumulative assessment, unless more recent data (e.g. from the proposed cumulative effects framework) becomes available*”. JNCC, NE, and NRW are currently working on the CuCombER project (Cumulative and In-combination Estimates Register), which aims to provide a publicly accessible database of mortality estimates from Offshore Wind Farms (OWF), recalculated to be in line with current SNCB advice, including calculating estimates for projects for which quantitative analyses were not undertaken at the time of the assessment. This will be available for use by the Applicant for both cumulative and in-combination assessments.

Page 172, paragraph 515

It is noted that “*The risk of cumulative effects during construction and decommissioning are scoped in on the basis that there is the potential for impacts from PDA 2 and 3 to the south of the Development, to overlap with the Development during these stages*”. However, in the case of disturbance and/or displacement, this impact can occur during construction, operation, and decommissioning. Therefore, we recommend assessment of disturbance and/or displacement during construction and decommissioning of the proposed development cumulatively with the operation of other projects. This also applies the other way around; assessment of disturbance and/or displacement during operation of the proposed development cumulatively with the construction and decommissioning of other projects.

Habitats Regulations Assessment

1.5 Benthic ecology comments

JNCC agree with the 15km Zol assigned to habitats (benthic/supporting habitats) and confirm that no offshore designated sites for benthic features need to be scoped into the assessment.

We note that multiple inshore designated sites have been scoped into the assessment and we defer to comments provided by NRW and NE for comments on these sites.

1.6 Marine mammal comments

We can confirm that the marine mammal sites of interest to JNCC have been scoped in. We highlight that we would expect our comments in relation to the impacts discussed for the EIA scoping report would also be applicable to the impact pathways scoped into the HRA.

When reviewing this document, we assumed the pressures listed within Table 7.1 Outcomes of the screening for each European site, qualifying feature and pressure pathway for the Development (pages 109-110), are to be screened into the HRA. However, we advise that this is clearly stated by the Applicant as it is currently unclear.

We also question why the Applicant has screened in P11 EMF for the HRA but has decided to screen this out of the EIA. As outlined within the above comments, JNCC advise that EMF be included within both assessments.

1.7 Marine ornithology comments

Paragraph 54 and 58, page 13 to 14: We reiterate our comments on the Round 5 plan-level HRA screening. There is a need to ensure that the steps in HRA are not confused. Likely Significant Effects (LSE) screening is a separate and earlier stage to Appropriate Assessment, and whilst these steps need to be followed, they should not be intertwined. We agree that assessments should be reasonable and meaningful, but LSE is a high-level test of the potential for significant effects (without considering any mitigation) and should not entail any detailed or quantitative assessment.

We do not agree with the approach to screening breeding birds in the non-breeding season. Whilst we agree with the use of BDMPS to investigate connectivity during the non-breeding season, the subsequent use of collision and displacement mortality calculation and comparison to baseline mortality of BDMPS populations is a more detailed assessment, the likes of which should be carried out at the Appropriate Assessment stage rather than LSE screening. Where a detailed assessment is undertaken at Appropriate Assessment, this should consider annual impacts apportioned to an SPA against the SPA population, rather than non-breeding season impacts against the BDMPS population. LSE is a coarse screening filter, should be simple, consider the Conservation Objectives of the site, and if further evidence is bought in then this should be as part of the Appropriate Assessment. This provides a transparent approach that can be followed through the Report to Inform Appropriate Assessment. We advise that LSE is concluded where there is both an impact

pathway and connectivity. Connectivity in the non-breeding season can be determined where the contribution of the non-breeding population of an SPA population represents >1% of the BDMPS population. This provides a proportionate and sensible screening approach to reduce the site/species combinations for consideration, while ensuring those that may be at risk are properly considered. Any additional work looking at, for example, apportioning impacts and assessments of predicted impacts against baseline mortality etc., should be included in the Appropriate Assessment.

Similarly, we do not agree with the proposed approach to screening in-combination impacts, i.e. screening out in-combination impacts where the Plan would contribute less than a 0.5% increase in baseline mortality of a qualifying feature. The purpose of an in-combination assessment is to ensure that a plan or project is not considered in isolation where its effects could combine with those of other plans or projects and collectively cause harm to a UK MPA Network site. The underlying principle is that several small effects, each insignificant on their own, may result in a significant cumulative impact when considered together. This helps prevent the gradual degradation of protected sites through multiple consents. We do not consider that having such a high threshold is suitably precautionary and has the potential to screen out in-combination impacts that could be significantly harmful.

Marine Conservation Zone Assessment

1.8 Benthic ecology comments

JNCC agree with the 15km ZOI assigned to habitats (benthic/supporting habitats) and confirm that no offshore designated sites for benthic features need to be scoped into the assessment.

We note that multiple inshore designated sites have been scoped into the assessment and we defer to comments provided by NRW and NE for comments on these sites.

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Please contact me with any questions regarding the above comments.

Yours sincerely,

██████████

Offshore Industries Adviser

Email: ██████████@jncc.gov.uk

Telephone: ██████████

From: [REDACTED] <clerktollangyndeyrncommunitycouncil@hotmail.co.uk>

Sent: 07 July 2026 14:42

To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>

Subject: Re: EN0110036 - Gwynt Glas Offshore Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from clerktollangyndeyrncommunitycouncil@hotmail.co.uk.
[Learn why this is important](#)

Good afternoon,

We note with thanks your email dated 26/06/26. Which was placed before the Council last night.

We would however be grateful to receive further information if and when this becomes available.

Yours faithfully,

[REDACTED]

Clerk to Llangyndeyrn Community Council



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Gwynt Glas Project Case Team
Planning Inspectorate
gwyntglas@planninginspectorate.gov.uk
(Email only)

MMO Reference: ENQ/2026/00094
Planning Inspectorate Reference: EN0110036

21 July 2026

Dear [REDACTED]

1. Planning Act 2008, Gwynt Glas Offshore Wind Farm Limited, Proposed Development Consent Order for Gwynt Glas Offshore Wind Farm

- 1.1. This document comprises the Marine Management Organisation's (MMO) Scoping Opinion response in respect of the above Development Consent Order application (DCO Application).
- 1.2. This is without prejudice to any future representation the MMO may make about the DCO Application throughout the pre-application process. This is also without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

2. The MMO's role in Nationally Significant Infrastructure Projects (NSIPs)

- 2.1. The MMO was established by the Marine and Coastal Access Act 2009 (MCAA 2009) to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.
- 2.2. The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Northern Ireland offshore waters by way of a marine licence. Inshore waters include any area which is submerged at mean high water spring (MHWS) tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.



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- 2.3. In the case of NSIPs, the Planning Act 2008 (the 2008 Act) enables DCOs for projects which affect the marine environment to include provisions which deem marine licences.

As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate users of the sea and any potential impacts on the marine environment from terrestrial works.

- 2.4. Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence (DML) enable the MMO to fulfil these obligations.

- 2.5. Further information on licensable activities can be found on the MMO's website [here](#). Further information on the interaction between the Planning Inspectorate (PINS) and the MMO can be found in our joint advice note 11 Annex B [here](#).

3. The Proposed Development

- 3.1. The Proposed Development comprises the construction, operation and decommissioning of the Gwynt Glas Offshore Wind Farm located approximately 42 kilometres (km) off the southwest coast of Pembrokeshire in the Celtic Sea, with an anticipated capacity of up to 1.5 gigawatts (GW). The Array Scoping Boundary covers approximately 369 square kilometres (km²). The Development would include offshore generating infrastructure and associated transmission assets. It is expected that the grid connection would be made at the proposed Llandyfaelog Substation in Carmarthenshire (to be built by National Grid), requiring the installation of underground export cables between the landfall and the grid connection point.

- 3.2. The Scoping Boundaries are broad areas at this stage of the Development to allow for further analysis of environmental and engineering constraints. The final route will be selected through Applicant engagement with stakeholders and further assessment of options which the MMO will engage in.

4. General Comments

- 4.1. The MMO was first made aware of this DCO Application upon receipt of the Environmental Impact Assessment (EIA) Scoping Opinion consultation of the 2008 Act, Regulation 3 of the Infrastructure Planning Regulations 2009, and Regulations 11 and 13 of the Infrastructure Planning (Environmental Impacts Assessment) Regulation 17' (the 2017 Regulations) on 26 June 2026.
- 4.2. The MMO has powers under the Infrastructure Planning (Fees) Regulations 2010 (as amended) to charge for its services in relation to any advice, information or other assistance (including a response to a consultation) provided in connection with:



- an application or proposed application, for an order granting development consent, and
- an application/proposed application to make a change to, or revoke, such an order, and
- any other prescribed matter relating to NSIPs, including both statutory and non-statutory work.

4.3. Gwynt Glas Offshore Wind Farm Limited submitted an 'enquiry' on our online Marine Case Management System (MCMS) on 28 May 2026 and a fee estimate was sent by the MMO on 3 June 2026. This is to allow the MMO to review the Scoping Report documents, which may include scientific advice from the Centre for Environment, Fisheries and Aquaculture Science (Cefas), and to provide formal advice on potential marine licence requirements under the MCAA 2009. That estimate must be accepted before the MMO is able to proceed with any review. The MMO notes that the fee estimate for the submitted enquiry was accepted on 10 July 2026 which unfortunately did not give the MMO enough time to review the Scoping Report and provide a suitable Scoping Opinion to PINS.

4.4. A generic high level scoping opinion often applied to large scale projects is attached to this letter in Annex 1. There is a risk that without formal advice from the MMO, the project is at potential risk of enforcement action should it proceed with activities within MMO jurisdiction (the marine environment in English waters) without the appropriate approvals.

4.5. It is the Applicant's responsibility to identify any marine licensable activities that will be undertaken and to apply for a deemed Marine Licence as part of this DCO Application.

4.6. The MMO requests further engagement on this matter at your earliest convenience. The MMO reserves the right to make further comments on the project throughout the DCO process and may modify its present advice or opinion in view of any additional information that may come to our attention. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development. If you require any further information, please do not hesitate to contact me using the details provided below.





[Redacted]

Marine Licensing Case Manager

D [Redacted]

E [Redacted] [@marinemangement.org.uk](mailto:[Redacted]@marinemangement.org.uk)



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Annex 1 - Marine Licensing, Wildlife Licences and other permissions

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Marine Licensing Works

Activities taking place below the mean high-water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Should a deemed marine licence be included within the NSIP then this should be clearly set out and assessed.

Environmental Impact Assessment

The topics the MMO can provide advice on are:

- Coastal/Marine Processes
- Dredge, disposals, sediment survey requirements and chemical use
- Benthic ecology
- Fisheries ecology
- Shellfish ecology
- Underwater Noise

Marine Planning

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. The Secretary of State will have to take this into account as part of the process and if the project is within a Marine Plan area this should be fully assessed in a standalone table as part of the policy and legislation section. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below;

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.



- The National and regional guidelines for aggregates provision in England 2005- 2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land-based resources are becoming increasingly constrained.

Fees

The MMO has powers under the Infrastructure Planning (Fees) Regulations 2010 (as amended) to charge for its services in relation to any advice, information or other assistance (including a response to a consultation) provided in connection with:

- an application or proposed application, for an order granting development consent, and
- an application/proposed application to make a change to, or revoke, such an order, and
- any other prescribed matter relating to NSIPs, including both statutory and non-statutory work.

For any statutory work undertaken by the MMO throughout the NSIP process, staff time will be charged at the current rate of £122 per hour.

From 1 May 2024 the MMO will begin charging for all statutory work done in the NSIP process, including responding to post application documents, Section 56 consultations, attendance at examinations and providing written representations in examinations.

For non-statutory or discretionary work undertaken by the MMO during the NSIP process staff time will be charged at the current rate of £122 per hour plus VAT.

The MMO will also charge for any work done by any third-party scientific advisors in relation to NSIP work. This is most often work done by Cefas at the current rate of £116.38 per hour.

Post consent monitoring, discharging of requirements under Deemed marine licences (DML) or variations to DMLs are chargeable by virtue of powers the MMO has under [The Public Bodies \(Marine Management Organisation\) \(Fees\) Order 2014](#) and this work is currently charged at the rate of £94 per hour.

You will receive an estimate of the number of hours required for MMO and Cefas hours for all work needed on your NSIP project. Fee estimates may be broken down depending on the stage your project is at in the NSIP process. The estimated hours are multiplied by the appropriate hourly rate to give an estimated fee. You must accept the terms quoted before we can progress.

Final charges invoiced by the MMO and Cefas are based upon actual hours worked, not the original estimate.



The staff time spent on your NSIP project is recorded in units of 15 minutes with a minimum of 15 minutes for each item of work.

The MMO case managers monitor your NSIP project weekly to assess how many more case hours are needed. If the estimated final cost is likely to be significantly different from the actual final cost, you will be notified in good time. You will also receive an explanation of the circumstances and an updated estimate. You will also be informed when more than 90% of the estimated total number of hours has been used.

Please refer to our published guidance for a detailed summary of fees for marine licensing and associated work here: <https://www.gov.uk/government/publications/marine-licensing-fees/marine-licensing-fees>

Please also refer to additional government guidance regarding cost recovery by certain prescribed public authorities such as the MMO in relation to NSIPs here: [Planning Act 2008: Infrastructure Planning \(Fees\) Regulations 2010 - GOV.UK](#)

If you require further guidance on the Marine Licencing process, please visit <https://www.gov.uk/topic/planning-development/marine-licences>





Maritime &
Coastguard
Agency

Maritime and Coastguard Agency
Marine Safety and PNT Services
Bay 2/24, Spring Place
105 Commercial Road
Southampton
SO15 1EG

Environmental Services Infrastructure
Decisions and Applications Service
Planning Inspectorate c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

Your Ref: EN0110036

Date: 24 July 2026

Via email: gwyntglas@planninginspectorate.gov.uk

Dear [REDACTED],

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATIONS FOR GWYNT GLASS OFFSHORE WIND FARM LIMITED, - UNDER THE EIA REGULATIONS.

The MCA has reviewed the scoping report provided by Gwynt Glas Offshore Wind Farm Limited as detailed in your correspondence on 26th June 2026 and would like to comment as follows:

The Environmental Impact Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk.
- Navigational Safety.
- Visual intrusion and noise.
- Risk Management and Emergency response.
- Marking and lighting of site and information to mariners.
- Effect on small craft navigational and communication equipment.
- The risk to drifting recreational craft in adverse weather or tidal conditions.
- The likely squeeze of small craft into the routes of larger commercial vessels.

The development area carries a moderate amount of traffic with several important commercial shipping routes to/from UK ports and the Celtic Sea. Attention needs to be paid to vessel routing, so that vessels can continue to make safe passage without large-scale deviations. The likely cumulative and in combination effects of all on shipping routes should be considered for this project. It should

consider the proximity to other windfarm developments, other infrastructure, and the impact on safe navigable sea room.

A Navigational Risk Assessment (NRA) will need to be submitted in accordance with MGN 654. This NRA should be accompanied by a detailed MGN 654 Checklist which can be found at [Offshore renewable energy installations: impact on shipping - GOV.UK](#)

MCA is content with the presentation of 28 days AIS only data for the winter and summer periods as summarised in 2.7.2.2 to inform this scoping report on this occasion. However, for the Navigation Risk Assessment a full-scale vessel traffic survey to the standard of MGN 654 will need to be carried out. This will involve coverage of least 28 days which is to include seasonal data (two x 14-day surveys) collected from a vessel-based survey using AIS, radar and visual observations to capture all vessels navigating in the study area. We would also welcome the addition of 12 months up to date AIS data to help further inform vessel activity.

Review of the AIS data presented in the Scoping Report part 1 figure 2.7.3 indicates that the principal north-south vessel traffic between the Off Smalls TSS and the Lands' End TSS are located to the west of the proposed Gwynt Glas array area, comprising both northbound and southbound traffic streams. While vessel tracks are observed within and around the proposed development area, traffic density appears substantially lower than within these established routes. The Environmental Impact Report and subsequent Navigational Risk Assessment should assess the potential effects of the development on existing navigation patterns, including any vessel displacement, routeing changes, redistribution of traffic, or reduction in available sea room required to take substantial collision avoidance action in compliance with **COLREGS**.

We note that Section 2.7.5.3 states that a **Cumulative Effects Assessment** will be undertaken. This assessment should consider the project both alone and cumulatively with other offshore renewable developments at the planning, consented and pre-construction stages, including the other Offshore Wind Leasing Round 5 Project Development Areas (PDAs) in the Celtic Sea. The proximity of other offshore wind developments should be fully considered, including an assessment of the distances between OREI boundaries and established shipping routes in accordance with MGN 654. Given the limitations of AIS data and the potential for future changes in traffic patterns, the Environmental Impact Report and subsequent Navigational Risk Assessment should clearly demonstrate that navigational safety risks have been reduced to As Low As Reasonably Practicable (ALARP), and that sufficient sea room will remain available for safe navigation under foreseeable operating conditions.

We acknowledge that wet storage options are yet to be fully developed as detailed in section 2.7.5.1.9 As a reminder to the Applicant any wet storage solutions should be discussed in consultation with relevant maritime stakeholders including the MCA and Trinity House. We welcome the early engagement with relevant port authorities especially Milford Haven and Bristol. We would also expect the Navigation Risk Assessment to be updated to include the proposals for any wet storage once they are known.

The Development Specification and Layout Plan will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.

It is noted that this scoping report incorporates both the offshore array area and export cable corridor route. As such attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location. Additionally, it should be noted from Figure 2.7.2 that the Aggregate Production Area lies within the Offshore Scoping Boundary. Therefore, particular attention should be paid prior to route refinement to ensure that cable-laying activities maintain a sufficient separation distance from the Aggregate Production Area, thereby minimising the potential for interaction with ongoing or future aggregate operations.

As noted within table 1.5.4 and section 1.5.3.1.2 we understand that the final design of the station keeping systems used will be determined during the design development, we would like to point out that compliance with regulatory expectations on moorings for floating wind and marine devices (HSE and MCA, 2017) is identified as relevant guidance for floating infrastructure. This guidance should be followed, and a Third-Party Verification of mooring arrangements will be required.

Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). The report must recognise the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)). A SAR checklist will also need to be completed in consultation with MCA, as per MGN 654 Annex 5 SAR requirements.

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.

It is noted that the use of both HVAC and HVDC transmission infrastructure is discussed in this scoping report. We would like to remind the applicant when considering this that in the case of HVDC installation, consideration must be given to the effect of electromagnetic deviation on ships' compasses. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. If an HVDC cable is being used, we would expect the applicant to do a desk based compass deviation study based on the specifications of the cable lay proposed and assess the effect of EMF on ship's compasses. MCA may request for a deviation survey post the cable being laid; this will confirm conformity with the consent condition. The developer should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts (actions at a later stage depending upon the desk-based study and post installation deviation survey).

Scoping Questions to Consultees:

1. Do you agree with the proposed Shipping and Navigation Study Area and that it is sufficient to capture the relevant impacts?
 - Yes.
2. Do you agree with the characterisation of the baseline environment??
 - Yes. This is on the understanding that the further MGN 654 compliant traffic data is obtained and incorporated into the Navigation Risk Assessment.
3. Have all the relevant data sources been identified in the Scoping Report?
 - Yes.
4. Have all the potential impacts resulting from the Development been identified in the Scoping Report?
 - Yes.
5. Do you agree with the impacts that have been scoped in for further assessment?
 - On the understanding that a full list of risk controls and associated mitigation measures will be identified during the NRA process of consultation with navigation stakeholders and hazard analysis, we are content at this stage.
6. Do you agree that appropriate Shipping and Navigation consultees have been identified?
 - Yes.
7. Do you agree with the proposed approach to the NRA and EIA assessment?
 - We remain content at this stage with the shipping and navigation issues that have been identified. Any further issues raised by stakeholders as the project progresses should be addressed accordingly as part of the EIA process.

On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach.

Yours sincerely,



Marine Licensing and Offshore Consenting Lead
UK Marine Safety and PNT Services



Defence Infrastructure Organisation

Assistant Safeguarding Manager
Ministry of Defence
Safeguarding
Defence Infrastructure Organisation
St George's House
DMS Whittington
Lichfield, Staffordshire
WS14 9PY
United Kingdom

Application Ref: EN0110036

Our Reference: DIO10070733

E-mail: DIO-Safeguarding-Wind@mod.gov.uk

Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
SLOUGH
SL1 4PN

23 July 2026

Dear [REDACTED],

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Gwynt Glas Offshore Wind Farm Limited (the applicant) for an Order granting Development Consent for the Gwynt Glas Offshore Wind Farm (the proposed development)

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion in respect of the Gwynt Glas Offshore Wind Farm development. Consultation correspondence was received by this office on 26 June 2026.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

It is acknowledged that, at this time, details of the precise location, dimensions, and configuration of the turbines and associated infrastructure is not available and that a Project Design Envelope approach has been adopted for this development. The components of the project subject to this scoping opinion request includes the following:

- up to 118 wind turbine generators (WTGs) with a maximum blade tip height of 310 metres (m) above Highest Astronomical Tide (HAT) on floating substructures with station keeping systems;
- up to 3 Offshore Transmission Stations;
- inter-array cables, interconnector cables and up to 6 Offshore Export Cables connecting the offshore scoping boundary to landfall on the south Pembrokeshire coast (between Freshwater East and Burry Port);

- the potential for an unknown number of Midpoint Compensation Reactors (if required) which will be situated outside of the Array Area part way along the Offshore Export Cable Corridor(s);
- the potential for an unknown number of subsea transmission station(s) (if required);
- the potential for an unknown number of subsea power collector(s) (if required);
- scour protection for subsea infrastructure;
- up to 6 underground Onshore Export Cables; and
- up to 3 Onshore Transmission Stations with a maximum external equipment height of 50m above ground level located close to the onshore grid connection point at the proposed Llandyfaelog Substation (which is subject to a separate consent application process).

I write to confirm the safeguarding position of the MOD on information that should be provided in the Environmental Statement to support any application; this response is based on the Environmental Impact Assessment (EIA) Scoping Report dated 19 June 2026 (Document Number PRJ00101-XRHD-PRJ-COS-REP-000001, Revision 01) which recognises some of the principal defence issues that will be of relevance to the progression of the proposed development.

Air Defence (AD) Radar

EIA Scoping Report, 2 Offshore, Section 2.8, Aviation and Radar covers Military Aviation. Figure 2.8.1 – Aviation and Radar Study Area, and subsection 2.8.2.2 references MOD Military Aviation.

Within paragraph 679 of subsection 2.8.2.2 it is stated that the nearest military air defence radar is located at Remote Radio Head (RRH) Portreath, which is approximately 108km from the closest point of the scoping array, and identifies that the WTGs are within radar Line of Site (LOS) of RRH Portreath. The MOD agrees with this. The proposed WTGs would be detectable by, and will cause unacceptable interference to, the AD radar deployed at RRH Portreath.

Wind turbines have been shown to have detrimental effects on the operation of AD radar. These include the desensitisation of the radar in the vicinity of wind turbines, and the creation of "false" aircraft returns. The probability of the radar detecting aircraft flying over or in the locality of the turbines would be reduced, hence turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and manage aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

The AD radar at RRH Portreath has been included as relevant receptor (Table 2.8.2) and therefore must be scoped into the EIA. The impact on the AD radar will require technical mitigation which will need to be provided by the applicant and accepted by the MOD.

The need to mitigate the impacts of the proposed development upon military radars has been recognised by the applicant and potential mitigation measures to address impacts on AD and ATC radars are set out in 2.8.6 of the Aviation and Radar section of the Scoping Report. Paragraphs 712 and 713 refer to the MOD's Programme NJORD and how air defence radar mitigation will be funded. Mitigation measures will be determined through the EIA and in response to consultation with relevant stakeholders, however, the MOD wishes to clarify at this stage the Applicant's understanding of Programme NJORD and the funding of air defence radar mitigation.

Programme NJORD has been established by the MOD to identify, procure and implement air defence radar mitigation for four AD radars at Buchan, Brizlee Wood, Staxton Wold and Neatishead. The MOD would like to clarify that Programme NJORD will not provide mitigation to this development as the AD Radar at Portreath does not fall within Programme NJORD's scope. His Majesty's Government (HMG) has currently only committed and agreed to fund mitigations at four locations: Buchan, Brizlee Wood, Staxton Wold and Neatishead. HMG has not confirmed any such funding for Portreath, Benbecula nor Saxa Vord. As such, the

developments affecting these three radars should not assume funding will be in place by HMG, until otherwise confirmed.

In addition, where MOD removes an AD radar objection, it will be replaced with a consent condition that requires the developer to agree and sign a Radar Mitigation Scheme Agreement with MOD detailing the mitigation arrangement and any funding requirements where applicable. It is in this agreement that MOD will agree the date in which the development can operate which will be linked to the mitigation solution it has agreed. In the interest of transparency, there is a cost associated with the creation of the bilateral agreement with MOD which will be payable upfront before negotiations start but after MOD has agreed the consent Requirement wording for inclusion in the Development Consent Order.

Air Traffic Control (ATC) Radar

EIA Scoping Report, 2 Offshore, Section 2.8, Aviation and Radar covers Military Aviation. Figure 2.8.1 – Aviation and Radar Study Area, and subsection 2.8.2.2 references MOD Military Aviation.

Within paragraph 678 of subsection 2.8.2.2 it is stated that the nearest military ATC radars are located at Manorbier Firing Range (approximately 58.7km from the closest point of the scoping array) and Hartland Point (approximately 72.6km from the closest point of the scoping array), and it identifies that the WTGs are within Primary Surveillance Radar (PSR) LOS of both Manorbier Firing Range and RNAS Hartland Point.

The MOD has undertaken an assessment based on 118 wind turbines at 310m to blade tip height using the Project Design Envelope boundary co-ordinates, as provided by the applicant for the pre-application consultation. WTGs within the array area will be detectable to the PSR at Hartland Point only. The ATC radar at Hartland Point has been included as relevant receptor (Table 2.8.2) and therefore must be scoped into the EIA.

The impact of the turbines on the PSR at Hartland Point, therefore, will need to be addressed through a suitable technical mitigation solution. The need to mitigate the impacts of the proposed development upon military radars has been recognised by the applicant and potential mitigation measures to address impacts on ATC radars are considered within 2.8.6 of the Aviation and Radar section of the Scoping Report. Paragraph 710 states that a suitable radar mitigation is achieved through consultation with the relevant stakeholder / operator of each radar. The MOD welcomes the opportunity for consultation on this development; however, it is an applicant's responsibility to provide a suitable technical mitigation solution to the MOD.

Deep Space Advanced Radar Capability (DARC)

The Scoping Report considers the Deep Space Advanced Radar Capability (DARC), a radar facility that will be installed at Cawdor Barracks in Pembrokeshire. The Applicant has stated the development will not impact upon the DARC radars. The MOD expects that the DARC radars will require safeguarding against wind developments but at this stage safeguarding criteria is yet to be confirmed so the MOD is not in a position to confirm if the development will impact upon DARC or not at this stage.

Military Low Flying

The potential for the development to create physical obstructions to military low flying aircraft activities is acknowledged within Section 2.8 Aviation and Radar, and at Table 2.8.4 it is indicated that the creation of an aviation obstacle environment for civil and military aircraft is Scoped In. To mitigate any potential impact, it is common practice that the MOD will request that a Requirement is added to any Development Consent Order that might be issued requiring the submission of information such as commencement dates, maximum turbine heights and the longitude and latitude of each wind turbine. This information is required to allow accurate charting of the development.

EIA Scoping Report, 1 Introduction, Table 1.8.2 details examples of Embedded Mitigation Measures Proposed for the Development. Within this Table there are mitigation measures covering amongst other entries topics relating to Aids to Navigation, Lighting and Marking Plan (LMP), Navigational Safety Plan, and Aviation Lighting and Marking. The MOD welcomes the commitment that the development will adhere to an LMP which will confirm compliance with legal requirements with regard to shipping, navigation and aviation marking and lighting. The MOD will request that aviation warning lighting and sufficient information is provided to enable the accurate charting of structures 50m or greater above surface level are added as a Requirements to any Development Consent Order (DCO) that might be issued.

Offshore Military Aviation, Danger and Practice Areas

EIA Scoping Report, 2 Offshore, Section 2.8, Aviation and Radar covers Military Aviation. Figure 2.8.1 – Aviation and Radar Study Area, and subsection 2.8.2.2 references MOD Military Aviation.

At paragraph 685 of subsection 2.8.2.2, the applicant has identified that sections of the proposed Offshore Export Cable Scoping Boundary lie within the Castlemartin (EGD113A and EGD113B), Manorbier (EGD115A and EGD115B), Pendine (EGD117) and Pembrey (EGD118) Danger Areas in place to protect military training and testing activities undertaken there, and Penally (X5104) Practice and Exercise Area (PEXA). The applicant has correctly identified that all these Danger Areas begin at sea level and have varying upper limits between 12,000 feet (ft) Above Mean Sea Level (AMSL) and 50,000ft AMSL.

The presence of cables, or any type of infrastructure, within a Danger Area where live firing takes place, would be at risk of damage from projectiles or fragments fired from the Ranges. The associated survey work required before a cable is laid, the construction phase and any periods of maintenance required post installation, would result in firing activities having to stop to accommodate such activities. Survey, installation and maintenance periods would cause disruption to range operations and therefore affect military training and Defence outputs. In addition, the sea floor beneath the Danger Areas would feature vast amounts of Unexploded Ordnance (UXO). UXO surveys and clearance (if it is possible) would also cause disruption to the Ranges.

The applicant has stated coordination with the MOD will be necessary to install the offshore cables within these Danger Areas. In addition, the MOD has land interests along the South Wales coast which will need to be accounted for when considering landfall locations. The applicant has engaged the MOD on this matter but at this stage the MOD is unable to confirm its position to a cable routing through the four affected Danger Areas. Engagement continues between both parties. Should the MOD be agreeable to a cable routing through one or more of these Danger Areas, then it can be expected the MOD will be require a Requirement be included within the DCO for a communication protocol and a legal agreement be established regarding the transfer of liability relating to damage caused by MOD activities. Impact on MOD Danger Areas should therefore be scoped into the EIA.

It is noted that a Midpoint Compensation Reactor may be required to help manage reactive power generated in the offshore export cable. A Midpoint Compensation Reactor would be housed on a platform above sea level, expected to be located part way between the array and onshore landfall location. Any Midpoint Compensation Reactor must be located outside of the Danger Areas associated with Castlemartin, Manorbier, Pendine and Pembury and X5104. Above sea level infrastructure within a Danger Area would be incompatible with Range training, exercise and testing activities.

EIA Scoping Report, 2 Offshore, Section 2.7, Shipping and Navigation covers the impact on military activities. At paragraph 597 of subsection 2.7.2.1 the applicant has identified Practice and Exercise Areas D064B and D064C – aerial practice areas which extend from 5,000ft AMSL – and X5104 – Penally Small Arms Range which extends from surface level, are within the Shipping and Navigation Study Area. At paragraph 681 of subsection 2.8.2.2 Military Aviation the applicant identifies that the southern extent of the Array Scoping Boundary is located beneath EGD064B. The applicant states that the lower limit for EGD064B is approximately 5,000ft AMSL and military activity conducted within EGD064B includes high energy manoeuvres. Through Figures 2.8.1 Aviation and Radar Study Area and 2.9.2 Infrastructure and Other Users

Study Area the applicant identifies that the entirety of Penally Range (X5104) PEXA is contained within the Offshore Export Cable Scoping Boundary. The MOD requires consultation on the design and any proposed structures that lie within the boundaries of these PEXAs and they should be scoped in for further assessments and consultation.

In addition, the proposed offshore scoping boundary interacts with areas of the sea where other Defence maritime navigational interests take place (outside of published Danger Area's and PEXA). A wind farm at this location could impact on these interests and should be scoped into the EIA. The MOD will engage with the applicant on this matter.

Onshore Transmission Assets

EIA Scoping Report 1 Introduction, Figure 1.1.1 Location of the Gwynt Glas Offshore Wind Farm, provides an overview of the Onshore Scoping Boundary.

Sections of the Onshore Scoping Boundary encompass both MOD land interests along the South Wales coast and statutory explosives and technical safeguarded areas (explosives for Pendine and technical for Manorbier and Pembrey Sands). These will need to be considered when identifying landfall locations and the Onshore Export Cable route. It is noted that the onshore export cables will be installed underground. The MOD notes that whilst the maximum Onshore Transmission Station height as detailed in Table 1.5.7 Key Indicative Parameters for the Onshore Transmission Station(s) would be 30m Above Ground Level (AGL), the maximum external equipment height associated with the Onshore Transmission Station would be 50m AGL. Equipment of this height has the potential to create a physical obstruction to low flying military aircraft and the MOD will likely request that aviation warning lighting and sufficient information being provided to enable the accurate charting of structures 50m or greater above surface level are added as a Requirements to any Development Consent Order that might be issued.

Unexploded Ordnance (UXO)

EIA Scoping Report 2 Offshore, Section 2.9 Infrastructure and Other Users identifies at paragraph 727 of subsection 2.9.2.7 that the potential for unexploded ordnance (UXO) to be present within the development area is considered high. The intention is stated that in 2027 geophysical surveys will be undertaken within the Offshore Export Cable scoping Boundary to assess the potential for UXO. The geophysical data for the Array Scoping Boundary has already been acquired. The MOD agree that the potential presence of UXO and disposal sites should be a consideration during the installation and decommissioning of turbines, cables, and any other infrastructure, or where other intrusive works are necessary.

I trust that this is clear but if you have any questions, please feel free to contact me at DIO-Safeguarding-Wind@mod.gov.uk.

Yours sincerely

[Redacted Signature]

[Redacted Name]

Assistant Safeguarding Manager

Submitted via email to: gwyntglas@planninginspectorate.gov.uk

Date: 24th July 2026

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Gwynt Glas Offshore Wind Farm Limited (the Applicant) for an Order granting Development Consent for the Gwynt Glas Offshore Wind Farm (the Proposed Development)

I refer to your letter dated 26/06/26 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission PLC (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has 1 feeder main located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM28
- NGT Freehold – CYM359375
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing rights for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings / structures, change to existing ground levels or storage of materials etc within the easement strip.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

General Pipeline Information

NGT requires its pipelines remain accessible during and after completion of any works. Some work types have specific restrictions when being undertaken in the vicinity of gas assets, therefore, early consultation with NGT is essential.

General information Promoters should be aware of is contained in *UKOPA GPG/042 - Guidance on the Issues to be Considered by Promoters, Designers and Planners of New Developments in the Vicinity of High Pressure Pipelines* [Good Practice Guide](#).

Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of an NGT representative. Ground cover above our pipelines should not be reduced or increased. Further guidance around working safely may be sought from NGT and additional specifications provided where required.

Any works within the vicinity of NGT's pipelines must adhere to the safe working requirements set out in [T/SP/SSW/22](#).

If any excavations are planned within a pipeline's easement, or within 10 metres (whichever is higher), or within 10 metres of an Above Ground Installation (AGI), or if any embankment or dredging works are proposed, then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method must be agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

Any large installations which may result in a population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning (LUP) methodology, and the HSE response should be submitted to NGT for review. NGT will typically support the HSE's advice, however, the HSE's LUP methodology differs from IGEM risk assessment methodology and as such, the pipeline operating conditions / specifications and the formation of a population cluster and / or increased population density near the pipeline as a result of development, may provide sufficient reasons on safety grounds for NGT to request that the Promoter / Developer conducts a risk assessment in form of a Quantitative Risk Assessment (QRA). The QRA must be completed by a specialist company approved to carry out these assessments for NGT.

Other electrical infrastructure (OHLs and Substations)

There is specific criteria that must be adhered to for developing electrical infrastructure near NGT's pipelines to avoid unacceptable levels of interference.

Information Promoters should be aware of is contained in *UKOPA/GPG/027AC Corrosion Guidelines*.

Promoters should limit the routing of Overhead Lines (OHLs) parallel to buried pipelines as much as possible. Where crossing a pipeline with an OHL, the crossing angle should be as close to perpendicular as possible.

Subject to compliance with the acceptable interference criteria in the standards, the installation can be built adjacent to pipelines but never within the easement. It is possible that the pipelines are already experiencing acceptable levels of interference, and in such cases the level of acceptance for new constructions shall be restricted to levels that do not raise the existing levels beyond the acceptable levels defined in the standards.

HV cables (UG)

There is specific criteria that must be adhered to for developing electrical infrastructure near NGT's pipelines to avoid unacceptable levels of interference.

Information Promoters should be aware of is contained in *UKOPA/GPG/027AC Corrosion Guidelines* and *UKOPA/GPG/031DC Interference Guidelines*.

Utility crossings over NGT's gas pipelines are restricted and require formal written permission in the form of a Deed of Consent before any installation / construction within the pipeline easement is permitted.

Cables must cross the pipeline as close to perpendicular as possible to limit the risk of interference. A new service must not be laid parallel within NGT's easement strip.

The separation distance for a cable >33kV is 1000mm. However, trenchless installation techniques may increase the required separation to be further. No new assets will be permitted to be installed with 600mm of NGT's pipeline.

The Promoter is to engage with NGT for further guidance in the early stages of design to ensure the required integrity assessments are agreed, and consideration has been given to electrical interference, security, crossing points, future access and safe construction methods, all of which must be mutually agreed prior to undertaking any works on site.

Pipelines and Buried Services

There is specific criteria that must be adhered to for developing electrical infrastructure near NGT's pipelines to avoid unacceptable levels of interference.

Utility crossings over NGT's pipelines are restricted and require formal written permission in the form of a Deed of Consent before any installation / construction within the pipeline easement is permitted.

The Promoter is to engage with NGT for further guidance in the early stages of design to ensure the required integrity assessments are agreed, and consideration has been given to electrical interference, security, crossing points, future access and safe construction methods, all of which must be mutually agreed prior to undertaking any works on site.

Pipelines must cross NGT's pipeline as close to perpendicular as possible to limit the risk of interference. A new pipeline must not be laid parallel within NGT's easement strip. The separation distance for a pipeline is 1000mm. However, trenchless installation techniques may increase the required separation to be further.

Yours faithfully,



DCO Liaison Officer

██████████
Lead Development Liaison Officer
██████████@nationalgrid.com
██████████

██████████
Development Liaison Support Officer
██████████@nationalgrid.com
██████████

Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
gwyntglas@planninginspectorate.gov.uk

23 July 2026

Dear Sir/Madam

RE: APPLICATION BY GWYNT GLAS OFFSHORE WIND FARM LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE GWYNT GLAS OFFSHORE WIND FARM (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 26th June 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Overhead Lines

4YV ROUTE 400kV OHL	PEMBROKE – WALHAM PEMBROKE – SWANSEA NORTH 2
4YW ROUTE 400kV OHL	PEMBROKE – SWANSEA NORTH 1 PEMBROKE – SWANSEA NORTH 3

We enclose plans showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

New infrastructure

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

Llandyfaelog Substation

Substantial work has been undertaken with the Carmarthenshire Council Officers around ecology, landscape mitigation and NBB provision on site. The landscape and ecology mitigation strategy has considered the known customer connections for the site. Whilst there is reserved capacity at the site for Celtic sea, any connection will need to be carefully considered to ensure there are no conflicts with the current design put forward by NGET.

National Grid Electricity Transmission plc, Registered Office: 1-3 Strand, London WC2N 5EH.
Registered in England and Wales No. 2366977

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

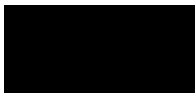
NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address:

box.landandacquisitions@nationalgrid.com

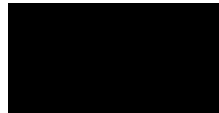
We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,



Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)



Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Technical Guidance Note 287

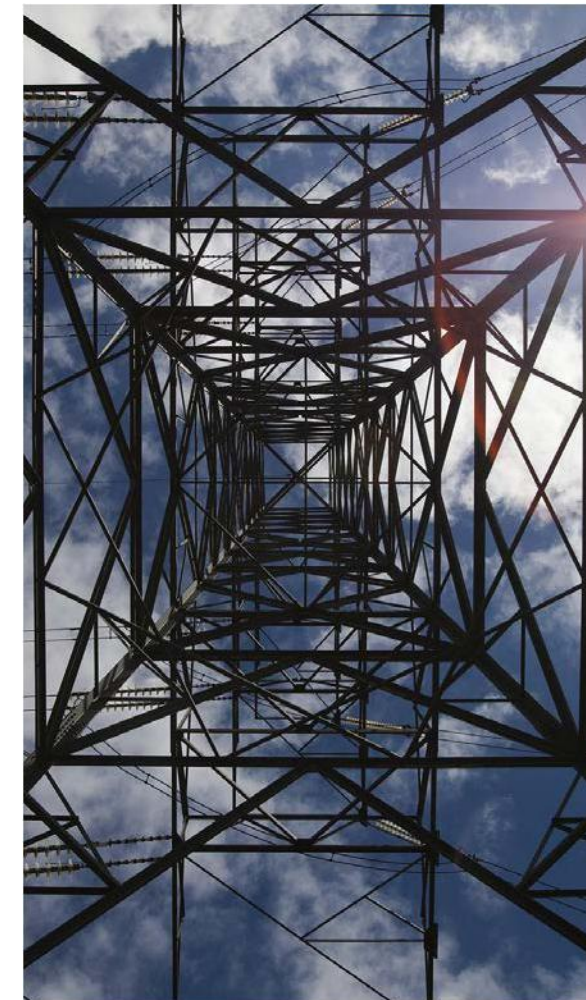
Third-party guidance for working near National Grid Electricity Transmission equipment

nationalgrid





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Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

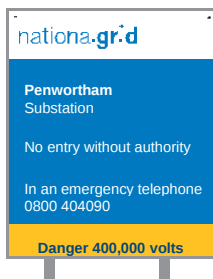
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

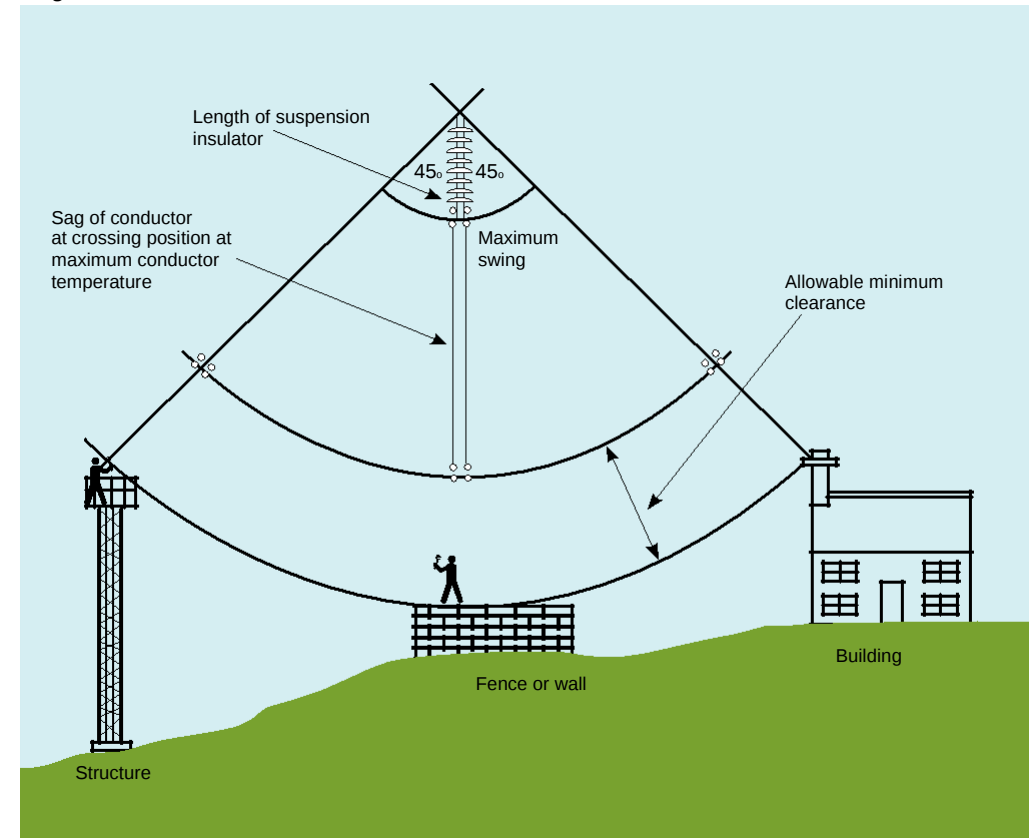
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be laid in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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next page »

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

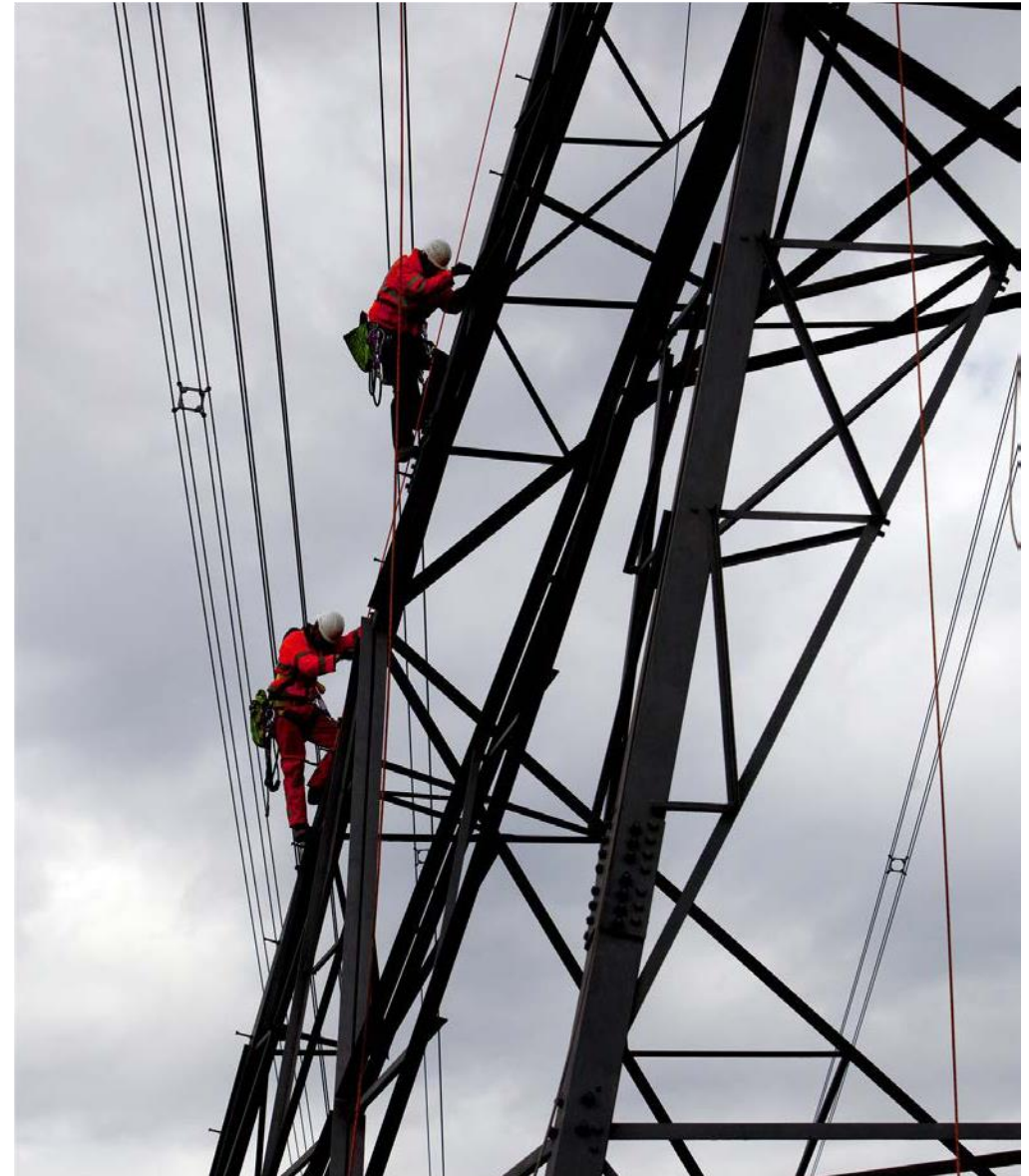
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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previous page

Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (*as outlined in ENA TS 43-8*).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

*The minimum distance that
should be maintained from
National Grid assets when
quarry blasting*

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

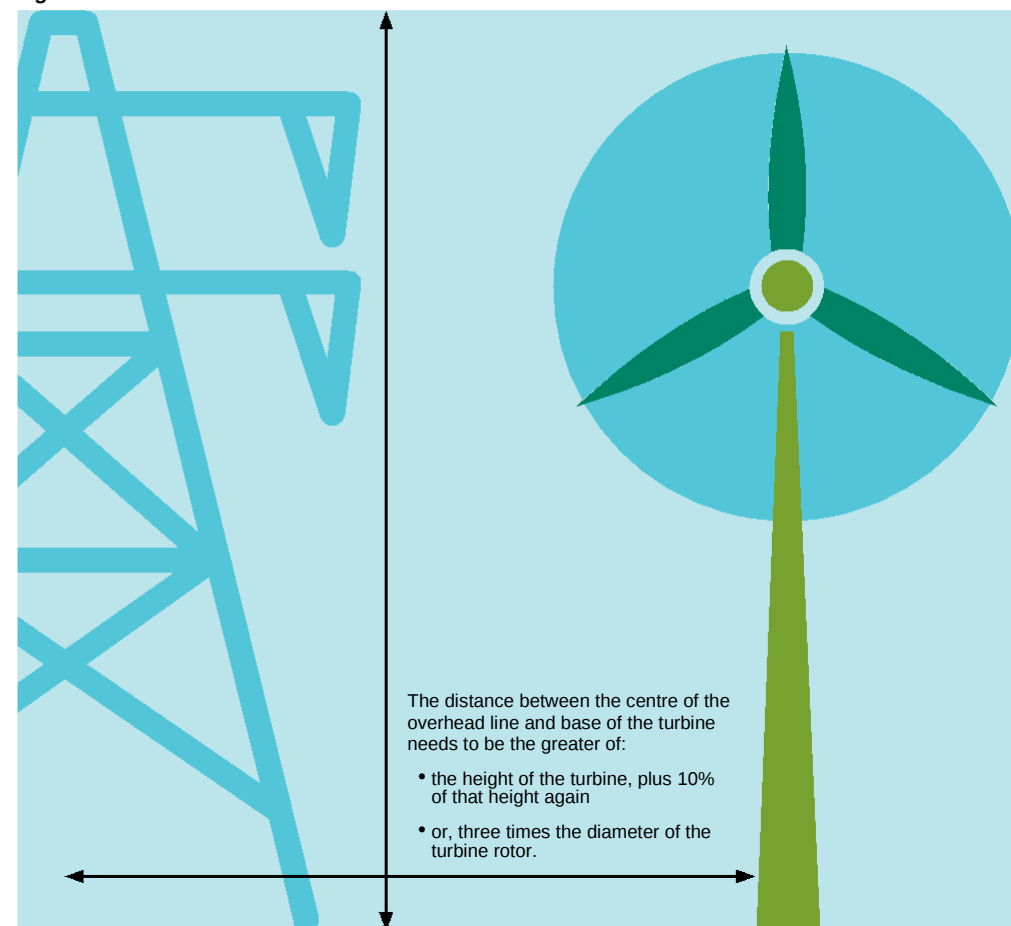
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

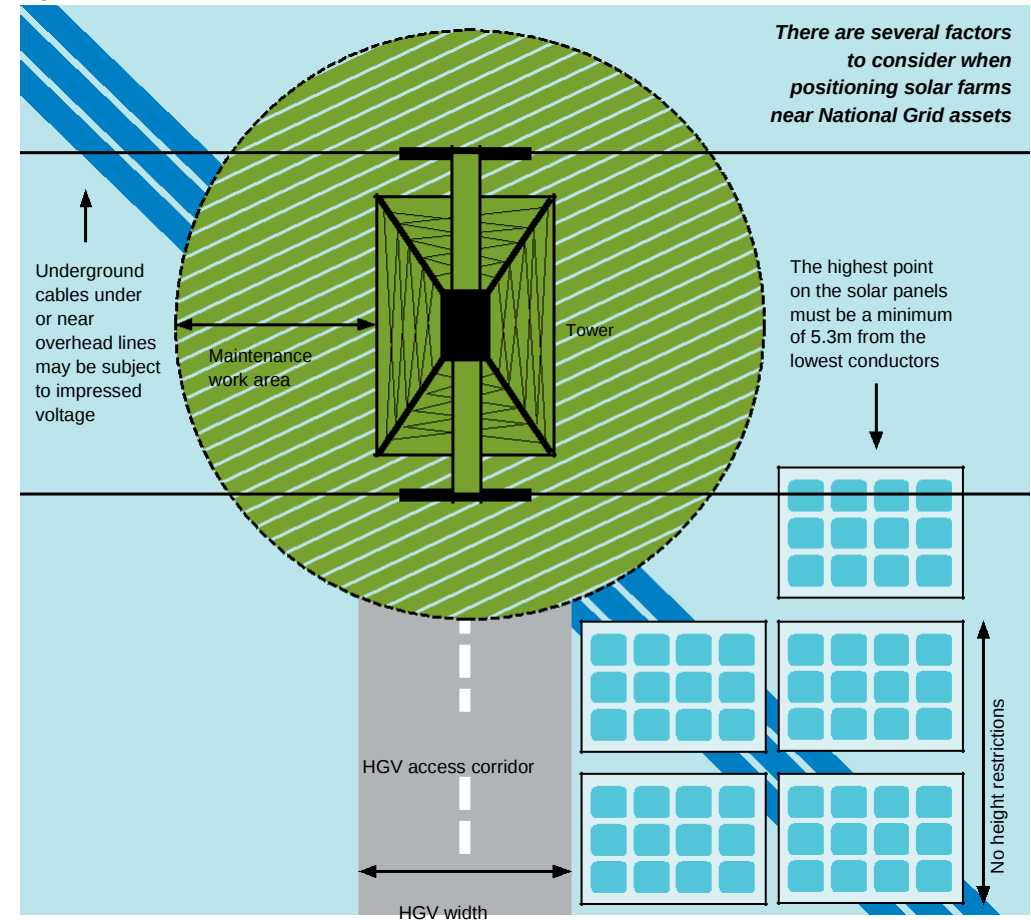
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

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(2) Vertical Axis indicates meters above OS GB Datum 2m distance between minor marks/box

**X & Y Co-ordinate of tower base.
Route & Tower Number
Tower Type**

Span Length (m)

Height of Conductor Attachment Point Above OS GB

Bottom Conductor Displayed at Max Sag

5.3m Clearance line at Max Orange dashed line

7.3m Clearance line at Max Sag Blue dashed line

Lidar Data showing Buildings, Roads, Vegetation etc.

North Arrow

OHL Plan View & Downward Looking Imagery

5.3m Clearance line at Max Swing Orange dashed line

**Section Operating Voltage,
Conductor Type, Conductor Name,
Bundle Configuration & Sagging Condition**

(1) Vertical & Horizontal Scale – can be used in conjunction with a ruler to take measurements.

IMPORTANT: NOTE HORIZONTAL & VERTICAL SCALES DISTANCE (1) MAY DIFFER FROM HORIZONTAL & VERTICAL GRID MARKS SCALE/BOX DISTANCE (2).

Generic Data Origin of Drawing

Key for LIDAR Data

ENA43-8 Clearance to Objects at 400kV

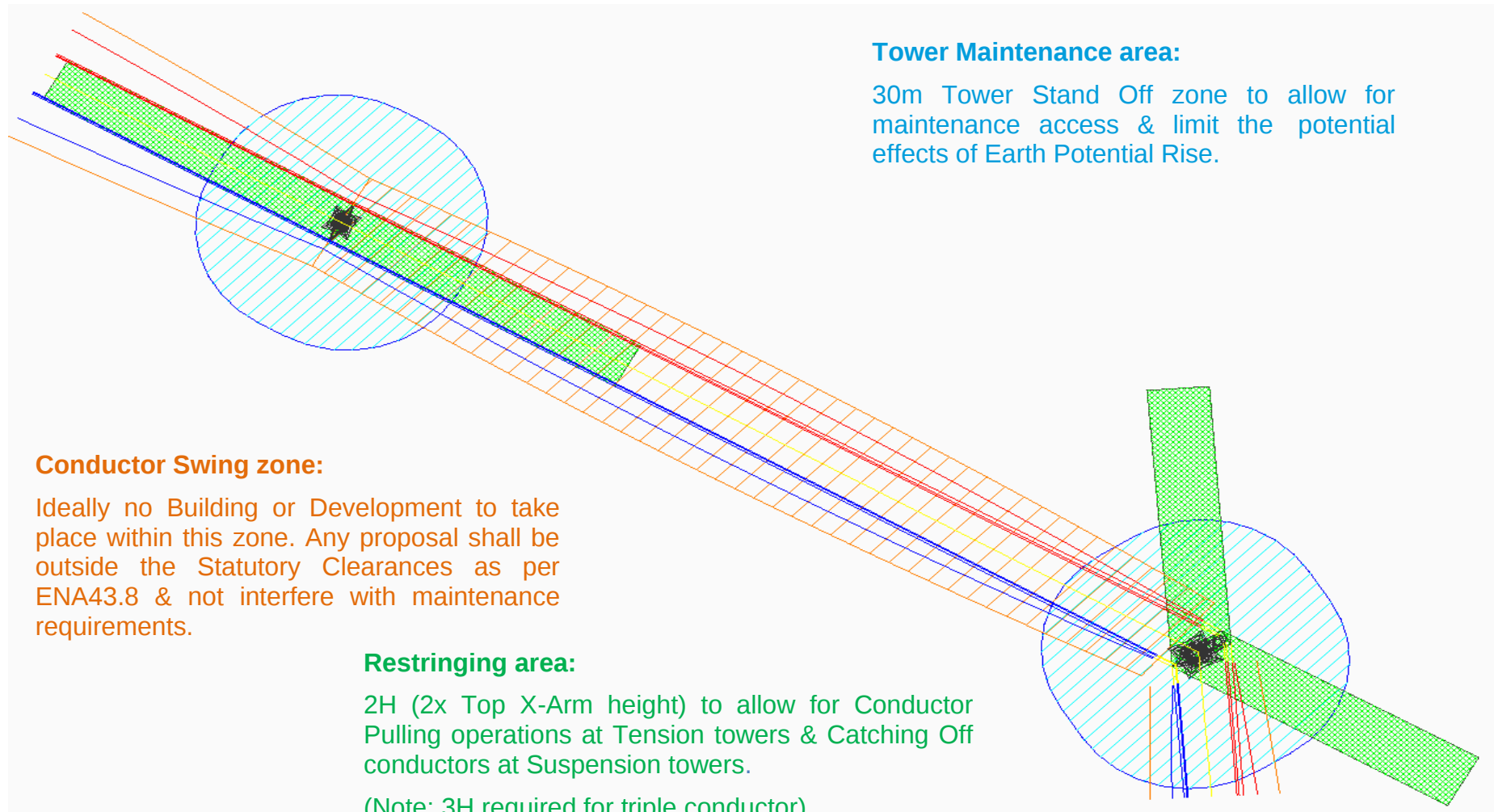
Swing & Sag Diagram

NG Drawing Specific Data

15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area



From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Sent: 02 July 2026 13:37

To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>

Subject: RE: EN0110036 - Gwynt Glas Offshore Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification [SG41580]

Our Ref: SG41580

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

www.nats.co.uk



NATS Internal

Date: 24/07/2026
Our ref: 549666
Your ref: EN0110036



Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by EDF Power Solutions UK and Ireland, and ESB trading as Gwynt Glas Offshore Wind Farm Limited for an Order granting Development Consent for the Gwynt Glas Offshore Windfarm.

Scoping consultation and notification of the Applicant's contact details

Thank you for your letter dated 26th June 2026 consulting Natural England on the Gwynt Glas Offshore Wind Farms Environmental Impact Assessment (EIA) Scoping Report. The following constitutes Natural England's formal statutory response. This advice is provided without prejudice to any comments we may wish to make in light of further submissions on the presentation of additional information.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). As the application is located partially outside English territorial waters, it should be noted that pursuant to an authorisation made on the 9th of December 2013 by the JNCC under paragraph 17(c) of Schedule 4 to the Natural Environment and Rural Communities Act 2006, Natural England is authorised to exercise the Joint Nature Conservation Committee's (JNCC) functions as a statutory consultee in respect of applications for offshore renewable energy installations in offshore waters (0-200 nm) adjacent to England. This application was included in that authorisation and therefore Natural England will be providing statutory advice in respect of that delegated authority.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA), Habitats Regulations Assessment (HRA) screening and Marine Conservation Zone Assessment (MCZA) screening for this development.

Summary of Main Points

1. Approach to scoping

It is noted that due to the timing of the scoping report the information contained within it is extremely high level and based on a large area of search. The rationale for the inclusion of these large boundaries is due to substantial components of the projects remaining undetermined at the point of scoping, but also other aspects including incomplete data collection.

This makes it difficult to provide targeted advice on the scope of the assessments at this stage. Given the EIA scoping opinion from PINS is binding as regards the scope of the Environmental Statement (ES), this creates consenting risks further down the line with identifying and resolving environmental impacts/concerns.

2. Focus of the Scoping Report

When scoping a project, developers, or their consultants, should satisfy themselves that they have addressed all the potential impacts and the concerns of all organisations and individuals with an interest in the project. Due to the capacious scoping envelope it is challenging to scope impacts out at this stage and therefore difficult for Natural England to comment meaningfully. Further consideration is likely needed in relation to the cable corridor and need for further scoping or ongoing discussions. However, due the timing of 'the scoping' we have focused our advice on the known issues of greatest importance/risk taking into account the likelihood of significant effects on the environment.

3. Impacts to designated sites

Because the project's landfall location has potential to result in a cable route through North of Lundy Marine Conservation Zone, if it is concluded that there is potential for the proposal to hinder the conservation of the conservation objectives of the MCZ, it will be necessary to include an 'in principle' case for the provision of Measures of Equivalent Environmental Benefit ('MEEB') as part of the MCZ Assessment. Please see Annex A for more information.

4. Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards

¹ *Harrison, J in R. v. Cornwall County Council ex parte Hardy (2001)*

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004) available from*
<http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/>

Natural England has been leading the 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' project, funded by Defra's Offshore Wind Enabling Actions Programme (OWEAP).

The project is providing up-front best practice advice on the way data and evidence is used to support offshore wind farm development and consenting in English waters, focussing on the key ecological receptors which pose a consenting risk for projects, namely seabirds, marine mammals, seafloor habitats and species and fish.

The project aims to facilitate the sustainable development of low impact offshore wind by increasing clarity for industry, regulators and other stakeholders over data and evidence requirements at each stage of offshore wind development, from pre-application through to post-consent. However, we advise that this best practice guidance is also applicable to other marine major casework

The advice documents are currently stored on a SharePoint Online site, access to the SharePoint site needs to be requested from neoffshorewindstrategicsolutions@naturalengland.org.uk. Please allow up to three working days for requests to access the site to be granted. Natural England is currently reviewing ways of making the advice more accessible and open access.

The application should be fully informed by the recommendations in the Best Practice Advice, and we will increasingly be appraising applications with respect to the extent to which the guidance has been followed.

In addition, we refer the applicant to our [Cabling Lessons Learnt guidance](#) and our joint environmental best practice advice for subsea cable projects in English inshore and UK offshore waters: [Nature conservation considerations and environmental best practice for subsea cables for English Inshore and UK offshore waters, Sept 22](#).

Please see **Annex A** for guidance on EIA requirements. In **Annex B** we provide detailed comments on the project-specific aspects of the scoping report.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

In accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again if the proposal is amended in any way which significantly affects its impact on the natural environment.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

For any queries relating to the specific advice in this letter please contact us using the details below.

Yours sincerely,

██████████

Marine NSIP Senior Officer, Devon Cornwall and the Isles of Scilly
E-mail: ██████████@naturalengland.org.uk

Annex A – Advice related to Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 / Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (Regulation 10) sets out the necessary information to assess impacts on the natural environment to be included in an Environmental Statement (ES), specifically:

- A description of the development – including physical characteristics and the full marine use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape/seascape, and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects.
- Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the ‘in combination’ effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure and activities should be included within the assessment.

Natural England’s advice on the scope and content of the Environmental Statement is given in accordance with the National Infrastructure Planning Advice Notes:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. [Guidelines](#) for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The [National Planning Policy Framework \(NPPF\)](#) sets out guidance on how to take account of biodiversity interests in planning decisions and the framework that the responsible authority should provide to assist developers. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

2.2 Use of EIA Matrices

Natural England notes that the approach to the assessment is proposed to align with EIA approaches used on other projects. This matrix approach has been used throughout ESs to date to support the assessment of the magnitude and significance of impacts. Natural England notes numerous instances where significance has been presented as a range (i.e., slight, or moderate, or large) and it is nearly always the lower value that has been taken forward. Indeed, to date no offshore windfarm has identified ecological impacts that are assessed as significant in EIA terms, either cumulatively or in-combination which is surprising. In the absence of evidence to support the use of the lower value in a range, Natural England's view is that the higher value should always be assessed in order to ensure that impacts on features are not incorrectly screened out of further assessment. This is in line with the principles of the Rochdale envelope approach.

2.3 Impact Risk Zones

Natural England advises that scoping area should be based on the potential for species to be present within the area, the Impact Risk Zone (IRZ) for designated sites as available on Magic, the ecology, i.e., foraging areas of designated species of sites in proximity to the proposed development area.

2.4 Designated Sites – Special Protection Areas (SPAs) and Special Areas of Conservations (SACs)

The application documents should thoroughly assess the potential for the proposal to affect designated sites. Internationally designated sites (e.g., designated Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition, paragraph 181 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential, or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites. (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017).

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) and Regulation 28 of the Conservation of Offshore Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a National Site Network site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

The application documents should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects.

Further information on the special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/>; and the JNCC website.

Please note: As there is only an area of search for the cable corridor at this stage, we are unable to provide a definitive list of sites relevant to the project, but these should be identified and fully considered within an Environmental Statement (ES)/Application documents.

2.5 Habitats Regulations Assessment

If the proposal outlined within the scoping document has the potential to significantly affect features of the designated sites and the activity is not directly connected to the management of any designated site it should be assessed under regulation 63 the Conservation of Species and Habitats Regulations (2017)/ regulation 28 of the Conservation of Offshore Species and Habitats regulations (2017). Should a Likely Significant Effect on an Internationally designated site be identified or be uncertain, the competent authority (e.g., the Marine Management Organisation or Local Planning Authority or Government Department) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA/Application process.

If during the EIA/Application process the potential for a Likely Significant Effect on the conservation objectives of the sites cannot be ruled out the competent authority for the licence/consent (MMO/Government Department/LPA) should undertake an Appropriate Assessment of the implications for the site in view of its conservation objectives. Noting recent case law (*People Over Wind*³) measures intended to avoid and/or reduce the likely harmful effects on an internationally designated sites cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site, therefore consideration is required at Appropriate Assessment. Natural England wishes to be consulted on the scope of the Habitats Regulations Assessment and the information that will be produced to support it and should be formally consulted on any Appropriate Assessment provided for the proposal (Regulation 63/28).

The consideration of Likely Significant Effects should include any functionally linked habitat outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically. Further guidance is set out in Planning Practice Guidance on appropriate assessment here:

<https://www.gov.uk/guidance/appropriate-assessment>

Further information on the special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/> ; and the Joint Nature Conservation Committee (JNCC) website [About Marine Protected Areas | JNCC - Adviser to Government on Nature Conservation](#).

2.6 Marine Conservation Zones (MCZs) and Sites of Special Scientific Interest (SSSI)

Marine Conservation Zones (MCZs)

³ *People Over Wind and Sweetman vs Coillte Teoranta* (ref: C 323/17).

Marine Conservation Zones are areas that protect a range of nationally important, rare, or threatened habitats and species. You can see where MCZs are located and their special interest features on www.magic.gov.uk. Factsheets that establish the purpose of designation and conservation objectives for each of the MCZ's are available at <https://www.gov.uk/government/collections/marine-conservation-zone-designations-in-england>

The ES should consider including information on the impacts of this development on MCZ interest features, to inform the assessment of impacts on habitats and species of principle importance for this location. Further information on MCZs is available via the following link: <http://publications.naturalengland.org.uk/category/1723382>

Further information on the special interest features, the conservation objectives, and relevant conservation advice packages for designated sites is available on our website <https://designatedsites.naturalengland.org.uk/>

Please note: As there is only an area of search for the cable corridor at this stage, we are unable to provide a definitive list of sites relevant to the project, but these should be identified and fully considered within an Environmental Statement (ES)/Application documents.

Sites of Special Scientific Interest (SSSIs)

Further information on the location of SSSIs and their special interest features can be found at www.magic.gov.uk. The application should include a full assessment of the direct and indirect effects of the development on the features of special scientific interest and should identify such mitigation measures as may be required in order to avoid, minimise, or reduce any adverse significant effects.

Please note: As there is only an area of search for the cable corridor at this stage, we are unable to provide a definitive list of sites relevant to the project, but these should be identified and fully considered within an Environmental Statement (ES)/Application documents.

2.7 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES/Application should assess the impact of all phases of the proposal on protected species (including, for example, pinnipeds (seals), cetaceans (including dolphins, porpoises, and whales), fish (including seahorses, sharks, and skates), marine turtles, birds, marine invertebrates, bats, etc.). Information on the relevant legislation protecting these species can be reviewed on the following link <https://www.gov.uk/government/publications/protected-marine-species>. Natural England does not hold comprehensive information regarding the locations of species protected by law but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, [NBN Atlas](#), groups, and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#). The area likely to be affected by the proposal

should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information, there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. **For Land Based Impacts:** Natural England has adopted [standing advice](#) for terrestrial protected species which includes links to guidance on survey and mitigation. All other information on protected species can be found in '[Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards](#)'

2.8 Habitats and Species of Principal Importance

The ES/Application should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

2.9 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape/Seascape Character

3.1 Nationally Designated Landscapes

Consideration should be given to any potential direct or indirect impacts to designated landscapes.

Natural England confirms that the Lundy Heritage Coast falls within the area of search for landscape and seascape impacts.

3.2 Landscape/Seascape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site, as well as any relevant management plans or strategies pertaining to the area. The EIA/Application should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA/Application should include a full assessment of the potential impacts of the development on local landscape character using [landscape/seascape assessment methodologies](#). We encourage the use of Landscape and Seascape Character Assessment (LCA/SCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA/SCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment. For National Parks and Areas of Outstanding Natural Beauty (AONBs), we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

In order to foster high quality development that respects, maintains, or enhances, local landscape / seascape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape / Seascape Character Assessment at a local level are also available on the same page.

<https://www.gov.uk/government/publications/seascape-assessments-for-north-east-north-west-south-east-south-west-marine-plan-areas-mmo1134>

<https://data.gov.uk/dataset/3fed3362-2279-4645-8aaf-c6b431c94485/mmo1037-marine-character-areas>

We draw your attention to changes to appropriate Zone of Theoretical Influence for larger offshore windfarm turbines noting that 60km ZTIs are now accepted norm for larger ~400m turbines.

5. Water Quality

Increases in suspended sediment concentrations (SSC) during construction and operation (e.g., cable installation) have the potential to smother sensitive habitats. The ES/Application should include information on the sediment quality and potential for any effects on water

quality through suspension of contaminated sediments. The EIA/Application should also consider whether increased suspended sediment concentrations resulting are likely to impact upon the interest features and supporting habitats of the designated sites as listed above.

The ES/application should consider whether there will be an increase in the pollution risk as a result of the construction or operation of the development.

For activities in the marine environment up to 1 nautical mile out at sea, a Water Framework Directive (WFD) assessment is required as part of any application. The ES should draw upon and report on the WFD assessment considering the impact the proposed activity may have on the immediate water body and any linked water bodies. Further guidance on WFD assessments is available here: <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example, over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water, and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES/Application should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 187(d)), which should be demonstrated through the ES/Application.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

8. Contribution to local environmental initiatives and priorities

Due to the lack of detail available at this stage, Natural England is unable to provide any information on how this development fits with local initiatives and priorities such as the delivery of green/blue infrastructure, biodiversity opportunity areas or biodiversity enhancements.

9. Cumulative and in-combination effects

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the Application. All supporting infrastructure and activities should be included within the assessment.

The ES/Application should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e., projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Natural England's advice on the scope and content of an Environmental Statement is given in accordance with the National Infrastructure Planning Advice Notes:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/> .

We advise that all Applications use this as a template.

10. Use of the Rochdale Envelope

Natural England recognises the need to use a Rochdale Envelope approach to allow flexibility in project design to ensure that changes in available technologies and project economics can be considered post consent. However, Natural England has concerns over the extent to which uncertainty in ground conditions is driving the extent of the project envelope, and that the Rochdale Envelope approach is resulting in the provision of insufficient baseline information to inform both project design and assessment of impacts. The lack of understanding of the ground conditions results in the use of Maximum Design Scenarios (MDSs) that are conservative enough to make up for that lack of understanding and allow for all eventualities. This in turn translates into a vast number of variables, causing difficulties in assessment, as it is difficult to identify and assess a realistic worst-case scenario for each of the relevant receptors with any certainty, which in turn necessitates precautionary assessments given this uncertainty. That presents challenges when it comes to identifying appropriate mitigation measures.

11. Ecological join up between marine receptor assessments

Natural England advises that changes to marine processes and benthic ecology could cause an indirect impact on mobile interest features from designated sites through changes to supporting habitats and prey availability. Ecosystem impacts should be thoroughly considered within the relevant receptor chapters throughout the ES/Application documents.

12. Cable protection – including secondary scour

In addition, Natural England's position provided for Hornsea Project Three, Norfolk Vanguard and Norfolk Boreas in relation to Adverse Effects on Integrity from the placement of cable protection remains unchanged and therefore cable protection within marine protected areas should be avoided and where that is possible every effort should be made to mitigate the impacts. In order to achieve this, we advise that a cable burial risk assessment is undertaken as part of the application process informed by comprehensive geotechnical and geophysical surveys. If cable protection is required options that have the greatest success of removal with

least impact to interest features should be taken forward. A site integrity plan could then be used to determine the risk to the conservation objectives for the site and determine the requirements for any compensation measures.

Please note that impacts from secondary scouring around cable protection should also be factored into both marine processes and benthic assessment.

13. Marine Mammals impact assessments

If not already considered we advise Applicants to include reference to the following

IAMMWG. 2022. *Updated abundance estimates for cetacean Management Units in UK waters (Revised 2022)* <https://hub.jncc.gov.uk/assets/3a401204-aa46-43c8-85b8-5ae42cdd7ff3>

Scientific Advice on Matters Related to the Management of Seal Populations: 2025 [Scientific Advice on Matters Related to the Management of Seal Populations: 2025](#)

Carter et al. (2022) <https://www.frontiersin.org/articles/10.3389/fmars.2022.875869/full>

And where appropriate outputs from site-specific surveys of the Celtic Sea.

15. Outline Plans

Natural England advises that outline documents and/or assessment will need to be included in the Application to ensure that all impacts have been considered and appropriately managed.

16. Offshore Wind Environmental Standards (OWES)

In line with section 2.8.83 of the National Policy Statement for Renewable Energy (EN-3) Defra is soon to publish Offshore Wind Environmental Standards (OWES) specifically for Round 5. The Celtic Sea SNCBs (Natural England (NE), Natural Resources Wales (NRW) and Joint Nature Conservation Committee (JNCC)) have formed part of the steering group of this project and inputted into the guidance.

There are 7 OWES due to be published this summer; they are as follows;

OWES 1 - Export cable burial to reduce electromagnetic field (EMF) effects on sensitive species.

OWES 2 - Adoption of Vessel Traffic Management Plans to avoid disturbance to seabirds and marine mammals in sensitive or higher-density areas.

OWES 3 - Avoidance of excess lighting to protect seabirds, whilst ensuring compliance with aviation and navigation regulatory requirements.

OWES 4 - Adherence to published SNCB and regulator best practice advice.

OWES 5 - Use of Natural England's Offshore Wind Seabird Assessment Tool (OWSAT) to support the developer's Preliminary Environmental Information Reports (PEIRs) during pre-application, and final submissions at application.

OWES 6 - Agreement of an Archaeological Written Scheme of Investigation (WSI) with the MMO (in consultation with Historic England) in English Waters and NRW (in consultation with RCAHMW and Cadw) in Welsh Waters, and a commitment to submitting all heritage information to the Marine Data Exchange (MDE) according to the timetable set out in the WSI.

OWES 7 - Following a benthic impact framework for cable routing, avoiding sensitive areas or mitigating impacts to benthic habitats where avoidance is not possible.

As well as these OWES measures, Defra is planning on promoting **3 further Best Practice Measures** to complement the OWES measures. These measures reflect additional desirable best practice mitigation approaches and are strongly encouraged for adoption by Leasing Round 5 developers but are not mandatory.

BPM 1 - To regularly monitor mooring lines and inter-array cables for any entanglement of marine species and entanglement risks, and to remove any entanglement risks identified such as marine debris and derelict fishing gear.

BPM 2 - Minimum turbine air gap of 25m to reduce seabird collisions.

BPM 3 - Adoption of Site Integrity Plans (SIP) for array areas within 20km of the Bristol Channel Approaches/Dynesfeydd Môr Hafren Special Areas of Conservation (SAC) to protect Harbour Porpoise from underwater noise.

Natural England supports this new policy and the environmental benefits it will bring for offshore wind projects. In line with EN-3, Natural England expect Applicants to adopt all OWES measures into their project design and detail how their application complies with the OWES

guidance in any documentation submitted as part of the application. Whilst the Best Practice Measures are not mandatory Natural England will continue to advise that they are adopted as mitigation measures as they will be an important step in reducing environmental impact and provide valuable data to support EIA assessments.

Natural England acknowledges that the OWES guidance is not yet published therefore Gwynt Glas have been unable to incorporate the measures into this Scoping Report (submitted to PINS June 2026). However, we recommend that OWES measures are considered fully and referenced in all documentation moving forward. Gwynt Glas have been involved in the development of the OWES through stakeholder engagement with Defra and have had the opportunity to shape the OWES during multiple consultations, therefore we hope they are amenable to adopting the OWES Measures (and Best Practice Measures) into their project.

Annex B: Detailed Comments

The following framework has been used in Natural England's advice to attribute risk and determine the potential to resolve both risks and issues identified through the scoping consultation only, this is indicated in column 1 of each of the detailed comments tables:

- **Red:** Natural England considers these issues to be potential showstoppers i.e., unless baseline data; significant design changes; and/or significant mitigation is provided, then we advise that a lasting and significant adverse effect on protected sites, species, landscape/seascape, or the wider environment cannot be ruled out meaning the EIA will have significant unresolved challenges.
- **Amber:** Natural England considers that if these are not addressed/resolved then they would have the potential to become a RED risk as set out above. Likely to relate to fundamental issues with assessment methodology which could be rectified, preferably before the Applications submission.
- **Yellow:** These are issues/comments where NE doesn't agree with the Applicant's position and/approach. Unless otherwise stated, we are satisfied for this project that it will not make a material difference to our advice or the outcome of the decision-making process. However, it should be noted that this may not be the case for other projects.
- **Purple:** Note for the developer.

NB: We reserve the right to revise our opinion should new evidence be presented.

General comments

Natural England Best Practice Guidance

Natural England is increasingly utilising the best practice guidance to provide information to developers on the expected methodologies and then to appraise their robustness, rather than give detailed advice on alternative methodologies that a developer/consultant wishes to use instead.

Embedded mitigation

Natural England advises the provision of a plan is not embedded mitigation and the commitments within the plans will be key. Until plans have been provided, we are unable to advise if impacts have been adequately addressed and therefore the impacts (e.g. invasive non-native species, pollution events) cannot be scoped out. Natural England advises that outline plans including any mitigation measures should be provided at the time of Application. We also advise that accidental spillages and leakages of oils, fuel and other polluting substances which could potentially enter the water environment be scoped in for further assessment with regards to designated sites and potential impacts to their interest features.

Introduction

Natural England's advice provided below focuses on the aspects of the Scoping Report that are relevant to English waters, the English coastline, Marine Protected Areas (MPAs), and other sensitive receptors. For matters relating to impacts within Welsh waters and along the Welsh coastline, including the proposed landfall area, we defer to Natural Resources Wales (NRW) and other relevant statutory consultees. Table 1 covers our detailed advice and recommendations on general issues, not specific to one thematic area.

Table 1 Natural England's detailed advice and recommendations regarding general issues

Point No.	Section	Para	Topic	Comments	Recommendations
A1	General	-	Natural England's Remit	The advice provided below on Marine Geology, Oceanography and Physical Processes by Natural England has been aimed at considering those aspects of the Scoping Report that may be relevant to English Waters, the English coastline, MPAs, and other sensitive receptors.	For marine physical processes impacts relevant specifically to the Welsh coastline (landfall) and Welsh Waters, Natural England refer the Secretary of State to Natural Resources Wales (NRW) and other relevant consultees.
A2	General		Wet Storage	It is currently unclear whether storage, construction, and maintenance ('wet storage') of floating devices could lead to impacts on receptors such as marine processes due to this activity.	Natural England advises that all aspects of a project should be considered holistically and that further information is needed on potential wet storage requirements and whether they need consideration within the Environmental Impact Assessment (EIA).
A3	1.5.3.1.1	Table 1.5.2, 59 & 62	WCS	Natural England notes that the number of wind turbines could be between 66 x 14 MW and 118 x 25 MW, which allows 10% for overplanting. It is also stated that the final wind turbine model(s) that would be used for the development would be selected post-consent. We also note that multiple options are being considered for offshore windfarm (OWF) infrastructure components including substructures,	Natural England advises that the WCS for each ecological receptor should be informed by the design options and installation methods that represent the maximum extent of change.

				anchors, mooring lines etc., and that the Environmental Statement (ES) would consider worst-case scenarios (i.e. those resulting in the worst-case environmental impacts). This is welcomed, however, currently owing to the early stage of the project and multiple design options, the worst-case scenario (WCS) is not yet clearly defined.	
A4	1.5.3.1.1	Table 1.5.2	Turbine Design	Natural England notes that the maximum blade tip height above Highest Astronomical Tide (HAT) is lower than the maximum wind turbine rotor diameter. This may be an error as it would not seem to be possible, given that the entire rotor diameter is above the surface of the water.	Natural England advises that the maximum design parameters are clarified and consistent.
A5	1.5.3.1.1 & 1.8.5	Table 1.5.2 & 1.8.2	Turbine Design	Natural England notes that the minimum 'air gap' (22 m) is provided relative to mean high water springs (MHWS) in one instance and highest astronomical tide (HAT).	Natural England advises that reference datums should be provided consistently throughout.
A6	1.5.3.1.1	Table 1.5.2	Turbine Design	Natural England notes the intended minimum blade tip clearance is 22m. Once published, the Offshore Wind Environmental Standards will recommend a 25m minimum blade tip clearance as a best practice measure.	Natural England advises the minimum blade tip clearance is increased to 25m to minimise collision impacts with seabirds.

A7	1.5.3.1.1	Table 1.5.2	Worst-case scenario (WCS) project parameters	Worst-case scenario (WCS) project parameters are currently very high-level and not clearly defined. Natural England notes there is no estimation of the required number of mooring lines or anchors within the Wind Turbine Design Envelope.	Natural England understands that the design of the substructures and mooring lines are not yet finalised. However, Natural England advises that the WCS should be informed by the design options and installation methods that represent the maximum extent of change. Until then it is difficult to agree with the scoping out of impact pathways.
A8	1.5.3.1.3	76	Scour protection	Natural England notes the inclusion of reef cubes within the list of potential scour protection methods.	Natural England is supportive of trials involving reef cubes in appropriate locations. However, at present, we do not support their use within sedimentary Marine Protected Areas because their deployment would be analogous to placing rock armouring and would result in the loss of designated habitats and features.
A9	1.5.5 & 1.5.8	119, 133 & 134	Phased Development	Natural England notes that the indicative construction programme is 2034-2039, but also that the development could be delivered in phases spanning 3-4 years, with overlapping activities. The implications of development phasing on potential impacts to marine receptors are currently unclear.	Natural England advises that implications of development phasing will need to be carefully considered in the Environmental Impact Assessment (EIA).
A10	1.5.7 & 2.1.5		Decommissioning	Natural England notes that a decommissioning plan would be prepared during detailed design and developed and refined during the development's lifetime and as decommissioning approaches. Natural England refers to OSPAR Guidance and United Nations Convention on the Law of the Sea, and the '<i>Guidance Notes for Industry for the Decommissioning of Offshore Renewable Energy Installations under the Energy Act, 2004</i>'	While we welcome commitments to decommissioning plans, we advise that an outline decommissioning programme will need to be produced at the consenting phase and updated throughout the project lifetime prior to decommissioning of the windfarm. We also note that dismantling, removal, and reuse/recycling of OWF components is discussed and where infrastructure is retained, it shall be made safe and 'environmentally neutral to prevent future hazards. Natural England advises that the default expectation

				full removal would be required at decommissioning.	should be that full removal at decommissioning would be required of structures on the seabed, exposed or at risk of exposure.
A11	1.7.3	178	Cross Border Impacts	Natural England notes that the proposed development is located predominantly in Welsh waters, although a small section of the Offshore Scoping Boundary extends into English waters. There is, therefore, a potential for cross-border impacts which will need to be considered.	Natural England advises that a map should be provided that identifies Welsh, English, and Irish waters to inform the assessment of cross-border impacts due to the proposed development.
A12	1.8.3.2	196	Magnitude of impact	Natural England notes that when predicting the magnitude of impact the following is proposed: - the extent of an impact should be broken down into Transboundary, National, Regional, Local and Site-Specific - duration of an impact should specify a timescale, for example, short-term <1 year, medium-term 1-5 years etc. - frequency should be broken down into high (i.e. continuous during a specific phase of the project) etc.	Natural England advises that definitions for magnitude of change should be provided in the ES and made more specific.

A13	1.8.8	209	Cumulative Effect Assessment	Natural England notes reference to the PINS Cumulative Effect Assessment (CEA) tiered approach. We draw attention to Natural England's tiered system which is structured differently and takes account of different aspects.	Natural England's tiered system for scoping projects into cumulative/in-combination assessment can be found in: Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase III: Expectations for data analysis and presentation at examination for offshore wind applications (NE, 2022). Either the PINS or Natural England approach can be used, but applications must capture all projects and group them in a logical way for assessment. A full explanation should also be provided as well as a justification for how they are structured.
A14	Section 1.8.8	210	Cumulative Effect Assessment	The Applicant states that, where possible, they would "use as-built project parameter information (if available) as opposed to consented parameters to reduce over precaution (inaccuracies) in the CEA." Natural England is actively engaged with industry considering ways that 'as-built' parameters can be used within assessments. However, at present we do not consider it appropriate to reduce impact estimates by considering as-built parameters unless those parameters are legally secured. Speculation of impacts from 'as-built' scenarios in in-combination/ cumulative impact assessments are of limited value unless legal agreements are put in place to ensure existing projects will not expand further. Without such agreements, the only robust option is to use impacts from consented designs in in-combination and cumulative assessments.	Natural England advises that a version of the cumulative impact assessment should be presented based on consented impact values only, except in cases where the as-built parameters are legally secured. This is not to say that a version of the assessment based on as-built parameters cannot be presented as well for illustrative purposes.

A15	1.8.9		Use of Artificial Intelligence	Natural England welcomes the declaration of use of Artificial Intelligence (AI). We recognise the usefulness of AI tools, however, the extent to which AI has been used for each of the identified tasks is unclear, for example, comparison of standards or guidance, providing background on projects etc.	Natural England recommends that further details and clarity is provided regarding use of AI.
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Marine Geology, Oceanography and Physical Processes Including Water Quality

Natural England's advice on marine geology, oceanography and physical processes including water quality is provided below focuses on the aspects of the Scoping Report that are relevant to English waters, the English coastline, Marine Protected Areas (MPAs), and other sensitive receptors. For matters relating to impacts on marine geology, oceanography and physical processes including water quality within Welsh waters and along the Welsh coastline, including the proposed landfall area, we defer to Natural Resources Wales (NRW) and other relevant statutory consultees. Table 2.1 answers the Applicant's questions for this thematic area included within the scoping report, Table 2.2 covers our detailed advice and recommendations on this thematic area.

Table 2.1 Natural England's Response to the Applicant's Questions Regarding Marine Geology, Oceanography and Physical Processes Including Water Quality

Marine Geology, Oceanography and Physical Processes Including Water Quality	
Do you agree with the proposed Marine Geology, Oceanography and Physical Processes, including Water Quality Study Area and that it is sufficient to capture the relevant impacts?	Natural England advises that, based on the high-level information provided, we are broadly in agreement with the proposed study area for the proposed development alone effects. However, we consider that study area needs to encompass the scale and extent of potential cumulative effects. Furthermore, the Zol has primarily been informed by tidal ellipses and not considered potential changes to the wave regime due to array blockage effects for the project alone and acting cumulatively with other nearby projects.
Do you agree with the characterisation of the baseline environment?	Natural England considers that the baseline characterisation encompasses many key marine physical environment and processes relevant to the proposed development and assessment of impacts.

	However, there are some omissions which we have detailed in our advice below.
Have all the relevant data sources been identified in the Scoping Report?	Given the early stage of the assessment, the data sources identified in the Scoping Report are adequate. However, many of the sources are old and/or not site-specific. We reiterate that it is important to demonstrate that the data used to inform the baseline characterisation and impact assessment are reliable, directly applicable/representative of the study area, and valid for the intended purpose. Where evidence gaps are identified and it is considered necessary to collect data for the proposed development, these should be specific to marine geology, oceanography, and physical processes and of appropriate and sufficient temporal and spatial coverage and resolution. Natural England can provide further advice on data collection requirements. We also defer to our NRW counterparts for further advice on data specifically relevant to Welsh waters and the Welsh coastline. Natural England also notes the apparent marked time gap between the site- and project-specific surveys and the indicative construction programme of 2034-2039. Noting that the geotechnical & geophysical, and benthic surveys undertaken across the Array Scoping Boundary area in 2024 and 2025, respectively and the Gwynt Glas geophysical & geotechnical and benthic surveys due to be undertaken across the Offshore Export Cable Boundary in 2027. This will need to be carefully considered in light of comments below on the age of previously collected data.
Have all the potential impacts resulting from the Development been identified in the Scoping Report?	Whilst Natural England is broadly content with many of the potential impacts identified for the project alone, there are other impacts, particularly cumulative effects, which will need to be considered in the phase of assessment. We also highlight the considerable uncertainty regarding the WCS project parameters owing to multiple design options (including innovative deepwater solutions) and the early stage of the assessment. Therefore, our advice on potential impacts may change as more details become available.

Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?	No. Please see our comments below for detailed advice in this regard.
Do you agree with the proposed approach to assessment?	Natural England is broadly in agreement with the proposed approach, as noted above, there is considerable uncertainty regarding the WCS project parameters, and the assessment is at an early stage, and details are generally very high level. Therefore, our advice on the approach to assessment may change as more information becomes available.

Table 2.2 Natural England's Detailed Advice and Recommendations Regarding Marine Geology, Oceanography and Physical Processes including Water Quality

Point No.	Section	Para	Topic	Comments	Recommendations
B1	1.5.5	123	Novel Techniques & Equipment	Natural England notes that details of offshore infrastructure construction are currently high-level, but construction of substructures utilising innovative deepwater solutions are discussed. Whilst we welcome innovation, the potential for impacts to marine physical processes and the marine physical environment due to novel techniques and equipment are currently uncertain.	Natural England advises that impacts due to novel techniques, methods, and equipment will need to be fully considered and assessed during pre-application/in the ES.
B2	1.8.2	189	Climate Change	Natural England notes that it is stated that consideration would also be given to how the environment would change over the lifetime of the development if it did not go ahead. This would take account of wider issues such as climate change. However, we note that this is not specifically discussed with regards to Marine Geology, Oceanography, and Physical Processes.	Natural England highlights that it is important that climate change effects such as sea level rise, increased storminess, seabed sediment mobilisation, storm surge level, and increases in sea surface temperatures, are considered and assessed using the best available information.
B3	2.1.3		Data Sources	Natural England recognises the current high level and early stage of assessment but also	Natural England advises that careful consideration will need to be given to the use of

Point No.	Section	Para	Topic	Comments	Recommendations
				notes age of many data sources used (e.g. Cefas (2016) Suspended Sediment Concentrations (SSCs) data, tide and wave data from ABPmer (2018), modelling undertaken by DTI (2003) and work undertaken for Scroby Sands OWF (2006) on changes to bedload sediment transport morphological change of the seabed).	previously collected or other old data. It is important that the data used to inform the baseline characterisation and impact assessment are reliable, directly applicable/representative of the study area, and valid for the intended purpose. Where it is considered necessary to collect project-specific data, these should be specific to marine geology, oceanography, and physical processes and of appropriate temporal and spatial coverage and resolution. Natural England can provide further advice on data collection requirements. We have signposted below to recent/ongoing research projects which may provide useful data. In addition, we signpost to Cefas WaveNet and evidence gathered for other nearby projects such as White Cross.
B4	2.1.3	Table 2.1.1	Project Specific Surveys	Natural England notes that the project-specific geophysical, geotechnical, and benthic (including particle size distribution) surveys for the Offshore Export Cable Scoping Boundary are due to be completed in 2027, whilst the site-specific benthic surveys for the Array Scoping Boundary were undertaken in 2025, and The Crown Estate Surveys for Leading Round 5, were undertaken in 2024. Given that the indicative construction programme is 2034-2039, this represents a considerable time gap between characterisation surveys and construction, which is a concern that will need to be	Natural England advises that for benthic pre-construction baseline conditions, surveys should not be older than two years, whilst for dynamic marine environments and areas of high seabed mobility, recent data may be required to inform the EIA characterisation. The implications of potential changes over time on the EIA/MCZA/HRA conclusions will need to be carefully considered.

Point No.	Section	Para	Topic	Comments	Recommendations
				addressed through pre-construction baseline surveys.	
B5	2.1.2.5 & 2.1.3		Geology Baseline	Natural England notes and welcomes reference to seabed sediment, Quaternary geology, and bedrock geology mapping. These are an important part of the baseline characterisation.	Natural England advises that maps and descriptions of the regional geology, sediment distributions, sediment thickness, bedrock lithology, lithostratigraphic units, should be provided for the area of interest.
B6	2.1.3 & 2.1.5.5		Cumulative Effects Baseline	Natural England notes that it is stated that the ZoI would be defined as part of the EIA and would consider other projects including other OWFs/projects nearby, aggregate extraction and dredging, subsea cables, and oil and gas activity. However, we advise that the baseline be sufficiently large to inform the assessment of cumulative effects.	Natural England advises that the baseline should be sufficiently large to capture the extent of potential cumulative effects (e.g. due to multiple OWFs/projects acting on marine physical processes together). It is also recommended that a figure is produced to display the location and footprint of projects scoped into the cumulative effect assessment from across the wider region. Another figure should be produced to overlay this information with designated site boundaries, other important areas for protected habitats and species, and/or marine processes receptors.
B7	2.1.4.3	Table 2.1.2	Relevant Receptors	Natural England notes that Table 2.1.2 lists the receptors proposed for inclusion in the assessment and that are located within the 15km ZoI. Currently these include some SACs and MCZs within the Zone of Influence (ZoI), however, the ZoI is based on tidal ellipses only. Currently the potential extent of changes to the wave regime due to array blockage effects is not known but could extend to the adjacent English coastline and include Lundy Island. Furthermore, as indicated in para 256, receptors may include	Natural England advises that <u>all</u> relevant receptors or Marine Geology, Oceanography, and Physical Processes (including Sediment and Water Quality) within the study area should be identified and considered within the impact assessment. All marine physical processes receptors (including relevant nature and geological conservation sites) should be identified on relevant maps.

Point No.	Section	Para	Topic	Comments	Recommendations
				coastal and seabed morphological features, geodiversity features/deposits, and water column structures and features. These have not yet been identified. There is also a potential for cumulative effects to the wave regime due to the proposed development acting alone and cumulatively with other nearby OWFs/projects, which could extend to the adjacent English coastline and Lundy Island.	
B8	2.1.4	242	Subsea Cables Guidance	Natural England notes that Natural England and JNCC's best practice advice on subsea cable has not been included in the list in Section 2.1.4. This guidance may be useful and/or relevant to the pre-application and ES stages.	Natural England signposts to the joint NE/JNCC (2022) advice on subsea cables for English Inshore and UK offshore waters: Nature conservation considerations .
B9	2.14	242	Best Practice Advice for Evidence and Data Standards	Natural England notes that Natural England's Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards were updated in 2025 for all Phases (I-IV). The versions referenced in this list are from 2022.	Natural England signposts to the latest versions of this guidance here: Environmental considerations for offshore wind and cable projects - Home
B10	1.8.3 & 2.1.4.1	192 & 245	Seabed and Subsurface Sediment Composition	Natural England highlights potential changes to sediment composition may have important implications for sensitive receptors and currently the WCS is unclear as such the potential extent of changes and persistence of those changes is not known.	Natural England advises that the assessment of potential changes to seabed and sub-surface sediment composition (extent and persistence) should be considered and assessed in the relevant EIA, HRA, MCZA.
B11	2.1.4.1	247	Sediment Dispersion Modelling	Natural England welcomes the proposed sediment dispersion modelling to quantify potential impacts of anchor and cable	Natural England advises that it will be important to quantify maximum plume extent, concentration, and persistence, spatial

Point No.	Section	Para	Topic	Comments	Recommendations
				installation, along with transport and fate of material released into the water column as part of the installation works. However, there are no details yet on the modelling approach or reporting.	footprints and deposition thickness, and volumes of disturbed material.
B12	2.1.4.1	247	Cumulative Scenarios	Natural England notes that modelling of cumulative impacts to the wave and tidal regimes during the O&M stage is not mentioned. However, it is important to understand potential for any cumulative effects due to the presence of multiple OWF developments on the wave and tidal regimes and, in turn, water column properties.	Natural England advises that cumulative scenarios should be considered within the modelling.
B13	2.1.4.1	248	Wave and Tidal Regime Modelling	Natural England welcomes the proposed modelling of impacts on the wave and tidal regimes (during the O&M stage). We note that the study would be undertaken using the MIKE software developed by DHI. Choice between 2D and 3D model is not stated. It is stated that the modelling would be validated using relevant available data sources. Details of the proposed modelling and the relevant datasets for model validation are not included.	Natural England advises that further details should be provided on the proposed approach to modelling, boundary conditions, supporting data (e.g. resolution of bathymetry data and sufficiency of data used for calibration and validation). Careful consideration should also be given to the WCS array and other windfarm infrastructure, baseline conditions including stratification, appropriate Zol, relevant receptors, development phases, and climate change effects. Please also see comment below regarding cumulative scenarios.
B14	2.1.4.1	251 & 252	Baseline Stratification Assessment	Natural England agrees that establishing baseline stratification and positioning of tidal mixing fronts, is essential. We note that this will be assessed using data from Copernicus	Natural England would wish to see the proposed approach to assessing baseline stratification and would welcome the opportunity to discuss the approach once

Point No.	Section	Para	Topic	Comments	Recommendations
				Marine Environment Monitoring Service and that for the initial impact assessment, a simplified analytical method would be applied. However, we would need to see further details of the proposed approach, deliverables, and outcomes, in order to be able to agree with it.	further details are available. However, following on from above, we also advise that the study area should reflect the maximum area across which potential changes could occur to stratification due not only to the project alone but also acting cumulatively with other nearby projects. In addition to the ongoing research programmes listed (FLOWERs and eSWEETs), Natural England also signposts to the following projects which may provide useful information also: FRONTWARD, ECOWind & ECOFlow projects, EQUIFy & Frontline, and PELAgIO.
B15	2.1.4.1 & 2.1.5.1.2	256 & 259	Seabed Mobility and Bedform Migration Analysis	Natural England notes that potential construction-related morphological change of the seabed, including sandwave clearance and rock dumping will be assessed in the EIA - which is welcomed. However, seabed mobility and bedform migration trends, direction and rates also need to be considered, not only to inform understanding of impacts to seabed morphology and also to inform the cable burial and other engineering assessments.	Natural England advises that seabed mobility, bedform migration analysis, and erosion/accretion potential should be considered and assessed across the area of interest. Areas where sandwave clearance and external cable protection may be required should be identified and displayed on a map in the EIA.
B16	2.1.5		Wind Energy Extraction	Natural England notes that consideration has not been given to impacts associated with wind energy extraction due to the presence of array infrastructure. Whilst it is acknowledged that this is an emerging issue, the evidence base is growing with an indication that changes to wind energy at the sea surface could have significant and large-	Natural England advises that unless there is clear, robust field evidence to demonstrate that this impact pathway can be confidently scoped out, this potential impact should be acknowledged in the impact assessment, with the latest available peer reviewed scientific publications used to inform the assessment.

Point No.	Section	Para	Topic	Comments	Recommendations
				scale impacts on marine physical processes and the wider marine ecosystem.	This is particularly important for first-of-a-kind projects.
B17	2.1.5.1.1	258	Impacts on Waves and Tidal Currents	Natural England notes that it is stated that wave and tidal current changes due to the presence of array infrastructure would increase incrementally as the development is constructed, with the greatest potential impacts resulting from the completed development. Consequently, these impacts have been screened out from further consideration in relation to construction and decommissioning stages. Natural England acknowledges that the greatest potential impacts may result from the completed development, but we also note the potential for phasing of the development construction (i.e. 3–4-year phases), with the potential for overlapping activities, and cumulative effects with other nearby OWFs/projects. This leads to considerable uncertainty regarding the implications of a phased construction approach on wave (and tidal current) blockage effects, impacts to sensitive receptors and potential for cumulative effects with other nearby OWF projects.	Natural England advises that impacts on waves (and tidal currents) during the construction phase should remain scoped in until further information is available and further assessment carried out to rule out potential impacts on sensitive receptors.

Point No.	Section	Para	Topic	Comments	Recommendations
B18	2.1.5.1.7	264	Impacts on Water Column Stratification Influencing Nutrient Fluxes and Primary Production	Natural England notes that it is stated that impacts on stratification begin in construction and continue through decommissioning. However, it is stated that to avoid duplicating assessments, the full extent of this impact would be assessed in the O&M stage section, with a clear acknowledgement that they span the duration of the development's lifetime. Natural England reiterates the concern above that currently there is considerable uncertainty regarding the scale and extent to which these impacts may occur during construction (and decommissioning) particularly given the potential for a phased approach to construction and, the potential for cumulative effects with other nearby OWFs/projects.	Natural England advises, as above, that until sufficient information is available to more fully understand the scale and extent of wave and tidal current blockage effects through construction and decommissioning, should remain scoped into the EIA.
B19	2.1.5.2.2	266	WCS Scour Footprints	Natural England notes that it is stated that previous studies have concluded that minimal impacts can be expected on prevailing bedload sediment transport conditions, both within windfarm sites as well as further afield. It is also suggested that the fixed foundation research provides a conservative, worst-case basis for assessing potential impacts on bedload sediment transport and seabed morphological change. Whilst it is anticipated that impacts due to floating turbines and innovative deepwater technology will be similar in nature, though smaller in magnitude.	Natural England highlights that, in our experience, in some cases OWF-related scour effects have arisen that have been considerably greater than predicted in the ES. This highlights the importance of carrying out a detailed seabed mobility and scour assessment to inform design and installation. Assessments should, therefore, determine the WCS scour footprint for individual turbines/structures, and the array as a whole.
B20	2.1.5.2.3	268	Impacts on Sediment	Natural England notes that impacts on sediment transport processes and seabed	Natural England advises that potential impacts on adjacent coastlines (including but not limited

Point No.	Section	Para	Topic	Comments	Recommendations
			Transport Processes and Morphological Change at the Coast	morphological change at the coast only consider impacts associated with the offshore export cable installation, O&M, decommissioning. However, there is the potential for the array to alter the wave regime downwind, reducing significant wave heights at adjacent coastlines and affecting coastal morphological processes.	to Lundy Island) and coastal morphology due to wave blockage effects should be scoped in. The spatial extent of projected changes to the wave regime downwind of the array and reductions in significant wave should be quantified.
B21	2.1.5.1.4 & 2.1.5.1.5	271	Impacts on Contaminant Concentrations due to Changes in Suspended Sediment Concentrations (SSCs)	Natural England notes that whilst impacts on SSCs (and seabed morphology) due to resuspended sediment have been scoped in for the O&M stage, they have not been scoped in for impacts on contaminant concentrations due to changes in SSCs. However, given the multiple OWF infrastructure design options at present, potential for use of innovative solutions, and presence of the (now) closed Milford Haven Industrial Sea disposal site overlapping the Array Scoping Boundary we are concerned that this impact has been scoped out too early,	Natural England advises that ' <i>Impacts on Contaminant Concentrations due to Changes in SSCs</i> ' should remain scoped in for the O&M stage until design options and O&M methods have been refined and the nature of potential contaminants within the Array Scoping Boundary is better understood.
B22	2.1.5.5		Cumulative/In-combination Assessment	Natural England agrees that cumulative/in-combination impacts should be scoped in to the EIA. As highlighted above, we advise that potential cumulative blockage effects on wave, tide, and sediment transport regimes will need to be considered, along with other potential cumulative effects such as overlapping sediment plumes, cable crossings or multiple external cable protection measures altering the hydrodynamics and sediment transport etc.	Natural England advises that the CEA cumulative/in combination assessment should include consideration of changes to hydrodynamics, geology, sediments and sediment transport, morphology and morphodynamics from your project and potential changes arising from any other relevant projects or activities.

Point No.	Section	Para	Topic	Comments	Recommendations
B23	MCZ Assessment, Section 4		Cumulative Effects from Proposed Development	Natural England notes that the MCZA has not considered potential cumulative effects on waves, hydrodynamics, and sediment transport due to the presence of the proposed development.	Natural England advises that this should be considered in the MCZA.
B24	MCZ Assessment, Section 2.3 & 5		Cumulative Effects from Other Projects	The MCZA has not considered potential cumulative effects on waves, hydrodynamics, and sediment transport due to the presence of the proposed development and other OWFs/projects.	Natural England advises that this should be considered in the MCZA.

Benthic Habitat

Natural England's advice on benthic habitats, provided below, focuses on the aspects of the Scoping Report that are relevant to English waters, the English coastline, Marine Protected Areas (MPAs), and other sensitive receptors. For matters relating to benthic habitat impacts within Welsh waters and along the Welsh coastline, including the proposed landfall area, we defer to Natural Resources Wales (NRW) and other relevant statutory consultees. Table 3.1 answers the Applicant's questions for this thematic area included within the scoping report, Table 3.2 covers our detailed advice and recommendations on this thematic area.

Table 3.1 Natural England's Response to the Applicant's Questions Regarding Benthic Habitat

Benthic Habitat	
Do you agree with the proposed Benthic Habitat Study Area and that it is sufficient to capture the relevant impacts?	Based on the high-level information provided, Natural England is broadly in agreement with the proposed study area for the proposed development alone effects, however, we consider that study area may need to encompass the scale and extent of potential cumulative effects with other nearby projects.
Do you agree with the characterisation of the baseline environment?	We agree with the characterisation of the benthic habitat baseline environment.
Have all the relevant data sources been identified in the Scoping Report?	Given the early stage of the assessment, the data sources identified in the Scoping Report are adequate. However, we highlight the

	apparent marked time gap between the site- and project-specific surveys and the indicative construction programme of 2034-2039. We also defer to our NRW counterparts for further advice on data specifically relevant to Welsh waters and the Welsh coastline.
Have all the potential impacts resulting from the Development been identified in the Scoping Report?	Natural England is broadly content with the potential impacts identified for the project alone. We highlight the considerable uncertainty regarding the WCS project parameters owing to multiple design options (including innovative deepwater solutions) and the early stage of the assessment. Therefore, our advice on potential impacts may change as more details become available.
Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?	No. Please see our comments below for detailed advice in this regard.
Do you agree with the proposed approach to assessment?	Natural England is broadly in agreement with the proposed approach, as noted above, there is considerable uncertainty regarding the WCS project parameters, and the assessment is at an early stage, and details are generally very high level. Therefore, our advice on the approach to assessment may change as more information becomes available.

Table 3.2 Natural England's Detailed Advice and Recommendations Regarding Benthic Habitats

Point No.	Section	Para	Topic	Comments	Recommendations
C1	Table 2.2.4		Geophysical surveying of the offshore export cable scoping boundary	Geophysical surveys undertaken by The Crown Estate for Round 5 did not include the offshore export cable scoping boundary. Geophysical surveying of the offshore export cable scoping boundary is not proposed within the Scoping Report.	Natural England advises geophysical surveying should be undertaken by the Applicant throughout the offshore export cable scoping boundary. The results from these surveys should subsequently be ground-truthed to produce biotope mapping. We also advise that the Applicant's also undertake geotechnical surveys
C2	2.2.5.1	310	Subtidal Impacts During	Natural England notes the proposed approach to assess the full extent of impacts associated with permanent habitat loss, the	Natural England advises that all impacts to benthic habitats and associated receptors should be assessed at the relevant stages of

			Construction Phase	introduction of hard substrate, and the effects of heating and electromagnetic fields (EMF) from cables within the O&M assessment to avoid duplication. However, we advise that potential effects arising during the construction phase should also be considered within the Construction Phase Assessment, where relevant, to ensure that all impacts to benthic habitats and associated receptors are appropriately assessed throughout the lifecycle of the Development.	development. Cross-references to the O&M assessment may be used where appropriate.
C3	2.2.5.1 2.2.5.2	315, 319, 329 & 332	Embedded Mitigation	Natural England acknowledges the proposal to scope out potential impacts associated with pollution incidents and the introduction of Invasive Non-Native Species (INNS), on the basis that mitigation measures will be secured through the implementation of the Project Environmental Management Plan (PEMP) and Marine Pollution Contingency Plan (MPCP). However, the provision of a plan, in itself, does not constitute embedded mitigation. Rather, it is the specific measures, commitments and procedures contained within those plans that are critical to avoiding or reducing adverse effects. In the absence of the final plans, Natural England is unable to determine whether such impacts have been adequately addressed. Consequently, potential impacts arising from pollution incidents and the introduction or spread of INNS cannot currently be scoped out.	Natural England advises that impacts associated with pollution incidents and the introduction or spread of Invasive Non-Native Species (INNS) should remain within the scope of the assessment for all phases of the Project lifecycle. In the absence of the Project Environmental Management Plan (PEMP) and Marine Pollution Contingency Plan (MPCP), Natural England cannot conclude that these impacts have been adequately avoided, reduced or managed. Accordingly, outline plans, including the proposed mitigation measures and commitments, should be provided at the application stage to support the assessment of likely significant effects.
C4	2.2.5.2	323 & 324	Potential Impacts	Natural England notes that impacts relating to permanent habitat loss have been scoped	Natural England advises that impacts associated with permanent habitat loss should

			Relating to Permanent Habitat Loss	in for the O&M phase, but are not included for consideration during the Construction and Decommissioning phase of development. It is appropriate for these impacts to be considered throughout the lifecycle of the Project.	be assessed, where relevant, across all phases of the Project lifecycle. This will ensure that the full extent of potential effects is appropriately considered and that any phase-specific impacts are identified and assessed.
C5	2.2.3	Table 2.2.3	Project Specific Surveys	Natural England notes that site-specific benthic surveys for the Array Scoping Boundary were undertaken in 2025, and The Crown Estate Surveys for Leading Round 5, were undertaken in 2024. Given that the indicative construction programme is 2034-2039, this represents a considerable time gap between characterisation surveys and construction.	Natural England advises that for pre-construction benthic baseline conditions, surveys should not be older than two years, whilst for dynamic marine environments and areas of high seabed mobility, recent data may be required to inform the EIA characterisation. The implications on the EIA/MCZA/HRA conclusions will need to be carefully considered.

Fish and Shellfish Ecology

Natural England's advice on fish and shellfish ecology provided below focuses on the aspects of the Scoping Report that are relevant to English waters, the English coastline, Marine Protected Areas (MPAs), and other sensitive receptors. For matters relating to fish and shellfish ecology impacts within Welsh waters and along the Welsh coastline, including the proposed landfall area, we defer to Natural Resources Wales (NRW) and other relevant statutory consultees. Table 4.1 answers the Applicant's questions for this thematic area included within the scoping report, Table 4.2 covers our detailed advice and recommendations on this thematic area.

Table 4.1 Natural England's Response to the Applicant's Questions Regarding Fish and Shellfish Ecology.

Fish and Shellfish Ecology	
Do you agree with the proposed Fish and Shellfish Ecology Study Area and that it is sufficient to capture the relevant impacts?	Natural England agrees with the proposed Fish and Shellfish Study Area and consider it sufficient to capture the relevant impacts.
Do you agree with the characterisation of the baseline environment?	Natural England is broadly content with the considerations for the baseline characterisation assessment. Please see our comments below for additional species that should be considered.

Have all the relevant data sources been identified in the Scoping Report?	Natural England is broadly content with the data sources provided by the Applicant and would expect any additional sources to be included if available prior to the assessment. Please see our comments below for additional sources that could be considered. We welcome any engagement with the Applicant when finalising their site-specific survey methods ahead of their commencement in 2027.
Have all the potential impacts resulting from the Development been identified in the Scoping Report?	Natural England is broadly content with the potential impacts identified for the project alone. Where concerns remain, these are highlighted in our advice below.
Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?	No. Please see our comments below for detailed advice in this regard.
Do you agree with the proposed approach to assessment?	Natural England agrees with the proposed approach.

Table 4.2 *Natural England's Detailed Advice and Recommendations on Fish and Shellfish Ecology*

Point No.	Section	Para	Topic	Comments	Recommendations
D1	General		Consideration of OSPAR and schedule 5 species	Natural England notes that some species listed under schedule 5 of the Wildlife and Countryside Act have been considered within the Scoping Report. However, some listed species present within the OSPAR Celtic Sea Region (Region III) are not.	Natural England recommends consideration should also be given to species such as white skate, Atlantic sturgeon, and other OSPAR listed species present within the Celtic Sea.
D2	2.3.2.2		Sandeel and herring spawning site references	Natural England notes that some key references recommended in our best practice have not been included in the assessment of herring and sandeel spawning sites. Natural England notes that Ellis et al. 2012 is referenced within the scoping report, but not specifically for herring spawning sites.	Natural England recommends that the following references should be considered by the Applicant when assessing the location and seasonality of herring and sandeel spawning sites during the baseline characterisation assessment: Ellis, J.R., Milligan, S.P., Readdy, L., Taylor, N. and Brown, M.J. (2012). Spawning and nursery grounds of selected fish species in

					UK waters. Sci. Ser. Tech. Rep., Cefas Lowestoft, 147: 56 pp. Katara, I., Peden, W. J., Bannister, H., Ribeiro, J., Fronkova, L., Scougal, C., Martinez, R., Downie, A. & Sweeting, C. J. (2021). Conservation hotspots for fish habitats: A case study from English and Welsh waters. Regional Studies in Marine Science, 44, 101745.
D3	2.3.5.2.5	395	Auditory injury from underwater noise during O&M	Natural England disagrees with the decision to scope out auditory injury from underwater noise during the O&M phase. Floating offshore wind farms have also been found to produce underwater noise associated with mooring lines which can make snapping or straining noises during operation phase of the project (Burns et al. 2022, Risch et al. 2026). Research on this noise has been limited to small scale floating wind farms. Unless strong evidence can be provided this impact should be scoped into the EIA.	Natural England advises that potential impacts to fish from underwater noise/auditory injury is scoped into the assessment for the O&M phase of the project.
D5	2.3.5		Entanglement impacts	Natural England's view is that the risk of entanglement to fish should be scoped into the EIA assessment. While primary entanglement is unlikely for designated fish species, risk of secondary and tertiary entanglement will be present from the installation of the first turbines.	Natural England advises that secondary entanglement risks to fish are scoped into the assessment for the construction phase and O&M phase of this project.
D6	2.3.5		Pollution impacts	Natural England's view is that the risk of accidental release or pollution events to fish should be scoped into the EIA assessment.	Natural England advises that potential impacts from accidental release or pollution events to fish are scoped into the assessment for all phases of the project.

Fish and Shellfish Ecology References

Burns, R.D.J., S.B. Martin, M.A. Wood, C.C. Wilson, C.E. Lumsden, and F. Pace., 2022. Hywind Scotland Floating Offshore Wind Farm: Sound Source Characterisation of Operational Floating Turbines.

<https://static1.squarespace.com/static/689204c4e701705413225916/t/68e80e6ac15563000c3767dc/1760038506317/Hywind%2BScotland%2BSound%2BSource%2BCharacterisation.pdf>

D. Risch, D., van Geel, N. C. F., Benjamins, · S., Wittich, A., Wilson, B., Marmo, B., 2026, Underwater Noise Produced by Two Types of Operational Floating Wind Turbines and Preliminary Data on Harbor Porpoise, in A. N. Popper et al. (eds.), The Effects of Noise on Aquatic Life IV, https://doi.org/10.1007/978-3-031-94229-7_208-1

Marine Mammals and Marine Turtles

Natural England's advice on marine mammals and marine turtles provided below focuses on the aspects of the Scoping Report that are relevant to English waters, the English coastline, Marine Protected Areas (MPAs), and other sensitive receptors. For matters relating to marine mammal and marine turtle impacts within Welsh waters and along the Welsh coastline, including the proposed landfall area, we defer to Natural Resources Wales (NRW) and other relevant statutory consultees.

Table 5.1 answers the Applicant's questions for this thematic area included within the scoping report, Table 5.2 covers our detailed advice and recommendations on this thematic area.

Table 5.1 Natural England's Response to the Applicant's Questions Regarding Marine Mammals and Marine Turtles.

Marine Mammals and Marine Turtles	
Do you agree with the proposed Marine Mammals Study Area and that it is sufficient to capture the relevant impacts?	Natural England agrees with the proposed Marine Mammals Study Area and consider it sufficient to capture the relevant impacts.
Do you agree with the characterisation of the baseline environment?	Natural England agrees that all relevant species and associated marine mammal management units (MMUUs) have been considered for the assessment.
Have all the relevant data sources been identified in the Scoping Report?	Natural England is content with the data sources provided by the Applicant and would expect any additional sources to be included if available prior to the assessment. We welcome any engagement with the Applicant when finalising their site-specific survey methods ahead of their commencement in 2027.
Have all the potential impacts resulting from the Development been identified in the Scoping Report?	Natural England is broadly content with the potential impacts identified for the project alone. Where concerns remain these are highlighted in our advice below.
Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?	No. Please see our comments below for detailed advice in this regard.
Do you agree with the proposed approach to assessment?	Natural England agrees with the proposed approach and with the activities for which underwater noise modelling will be undertaken. We note that UXO clearance is not to be included in this application as a licenced activity, though we welcome future opportunities to advise on this work.

Table 5.2 Natural England's Detailed Advice and Recommendations on Marine Mammals and Marine Turtles.

Point No.	Section	Para	Topic	Comments	Recommendations
E1	General	-	Marine Noise	Natural England recognises that there may be lower requirements for piling and other noisy activities in constructing floating offshore wind infrastructure when compared to developments utilising fixed piled foundations. However, should piling remain within the project design envelope, we highlight that noise modelling for piling will need to be undertaken with and without noise abatement being applied.	Natural England advises that Defra's Reducing Marine Noise Policy is adhered to and note that the Welsh Government have also committed to developing a similar policy. We also highlight that JNCC will be publishing recommendations for undertaking noise assessments for piling and UXO clearance in August, and recommend the applicant consider these when undertaking their assessment.
E2	General	-	Heavy Metals and Persistent Organic Pollutants	Natural England has concerns regarding the potential release of heavy metals and persistent organic pollutants (POPs) during construction piling and cable-laying activities. These hazardous substances are already thought to be widespread in cetaceans and are a chronic threat to populations.	Natural England advises that the potential impacts of heavy metals and persistent organic pollutants (POPs) released from marine sediments during construction activities should be assessed, including both direct effects on marine mammals and indirect effects through potential impacts on prey species.
E3	2.4.5.2.1	454	Auditory Injury Resulting from Underwater Noise	Natural England disagrees with the decision to scope out the potential for auditory injury resulting from underwater noise during the operation and maintenance (O&M) phase. Evidence from the FLOWN-MIT project indicates that floating offshore wind infrastructure can generate underwater noise impacts on marine mammals, including disturbance, barriers to species movement, and potentially auditory injury (Risch et al.,	In light of the available evidence, Natural England advises that the potential impacts of underwater noise on marine mammals, including the risk of auditory injury, should be scoped into the assessment for the operation and maintenance (O&M) phase of the project.

				2026). Given this evidence, Natural England considers that the potential for auditory injury during the O&M phase cannot currently be discounted and should therefore be retained within the scope of the assessment.	
E4	2.4.5.2.6	459	Primary and Secondary Entanglement Risk	In addition to the potential impacts identified, Natural England advises that primary and tertiary entanglement risk are also scoped into the assessment. Whilst we acknowledge that the assessment focus should be on secondary entanglement risk, we advise that these other two aspects are considered and presented within the EIA. A recent Natural England report published in 2024 provides further information to understand that impact further (Genesis 2024).	Natural England advises that both primary and tertiary entanglement risks to marine mammals are scoped into the assessment.
E5	2.4.5.2.6	459	Entanglement Risk Scoping	Natural England's view is that the risk of entanglement to marine mammals will be present from the installation of the first turbines. Accordingly, we advise that this impact is included within the scope of the assessment for the construction phase, as well as for the operational and maintenance phase.	Natural England advises that entanglement risks to marine mammals are scoped into the assessment for the construction phase of the project.
E6	2.4.5.2.9	462	Barrier Effects from the Physical Presence of the Development	Natural England notes that the installation of up to 166 floating turbines near the Bristol Channel Approaches SAC has the potential to act as a barrier to marine mammal species movement. The funnel-like nature of the Bristol Channel topography means that marine mammal	Natural England advises that barriers to species movement from the physical presence of the project should be scoped into the assessment

				species have limited options to avoid the multiple floating offshore wind developments currently planned when approaching the Bristol Channel Approaches SAC.	
E7	2.4.5.2.10	463	Effects from EMFs	Natural England considers that the rationale provided for scoping out effects associated with electromagnetic fields (EMFs) is not currently sufficient. While EMF effects have historically been screened out of EIA for marine mammals, floating offshore wind developments introduce a new exposure pathway through unburied cables suspended within the water column, the potential effects of which are not yet fully understood.	Natural England advises that potential impacts to marine mammals from EMFs be scoped into the assessment.

Marine Mammal References

Genesis, 2024. Assessment of environmental impacts of proposed floating offshore wind design envelope. NECR501. Natural England.
<https://publications.naturalengland.org.uk/publication/5224811773820928>

D. Risch, D., van Geel, N. C. F., Benjamins, · S., Wittich, A., Wilson, B., Marmo, B., 2026, Underwater Noise Produced by Two Types of Operational Floating Wind Turbines and Preliminary Data on Harbor Porpoise, in A. N. Popper et al. (eds.), The Effects of Noise on Aquatic Life IV, https://doi.org/10.1007/978-3-031-94229-7_208-1

Offshore Ornithology

Natural England's advice on offshore ornithology provided below focuses on the aspects of the Scoping Report that are relevant to English waters, the English coastline, Marine Protected Areas (MPAs), and other sensitive receptors. For matters relating to offshore ornithology impacts within Welsh waters and along the Welsh coastline, including the proposed landfall area, we defer to Natural Resources Wales (NRW) and other relevant statutory consultees. Table 6.1 answers the Applicant's questions for this thematic area included within the scoping report, Table 6.2 covers our detailed advice and recommendations on this thematic area.

Table 6.1 Natural England's Response to the Applicant's Questions Regarding Offshore Ornithology.

Offshore Ornithology	
Do you agree with the proposed Offshore Ornithology Study Area and that it is sufficient to capture the relevant impacts?	We generally agree with the proposed Offshore Ornithology Study Area and that it is sufficient to capture the relevant impacts. We note the different treatment the Applicant has suggested for common guillemot and herring gull in the non-breeding season and recommend that the standard BDMPS regions should be adopted pending any further evidence from the Applicant.
Do you agree with the characterisation of the baseline environment?	We agree with the characterisation of the baseline environment for offshore ornithology.
Have all the relevant data sources been identified in the Scoping Report?	We have highlighted additional data sources to be used to support the assessment, comprising joint Statutory Nature Conservation Body ('SNCB') advice notes on displacement and collision assessment, and the Natural England Offshore Wind Seabird Assessment Tool ('OWSAT'), which brings together SNCB advised parameters to be used across the assessment and which we recommend is used throughout the evidence plan process. Natural England also highlights that the following pieces of work are in progress: a review and update of seabird demographic rates, an update of the Biologically Defined Minimum Population Size ('BDMPS') apportioning rates and associated reference populations, the development of new flight height distributions, and a study to further our understanding of the behaviour and demography of Manx shearwater and Storm petrel. The Applicant should continue to monitor

	the outputs of these projects and discuss potential applications with the SNCBs as soon as practicable.
Have all the potential impacts resulting from the Development been identified in the Scoping Report?	All the potential impacts resulting from the Development have been identified.
Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?	Most of the potential impact pathways have been correctly scoped in. We recommend scoping in displacement impacts and barrier effects due to the presence of turbines during the construction and decommissioning stages. We also do not consider it appropriate to screen out non-breeding season impacts on the kittiwake feature of Flamborough and Filey Coast SPA based on the results of the LR5 HRA.
Do you agree with the proposed approach to assessment?	We broadly agree with the proposed approach to assessment. However, please see our detailed comments.

Table 6.2 Natural England's Detailed Advice and Recommendations Regarding Offshore Ornithology

Point No.	Section	Para	Topic	Comments	Recommendations
F1	HRA		Screening	Natural England does not agree with the two-stage methodology used for screening of breeding seabirds in the non-breeding season, migratory seabirds and migratory waterbirds. All species features which pass stage one of the screening should be subject to a quantitative assessment of project-alone impacts at least. As it stands, we consider that a number of features from protected sites in England are absent from the full list of features screened in, which should be included.	Natural England advises that all species features which pass the LSE test in stage one of the screening method should be included in the HRA impact assessment. We recommend that the use of OWSAT to support this assessment should be discussed with NRW/JNCC as we consider that this should allow quantitative assessments to be produced for a large number of sites with minimal additional effort or text required in the final report.

F3	Section 2.5.1.2	479	Regional Study Areas	Natural England notes the Applicant has suggested that regional study areas for Guillemot and Herring gull may differ to the standard BDMPS regions. In the BDMPS review commissioned by Natural England (Johnston et al, 2025), it is stated that: <i>“Guillemot is ... an example of a species where the specific location of a wind farm may influence the suitability of the use of the BDMPS apportioning approach outside of the breeding season. For example, projects sited close to major breeding colonies are likely to have a higher proportion of birds with connectivity to those specific colonies, particularly immediately before and after the breeding season. In such cases, the assumption of random mixing of the component populations of the BDMPS are clearly violated and a more bespoke approach to apportioning may be required based on the available evidence.”</i> However, the review also stated that: <i>“Due to the continuity of Guillemot colonies along UK coasts, a divide beyond east and west waters is likely inappropriate at this stage.”</i>	Natural England advises that BDMPS non-breeding season regions should be used for Guillemot and Herring Gull, pending further specific evidence and consultation with the SNCBs.
F4	Table 2.5.2		Seasonal definitions	Natural England does not agree that all of the seasonal definitions presented in Table 2.5.2 are appropriate for assessment purposes. Several of the seasons presented overlap, with individual months being assigned to multiple seasons. While this may reflect ecological reality to a certain extent (for example, part of a population may still be on	Natural England advises using the seasonal definitions provided by SNCBs within OWSAT.

				migration while another part has started breeding), it makes assessment processes such as calculating seasonal mean peak abundances and apportioning rates problematic. Natural England, NRW and JNCC have collaborated to produce an advised set of seasonal definitions, which is embedded within Natural England's Offshore Wind Seabird Assessment Tool (OWSAT).	
F5	Table 2.5.4		Tools and data sources	Natural England confirms that the tools and data sources listed in this table are broadly appropriate. However, there are some additional data sources we advise using. We advise the inclusion in this table of the Joint SNCB Interim Displacement Advice Note (2022) and the Joint advice note from the SNCBs regarding bird collision risk modelling for offshore wind developments (2024). We also strongly recommend the use of the Natural England Offshore Wind Seabird Assessment Tool (OWSAT). This has been developed with the support of NRW and JNCC. OWSAT contains key information from many of the sources listed in the table in one place and allows efficient tracking and updates to the assessment figures. SNCBs will be using OWSAT across the Round 5 projects to review, keep track of and ensure consistency between ornithological	Natural England advises the inclusion of reference to the joint SNCB advice notes and OWSAT in the table. The Applicant should consult with NRW/JNCC regarding the use of OWSAT throughout the evidence plan process. We note there is work in progress to: review and update seabird demographic rates, update BDMPS apportioning rates and regional reference populations (using the latest census data), develop new flight height distributions (Offshore Wind Evidence and Change ('OWEC') ReSCUE project), and understand the behaviour and demography of Manx shearwater and Storm petrel (OWEC ProcBe project). The Applicant should continue to monitor outputs of these projects and discuss the outcomes with the SNCBs.

				impact assessments. Note that the use of OWSAT is included as one of the Offshore Wind Environmental Standards due to be published this summer.	
F6	Section 2.5.5.1 & Table 2.5.5		Construction impacts	Natura England advises that Disturbance and Displacement from Turbines and Barrier Effects are scoped in for assessment during the construction and decommissioning stages as well as during operations and maintenance. As well as the effects of construction activity, this is because turbines will be present in the water for some of the construction stage prior to the start of operations and will remain present for some of the decommissioning phase before completion of removal.	Natural England advises that displacement impacts and barrier effects during the construction and decommissioning stages should be scoped in and assessed as 50% of the displacement impacts values in the operations and maintenance stage.
F7	Section 2.5.5.5	513	Cumulative and in-combination impacts	Natural England notes that: <i>"...the Applicant proposes to utilise 'gap-filling' data presented by the Mona, Morgan and Morecambe projects in the cumulative assessment, unless more recent data (e.g. from the proposed cumulative effects framework) becomes available"</i>. Natural England, NRW and JNCC have collaborated on the CuCombER project to produce agreed updated cumulative impact estimates from all the relevant OWFs required to inform cumulative assessments for Round 5, based on SNCB advised methods. When this project concludes, we recommend that these impact figures are used to inform the cumulative assessment.	Natural England advises that consideration is given to the use of the CuCombER project impact estimates with NRW/JNCC.

F8	Section 2.5.5.5	515	Cumulative Effects	Natural England agrees that cumulative effects during construction and decommissioning should be scoped in, but we note that this is not purely due to the potential for overlap with the construction stages of PDA 2 and 3. Impacts during the construction and decommissioning stage may act cumulatively with impacts during the operations and maintenance stage of all existing projects in the region and should be scoped in on this basis.	Natural England advises the scoping in of impacts during the construction and decommissioning stages for potential cumulative impacts with all existing projects in the region, as well as with PDA 2 and 3.
F9	HRA Section 3.1.1.1 Section 3.1.1.2	54 & 58 60 & 61	Exclusion of sites at the screening stage	Natural England does not consider it appropriate to exclude sites at the screening stage of the assessment on the basis of predicted magnitude of impacts in the absence of sufficient information about those impacts. All sites within the relevant BDMPS regions, where there is Likely Significant Effect (LSE), should be screened in and a quantitative assessment, where the methodology used is clearly set out, should be presented, with full parameter sets such that the modelling can be exactly replicated.	We recommend the use of OWSAT to allow impact estimates for a large number of sites to be apportioned efficiently and final impact values to be presented. Where impacts are small (e.g., <1% baseline mortality of the respective population), this can be recorded in a simple table with supporting text (referencing the relevant version of OWSAT) to demonstrate the sites have been assessed with a single consistent method and that adverse effects on site integrity can be ruled out.
F10	HRA Section 3.1.1.1	78	Flamborough and Filey Coast SPA Kittiwake	Natural England notes it is stated that <i>“Within the LR5 HRA, kittiwake from Flamborough and Filey Coast SPA were considered but discounted, as the SPA contributes only a small proportion of the UK western waters BDMPS population and collision estimates, derived using highly precautionary modelling assumptions, were low, leading to the conclusion that any impact attributable to this SPA would be negligible. It is considered appropriate that the same conclusion is</i>	Natural England advises that the kittiwake feature at FFC SPA should not be screened out at this stage given the LR5 HRA was based on indicative kittiwake abundance data. We also note that updates to BDMPS non-breeding season apportioning values may influence assumption about apportioning of kittiwake impacts to FFC SPA.

				<i>reached at the project level, i.e. that there would be no LSE for the kittiwake feature at Flamborough and Filey Coast.”</i> Natural England does not agree that LSE for the kittiwake feature at FFC SPA should be ruled out at this stage given we do not have sufficient information about the magnitude of the predicted impacts. We suggest that this should be retained and considered further in relation to outcomes of assessment.	
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Ornithology References

JNCC, Natural England, Natural Resources Wales, NatureScot. 2024. Joint advice note from the Statutory Nature Conservation Bodies (SNCBs) regarding bird collision risk modelling for offshore wind developments.

Johnston, D., Langlois Lopez, S., Humphreys, E. & O’Hanlon, N. 2025. A review of the Biologically Defined Minimum Population Scale (BDMPS) approach and methodology to apportioning non-breeding season impacts on seabirds arising from offshore wind farms. BTO Research Report 791, BTO, Thetford, UK. <https://www.bto.org/sites/default/files/RR%20791%20Johnston%20et%20al%20FINAL%20%28web%29.pdf>

SNCBs. 2022. Joint SNCB Interim Displacement Advice Note.

Woodward, I., Thaxter, C.B., Owen, E., Cook, A.S.C.P. 2019. Desk-based revision of seabird foraging ranges used for HRA screening.

Woodward, I., Thaxter, C.B, Owen, E., Bolton, M., Ward, R.M., Cook, A.S.C.P. 2024. The value of seabird foraging ranges as a tool to investigate potential interactions with offshore wind farms. *Ocean & Coastal Management*. 254. 107192, ISSN 0964-5691 <https://doi.org/10.1016/j.ocecoaman.2024.107192>

SLVIA

Natural England's advice on SLVIA provided below focuses on the aspects of the Scoping Report that are relevant to English waters, the English coastline, and other sensitive receptors. For matters relating to SLVIA impacts within Welsh waters and along the Welsh coastline, including the proposed landfall area, we defer to Natural Resources Wales (NRW) and other relevant statutory consultees. Table 7 answers the Applicant's questions for this thematic area included within the scoping report.

Table 7 Natural England's Response to the Applicant's Questions Regarding SLVIA.

SLVIA	
Do you agree with the proposed SLVIA Study Area and that it is sufficient to capture the relevant impacts?	We agree with the proposed SLVIA Study Area and that it is sufficient to capture the relevant impacts on English Landscapes and Seascapes.
Do you agree with the characterisation of the baseline environment?	We agree with the characterisation of the baseline environment for SLVIA.
Have all the relevant data sources been identified in the Scoping Report?	Natural England agrees the relevant data sources have been identified.
Have all the potential impacts resulting from the Development been identified in the Scoping Report?	All the potential impacts resulting from the Development have been identified.
Do you agree with the impacts that have been scoped in (or scoped out) of further assessment?	We agree potential impact pathways have been correctly scoped in.
Do you agree with the proposed approach to assessment?	We agree with the proposed approach to assessment.

Our Ref: AOS-22063-0004-EN0110036

Your Ref: EN0110036

Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN
United Kingdom

By email: gwyntglas@planninginspectorate.gov.uk

Date: 24th July 2026

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Nationally Significant Infrastructure Project (NSIP): Gwynt Glas Offshore Wind Farm

Thank you for your letter, dated 26th June 2026, requesting Cyfoeth Naturiol Cymru / Natural Resources Wales' (NRW) comments on the scope and detail of information to be provided within the Environmental Statement (ES) that will accompany the future application of the proposed Gwynt Glas Offshore Wind Farm.

The statutory purpose of NRW is set out by the Environment (Wales) Act 2016. In the exercise of its functions, NRW must pursue sustainable management of natural resources in relation to all of its work in Wales and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development. This means, in general terms, looking after air, land, water, wildlife, plants, and soil to improve Wales' well-being, and provide a better future for everyone. NRW is also an advisor to the Welsh Government on the natural heritage and resources of Wales and its coastal waters, and is

an Appropriate Nature Conservation Body (ANCB) under the Conservation of Habitats and Species Regulations 2017.

The comments provided in this submission comprise NRW's response as a Statutory Party under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Our comments are made without prejudice to any further comments we may wish to make in relation to this application and examination whether in relation to the ES and associated documents (including the draft Habitats Regulations Assessment (HRA), draft Water Framework Directive (WFD) Assessment and draft Marine Conservation Zone (MCZ) Assessment), provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by Gwynt Glas Offshore Wind Limited ('the Applicant'), the Examining Authority or other Interested Parties. They are also made without prejudice to any (further) advice NRW may need to give, or decisions NRW may need to take, in a project specific context should different circumstances or new information / evidence emerge that NRW will need to take into account.

In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation including (but not limited to) the Environmental Permitting (England and Wales) Regulations 2016 (as amended), and Marine and Coastal Access Act 2009.

NRW's submissions to the Gwynt Glas offshore windfarm application are therefore provided in the context of NRW's statutory purpose, functions, powers and duties. For the avoidance of doubt, the advice and comments provided in the Overarching Comments, Detailed Comments - Marine, and Detailed Comments - Onshore Sections of this response relate to NRW in its capacity as advisor and / or consultee (referred to as NRW Advisory (NRW(A))). The advice provided in the Marine Licensing / Regulatory section relate to NRW in its capacity as a regulator under the Marine and Coastal Access Act (2009) and are made by NRW's Marine Licensing Team (MLT).

We advise that, in addition to planning consent, it is the Applicant's responsibility to ensure that all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Herein we provide our submissions on the scoping application documents as submitted. Our comments on offshore aspects of the application are followed by onshore aspects and then regulatory aspects. In order to facilitate the review process, we have presented our advisory comments using a RAG format. The RAG status categories and their definitions are provided in Annex 1 at the end of this document. Our Marine Licensing / Regulatory comments are not presented with the RAG format.

With regards to our regulatory advice, we strongly advise that the Applicant requests bespoke pre-application advice directly from the NRW MLT at the earliest opportunity, to advise on the drafting of the deemed Marine Licence and other marine licensing elements, as necessary.

Please do not hesitate to contact [REDACTED] [REDACTED]@cyfoethnaturiolcymru.gov.uk), [REDACTED] [REDACTED] [REDACTED]@cyfoethnaturiolcymru.gov.uk) or [REDACTED] [REDACTED] [REDACTED]@cyfoethnaturiolcymru.gov.uk) should you require further advice or information regarding these representations.

Yours faithfully,

[REDACTED]

[REDACTED]
Senior Marine Advisor

[REDACTED]

[REDACTED]
Marine Services Manager

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.

NRW Advice

Contents

- Overarching Comments
- Requires Action (Summary of advisory comments requiring action)
- Detailed Comments - Marine
 - Marine & Coastal Physical Processes
 - Marine (Subtidal and Intertidal) Ecology
 - Marine Water Quality
 - Marine Fish
 - Marine Mammals
 - Marine Ornithology
- Detailed Comments - Onshore
 - Designated Landscapes
 - Designated Sites (Onshore)
 - Terrestrial Ornithology
 - Protected Species
 - Freshwater Fish
 - Flood Risk
 - Fluvial Geomorphology
 - Freshwater Water Quality
 - Groundwater
- Marine Licensing / Regulatory Comments
- References

Overarching Comments

- i) Scoping Report: NRW(A) welcomes the work undertaken by the Applicant in trying to appropriately identify the key approaches to developing project-level environmental assessments. However, there are several matters which we advise require further consideration and / or action from the Applicant in developing their proposals, in order to ensure that the environmental assessment processes for the project are robust. These matters are explained herein. NRW will continue to work with the Applicant to provide further advice on all required matters, through correspondence and meetings, with the aim of reaching as many positions of agreement and common ground as possible, on outstanding matters prior to full application submission.

For the avoidance of doubt, our marine advice on the draft HRA screening report is based on the updated Conservation Advice Packages published 25th June 2025: Natural Resources Wales / Conservation advice for European marine sites (Reg 37).

- ii) Potential Impacts and Engagement: There is the potential for the project to present significant impacts, both alone and/or cumulatively/in-combination under both the EIA and HRA regulations. There is also the potential for the proposed development to impact the Skomer MCZ alone and/or cumulatively, and to cause deterioration in WFD waterbodies.

We note the Applicant's commitment undertake a Cumulative Effects Assessment (CEA) as part of the EIA process. While information for some projects and plans has been provided, details of the specific approaches to be adopted are unclear and in some instances potential cumulative impact pathways have not been identified. We advise that further discussion is required and that a draft long-list of projects and plans to be included will need to be further developed in consultation with NRW. Furthermore, the potential for transboundary impacts will also need to be considered.

We, therefore, strongly encourage early and comprehensive engagement with NRW(A) on developing the project proposals. This is with particular respect to (but not limited to) approaches to environmental assessment (both alone and cumulatively/in-combination) and their outcomes (including consideration of potential mitigation/monitoring options and derogations if required).

- iii) Surveys and Data Collection: Whilst some information has been provided with respect to proposed project surveys and/or the data to be collected, we consider that, in places, this information is limited. As above, we strongly recommend further engagement to discuss exact survey requirements in order to avoid the risk of there being inadequate data to inform assessments.

- iv) Use of NRW Guidance and Evidence: We encourage the Applicant to use the NRW guidance and evidence that has previously been provided to inform project-level considerations and assessments. We have provided the links to some of these guidance documents again throughout this response.
- v) Decommissioning: NRW(A) acknowledges the commitment by the Applicant to produce a written Decommissioning Plan. NRW(A)'s general position on decommissioning is that plans should retain all decommissioning options (maintain, full removal, and partial removal) so that all options can be fully assessed and refined closer to the time of decommissioning itself. NRW(A) reserves its position until a draft plan is submitted at which point we will provide further advice.
- vi) Strategic Initiatives: In line with section 2.8.83 of the National Policy Statement for Renewable Energy (EN-3), Defra is due to publish Offshore Wind Environmental Standards (OWES) specifically for Round 5 in late summer 2026. There are seven OWES, and three Best Practice Measures to further complement these OWES.

NRW(A) supports this new policy and the environmental benefits it will bring for offshore wind projects. Further, the relevant SNCBs (NRW, Natural England, and Joint Nature Conservation Committee (JNCC)) have formed part of the OWES steering group and inputted into their development.

In line with EN-3, NRW(A) expects Applicants to adopt all OWES measures into their project design, and detail how their application complies with the OWES guidance in any documentation submitted as part of the application. Whilst the Best Practice Measures are not mandatory, NRW(A) advises that they are adopted as mitigation measures as they will be an important step in reducing environmental impact and provide valuable data to support EIA assessments.

NRW(A) acknowledges that the OWES guidance is not yet published therefore Gwynt Glas have been unable to incorporate the measures into this Scoping Report (submitted to PINS June 2026). However, we recommend that OWES measures are considered fully and referenced in all documentation moving forward.

Summary of advisory comments requiring action

Requires Action		
Marine Receptors		
Reference	Summary	RAG
Receptor - Marine & Coastal Physical Processes		
PP1	We do not consider that the proposed Zone of Influence (Zol) has been adequately justified for the assessment of marine and coastal physical processes. Evidence is required to demonstrate that hydrodynamic connectivity, residual sediment transport pathways and associated morphological responses do not extend beyond the proposed Zol.	RED
PP2	An outline Cable Burial Risk Assessment (CBRA) and Cable Specification and Installation Plan (CSIP) should be provided.	AMBER
PP3	St Gowan Shoal feature of the Pembrokeshire Marine Special Area of Conservation (SAC) and the Helwick Sandbank feature of the Carmarthen Bay and Estuaries SAC are missing from impact assessment.	AMBER
PP4	Impacts to waves and tides during construction and decommissioning should be scoped in.	AMBER
PP5	Impacts to waves from cable protection in shallow water have not been considered.	AMBER
PP6	Water Quality should be treated as a standalone receptor in the ES, distinct from Marine and Coastal Physical Processes.	AMBER
PP7	We advise the ES should include justification of the scour protection approach.	AMBER
PP8	We strongly recommend early consultation with NRW to inform the refinement of routing for export cable corridor and landfall options. We advise that these aspects must be fully assessed for the proposed locations and any reasonable alternatives.	AMBER
PP9	We advise the ES should clearly describe all the proposed landfall installation methods, including whether Horizontal Directional Drilling (HDD) or other	AMBER

	trenchless techniques are being considered, together with the environmental implications of each option for each proposed landfall site.	
PP10	More information is required on sandwave clearance and the effects of cable/scour protection on sandwave recovery.	AMBER
PP11	Justification is needed for the offshore export cable configurations requiring additional infrastructure.	AMBER
PP12	Justification is needed for the use of dated suspended sediment concentration data to characterise baseline conditions.	AMBER
PP13	Clarification required as to whether vertical mixing impacts will be assessed in modelling exercises.	AMBER
PP14	Further clarification on decommissioning plan is required.	AMBER
PP15	Embedded mitigation relating to boulder removal is also relevant to marine geology, oceanography and physical processes. Further information is required on the management of any seabed material arising from any dredging, trenching, seabed preparation or boulder clearance activities.	AMBER
PP25	Justification needed for difference between Holistic Network Design and Project Level and Leasing Round 5 Zol.	AMBER
PP26	Waves and wave-current interaction can play a significant role in sediment transport processes and should also be considered within MCZ Screening Assessment.	AMBER
Receptor – Marine (Subtidal and Intertidal) Ecology		
ME2	The benthic characterisation presented within the Scoping Report has not drawn key information from the desk-based sources available.	AMBER
ME3	The list of Invasive Non-Native Species (INNS) present within the scoping boundary is incomplete.	AMBER
ME4	The current benthic baseline is not adequate for informing robust assessment under Environmental Impact Assessment (EIA) or Habitats Regulations Assessment (HRA). Site specific surveys have been proposed, and we advise the scope of these surveys	AMBER

	should be agreed in consultation with NRW(A) in order to ensure efficacy.	
ME5	The proposed intertidal survey methods are unlikely to be adequate, we recommend consultation with NRW(A) on the scope and direct the Applicant to relevant guidance.	AMBER
ME8	NRW(A) are unable to agree that accidental pollution can be scoped out based on the information provided and mitigation proposed. Outline management plans relevant to accidental pollution should accompany the Application to provide assurance that the risks of accidental pollution events will be effectively mitigated.	AMBER
ME9	NRW(A) does not agree that the introduction of INNS can be scoped out based on the current level of information and assessment which has been provided. We direct the Applicant to our guidance.	AMBER
ME10	NRW(A) are unable to agree that sediment heating effects on benthic receptors can be scoped out given the current level of information and evidence (specifically in relation to likely zone of effect)	AMBER
ME12	All impact pathways updated for construction impacts (following above comments) should also be updated for decommissioning impacts.	AMBER
ME13	Clarification is required regarding assessment criteria, and how categories will be defined.	AMBER
ME15	We advise Annex I habitats which may be found outside of protected sites during site specific surveys should be elevated when considering their value/importance.	AMBER
ME16	NRW(A) strongly disagrees that CBRAs can be undertaken post-consent. An outline CBRA and associated plans and studies are essential to informing a full meaningful assessment of the Worst Case Scenario (WCS) of cable protection parameters, and therefore habitat loss, through the project lifecycle. The use of cable protection which leads to lasting habitat loss within Marine Protected Areas (MPA) should be the final consideration after other alternatives have been exhausted. Where this cannot be avoided detailed cable protection parameters will be required to underpin meaningful assessment of the WCS.	AMBER

ME17	The Project should consider project design commitments that retains all decommissioning options for all components including scour/cable protection (i.e. maintain, partial removal and full removal).	AMBER
ME18	We strongly encourage the Applicant to engage in discussions with NRW(A) on the final refined cable route(s).	AMBER
ME19	We strongly encourage the Applicant to use HDD where possible given the potential greater environmental impacts trenching presents for the designated and/or notified intertidal features at landfall.	AMBER
ME21	In respect of transmission cable design options (High Voltage Alternating Current (HVAC)/High Voltage Direct Current (HVDC), we strongly advise that the Applicant considers the design option which would reduce impacts on benthic receptors.	AMBER
Receptor - Marine Water Quality		
MW1	A Water Framework Directive Compliance Assessment (WFD CA) is required and we strongly advise that a draft is produced for review at the earliest opportunity.	AMBER
MW2, MW3, MW8	We defer to Marine & Coastal Physical Processes comments request for modelling to establish the Zol.	AMBER
MW4	Water quality should be treated as a standalone receptor within the ES rather than being incorporated within the Marine and Coastal Physical Processes assessment. We request the Applicant creates a new water quality chapter within the ES and focuses on assessment of potential impacts on water quality.	AMBER
MW5	We do not agree that assumptions should be made on water quality based upon the area being dynamic with a varied wave and tidal regime. Please provide samples to evidence water quality and a WFD assessment.	AMBER
MW9 & MW5	Please provide a locations map of where samples were taken within the array and to what depth. This should be accompanied by the full results with the dates they were conducted to allow us to make a full assessment.	AMBER
MW11	At this stage we cannot rule out Likely Significant Effect (LSE) due to mitigation measures when the full Project Environmental Management Plan (PEMP) and Marine	AMBER

	Pollution Contingency Plan (MPCP) have not be developed and submitted for assessment. Please scope into the EIA.	
MW12	We request further information on the dredge area and total amount of volume of sediment to be dredged. Please can the applicant provide further details on the disposal methods and location for dredged material.	AMBER
MW13	We disagree that accidental release of contaminants from suspended sediments in construction and resulting impact on water quality would be short lived and localised. Please scope into the assessment and define timelines on construction of what 'short lived' refers to.	AMBER
MW14	Mitigation should be proposed to prevent any reduction in water quality during construction through the development of a Construction Environmental Management Plan (CEMP) and should include standard best practice measures as well as specific measures required by this development.	AMBER
Receptor - Marine Fish		
F1, F3, F14	A number of revisions or inclusions to the information presented in the ES is advised. This is required in order to ensure that the relevant information is included in the ES and has been appropriately considered.	AMBER
F6, F7, F16	Some relevant protected sites and features are missing from the scoping document. We advise their inclusion in order to allow for robust assessment.	AMBER
F4, F5, F10,	We note several instances where the approach to ongoing assessment is not clear. We have therefore advised on our recommended approach.	AMBER
F11, F12, F13	Amendments and additions to the risk pathways and pressures is advised.	AMBER
F9	Reference has been made to survey data that has not been made available (Table 2.3.4). We request that this data is made available to NRW in order to allow us to fully assess the impacts.	AMBER
Receptor - Marine Mammals		
MM4	Clarity should be provided regarding the methodology used to analyse the Round 5 PDA surveys.	AMBER

MM5	Intentions regarding project specific pre-application survey effort should be clarified.	AMBER
MM6	Primary and tertiary entanglement should be included in the assessments.	AMBER
MM7	NRW(A) disagrees with scoping out impacts from barrier effects due to physical presence.	AMBER
MM8	NRW(A) disagrees with scoping out impacts from Electromagnetic Fields (EMF).	AMBER
MM9	NRW(A) disagrees with the decision and justification to scope out auditory injury as presented.	AMBER
MM10	"Cable snaps" as identified occurring at the Hywind project should be included in underwater noise impact assessments.	AMBER
MM11	NRW(A) does not agree with scoping out of entanglement from the Construction & Decommissioning phases.	AMBER
MM12	Mitigation options for entanglement and vessel collision should be included.	AMBER
MM13	"Support" or endorsement of Offshore Wind Evidence and Knowledge Hub (OWEKH) Evidence Review Notes (ERNs) should not be assumed.	AMBER
MM16	NRW(A) does not agree with scoping out physical presence and entanglement during the construction and decommissioning phases in the Marine Conservation Zone (MCZ) assessment.	AMBER
Receptor - Marine Ornithology		
MO1	We strongly recommend the use of Natural England's Offshore Wind Seabird Assessment Tool (OWSAT) to support the assessment. This has been developed with the support of NRW and JNCC and is intended to improve the efficiency and consistency of assessments and the ease with which they can be reviewed. The Applicant should consult with NRW/JNCC regarding the use of OWSAT throughout the evidence plan process.	AMBER
MO3	The Applicant states that, where possible, they would <i>"use as-built project parameter information (if available) as opposed to consented parameters to reduce over precaution (inaccuracies) in the Cumulative Environmental Assessment (CEA)."</i> At present we do	RED

	not consider it appropriate to reduce impact estimates by considering as-built parameters unless those parameters are legally secured. A version of the cumulative impact assessment should be presented based on consented impact values only, except in cases where the as-built parameters are legally secured.	
MO4	We agree with the proposed non-breeding season offshore ornithology regional study area (defined as <i>the Biologically Defined Minimum Population Scales (BDMPS) spatial areas for each species as described in Furness (2015)</i>). However, we do not agree with the exceptions to this approach proposed for common guillemot and herring gull. We advise that the non-breeding season regional study area for guillemot and herring gull are also the relevant BDMPS regions.	AMBER
MO5	We advise that assessment is considered to any instances where a species is a feature of a SSSI, but not a qualifying feature of the SPA that the SSSI is a part of.	AMBER
MO6	We advise that the foraging ranges are amended for razorbill and common guillemot, as well as the Grassholm SPA gannet colony.	AMBER
MO8	We agree that seasonal definitions for each species of interest are based on the biologically defined seasons from Furness (2015) where available. We advise that the 'full breeding season' (rather than the 'migration free breeding season') definitions from Furness (2015) are used with the non-breeding season definitions subsequently adjusted accordingly to ensure that no months are considered in two seasons. We recommend using the seasonal definitions provided by SNCBs within OWSAT.	AMBER
MO9	We advise Carmarthen Bay SPA is added to Table 2.5.3 as it overlaps the offshore export cable scoping boundary.	AMBER
MO12	We recommend that disturbance and displacement from turbines and barrier effects are scoped in for assessment during the construction and decommissioning stages as well as during operations and maintenance. We advise that displacement	AMBER

	impacts and barrier effects during the construction and decommissioning stages should be assessed as 50% of the displacement impacts values in the operations and maintenance stage.	
MO16	NRW(A) does not consider it appropriate to exclude sites at the HRA screening stage of the assessment on the basis of predicted magnitude of impacts (e.g. the two-stage methodology used for screening of breeding seabirds in the non-breeding season, migratory seabirds and migratory waterbirds). We would expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity (e.g. within foraging range) and a potential impact pathway (e.g. displacement or collision) - and hence the potential to undermine the conservation objectives for the feature - to be screened in for LSE and carried through to the Appropriate Assessment (AA) phase. Any additional work looking at e.g. apportioning impacts and assessments of predicted impacts (e.g. collision or displacement) against baseline mortality etc should be included in the AA.	AMBER
MO18	We suggest that the features of all Welsh Special Protection Areas (SPAs)/Ramsar screened into the HRA screening are checked utilising information available. We also note that assessments should assess the potential impact of projects on SPA colony population features throughout the whole year.	AMBER
Onshore Receptors		
Receptor – Designated Landscapes		
DL01	Further information is advised to demonstrate which scenario within the Project Design Envelope (PDE) would likely have the maximum effect on seascape, landscape and visual receptors.	AMBER
DL03	No cumulative study areas have been identified. The appropriateness of the proposed extent of any cumulative study areas will depend on the location of other relevant schemes and the results of cumulative Zone of Theoretical Visibility (ZTV) analysis. The	AMBER

	cumulative study areas may need to be larger than the primary Seascape, Landscape and Visual Impact Assessment (SLVIA) / Landscape and Visual Impact Assessment (LVIA) study areas to capture interacting developments.	
DL04	Updated mapping and additional information is required in order to allow interpretation of the results of the ZTV and verify the appropriateness of the proposed assessment viewpoints.	AMBER
Receptor – Designated Sites (Onshore)		
DS01	The ES will need to demonstrate how site selection has considered all available alternative options that would avoid any development within designated sites. The ES will also need to identify impact pathways (both direct and indirect) on designated sites, clearly assess the possible levels of impact and, where impacts are likely, should provide full details of appropriate mitigation measures to address those impacts.	AMBER
Receptor – Terrestrial Ornithology		
TO01	The ornithological surveys will need to be in line with industry best practice (see Bird Survey Guidelines). Additional, species-specific surveys may also be required and should be informed by the habitat on site as well as the results of any desktop surveys. The methods can be species specific and may require different timings (both during the day/night and seasonally). As we are not in receipt of the full results of a desktop survey we are not able to provide an exhaustive list of the species specific surveys we would expect to be included within the EIA.	AMBER
Receptor – Protected Species		
PS01, 02, 03, 04, 05, 08	Should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium and long term together	AMBER

	with any mitigation and compensation measures proposed to offset the impacts identified.	
Receptor – Freshwater Fish		
FF01	Advice is provided to the Applicant in order to minimise impacts on freshwater fish.	AMBER
Receptor – Flood Risk		
FR01	A Flood Consequence Assessment (FCA) should be provided in support of the application. The FCA should be undertaken in accordance with Technical Advice Note (TAN) 15. Further guidance on undertaking an FCA is available on our website .	AMBER
Receptor – Fluvial Geomorphology		
FG02	The ES should provide a complete watercourse crossing schedule covering the cable corridor, temporary haul roads, construction accesses and compounds.	AMBER
Receptor – Water Quality (Freshwater)		
WQ01	A Construction Environmental Management Plan (CEMP) should be provided to demonstrate that suitable pollution prevention measures will be put in place. An Outline CEMP (or similar document) should be submitted alongside the ES as part of any planning application.	AMBER
Receptor – Groundwater		
GW01	Advice is provided to aid the Applicant's assessment of impacts on groundwater.	AMBER

Detailed Comments - Marine:

The following advice seeks to answer the questions posed within each of the relevant sections of the Scoping Report.

Receptor – Marine & Coastal Physical Processes

Environmental Impact Assessment Scoping Report

PP1. RAG = RED

Section 2.1., Page 78 – Zone of Influence (Zol)

1. Whilst NRW(A) recognises that a precautionary 15km Zol, based on maximum spring tidal excursion distance, is commonly applied in plan-level assessments of impacts on Marine Protected Areas (MPAs), we do not consider that the proposed Zol has been adequately justified for the assessment of marine and coastal physical processes. In accordance with NRW best-practice guidance, the study area and assessment boundaries should be defined by the spatial extent of the relevant physical processes and the potential impact pathways, rather than by a pre-defined distance threshold alone.
2. This is particularly relevant within nearshore environments, where hydrodynamic and sediment transport pathways may extend laterally across littoral sediment cells and influence areas beyond the proposed 15km boundary. Evidence is therefore required to demonstrate that hydrodynamic connectivity, residual sediment transport pathways and associated morphological responses do not extend beyond the proposed Zol. Furthermore, it is not possible to fully assess whether the Zol is appropriate given that cable landfall has not yet been decided.
3. Given that construction activities with the potential to resuspend sediment are anticipated to occur on a continuous 24-hour basis, the Applicant should provide evidence demonstrating that the sustained generation of suspended sediment plumes will not result in far-field effects, including changes to seabed sediment characteristics, sediment transport patterns or seabed morphology.
4. NRW(A) therefore recommends that any hydrodynamic and sediment transport modelling undertaken to inform the ES extends beyond the proposed 15km scoping boundary and is of sufficient spatial extent to capture the full area over which residual effects may occur. Should modelling indicate measurable effects beyond 15 km, the Zol and assessment area should be revised accordingly. [NRW Report 243, Guidance on Best Practice for Marine and Coastal Physical Processes Baseline Survey and Monitoring Requirements to Inform EIA of Major Development Projects](#) contains more

detailed information about obtaining a baseline and best practice, whilst NRW's [GN019 Completing a coastal or physical processes assessment for small-scale projects](#) has valuable information on calculating Zol.

PP2. RAG = AMBER

Section 1.5.3.1.4., Page 35 – Cable Burial Risk Assessment and cable protection

5. NRW(A) advises that an outline Cable Burial Risk Assessment (CBRA) and Cable Specification and Installation Plan (CSIP) should be provided to enable a robust assessment of the risks, impacts and mitigation measures associated with the entire cable route, including landfall approach and further offshore. Providing this information at the pre-consent stage reduces uncertainty and allows any concerns regarding cable protection requirements to be addressed through the consent process rather than subsequent consultation.
6. NRW(A) advises that cable protection should only be considered as a last resort after all reasonable alternatives e.g. cable burial or remedial burial options are demonstrated to be unviable. The Crown Estate's (2019) *Review of Cable Installation, Protection, Mitigation and Habitat Recoverability* provides a hierarchy of preferred cable installation methods, wherein the principal methods of mitigation concentrate on the reduction of cable exposure, minimising the amount of disturbance to the seabed and restraint in the use of long-term non-burial cable protection.
7. Any cable protection constructed within an MPA will be subject to assessment of Worst-Case Scenario for Habitats Regulations Assessment (HRA); therefore, the anticipated volume, extent and location of cable protection must be provided in order for this assessment to be robust. This information must cover the lifespan of the project, including installation, any additional protection or material replenishment that may be required, and the decommissioning process.

PP3. RAG = AMBER

Table 2.1.2., Page 89 – Sensitive features missing from impact assessment

8. The Scoping Report does not appear to specifically identify or assess the St Gowan Shoal feature of the Pembrokeshire Marine Special Area of Conservation (SAC) or the Helwick Sandbank feature of the Carmarthen Bay and Estuaries SAC, despite both potentially falling within the physical processes Zol. Given the sensitivity of these features to changes in hydrodynamics, sediment transport and seabed morphology, NRW(A) expects them to be explicitly included within the ES and HRA.
9. We also recommend that the ES includes a detailed geomorphological characterisation of the project area (including these features) using the high-

resolution multibeam bathymetric (MBES) data collected in the proposed 2027 survey. This should include sandbanks, sandwaves, sediment type, mobile sediment depth and sediment transport processes. A robust understanding of sandwave migration and sediment transport around protected sandbank features, particularly features such as Helwick Sandbank and St Gowan Shoal, will be essential for assessing the impacts of cable installation, seabed preparation works and cable protection measures.

PP4. RAG = AMBER

Table 2.1.3., Page 94 – Impacts to waves and tides during construction and decommissioning should be scoped in

10. NRW(A) does not agree that impacts to waves and tidal currents during the construction and decommissioning phases can be scoped out at this stage. Whilst we recognise the report acknowledges tides, waves and broader hydrodynamic processes are relevant during these phases, persistent changes to waves and currents (even on a temporary or localised basis) may influence net patterns of sediment transport over time i.e. transport rate and direction. The significance of any change will depend on a) the relative importance of wave and tide-driven processes, b) the magnitude and extent of the effect, and c) the sensitivity of the receiving seabed and coastal system. Further supporting evidence is therefore required to demonstrate that construction and decommissioning activities would not adversely affect sediment transport pathways or the maintenance of dynamic morphological features via alterations to wave and tidal regimes.

PP5. RAG = AMBER

Section 2.1.5., Page 90 – Impacts to waves from cable protection in shallow water not considered

11. NRW(A) notes there is no consideration of whether cable protection placed in shallow water could modify wave transformation processes, including wave refraction and diffraction. The presence of cable protection in nearshore areas may alter local bathymetry and influence the propagation of waves across the seabed. This may affect wave refraction and diffraction patterns, potentially resulting in the focusing of wave energy towards sections of the coastline and increasing the risk of localised coastal erosion. Such effects could also influence nearshore sediment transport pathways and coastal geomorphological processes.
12. Without a CBRA, these potential impacts cannot be adequately assessed as there will be insufficient information regarding the likely location, extent, dimensions or volume of cable protection required for the development. Therefore, it is not possible

to determine whether cable protection could influence nearshore wave processes or whether additional wave modelling is required to assess potential effects on coastal morphology and erosion. NRW(A) strongly recommends that wave effects resulting from nearshore cable protection should be scoped into the ES.

PP6. RAG = AMBER

Section 2.1 – Separate Water Quality as a distinct receptor from Marine and Coastal Physical Processes

13. NRW(A) recommends that Water Quality should be treated as a standalone receptor within the ES rather than being incorporated within the Marine and Coastal Physical Processes assessment. Changes to hydrodynamics and sediment transport do not constitute receptors in themselves; instead, they are mechanisms through which the development may influence sensitive environmental receptors. The Physical Processes assessment should therefore focus only on potential alterations to waves, currents, water levels and sediment movement, whilst the resulting effects on receptors such as water quality, benthic habitats and intertidal ecology should be assessed within the relevant topic chapters, with clear cross-referencing between assessments.
14. We defer to Water Quality on sections pertaining to this receptor and assessment of these potential impacts:
 - Impacts on contaminant concentrations due to changes in suspended sediment concentrations (SSCs)
 - Impacts on water column stratification influencing nutrient fluxes and primary production

PP7. RAG = AMBER

Section 1.5.3.1.3., Page 33 - ES should include justification of scour protection approach

15. Where scour protection is required, we advise that preference should be given to solutions that minimise impacts on the natural environment and maximise opportunities for biodiversity enhancement. Nature-inclusive scour protection measures, such as eco-engineered products (e.g. reef cubes, as mentioned in paragraph 76), are likely to be preferable where technically feasible. Where conventional scour protection is required, rock placement is generally considered more environmentally beneficial than concrete mattresses due to the greater habitat complexity provided. NRW(A) advises that the Applicant should justify the selected scour protection approach and demonstrate that opportunities to incorporate nature-inclusive design have been fully considered. More information can be found in the

PP8. RAG = AMBER

Section 1.6.2., Page 46 - Cable landfall site identification

16. As neither the export cable corridor nor specific landfall locations have yet been identified, we strongly recommend early consultation with NRW to inform the refinement of routing and landfall options, as this will ensure that environmental constraints are considered at the earliest stage. For the purposes of the ES, NRW(A) advises that each landfall option should be supported by a robust baseline characterisation of coastal physical processes, including sediment transport pathways, beach morphodynamics and shoreline evolution. Given the potential for cable installation, cable protection and landfall infrastructure to affect coastal processes, we advise that these aspects must be fully assessed for the proposed locations and any reasonable alternatives.
17. Furthermore, the Scoping Report does not clearly demonstrate how designated sites and sensitive coastal receptors have been considered in the 'broad zone' site selection process. Site selection factors are described in paragraph 142 as *'Avoidance of areas with substantial infrastructure or urban land use e.g. areas of housing, coastal defences, military defence, tourism sites, other energy infrastructure; and 'Avoidance of areas with substantial sea cliffs.'*
18. We would expect landfall and cable route options to be designed, wherever possible, to also avoid designated sites and minimise effects on protected features. For example, detailed consideration should be given to any routing associated with the proposed Llandyfaelog substation connection given its proximity to the Carmarthen Bay and Estuaries SAC, and a highly SSSI-designated area of coastline. We advise this particular cable route and landfall option should therefore be carefully evaluated and clearly scoped within the ES.

PP9. RAG = AMBER

Section 1.5.3.2.1., Page 38 - Cable landfall methodology

19. NRW(A) notes the Scoping Report refers to additional 'trenchless solutions' without clearly defining the additional techniques under consideration. We advise the ES should clearly describe all the proposed landfall installation methods, including whether Horizontal Directional Drilling (HDD) or other trenchless techniques are being considered, together with the environmental implications of each option for each proposed landfall site.

20. NRW(A) welcomes the Applicant's stated preference for the use of trenchless installation techniques e.g. HDD where technically feasible, as discussed in paragraph 108. NRW generally favours HDD over open-cut trenching across the intertidal zone due to its potential to reduce disturbance to coastal habitats and physical processes. However, we advise that the ES should fully assess the risks associated with HDD, including bore failure, collapse, inadvertent returns and bentonite release, and identify appropriate mitigation and contingency measures. Consideration should also be given to the potential for HDD works through cliffed coastlines to affect cliff stability and erosion processes, both during construction and over the longer term.
21. We advise that the design of the landfall and cable installation should take account of natural beach and coastal change processes, including beach profile variability, sediment transport and projected coastal erosion over the lifetime of the development. Cable burial depths across the intertidal should be informed by beach profile surveys and sediment investigations to minimise the risk of future cable exposure resulting from storm-driven beach drawdown or long-term shoreline retreat. Any shallow-water cable protection required at the landfall should be clearly identified and its effects on coastal processes assessed.
22. In addition, we advise all permanent landfall infrastructure, including the Transition Joint Bay (TJB), should be located sufficiently far inland to account for current and future coastal erosion, taking into consideration relevant Shoreline Management Plan (SMP) policies and coastal change projections. NRW(A) welcomes the commitment to restore the intertidal area following construction and recommends that pre- and post-construction monitoring is undertaken to demonstrate that beach levels and morphology have recovered to pre-construction conditions.

PP10. RAG = AMBER

Section 2.1.5.1.2., Page 90 – More information required on sandwave clearance and effects of cable/scour protection on sandwave recovery.

23. NRW(A) has concerns regarding the potential effects of sandwave clearance on seabed morphology and sediment transport processes, as there are large sandwave systems to the south of Carmarthen Bay (King et al., 2019). We advise that the ES should provide evidence on sandwave characteristics, migration rates and their role within the wider sediment transport system to demonstrate whether cable burial depths are sufficient and whether additional cable protection may be required. If the proposed cable route or scour protection features intersect sandwaves, their recoverability following clearance should be assessed, together with the potential implications for sediment transport, seabed morphology and other environmental receptors e.g. benthic habitats and fish. NRW(A) recommends the Applicant should

commit to post-construction hydrographic and bathymetric monitoring to assess sandwave recovery and improve understanding of the long-term effects of sandwave clearance on physical processes.

PP11. RAG = AMBER

Section 1.5.3.1.4, Page 35 – Justification needed for offshore export cable configurations requiring additional infrastructure

24. NRW(A) notes that the Scoping Report states that both High Voltage Alternating Current (HVAC) and High Voltage Direct Current (HVDC) transmission options remain under consideration and that the preferred solution will be selected following assessment of environmental effects, technical efficiency and cost effectiveness. However, we advise that insufficient information has been provided to understand why both options are being progressed or to assess the implications of the additional infrastructure potentially associated with each option.
25. It is understood that an HVAC solution may require a Midpoint Compensation Reactor (MCR) and a greater number of export cables than an equivalent HVDC solution. We advise that the ES should therefore clearly justify the need for the transmission technology selected and explain why alternatives have been discounted. This should include a comparison of the environmental effects associated with HVAC and HVDC options, including the extent of offshore infrastructure, cable installation requirements, cable protection requirements and associated impacts on the marine environment. NRW(A) expects the ES to demonstrate that the chosen transmission solution represents the option with the lowest overall environmental impact, taking account of the extent of offshore infrastructure and associated effects.

PP12. RAG = AMBER

Section 2.1.2.6., Page 83 – Justification needed for suspended sediment concentration data

26. NRW(A) notes that the SSC data from CEFAS (2016) that has been used to characterise baseline SSC conditions in this Scoping Report is 11 years old. We require justification as to why this dataset is still appropriate and relevant, and that there is no requirement for collecting more contemporary SSC data; for example, if SSC across the 1998-2015 period did not show meaningful change within the Scoping Boundary area.
27. We recommend that the baseline characterisation is undertaken in accordance with NRW's [*GN41 Marine Physical Processes Guidance to inform Environmental Impact Assessment \(EIA\)*](#) and the guidance provided within [*NRW Report 243*](#), particularly the sections relating to baseline data requirements and survey design. The Applicant

should provide a clear justification for the use of any existing datasets, demonstrating that they remain representative of current site conditions, are of sufficient quality and resolution for the assessment, and are appropriate for the intended purpose. We advise data that no longer accurately reflects present-day conditions should not be relied upon as the sole basis for baseline characterisation.

PP13. RAG = AMBER

Section 2.1.4.1., Page 87 – Clarification as to whether vertical mixing impacts will be assessed in modelling exercises

28. NRW(A) requires clarification as to whether the potential effects of the proposed development on vertical mixing, stratification and thermocline dynamics will be assessed, and whether numerical modelling is proposed to support this assessment. Given the development's location within, or its potential influence on, seasonally stratified waters, we advise there is particular interest in understanding any implications for the Celtic Sea Front and associated physical and ecological processes. Any clear linkages between hydrodynamics, stratification, nutrient transport and ecological receptors should be appropriately cross-referenced.
29. We advise the assessment should consider whether floating offshore wind infrastructure could generate additional turbulence, alter mixing across the thermocline, or modify nutrient exchange between surface and deeper waters. Recent UK research programmes such as Enabling Sustainable Wind Energy Expansion in Seasonally Stratified Seas (eSWEETS) have identified these mechanisms as one of the key uncertainties associated with deployment of floating offshore wind in seasonally stratified shelf seas.
30. Numerical modelling would provide a more robust understanding of:
 - changes in turbulent kinetic energy and vertical diffusivity;
 - alteration of stratification strength and duration;
 - potential far-field and cumulative effects associated with multiple floating windfarm arrays
31. The Applicant should therefore justify the proposed assessment methodology and demonstrate whether a simplified analytical approach is adequate, or whether three-dimensional hydrodynamic modelling is required. Van Berkel et al. (2026) *Offshore wind farms reshape ocean stratification and mixing* is a particularly useful reference for understanding how floating offshore wind structures may affect stratification. We also point the Applicant towards [NRW Evidence Report 208 Advice to Inform](#)

[Development of Guidance on Marine, Coastal and Estuarine Physical Processes Numerical Modelling Assessments](#) for additional advice on numerical modelling.

PP14. RAG = AMBER

Section 1.5.7., Page 45 – Further clarification on decommissioning plan required

32. Whilst a definitive decommissioning plan is not expected at this stage due to uncertainty regarding future technologies and environmental conditions, we advise that the Applicant should provide a clearer description of the range of likely decommissioning scenarios and the potential environmental effects associated with each. The decommissioning strategy should be expanded beyond the assumption that it will simply mirror construction activities in reverse.
33. From the perspective of Physical processes, NRW(A) recommends that preference should be given to materials and installation methods that enable removal with minimal disturbance to the seabed during the design process. Any decommissioning activities that could give rise to physical processes impacts, such as excavation, dredging, sediment disturbance or removal of protection materials, should be identified and assessed within the project envelope.
34. More information can be found in [NECR403](#), which highlights the potential advantages of designing protection measures that minimise long-term environmental impacts and reduce the need for intrusive decommissioning interventions. We advise that any proposal to retain protection measures or other infrastructure at the end of the project life should be fully justified and supported by evidence.

PP15. RAG = AMBER

Table 1.8.2., Page 66 - Boulder removal mitigation as a physical processes issue

35. NRW(A) notes that the embedded mitigation relating to boulder removal is currently framed primarily in terms of reducing snagging risks for commercial fisheries. However, boulder relocation is also relevant to marine geology, oceanography and physical processes. Relocated boulders have the potential to influence local bed levels, scour development, sediment mobility and seabed morphology, as well as the distribution of associated habitats. Therefore, we recommend that any boulders requiring relocation are placed as close as practicable to their original location and in a manner that maintains the integrity of the local physical environment.
36. NRW(A) also recommends that the Applicant provides further information on the management of any seabed material arising from any dredging, trenching, seabed preparation or boulder clearance activities. In line with maintaining local sediment transport processes and sediment budgets, consideration should be given to retaining

material within the local sediment transport system, including disposal or placement as close as practicable to the point of origin where environmentally and logistically acceptable. We advise the ES should clearly explain how material relocation and disposal proposals have taken account of potential effects on seabed morphology, sediment transport pathways, scour and habitat distribution.

PP16. RAG = YELLOW

Section 1.5.5., Page 43 – Ensure impacts of 24-hour construction period are fully assessed

37. NRW(A) notes that paragraph 120 states that ‘*Construction of infrastructure in the marine area would typically be performed on a 24-hour basis depending on suitable construction weather windows.*’. Whilst we recognise that construction may not always occur around the clock, the ES should consider a realistic WCS involving sustained 24-hour operations over extended periods, particularly for activities with the potential to generate sediment plumes or cause significant sediment disturbance.
38. We advise that the ES should demonstrate how the duration and continuity of these activities could influence the magnitude, persistence and spatial extent of suspended sediment concentrations, deposition patterns and any associated effects on sensitive receptors. Consideration should also be given to whether continuous disturbance could limit recovery between construction activities, resulting in effects that are greater or more prolonged than those associated with intermittent working patterns.

PP17. RAG = YELLOW

Section 2.1.5., Page 90 – Ensure both component and array-scale assessment of impacts are conducted

39. NRW(A) welcomes the detail presented in the Development Infrastructure Overview (Section 1.5.3). As the final wind turbine substructure design has not yet been determined and may vary across the development site in response to site conditions, engineering requirements and future technological developments, we advise the ES should clearly evaluate the environmental implications of all realistic design options. Where multiple substructure types remain under consideration, the Applicant should identify and assess the maximum design scenario for each relevant impact pathway and explain how this has informed the overall WCS for the whole wind turbine array.
40. Particular attention should be given to seabed disturbance pressures, as the extent and nature of these effects will depend on the type, layout and operational characteristics of the supporting infrastructure. Where there is uncertainty regarding the final design solution, we advise the assessment should apply this precautionary approach and ensure that the design option with the greatest potential environmental

footprint is appropriately considered at the individual element level and at array-scale (the development as a whole). This will help ensure that both component-level and project-scale impacts are adequately characterised.

PP18. RAG = BLUE

Section 2.1., Page 79 – Map to include designated sites

41. NRW(A) advises that a map detailing the designated sites in the development area along with the Zol map used for the Marine and Coastal Physical Processes Chapter would be very helpful in order to understand how the Zol overlaps with these protected sites and features.

PP19. RAG = GREEN

Section 1.8.2., Page 59 - Additional guidance for consideration of change to baseline over time

42. NRW(A) welcomes consideration of natural/anthropogenic environmental change, including climate change and biodiversity, to the characterisation of the baseline environment. We suggest this consideration should also be applied to implemented mitigation measures to ensure their success and longevity.
43. For Marine and Coastal Physical Processes, we recommend [Welsh Government \(2022, updated 2026\): Adapting to Climate Change: Guidance for Flood and Coastal Erosion Risk Management Authorities in Wales](#), which suggests using a 5% increase in assumed extreme wave height until 2055 and a 10% increase beyond that.

PP20. RAG = GREEN

Section 1.5.7., Page 45 – Decommissioning considerations

44. NRW(A) welcomes the Applicant's commitment to complying with future legislation, guidance and policy requirements at the time of decommissioning. We would also encourage a commitment to exploring and adopting new and emerging technologies for infrastructure removal where these can deliver improved environmental outcomes and reduce decommissioning impacts.

PP21. RAG = GREEN

Section 1.5.4.1, Page 42 – Additional guidance for pre-construction activities

45. For pre-construction activities such as geophysical and geotechnical surveys, NRW(A) notes that additional guidance on best practice can be found in [NRW Evidence Report 243](#).

PP22. RAG = GREEN

Sections 2.1.5.4. and 2.1.5.5., Pages 93-94 – Additional guidance for impact assessment

46. NRW(A) advises that PINS' [Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment](#) provides additional guidance for inter-relationship and cumulative impact assessment.
47. Again, we advise that NRW's [GN019](#) has relevant information on determining Zol.

PP23. RAG = GREEN

Table 1.8.2., Page 63 – Additional references for mitigation

48. NRW(A) welcomes the commitment to embedding mitigation into the project design and suggest the additional references below:
- Bennun, L., van Bochove, J., Ng, C., Fletcher, C., Wilson, D., Phair, N., Carbone, G. (2021). Mitigating biodiversity impacts associated with solar and wind energy development. Guidelines for project developers. Gland, Switzerland: IUCN and Cambridge, UK: The Biodiversity Consultancy.
 - Carpenter, J.R., Merckelbach, L., Callies, U., Clark, S., Gaslikova, L. and Baschek, B. (2016) Potential Impacts of Offshore Wind Farms on North Sea Stratification. PLOS ONE, 11(8), e0160830
 - [Crown Estate Scotland \(2024\) Mitigation Measures Literature Review. Collaboration for Environmental Mitigation & Nature Inclusive Design \(CEMNID\).](#)
 - Hendriks, E. et al. (2025) The impact of offshore wind turbine foundations on local hydrodynamics and stratification in the Southern North Sea. Frontiers in Marine Science
 - Natural England (2018) Offshore wind cabling: ten years' experience and recommendations.
 - [Natural England \(2025\) Seabed Infrastructure in Marine Protected Areas with Designated Subtidal Sandbanks \(NECR550\). Natural England Commissioned Report 550. Published 3 April 2025.](#)
 - [RPS Group Plc \(2019\) Review of cable installation, protection, mitigation and habitat recoverability. Rev03, 12 November 2019. Prepared for The Crown Estate.](#)

PP24. RAG = GREEN

Section 2.1. – Additional information and guidance for establishing the baseline

49. NRW(A) suggests that the following documentation and guidance for the purposes of physical processes baseline characterisation may also be useful:

- King, E. V., Conley, D. C., Masselink G., Leonardi, N., McCarroll, R. J., & Scott, T. (2019). The impact of waves and tides on residual sand transport on a sediment-poor, energetic, and macrotidal continental shelf. *Journal of Geophysical Research: Oceans*, 124, 4974–5002.
- Guidelines in the use of metocean data through the lifecycle of a marine renewables development'. (ABPmer et al., 2008b)
- Offshore Windfarms: Guidance note for Environmental Impact Assessment in Respect of FEPA and CPA requirements'. (Cefas, 2004)
- Further review of sediment monitoring data'. (COWRIE ScourSed-09).' (ABPmer et al., 2010)
- Review of Round 1 Sediment process monitoring data - lessons learnt. (Sed01)' (ABPmer et al., 2007)
- Dynamics of scour pits and scour protection - Synthesis report and recommendations. (Sed02)' (HR Wallingford et al., 2007)
- Potential effects of offshore wind developments on coastal processes'. (ABPmer and METOC, 2002).

Habitats Regulations Assessment Screening Report

PP25. RAG = AMBER

Section 3.1.2.1., Table 3.1., Pages 18 and 22 – Justification needed for difference between Holistic Network Design and Project Level/Leasing Round (LR5) ZoI

50. NRW(A) notes that the ZoI used for the Holistic Network Design (HND) Implementation Plan HRA with regards to '*sediment plumes and water quality changes, representing the maximum tidal excursion of suspended sediments*' is 17km, whereas the project-level ZoI is 15km as within the Scoping Report and Marine Conservation Zone (MCZ) Assessment. We request clarification regarding the discrepancy in ZoI extent.

Marine Conservation Zone Screening Assessment

PP26. RAG = AMBER

Whole Document – Little consideration of waves as an impact pathway

51. NRW(A) notes that the assessment appears to rely primarily on tidal excursion as the basis for defining the Zol. However, we advise that waves and wave-current interaction can play a significant role in sediment transport processes and should also be considered. Storm-wave conditions can resuspend sediment across large areas of the seabed, substantially increase suspended sediment concentrations and alter sediment transport pathways beyond those predicted by tidal excursion alone. For example, sediment disturbed during cable installation or other seabed works may subsequently be remobilised and transported under combined wave-current forcing. This has the potential to affect sensitive MCZ receptors through changes to seabed sediment composition, sediment deposition patterns, habitat condition and the physical processes that support designated seabed features. Therefore, we recommend that the Applicant demonstrates how wave-driven and storm-driven sediment transport processes have been considered when defining the Zol and assessing potential impacts on MCZ features.

Receptor – Marine (Subtidal and Intertidal) Ecology

Environmental Impact Assessment Scoping Report

ME1. RAG = GREEN

Section 2.2.1, Pages 96-97

52. NRW(A) agrees with the Benthic Habitat Study Area which has been defined according to the maximum tidal excursion (as described in Section 2.1 of the Scoping Report), and that it is sufficient to capture all of the likely significant impacts to benthic receptors.

ME2. RAG = AMBER

Sections 2.2.2, 2.2.3, and Table 2.2.3, Pages 98-105 – Desk based benthic characterisation is missing relevant data

53. Whilst all the data sources relevant to a desk-based characterisation of the Scoping Boundary are listed in Table 2.2.3, NRW(A) notes that it appears not all the information from these sources has been used to produce the benthic characterisation provided in Section 2.2.2. We advise that Section 2.2.2 lacks reference to a number of priority and designated habitats and species which are known to be present.
54. For completeness, we refer the Applicant to data sources outlined in NRW's [*GN006 Marine ecology datasets for marine developments*](#) which sets out the marine ecology data that NRW own, as well as datasets we regularly use but which are held by others. These are the datasets we recommend are considered if existing marine ecology data is required to support an application for a proposed development or activity that may affect the Welsh marine environment.

ME3. RAG = AMBER

Section 2.2.2.4, Page 104 – Further information required

55. NRW(A) advises that the list of Invasive Non-Native Species (INNS) present within the Scoping Boundary is incomplete. We recommend that the Applicant update the list by referring to [*NRW Guidance for completing NRW's Marine Non-native Species Biosecurity Risk Assessment and Management Plan*](#). We advise that Section B.1.1 lists suitable data sources to investigate for records of INNS around the UK to inform this and future assessments.

ME4. RAG = AMBER

Sections 2.2.2.1, 2.2.2.2 and Table 2.2.3, Pages 98-105 – Additional/updated characterisation required

56. NRW(A) advises that whilst we can broadly agree with the benthic baseline information presented within the Scoping Report, it currently lacks the necessary detail, resolution and coverage for informing robust assessments under the statutory EIA and/or HRA processes.
57. NRW(A) therefore welcome the Applicant's commitment to undertake site specific surveys, and advise that to ensure efficacy, the scope of these surveys (intertidal and subtidal) should be agreed in consultation with NRW. The data produced should provide a more detailed and up-to-date baseline intended to identify sensitive habitats and the development of appropriate and effective mitigation.
58. The Applicant should refer to NRW's [*GN006*](#) and [*GN030b A guide to characterising and monitoring intertidal sediment habitats*](#). This guidance sets out the methods and approaches for characterising benthic habitats where such work is required to support

environmental and ecological impact assessments for developments and activities in or near Welsh waters.

59. We advise that regard should be given to the identification of species and habitats of conservation importance, including Annex I protected species and habitats, as well as those protected under section 7 of the Environment (Wales) Act 2016 and Wildlife and Countryside Act 1981. INNS should also be identified and mapped.

ME5. RAG = AMBER

Section 2.2.2.1, 2.2.2.5, and Table 2.2.4, Pages 98-105 – Survey methods require adjustment

60. NRW(A) advises that an intertidal ‘walkover survey’ alone is unlikely to be adequate for informing a robust assessment of the impacts within the intertidal habitats within the offshore cable scoping boundary, many of which are protected under the Habitats Regulations 2017, the Environment (Wales) Act 2016 and/or Wildlife and Countryside Act 1981.
61. We again refer the Applicant to NRW’s [GN030b](#) and advise these are used when designing surveys to characterise the intertidal habitats at landfall.

ME6. RAG = GREEN

Section 2.2.5., Pages 106-112

62. NRW(A) agrees that the main pathways of effect to benthic receptors have been identified within the Scoping Report.

ME7. RAG = GREEN

Section 2.2.5.1.6 and Table 2.2.5, Pages 108-112

63. NRW(A) agrees that vibration and noise during the construction phase can be scoped out of further assessment for benthic receptors.

ME8. RAG = AMBER

Section 2.2.5.1.4, Tables 1.8.2 and 2.2.5, Pages 63-74 and 107-112 – Further assessment/clarification required

64. NRW(A) are unable to agree that the accidental release of pollutants can be scoped out based on the information which has been provided within the Scoping Report.

65. NRW(A) notes that the proposed pollution prevention embedded mitigation measures are inconsistent between the text in Section 2.2.5.1.4 and Table 1.8.2 in Section 1.8.4., as the Marine Pollution and Contingency Plan (MPCP) is missing from Table 1.8.2.
66. In addition, we note that Table 1.8.2 provides examples of the types of embedded mitigation measures proposed for the development. We welcome the provision of such examples and encourage early engagement with NRW(A) on developing and finalising such measures in order to provide the confidence that the mitigation proposed is sufficiently secure to scope out accidental pollution impact pathways.
67. NRW(A) advises that the biggest concern from a benthic perspective is likely to be landfall operations and risks of spilled contaminants impacting designated and/or notified sensitive intertidal receptors including those designated under Annex I of the Habitats Regulations, those listed Under Section 7 of the Environment Wales Act 2016, and those protected under the Wildlife and Countryside Act 1981.
68. NRW(A) advises that all outline management plans relevant to accidental pollution should accompany the Application to provide assurance that the risks of accidental pollution events will be effectively mitigated.

ME9. RAG = AMBER

Sections 2.2.5.1.5, 2.2.5.2.7, and Table 2.2.5, Pages 108-112 – Further assessment required

69. NRW(A) does not agree that the introduction of INNS can be scoped out from either the construction, operational, or decommissioning phases based on the current level of information and assessment which has been provided.
70. NRW(A) advises that the Applicant should outline their intention to complete a biosecurity risk assessment and develop a management plan for each phase of the development, and these should be secured via the deemed Marine Licence (dML) (generation) and Marine Licence (ML) (transmission).
71. NRW(A) refers the Applicant to NRW's [Guidance for completing NRW's Marine Non-native Species Biosecurity Risk Assessment and Management Plan](#).

ME10. RAG = AMBER

Section 2.2.5.2.10, Page 110 – Impacts pathways require scoping in

72. NRW(A) are unable to agree that sediment heating effects on benthic receptors can be scoped out given the current level of information and evidence (specifically in relation to likely zone of effect) which has been provided within the Scoping Report.
73. Whilst we recognise the evidence available is limited in respect of this impact pathway, we note that thermal effects have been screened in for Habitats Regulations Assessment, and therefore we question the rationale behind this disparity.

ME11. RAG = GREEN

Section 2.2.5.4, Page 110

74. NRW(A) welcomes the consideration and scoping in of inter-relationship impacts.

ME12. RAG = AMBER

Section 2.2.5.3, Page 110 – Decommissioning impact pathways require updating

75. Please refer to advice above in relation to impacts pathways, all decommissioning impacts should mirror those identified for the construction phase.

ME13. RAG = AMBER

Sections 1.8 and 2.2.4, Pages 58-62 and 106 – Clarification and further definition required

76. NRW(A) notes that a generic approach to EIA has been provided in Section 1.8 where receptor value (i.e. is rare, protected or holds threatened status, and/or is considered important at local, regional, national or international scale) is proposed to be considered alongside sensitivity. However, we note in Section 2.2.4, where the proposed approach to considering benthic receptors is outlined, there is no mention of their value or importance. We assume the criteria provided in Section 1.8 applies to benthic habitats, but request clarification on the matter
77. In addition, we advise the Applicant should define the value categories which they intend to attribute to different receptors depending upon their relevant designation/notification status e.g. The Conservation of Habitats and Species Regulations 2017, Environment (Wales) Act 2016, OSPAR Convention, Wildlife and Countryside Act 1981.

ME14. RAG = YELLOW

Sections 1.8 and 2.2.4, Pages 58-62 and 106 – Further definition required

78. In general, NRW(A) agrees with the broad approach to how significance is to be determined but advise that the methods would benefit from providing definitions for each of the categories (negligible to high) for magnitude as a minimum.

ME15. RAG = AMBER

Sections 1.8 and 2.2.4, Pages 58-62 and 106 – Consider Annex I features outside of Sites

79. NRW(A) notes that the overarching aim of the Habitats Directive is to achieve 'Favourable' Conservation Status (FCS) of Annex I habitats, and this aim relates to the entire occurrence of a habitat type within its natural range rather than applying only to the occurrences within the Natura 2000 network.
80. We therefore consider that the impacts of development or activities on 'undesigned' Annex I habitat outside SACs should be assessed and adverse effects minimised or mitigated as far as possible. In addition, Article 10 of the Directive acknowledges the importance of improving the ecological coherence of the Natura 2000 network and encourages the management of features which support the migration, dispersal and genetic exchange of wild fauna and flora, both within and outside the Natura 2000 sites.
81. NRW(A) therefore advises that to help ensure compliance with the requirements of the Habitats Regulations, as far as is reasonably practicable, Annex I habitats which may be found outside of protected sites during site specific surveys should be elevated when considering their value/importance.

ME16. RAG = AMBER

Section 1.5.3.1.4, Pages 34-36 – Assessment required pre-consent and rock/scour protection considerations

82. NRW(A) strongly disagrees that the CBRA for either the inter-array cables or export cables can be undertaken post consent "*to determine where burial is possible, target burial depth and installation methods*".
83. NRW(A) advises that for cable protection to be laid during construction under the dML and ML, an outline CBRA and an outline CSIP are required as part of the application, together with an outline Scour and Cable Protection Plan (SCPP).

84. The information from these documents, and their supporting studies, is essential to informing a full meaningful assessment of the WCS of cable protection parameters (volume, extent and location), and therefore habitat loss, through the project lifecycle, both alone, and in combination with other projects and activities.
85. NRW(A) advises that the following information is required at the Application stage to determine the WCS:
- Volume and extent of cable protection to be laid during the construction phase;
 - Volume of cable protection required for replenishment of that laid during construction over the lifetime of the project;
 - Volume and extent of additional/ new cable protection that may be required to protect assets that become exposed during the operational phase;
 - Total volume and extent of cable protection potentially left in situ at the time of decommissioning (this may be the total of the above).
86. NRW(A) advises that the use of cable protection which leads to lasting habitat loss within MPAs should be the final consideration after other alternatives have been exhausted.
87. We further advise that the HRA will also need to consider what percentage area of each specific MPA feature will be affected, together with the overall percentage of the MPA area.
88. In the event that an area and/or volume or rock protection is required within an MPA, at any stage of the project, which is greater than that which has been assessed within the HRA, then we advise that an additional Marine Licence would be required.

ME17. RAG = AMBER

Section 1.5.3.1.4, Pages 34-36 – Decommissioning considerations

89. NRW(A) advises that all infrastructure projects should integrate decommissioning considerations at the project's inception and produce a decommissioning plan that retains all decommissioning options for all components including scour/cable protection (i.e. maintain, partial removal and full removal).
90. We advise that every effort should be made at the Application stage to ensure that impacts of each of the decommissioning options can be minimised as much as possible through project design commitments. Whilst specific decommissioning options may be reviewed and refined closer to the decommissioning phase

considering relevant future policy, legislation and evolving evidence, infrastructure should be designed and constructed to facilitate full removal.

91. Please refer to [NE Report NECR403](#) to inform the evidence gap in relation to the feasibility of and options for removing scour and cable protection upon decommissioning of offshore windfarms

ME18. RAG = AMBER

Section 1.5.3.2.1, Page 38 – Consultation on cable route refinement recommended

92. We strongly encourage the Applicant to engage in discussions with NRW(A) on the final refined cable route(s). We advise that there is the potential for the cables to interact with sensitive features (Annex 1 habitats) of the Pembrokeshire Marine SAC and Carmarthen Bay and Estuaries SAC.
93. NRW's [GN015 Marine cabling activities in Wales: information to support environmental assessment](#) provides an overview of the key environmental implications of marine cabling activity in Wales and sets out possible environmental effects and key consenting risks from an environmental perspective.

ME19. RAG = AMBER

Section 1.5.3.2.1, Page 38 – Mitigating impacts via method selection

94. Whilst NRW(A) understands that it is not possible at this stage to confirm whether trenching or HDD will be used for the cable installation at landfall, as noted in the Physical processes section above, we strongly encourage the Applicant to use HDD where possible given the potential greater environmental impacts trenching presents for the designated and/or notified intertidal features found at landfall.
95. Depending on the specific receptor, we advise that open cut trenching may constitute permanent habitat loss/change. We further advise that should HDD be selected, the potential need for cable protection at the HDD exit pits will require assessment within the EIA.

ME20. RAG = YELLOW

Section 2.2.2.3, Pages 101-102 – Updates required

96. We note the Applicant refers to 'UK Biodiversity Action Plan (UK BAP) habitats' which has now been superseded. Statutory lists of Priority habitats and species in Wales are now listed under Section 7 of the Environment (Wales) Act (2016). Therefore, all relevant text should be updated.

97. Under Section 6 of the Environment (Wales) Act 2016, public authorities have a duty to take all reasonable steps to maintain and enhance the habitats and species included in the Section 7 lists and encourage others to take such steps. As such, we further advise that the Applicant should consider measures to avoid and minimise impacts on Section 7 habitats to help ensure compliance with the duties of the Environment (Wales) Act 2016.

ME21. RAG = AMBER

Section 1.5.3.1.4, Pages 34-36 – Cabling considerations

98. NRW(A) notes that the Applicant is considering both HVAC and HVDC options, with the HVDC option requiring half the number of cable corridors (i.e. maximum of 3 rather than 6).
99. NRW(A) strongly advises that the Applicant considers the design option which would mitigate impacts to benthic receptors both through the construction, and operation and maintenance project phases. This is particularly pertinent at landfall where transit through designated benthic features will likely be unavoidable.

Marine Conservation Zone Screening Assessment

ME22. RAG = GREEN

100. NRW(A) agrees that Skomer MCZ can be scoped out regarding impacts to benthic receptors, and defer to NE regarding potential MCZ impacts within English waters.

Habitats Regulations Assessment Screening Report

ME23. RAG = GREEN

101. NRW(A) agrees with the designated sites and benthic features which have been scoped in for Habitats Regulations Assessment.

Receptor – Marine Water Quality

MW1. RAG = AMBER

Water Framework Directive Compliance Assessment

102. NRW(A) acknowledges the Applicant's commitment to undertaking a Water Framework Directive Compliance Assessment (WFD CA) as part of the supporting assessments to EIA. However, we note that the Applicant has not provided a draft / framework WFD CA as part of the scoping request. WFD CA is the process for determining how a new development may impact a WFD water body or WFD objectives. A WFD CA is an additional requirement to EIA, but they should be coordinated where possible.
103. We agree with the Applicant that a WFD CA is required and strongly advise that a draft is produced for review at the earliest opportunity. The assessment should consider both surface water and ground water receptors and include direct and indirect impact pathways.
104. The WFD Compliance Assessment will need to describe:
- the impact of the development project on the status water bodies – information can be found at [Water Watch Wales](#)
 - whether the proposed development complies with the relevant River Basin Management Plan (RBMP) and its objectives
 - any bathing waters, shellfish protected areas are included in the assessment.
105. Our guidance for assessing activities and projects for compliance with WFD is available here: [Natural Resources Wales / Complying with the Water Framework Directive Regulations 2017: screening, scoping and detailed assessment](#)

Marine Conservation Zone Screening Assessment

MW2. RAG = AMBER

Section 4.2.3.1, Page 29 - Further assessment required

106. NRW(A) disagrees with the Zol conclusions of the MCZ Screening Assessment as contaminants and pollution from diesels/oils could reach beyond 15km due to physical processes and the exact cabling route undefined. We defer to Marine & Coastal Physical Processes' request for modelling to establish the Zol.

Habitats Regulations Assessment Screening Report

MW3. RAG = AMBER

Section 3.1.2.1, Page 18 - Further assessment required

107. NRW(A) disagrees with the following statement and conclusions of the HRA for water quality:

“Sediment and water quality pressures: A distance of approximately 17km is used for sediment plumes and water quality changes, representing the maximum tidal excursion of suspended sediments.”

108. As stated in **MW2**, we defer to Marine & Coastal Physical Processes' request for modelling to establish the Zol.

Environmental Impact Assessment Scoping Report

MW4. RAG = AMBER

Section 2.1, Page 77 - Separate Water Quality as a distinct receptor from Marine and Coastal Physical Processes

109. NRW(A) advises that water quality should be treated as a standalone receptor within the ES rather than being incorporated within the Marine and Coastal Physical Processes assessment. We request the Applicant creates a new water quality chapter within the ES and focuses on assessment of these potential impacts on water quality:

- Impacts on contaminant concentrations due to changes in SSCs. As stated in **MW9**, sediment samples and results should be fully included (not just a summary statement) to allow us to fully assess not just the results but if the sampling process is adequate to ascertain water quality impact. A location plan of where samples are to be taken and to what depth should be included.
- Impacts on water column stratification influencing nutrient fluxes and primary production.
- Pollution from spills and contaminants during construction, operation and maintenance and decommissioning.
- Bathing waters and Shellfish Protected areas.

MW5. RAG = AMBER

Section 2.1.2.8, Page 84 - Further assessment required

110. As stated in **MW9**, NRW(A) requests that a locations map of where samples were taken within the array and to what depth is provided. This should be accompanied by the full results with the dates they were conducted to allow us to make a full assessment.
111. We do not agree that assumptions should be made on water quality based upon the fact that the area is dynamic with a varied wave and tidal regime, as stated in paragraph 238. We request that samples are provided to evidence water quality, as well as a WFD assessment, as stated in **MW1**.

MW6. RAG = GREEN

Section 2.1.5.2.3, Page 92

112. NRW(A) agrees with paragraph 268 that impacts on sediment transport processes should be scoped in and we look forward to reviewing the outputs of these assessments in due course.

MW7. RAG = GREEN

Table 2.1.3, Page 94

113. NRW(A) agrees with the impacts which are proposed to be scoped in and/or out of the EIA.

MW8. RAG = AMBER

Figure 2.1.1, Page 79 - Further assessment required

114. NRW(A) welcomes the inclusion of Figure 2.1.1, however, as stated in **MW2**, we disagree with the Zol due to a lack of modelling and defer to Marine & Coastal Physical Processes' comments.

MW9. RAG = AMBER

Section 2.1.2.8, Page 84 - Further assessment required

115. NRW(A) acknowledges that while sediment samples have been undertaken, further information is required to assess whether the sample locations are adequate. We request that a map is provided showing where samples were taken within the array and to what depth. This should be accompanied by the full results with the dates they were conducted to allow us to make a full assessment. We advise that this information should inform the cable route if there are any 'pockets' of contaminants to avoid.

MW10. RAG = GREEN

Section 2.1.5.1.5, Page 91

116. NRW(A) agrees with paragraph 262, and therefore we encourage sediment samples being used to inform where the cable route is likely to be, as stated in **MW9**.

MW11. RAG = AMBER

Section 2.1.4.2 and Section 2.2.5.1.4, Pages 88 and 107 - Further assessment required

117. NRW(A) agrees with paragraphs 255, 314 and 315, and we look forward to reviewing the Project Environmental Management Plan (PEMP) and Marine Pollution Contingency Plan (MPCP) in due course.
118. Without the full PEMP and MPCP, we cannot rule out LSE. Although the risk of a spill occurring may be low, the significance or impact of a spill could be very high and far reaching in a highly dynamic area of sea.

MW12. RAG = AMBER

Section 2.1.4.2, Page 88 - Further assessment required

119. NRW(A) requests further information on the dredge area and total amount of volume of sediment to be dredged. We advise a map of where dredging will take place is provided, along with further details on the disposal of dredged material and where it

will be disposed of. Consideration should be given to any contaminants within this dredge if suitable for disposal at sea.

MW13. RAG = AMBER

Section 2.4.5.1.7, Page 152 - Further assessment required

120. NRW(A) disagrees with paragraph 452 that accidental release of contaminants from suspended sediments in construction and resulting impact on water quality would be short lived and localised, as we note that no evidence has been provided to justify this statement.
121. Sediment samples are necessary to assess the levels of contaminants in the sediment. If contaminant levels are high, mitigation or avoidance may be required to prevent decreasing water quality. Under the WFD legislation, any developments should not deteriorate a waterbodies status or prevent it from achieving good status. We advise that this impact pathway is scoped into the ES and timelines are defined on construction of what 'short lived' refers to.

MW14. RAG = AMBER

Section 3.2.6.1.3, Page 346 - Further assessment required

122. NRW(A) agrees with scoping in potential impacts to water quality during construction of onshore developments. We advise that mitigation should be proposed to prevent any reduction in water quality during construction through the development of a Construction Environmental Management Plan (CEMP) and should include standard best practice measures as well as specific measures required by this development.

Receptor – Marine Fish

Environmental Impact Assessment Scoping Report

F1. RAG = AMBER

Section 1.4.3, Page 8 – Modifications required

123. NRW(A) advises that two pieces of legislation relevant to fish are missing from this list, namely The Eels (England and Wales) Regulations 2009 and Salmon and Freshwater Fisheries Act 1975.

124. Although the array site is offshore and outside the 6 nautical mile distance from the coast, we advise that the cable corridor and wider study area is inside the boundary where the legislation applies.

F2. RAG = YELLOW

Table 1.8.1, Page 61 – Modifications required

125. NRW(A) considers that Table 1.8.1 is confusing to read. Some ‘minors’ are not colour coded, but others are, a moderate rating is coloured in light green (rather than mid green), and moderate and major are given the same colour. We recommend that this table is reviewed and suggest that modifications are made to colours for ease of legibility.

F3. RAG = AMBER

Figure 2.3.1, Page 115 – Modifications required

126. Diadromous fish features of the southern Welsh coast estuaries have functional linkage across the South Wales coast and further afield. We advise that recent evidence (Davies, P., et al, 2020) has found that twaite shad from the River Severn undertake long range migration across the Celtic Sea. Further specific information about diadromous fish within SACs and their associated populations can be found within our [conservation advice packages](#).
127. Therefore, NRW(A) advises that the fish study area may not be large enough to capture the range of fish species / species populations that may be utilising the area. We advise expanding further into the marine area to encompass rectangles 30E5, 32E3, 31E3, and 30E3, as well as inshore areas 31E6 and 32E6, however, this may require further revision depending on the outcome of pressure assessments e.g. noise modelling maps.

F4. RAG = AMBER

Table 2.3.1, Page 117 – Amendments required

128. NRW(A) notes that the [Section 7 list](#) within the Environment (Wales) Act 2016 was recently updated, and therefore, we advise Table 2.3.1. should be updated to reflect these changes.
129. Previous offshore wind scoping reports have assessed species within international, national, regional and local criteria which can be useful to help categorise their importance.

130. NRW(A) advises that, for EIA purposes, receptor fish species importance should primarily be informed through a combination of species conservation status (e.g. Annex II, OSPAR, Section 7, WCA 1981), species of commercial and recreational importance and their ecological role, e.g. species which form important prey species for other receptors, such as marine mammals and birds and piscivorous fish.
131. We advise adopting a regional screening approach and screening all sites with noise-sensitive fish features to ensure that fish passing through the development area are taken into account. We note that Table 2.3.1 goes some way towards this, but we advise that it includes the range of species listed on pages 131 and 132 relevant to the study area, with the additions mentioned above.

F5. RAG = AMBER

Section 2.3.2.1 and 2.3.3, Pages 116 and 134 – Additional information required

132. NRW(A) notes that Coull et al., 1998 and Ellis et al., 2010 datasets have been used to inform fish spawning and nursery grounds. We advise that Campanella and van der Kooij (2021), provide a more recent update for some species of foraging fish in Welsh waters, and should therefore be used in addition.
133. Whilst these datasets contain useful information, the limitations of these maps should be noted, especially around the lack of survey data for estuaries and inshore coastal waters of less than 30m depth, as well as the age of some of the data.
134. We advise that there are Atlantic herring spawning grounds inside the Pembrokeshire Marine SAC, as well as in the coastal areas (Davies, C.E et al, 2020a; Clarke and King, 1985). The inshore areas of the proposed development are also important for marine/diadromous fish as spawning and nursery grounds. A recent study (Shute et al., 2025) highlighted the importance of saltmarsh to fish species within Carmarthen Bay and the Burry Inlet, with useful information on community composition and fish production.
135. In addition to the above, NRW(A) advises the inclusion of the following data sources to inform the baseline fish assessment:
- NRW advice on datasets to utilise when planning marine developments: [Natural Resources Wales / Marine ecology datasets for marine developments](#), includes a range of internal and external data sources specific to marine receptors including fish.
 - Habitat regulation 9a report for Wales. Diadromous fish can be found within the 'non bird species data' – sea lamprey, river lamprey, allis shad, twaite shad,

Atlantic salmon. [Natural Resources Wales / Habitats Regulations 9A Report for Wales 2019-2024](#)

- State of Natural Resources (SONARR) [Natural Resources Wales / State of Natural Resources Report 2025](#)
- Links to our condition assessments [Natural Resources Wales / Condition assessments for Welsh European marine sites \(EMS\)](#)
- WFD fish survey data [NRW Marine Fish Surveys | DataMapWales](#)

136. We recommend that the Applicant includes angling data to support baseline characterisation, as this will include non-commercial species. The 'Sea angling diary project' run by Cefas has relevant data available [Cefas Data Portal - View](#)
137. There may also be acoustic detectors present in the area, which could contain useful information on fish passage e.g. Celtic Sea Power instrumentation. We advise that the Applicant contacts Celtic Sea Power for more information.

F6. RAG = AMBER

Section 2.3.2.5, Page 132 – Additional information required

138. Whilst we understand that this is intended as a general overview of diadromous fish, NRW(A) notes that a number of designated sites and features are missing from this overview. For example, allis and twaite shad, sea and river lamprey are also features of Pembrokeshire Marine SAC. We advise that this section refers to the relevant information in the Habitats Regulations Assessment Screening Report.

F7. RAG = AMBER

Table 2.3.2, Page 133 – Additional information required

139. NRW(A) notes that Table 2.3.2 encompasses sites within a 30km boundary, however the Habitats Regulations Assessment Screening Report covers sites over a much wider area considering species specific information (e.g. 600km for shad, 100km for lamprey) and functional linkage to sites further afield.
140. We advise the inclusion of the following SACs and features:
- Bae Caerfyrddin ac Aberoedd / Carmarthen Bay and Estuaries SAC: allis shad, twaite shad, river lamprey, sea lamprey
 - Sir Pembrokeshire Marine SAC: allis shad, twaite shad, river lamprey, sea lamprey.

- Mor Hafren / Severn Estuary SAC and Ramsar: twaite shad, river lamprey, sea lamprey; the notable species sub feature within the Estuaries feature (migratory fish - Atlantic salmon, eel, sea trout, allis shad; assemblage of fish species (>100 species))
- Afon Gwy / River Wye SAC: allis shad, twaite shad, river lamprey, sea lamprey, Atlantic salmon
- Afon Tywi / River Tywi SAC: allis shad, twaite shad, river lamprey, sea lamprey
- Afon Wysg / River Usk SAC: allis shad, twaite shad, river lamprey, sea lamprey, Atlantic salmon
- Bae Ceredigion / Cardigan Bay SAC: river lamprey, sea lamprey

F8. RAG = BLUE

Section 2.3.2.7, Page 133

141. NRW(A) suggests that a map of designated sites would be useful to include here, similar to Figure 2.2.3 in the Benthic Habitat chapter.

F9. RAG = AMBER

Table 2.3.4, Page 136 - Further information required

142. NRW(A) has not seen the data from the surveys mentioned in Table 2.3.4. We request further information is provided in the form of the reports and methodology used for these surveys so that we can consider their adequacy / efficacy.

F10. RAG = AMBER

Section 2.3.4, Pages 136-137 - Further information required

143. NRW(A) advises that additional information is provided on the planned noise modelling within the Fish chapter. We recommend that site and project specific noise modelling is undertaken specific to fish receptors to inform the detailed assessment.
144. NRW(A) notes that information regarding herring spawning and sandeel suitability assessments are mentioned in Section 1.5.4.1, but not to the same level of detail in the Fish chapter. We welcome the intention to assess herring and sandeel spawning, and the proposal to use the planned benthic sampling to inform this. We advise that habitat suitability assessments are conducted for herring and sandeels, and that the amount of suitable habitat impacted is quantified in the ES.

145. NRW(A) does not agree with the herring spawning habitat and sandeel supporting habitat confidence heatmap methodologies (Kyle-Henney, 2024a; Kyle-Henney 2024b) as they use datasets not relevant to the Bristol Channel and Celtic Sea. Instead, habitat suitability can be assessed more simply using seabed habitat mapping for the Celtic Sea and suitability assessments against Folk triangle classifications.
146. NRW(A) advises that these modelling and suitability assessments inform the impact assessment to be undertaken for marine fish. We also advise that impacts to all Section 7 marine fish, identified as present in the area (e.g., have spawning or nursery areas overlapping the site) are included in the assessment.

F11. RAG = AMBER

Section 2.3.5, Page 137 – Amendments required

147. NRW(A) agrees with most of the scoping assessments that have been identified, however, we advise there should be amendments to some and the inclusion of a number of other potential pathways, as outlined below.
148. In Sections 2.3.5.1.4 and 2.3.5.2.5, we advise this pathway should include impacts due to particle motion including on larvae and possible avoidance of fish and shellfish.
149. We note that underwater noise and vibration have been scoped in for the operational phase for 'behavioural disturbance only'. We highlight new research by Botero-Bolivar et al., (2026) regarding potential impacts from aerodynamic noise on fish, which suggests that "...*aerodynamic noise from offshore wind farms could contribute to the underwater soundscape and may have implications for marine organisms.*" NRW(A) would welcome further discussion with Applicant regarding this potential impact pathway.
150. In Section 2.3.5.2.3, as noted, "*Temporary increases in suspended sediments have the potential to affect feeding, respiration or behaviour in sensitive fish and shellfish species.*" We advise this should be expanded to include effects on fish eggs and larvae which may also be negatively affected by increased SSC.
151. In Section 2.3.5.2.9, we note that heat impacts from cables have been scoped out, however, heat emitted from buried cables has the potential to have an impact on benthic spawning fish eggs e.g. herring eggs, depending on the depth of burial and substrate type. Toomey et al., (2023) illustrates temperature effects on egg development in the Downs Herring population, and therefore we advise this pathway is scoped in and assessed appropriately.

F12. RAG = AMBER

Section 2.3.5, Page 137 – Additional pressures to include

152. We note that secondary entanglement, vessel interaction (increased risk of collision) and changes to prey resource have been scoped in for marine mammals and/or bird receptors. NRW(A) advises that these pathways are also of relevance to fish receptors and therefore should be scoped in for fish.
153. NRW(A) advises that collision is of relevance to fish, with the risk increased for large slow-moving species, such as Basking sharks, or fast-moving species, such as Bluefin tuna.
154. We advise that the Applicant considers the potential for the floating devices to act as fish aggregation devices (FAD) acting as a reef/reserve effect with potential implications to prey distribution. Additionally, we advise this pressure considers impacts to fish species that may predate on other fish (such as sharks, tuna, cod), rather than only focussing on fish as prey.
155. Entanglement could occur for oceanic fish species, such as Bluefin tuna and Basking shark (a WCA and OSPAR protected species). Entanglement of fish could result from primary (direct entanglement), secondary (caught in marine debris or ghost gear snagged on mooring lines or other infrastructure) or tertiary entanglement (fish already entangled in marine debris swim past the lines and become entangled). We advise additional data should be consulted to assess the species-specific risk of entanglement. The ES for Project Erebus list several data sources and records which can be used.
156. Turbulence is an emerging area of research which considers the changes in flow as a result of Offshore Wind Farms. Such changes may affect fish larvae dispersion and could result in indirect habitat change. We advise that further consideration is given to this pressure, however, we acknowledge that impacts are likely lower for floating OWF than fixed turbines.
157. Cable 'snapping' associated with cable tension release in the mooring system should also be assessed.

F13. RAG = AMBER

Section 2.3.6, Page 143 – Additional text required

158. We note that mitigation relating to unexploded ordnance (UXO), such as noise abatement measures and low order detonation, is included the Marine Mammal chapter. NRW(A) advises that as these measures could also be beneficial for fish

receptors, and as such, they should be included in the mitigation section of the Fish chapter.

F14. RAG = AMBER

Section 2.4.2.1, Page 147 – Further information required

159. NRW(A) notes that aerial surveys have been undertaken to inform mammal and bird populations. We recommend that any records of large oceanic fish (e.g. sunfish, basking sharks, bluefin tuna) from these surveys are used to inform the fish assessment.

Habitats Regulations Assessment Screening Report

F15. RAG = GREEN

Section 3.1.1.1, Page 12

160. NRW(A) agrees with the approach utilised for migratory fish, reflecting the migratory and ranging behaviour of each species. We advise that a similar approach is utilised within the EIA assessment.
161. We note the list of pressures used in the HRA is different to those included within the EIA scoping and they are not defined, so it is unclear what each encompass. NRW(A) advises that definitions are provided and that the pressures assessed align across EIA Scoping Report and HRA Screening Report.

F16. RAG = AMBER

Appendix A, Table 7.1, Pages 31-166 – Additional screening required

162. We note that the Severn Estuary SAC contains additional fish features that have not been included in Table 7.1. Alongside the named species, the SAC contains 'migratory fish' (salmon, sea trout, eel and allis shad) and 'assemblage of fish species' features within the notable species sub-feature of the estuaries feature.

F17. RAG = BLUE

163. NRW(A) recommends that Appendix A is divided into receptors for ease of reading.

Receptor – Marine Mammals

Environmental Impact Assessment Scoping Report

MM1. RAG = GREEN

Figure 2.4.1, Page 145

164. NRW(A) are content with the study areas proposed in Figure 2.4.1.

MM2. RAG = GREEN

Section 2.4.2, Page 146

165. NRW(A) are content with the list of species identified and the associated Management Units (MUs) in paragraph 417.

MM3. RAG = GREEN

Section 2.4.3., Page 148

166. NRW(A) are content with the sources identified but note that should any further sources become available, we would expect those to also be included.

MM4. RAG = AMBER

Section 2.4.2.1., Page 147 – Clarification required on survey data

167. NRW(A) advises that it will be essential to clearly explain how the Round 5 Project Development Area (PDA) wide surveys have been processed for their own assessment, including whether densities have been generated for the whole area and whether data will be “cookie cut” to fit the Gwynt Glas project area.

168. We note that this data has not been provided to NRW(A) (or JNCC), so we are therefore currently unable to provide any comments upon it.

MM5. RAG = AMBER

Section 2.4.2.1., Page 147 – Clarification required on survey effort

169. NRW(A) notes that there is reference to surveys carried out between 2023 and 2025 covering all Round 5 PDA's. However, paragraph 433 states “*surveys that have been undertaken to date, and those that would be undertaken in 2027 by the Applicant to*

support the assessment". Going forward, we advise that the intentions regarding project specific pre-application survey effort should be clarified, and we also strongly encourage discussion with SNCBs ahead of any site-specific survey effort.

MM6. RAG = AMBER

Primary and Tertiary entanglement

170. NRW(A) notes the marine mammal section does not make any reference to primary entanglement (animals becoming directly entangled with infrastructure) or tertiary entanglement (animals with already entangled debris then becoming entangled in infrastructure). We advise these should be included in the ES, with the scoping and assessment decisions for these pathways explained.

MM7. RAG = AMBER

Section 2.4.5.2.9., Page 154 – Scoping out of barrier effects

171. NRW(A) disagrees with the decision to scope out barrier effects due to physical presence. While a number of studies have been cited, we note that these are from fixed offshore wind infrastructure in the North Sea. We advise that uncertainty remains in whether responses to floating infrastructure will be consistent with that for fixed infrastructure, and therefore must be taken into account during assessments.
172. Furthermore, the North Sea projects cited, and the two small Floating Offshore Wind (FLOW) projects in Scottish waters, are in areas of open water along an open coastline, whereas the proposed development would place a large array adjacent to an SAC without large areas of open sea due to the proximity of the coastlines which form the boundaries of the Bristol Channel, making transit through the project area much more likely.

MM8. RAG = AMBER

Section 2.4.5.2.10., Page 154 – Scoping out of EMF

173. To date, NRW(A) notes that impacts of Electromagnetic Fields (EMF) have been scoped out of assessments for offshore wind. However, knowledge is expanding on this pathway, and it is now understood that bottlenose dolphins and harbour porpoise can detect EMF (Geelhoed et. al. 2022, Hüttner et. al. 2023) and the ongoing project [EMPACT](#) is investigating what responses occur in harbour porpoise (Dahlström, 2026). Given the developing understanding and evidence suggesting the presence of a pathway, we disagree with this impact pathway being scoped out.

MM9. RAG = AMBER

Section 2.4.5.2.1, Page 153 – Scoping out of auditory injury during operation

174. NRW(A) does not agree with the decision and justification to scope out auditory injury as presented. Conclusions regarding the potential for auditory injury should be reached using quantitative evidence, given there is understood to be a viable risk (Risch et al., 2026).

MM10. RAG = AMBER

Section 2.4.5.2.2, Page 153 – Disturbance from underwater noise

175. NRW(A) highlights that “cable snaps” as identified occurring at the Hywind project should be included in underwater noise impact assessments (Martin et al., 2011). As noted below, this risk is linked to the presence of infrastructure in the water, so exists in all three phases of operation.

MM11. RAG = AMBER

Section 2.4.5.7., Page 155 – Secondary entanglement during construction and decommissioning

176. NRW(A) notes that Section 2.4.5.1 does not list secondary entanglement, but Table 2.4.3 lists this as having been scoped out. The risk of secondary entanglement is determined by the presence of infrastructure in the water, and as such occurs during both the construction and decommissioning phases. NRW(A) does not agree with the exclusion or scoping out of this pathway from the construction and decommissioning phases.

MM12. RAG = AMBER

Table 1.8.2., Page 63 – Mitigation of vessel collision and entanglement

177. NRW(A) advises the mitigation options for entanglement should be considered during the assessment and included in the suite of mitigation options presented for the project.
178. The Vessel Management Plan (VMP) and Marine Mammal Mitigation Plan (MMMP) should also include options for mitigating vessel collision risk, particularly for large cetaceans such as fin whales.

MM13. RAG = AMBER

Section 1.8.1, Page 58 - Offshore Wind Evidence and Knowledge Hub (OWEKH) Evidence Review Notes (ERNs)

179. NRW(A) notes that paragraph 183 states “*OWEKH has cross-governmental support from all UK administrations.*” JNCC and other SNCBs are listed as consultees of OWEKH Technical Topic Groups, and the ERNs for underwater noise and seals are not yet finalised. As per OWEKH, ERNs do not replace regulatory advice and do not imply any endorsement by any of the organisations participating in OWEKH. While a number of organisations have been consulted in the development of ERNs, we advise it is crucial that ‘*support*’ should not be assumed ahead of ERN publication and in absence of comments from the relevant organisations themselves.

Habitats Regulations Assessment Screening Report

MM14. RAG = YELLOW

Appendix A, Table 7.1, Pages 31-166 – clarification required

180. NRW(A) notes it is not stated whether the pressures listed in Table 7.1 are scoped into the assessment, but we assume this to be the case. In future, we advise this should be made clear to avoid ambiguity.

MM15. RAG = GREEN

Appendix A, Table 7.1, page 109 - EMF

181. As noted above, assuming the listed pressures are scoped in, NRW(A) notes that EMF is scoped in for marine mammal sites in the HRA, despite being scoped out of the EIA. As stated in **MM7**, NRW(A) considers scoping in of this impact to be the correct approach and therefore agrees with this conclusion.

Marine Conservation Zone Screening Assessment

MM16. RAG = AMBER

Section 4.1.3.1, page 19 - Scoping out of impacts during Construction & Decommissioning phases

182. As stated in **MM11**, given the risks are linked to the presence of infrastructure in the water, NRW(A) does not agree with scoping out physical presence and entanglement during the construction and decommissioning phases.

Receptor – Marine Ornithology

Environmental Impact Assessment Scoping Report

MO1. RAG = AMBER

Overarching Key Comment

183. NRW(A) strongly recommends the use of the Natural England Offshore Wind Seabird Assessment Tool (OWSAT), which has been developed as an OWES measure with the support of NRW and JNCC. OWSAT contains key information from many of the sources listed in Table 2.5.4. in one place and allows efficient tracking and updates to the assessment figures. We consider that using OWSAT will help address some of the issues identified in the comments below for the EIA Scoping Report and the HRA Screening Report.
184. The Applicant has already been made aware of OWSAT via email from NRW(A) dated 5th June 2026, however, if they require a further copy of the OWSAT summary and/or of OWSAT v1.5, we welcome them to contact us.
185. The Statutory Nature Conservation Bodies (SNCBs) will be using OWSAT across the Round 5 projects to review, keep track of and ensure consistency between ornithological impact assessments. NRW(A) are keen to work with the Applicant to start populating OWSAT with their survey data, as this will facilitate their assessment/our advice.

MO2. RAG = YELLOW

Tables 1.5.2 and 1.8.2, Pages 18 and 66 – further consideration required

186. NRW(A) notes that the minimum 'air gap' in Table 1.5.2 is quoted as 22m above Mean High Water Springs (MHWS), whereas in Table 1.8.2 it is quoted as 22m above Highest Astronomical Tide (HAT). We advise that the reference datum used for such parameters should be consistent throughout.
187. Additionally, we note that a clearance of 22m above MHWS is the minimum advised for navigational safety. In order to minimise the development's predicted collision impacts and hence minimise the contribution to cumulative and in-combination

collision totals, we recommend that the Applicant considers measures such as raising the turbine air gap by as much as feasibly possible in order to allow maximum realisation of renewable energy for the minimum environmental impact.

MO3. RAG = RED

Section 1.8.8, Page 75 – further assessment required

188. NRW(A) notes that paragraph 210 states: *‘Where possible, the Applicant would use as-built project parameter information (if available) as opposed to consented parameters to reduce over precaution (inaccuracies) in the CEA.’*
189. At present, NRW(A) does not consider it appropriate to reduce impact estimates by considering as-built parameters unless those parameters are legally secured. Speculation of impacts from ‘as-built’ scenarios in cumulative and in-combination impact assessments are of little value unless legal agreements are put in place to ensure existing projects will not expand further. Without such agreements, we consider there is no option other than to use impacts from consented designs in in-combination and cumulative assessments.
190. As a result of the above, we advise that a version of the cumulative and in-combination impact assessments should be presented based on consented impact values only, except in cases where the as-built parameters are legally secured. This is not to say that a version of the assessment based on as-built parameters cannot be presented as well for illustrative purposes.

MO4. RAG = AMBER

Section 2.5.1.2, Page 158 – further assessment required

191. NRW(A) agrees with the proposed non-breeding season offshore ornithology regional study area (defined as *the Biologically Defined Minimum Population Scales (BDMPS) spatial areas for each species as described in Furness (2015)*). However, we do not agree with the exceptions to this approach proposed for common guillemot and herring gull.
192. We note that where data allows, a more refined, quantitative approach to defining BDMPS regions based on ringing and tracking data may be possible for future work on the BDMPS, particularly for auks such as common guillemots that have been heavily tracked using GLS in recent years (e.g. Buckingham et al. 2022).
193. We note that Natural England contracted a review of the BDMPS approach and methodology to apportioning non-breeding season impacts on seabirds arising from offshore wind farms (see Johnston et al. 2025). This review included common

guillemot as a case study and concluded that due to the continuity of guillemot colonies along UK coasts, a divide beyond East and West waters is likely inappropriate at this stage (Johnston et al. 2025). Therefore, we advise that the non-breeding season regional study area for guillemot and herring gull are also the relevant BDMPS regions.

MO5. RAG = AMBER

Section 2.5.2, Page 161 – further consideration required

194. NRW(A) generally agrees that a separate assessment for SSSIs that form part of a seabird SPA would not be undertaken, as effects on the qualifying seabird species would be addressed through the HRA process. However, we advise that consideration should be given to any instances where a species is a feature of a SSSI, but not a qualifying feature of the SPA that the SSSI is a part of, as the current stated approach would risk qualifying species of a SSSI not being assessed for impacts.

MO6. RAG = AMBER

Table 2.5.1, Page 162 – further consideration required

195. In general, NRW(A) agrees with the use of the mean-maximum foraging ranges from Woodward et al. (2024). However, we advise that breeding season foraging ranges that should be used for razorbill and common guillemot are those presented within Appendix 1 of Woodward et al. (2019) which excludes data from Fair Isle where foraging range may have been unusually high as a result of reduced prey availability during the study year. Based on this, the foraging range we advise for use for razorbill is $73.8\text{km} \pm 48.4\text{km} = 122.2\text{km}$ and for common guillemot is $55.5\text{km} \pm 39.7\text{km} = 95.2\text{km}$.
196. Additionally, we advise a specific SPA foraging range is used for the Grassholm SPA gannet colony of 516.7km, which is the maximum foraging range for the colony from Woodward et al. (2019).
197. We note that the relevant BDMPS regions listed in Table 2.5.1 do not match those within the BDMPS report (Furness 2015) for several species. Therefore, we suggest the Applicant reviews Table 2.5.1 to ensure it is consistent with the relevant BDMPSs in Furness (2015) that the development sits in.

MO7. RAG = YELLOW

Section 2.5.2, Page 163 – Further consideration of Balearic shearwater

198. NRW(A) welcomes and agrees with the commitment in paragraph 491 that a qualitative assessment of the potential impacts on Balearic shearwater would be carried out in the EIA.
199. Whilst we note that from paragraph 491 it appears that some Balearic shearwaters have been detected in the Digital Aerial Survey (DAS) data, we note that it will be very difficult to distinguish birds from Manx shearwater using DAS. Balearic shearwater are features of SPAs outside of the UK on the Continent and an assessment of potential impacts to these sites may need to be made in the HRA and consideration should be given as to how this will be approached. We suggest that consideration could be given to use of existing data (e.g. that used in Phillips et al. 2021, any tracking data etc.) to inform apportioning of species from site-specific data, as well as discussions with any relevant interest groups.

MO8. RAG = AMBER

Table 2.5.2, Page 164 – further consideration required

200. NRW(A) agrees that seasonal definitions for each species of interest are based on the biologically defined seasons from Furness (2015) where available. We advise that the 'full breeding season' (rather than the 'migration free breeding season') definitions from Furness (2015) are used, with the non-breeding season definitions subsequently adjusted accordingly to ensure that no months are considered in two seasons. We recommend using the seasonal definitions provided by SNCBs within OWSAT.

MO9. RAG = AMBER

Table 2.5.3, Pages 165-166 – further consideration required

201. NRW(A) notes that Figure 2.5.1 shows the offshore export cable scoping boundary overlapping with the Carmarthen Bay SPA. Therefore, we advise that this site is added to Table 2.5.3 as a designated SPA that overlaps the offshore export cable scoping boundary.

MO10. RAG = YELLOW

Table 2.5.4, Pages 166-168 – further consideration required

202. Whilst we consider that the tools and data sources listed in Table 2.5.4 are broadly appropriate, NRW(A) recommends the following data sources are included in this table:
- Joint SNCB Interim Displacement Advice Note (2022)
 - Joint advice note from the SNCBs regarding bird collision risk modelling for offshore wind developments (2024).
 - Natural England OWSAT
203. NRW(A) are aware that there is currently work underway to review and update seabird demographic rates and to update the BDMPs report. Therefore, we recommend the Applicant monitors this work and discusses outputs with the SNCBs with a view to incorporating any updated recommended values/approaches in their submission documents.
204. Regarding seabird flight heights, we are also aware of the Reducing Seabird Collisions Using Evidence (ReSCUE) project funded by the Offshore Wind Evidence and Change Programme (OWEC) that is using existing sources of data and innovative technology such as light detection and ranging (LiDAR) to provide a better understanding of seabird flight heights and vulnerability to collision with wind turbines. The project will provide increased confidence in the assessment of potential impacts of offshore wind farms on seabirds and aid the development of design standards to mitigate them. Whilst the project is not due to conclude until 2027, we again recommend that the Applicant monitors this work and discusses the outputs with SNCBs with a view to incorporating any outputs in their submission documents.
205. Additionally, Procellariiform Behaviour and Demographics (ProcBe), also funded by OWEC, is specifically focussing on collation and collection of storm petrel (European and Leach's) and Manx shearwater flight heights and at sea distributions using handheld laser rangefinders, ground truthing with LiDAR and tagging data. The outputs of ProcBe will be publicly available in 2027 filling critical evidence gaps regarding procellariiform flight heights, directly enhancing parameterisation of collision risk models.

MO11. RAG = GREEN

Section 2.5.4 Page 169

206. NRW(A) are supportive of the proposed quantitative methods used, noting that the stochastic Collision Risk Model is advised over the deterministic version (SNCBs, 2024).

MO12. RAG = AMBER

Section 2.5.5.1 and Table 2.5.5, Pages 169-170 and 172-173 – further consideration required

207. NRW(A) recommends that disturbance and displacement from turbines and barrier effects are scoped in for assessment during the construction and decommissioning stages as well as during operations and maintenance. We advise this is due to the fact that turbines will be present in the water for some of the construction stage prior to the start of operations and will remain present for some of the decommissioning phase before completion of removal. Given that not all turbines will be in place during these periods, we advise that it would be reasonable to assess displacement impacts and barrier effects during the construction and decommissioning stages at 50% of the displacement impacts values in the operations and maintenance stages.

MO13. RAG = YELLOW

Section 2.5.5.5 Pages 171-172 – further consideration required

208. NRW(A) notes paragraph 513 states: *‘...the Applicant proposes to utilise ‘gap-filling’ data presented by the Mona, Morgan and Morecambe projects in the cumulative assessment, unless more recent data (e.g. from the proposed cumulative effects framework) becomes available.’*
209. JNCC, Natural England, and Natural Resources Wales are currently collaborating on the CuCombER project (Cumulative and In-combination Estimates Register), which aims to provide a publicly accessible database of mortality estimates from Offshore Wind Farms, recalculated to be in line with current SNCB advice, including calculating estimates for projects for which quantitative analyses were not undertaken at the time of the assessment. We advise this should be available for use by the Applicant for both cumulative and in-combination assessments within their submission documents.

MO14. RAG = YELLOW

Section 2.5.5.5, Page 172 – further consideration required

210. NRW(A) agrees that cumulative effects during construction and decommissioning should be scoped in. However, we advise that this is not solely due to the potential for overlap with the construction stages of PDA 2 and 3, as impacts from disturbance/displacement during the construction and decommissioning stage may act cumulatively with impacts during the operations and maintenance stage of all existing projects in the region and should be scoped in on this basis (although we note that the consented Celtic Sea FLOW demonstrator projects may have been constructed by the time Gwynt Glas construction may start).

MO15. RAG = YELLOW

Table 3.1.3, Page 317-318 – further consideration required

211. NRW(A) welcomes that overwintering bird surveys are proposed to be undertaken, and we note that Table 3.1.3 indicates that overwintering bird surveys are anticipated to be undertaken between October to March in 2026/27 and 2027/28. We note the table also states the proposed scope of the surveys *'would include all suitable habitats (including any functionally linked habitats) that may be impacted by the Development and / or afforded protection for overwintering birds. Two survey years are proposed however this may be refined to one year following the review of year one data and in consultation with key stakeholders.'*
212. We advise at least two contemporary years of wintering bird surveys are undertaken to account for interannual variation in use by bird features of designated sites, including those of the Burry Inlet SPA/Ramsar and Burry Inlet and Loughor Estuary SSSI and priority species included in Section 7 of the Environment (Wales) Act 2016. We suggest that in order to cover both passage and overwintering usage, the surveys should start in September rather than October and run through until at least April. These surveys should include *'Through-the-tidal-cycle'* survey methodology, which will provide good coverage across the tidal cycle and augment existing BTO survey methods (such as WeBS).

Habitats Regulations Assessment Screening Report

MO16. RAG = AMBER

Section 3.1.1.1 and Section 3.1.1.2, Pages 13-14 – further assessment required

213. NRW(A) does not consider it appropriate to exclude European sites at the screening stage of the assessment on the basis of predicted magnitude of impacts. We would expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity (e.g. within foraging range) and/or a potential impact pathway (e.g. displacement or collision) and hence the potential to undermine the conservation objectives for the feature to be screened in for LSE and carried through to the Appropriate Assessment (AA) phase. Any additional work looking at apportioning impacts and assessments of predicted impacts (e.g. collision or displacement) against baseline mortality should be included in the AA. Where a quantitative assessment is undertaken in the AA, the methodology used should be clearly set out and be presented, with full parameter sets such that the modelling can be exactly replicated.

214. With regard to seabirds in the non-breeding season, we suggest that the Applicant considers a similar approach to that taken by the Morecambe Generation Assets project (and the other Round 4 Irish projects) where potential connectivity (and thus, LSE if there is an impact pathway) was only assumed for cases where the contribution of an SPA population is thought to represent >1% of the relevant BDMPS population. We consider that such an approach provides a proportionate and sensible screening approach to reduce the site/species combinations for consideration, while ensuring those that may be at risk are properly considered.
215. We also recommend the use of OWSAT to allow impact estimates for a large number of sites to be apportioned efficiently and final impact values to be presented. Where these are small (e.g. equate to less than 1% of baseline mortality of the respective population), we recommend that only a relatively small amount of supporting text would be required to indicate that these sites have been assessed with a single consistent method and that adverse effects on site integrity can be ruled out on the basis of the results.

MO17. RAG = GREEN

Section 3.1.1.1, Pages 13-14

216. NRW(A) agrees that sites for non-breeding waterbirds that overlap with the development PDA area and offshore export cable route should be screened in and are content with the use of the precautionary 15km spatial criterion to allow for disturbance at distance and indirect effects on supporting habitats and prey.

MO18. RAG = AMBER

Appendix A, Table 7.1, Pages 31-166 – further consideration required

217. NRW(A) advises that although kittiwake, guillemot and razorbill are not qualifying features of the Skomer, Skokholm and seas off Pembrokeshire SPA, they are named components of the breeding seabird assemblage qualifying feature. The qualifying features of this SPA are puffin, Manx shearwater, European storm petrel, lesser black-backed gull and a breeding seabird assemblage (including razorbill, guillemot, kittiwake, puffin, lesser black-backed gull, Manx shearwater, storm petrel).
218. We suggest that the features of all Welsh SPAs/Ramsar sites that have been screened in within the Screening Report are verified using the following: <https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/find-protected-areas-of-land-and-sea/?lang=en>

219. We advise that the HRA should assess the potential impact of projects on SPA colony population features throughout the whole year. Therefore, we consider that SPAs such as Grassholm and Skomer, Skokholm and the seas off Pembrokeshire should be screened in for LSE for both the breeding season and the non-breeding season(s).

Detailed Comments - Onshore:

The following advice seeks to answer the questions posed within each of the relevant sections of the Scoping Report.

Receptor – Designated Landscapes

220. NRW(A)'s advice concerns the landscape character and visual amenity of the Pembrokeshire Coast National Park (PCNP) and the Gower National Landscape (the name for the legally designated Area of Outstanding Natural Beauty), and the statutory purposes of these designations, which include the conservation and enhancement of their natural beauty. Our advice is based on the Scoping Report, in particular:

- *Section 2.11 SLVIA*: which outlines the proposed scope and approach to the assessment of seascape, landscape and visual effects (SLVIA) resulting from the offshore components.
- *Section 3.6: Landscape and Visual Impact*: which outlines the proposed scope and approach to the assessment of landscape and visual effects (LVIA) resulting from the onshore components.

221. NRW(A)'s comments below cover the questions at paragraphs 856 and 1239 of the Scoping Report in so far as they are relevant to our remit on designated landscapes.

Proposed Development

DL01. RAG = AMBER

222. The proposed development would have an operational life of 40 years and includes both offshore and onshore components. A Project Design Envelope (PDE) approach will be used. The main offshore component is an array of wind turbines and the PDE for these is set out in Table 1.5.2 of the Scoping Report. The PDE includes minimum (66) and maximum (118) parameters for the number of wind turbines and minimum (220m) and maximum (310m) blade tip heights above Highest Astronomical Tide. The maximum rotor diameter is stated as 330m. The maximum blade tip height for a scenario where 118 turbines were deployed is not clear, but we assume it must be less than 310m as the Scoping Report (paragraph 862) goes on to state that the worst

case scenario for assessment purposes is deemed to be a scenario with 66 turbines at 310m. It is not clear what assumptions this conclusion is based on.

- 223. Further information is advised in order to understand and verify which PDE scenario would have the maximum effect on seascape, landscape and visual receptors. This information should explain the likely maximum heights of a scenario whereby a greater number of turbines were deployed, including up to 118 turbines, and comparisons should be evidenced with wireframe visualisations.
- 224. The array boundary is located approximately 36km from the closest point of the PCNP at Skokholm Island and 39km from the closest point of the mainland PCNP at St Ann's Head (Paragraph 859). NRW(A) notes that the Scoping Report at Paragraph 1.5.3.1 states the distance as 42km. With reference to Figure 2.11.1, the quoted distance of 42km appears to be an error and should be corrected.
- 225. Up to three offshore transmission substations may be required and these would include infrastructure on a platform raised above sea level. Similarly, midpoint compensation reactor(s) may be required which would also require infrastructure on a platform above sea level. Parameters for the infrastructure on these components is not stated, but it is expected these components will be located closer to the coastline than the wind turbines.
- 226. Onshore components include landfall works, an export cable corridor, onshore transmission substation(s) and a grid connection cable corridor. These components would be located in what is currently a broad onshore scoping boundary which includes the eastern parts of the PCNP and land outside of the PCNP but within its setting. The offshore scoping boundary which connects to the onshore scoping boundary abuts the north western parts of the Gower National Landscape (Figure 2.11.2).
- 227. In view of the limited information provided, and the elements of the project that are still to be confirmed, it is not possible, at this stage, to understand what the worst-case scenario is in terms of impacts on seascape, landscape and visual receptors.

Proposed Study Areas

DL02. RAG = GREEN

228. NRW(A) is satisfied with the proposed study areas which are:

- SLVIA: 60km radius from the array boundary
- LVIA: the onshore scoping boundary plus a 5km buffer for the assessment of the onshore transmission substations and a 3km buffer for the assessment of all potential landfall sites.

DL03. RAG = AMBER

229. No cumulative study areas have been identified. Cumulative study areas may need to be larger than the primary SLVIA / LVIA study areas to capture interacting developments. The appropriateness of the proposed extent of any cumulative study areas will depend on:

- The location of other relevant schemes; and
- The results of cumulative Zone of Theoretical Visibility (ZTV) analysis (not yet provided).

230. A cumulative ZTV analysis is also necessary to inform viewpoint selection. It should not be assumed that viewpoints selected for the primary assessments will be sufficient for cumulative assessment.

Proposed Assessment Viewpoints

DL04. RAG = AMBER

231. Figure 2.11.5 shows the results of a ZTV analysis based on the blade tip heights of the proposed wind turbines. It also shows the proposed SLVIA viewpoints. Figure 2.11.5 is presented on A3 paper size and at a low resolution. This means the base mapping and results of the ZTV are illegible. This information must be presented at a larger paper size (A1) at high resolution on OS 1:50,000 mapping in order for us to be able to interpret the results of the ZTV and verify the appropriateness of the proposed viewpoints.

232. A hub height ZTV has not been provided. This should be provided to support viewpoint selection. Comparing two ZTVs that separately show visibility at blade tip and hub height will indicate where only the turbine blades, or part-blades, may be

visible from. This will be useful for any inland viewpoints, or where the turbines might be viewed behind/above intervening land.

233. NRW(A) notes that due to uncertainties regarding the location of the onshore transmission infrastructure, potential viewpoints for the LVIA (onshore infrastructure) have not been defined in the Scoping Report. We request to be consulted on these viewpoints and the ZTV analysis on which they are based when available.
234. NRW(A) understands that the viewpoints will be used to inform an assessment of effects on both landscape and visual receptors. In addition to the effects at any given viewpoint location, we advise that the SLIVA and LVIA where applicable, should consider sequential effects on people using the Pembrokeshire Coast National Trail, who are expected to experience views of the development at more than one location.

Relevant Guidance

235. Relevant guidance for preparing SLVIA and LVIA is set out in section 2.11.4.1 of the Scoping Report. This includes:
- *Third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)* produced by the Landscape Institute and the Institute of Environmental Management.
 - *Assessment and Technical Guidance Note LITGN-2024-01 - Notes and Clarifications on Aspects of GLVIA3* prepared by the Landscape Institute.
236. NRW(A) notes reference to '*Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance (White, Michaels and King, 2019)*'. We advise this guidance consists of three separate reports which should be read together.

Visualisations

237. It is proposed to prepare visualisations but the proposed approach is not stated. We advise visualisations should accord with relevant guidance, namely:
- *Visual Representation of Development Proposals and the Scottish Natural Heritage (2017) Visual Representation of Wind Farms Guidance. Version 2.2.*
 - *Landscape Institute Technical Guidance Note 06/19 (2019)*
238. Visualisations should include baseline photographs, wirelines (including cumulative wirelines), and photomontages. When available, hard copies should be provided to NRW at the correct paper size for use on site.

239. Depending on the extent of lighting required for both the offshore and onshore components, night time visualisations may be required, particularly as ‘dark skies’ are one of the special qualities of the PCNP and the park includes a number of Dark Sky Discovery Sites. Any night time visualisations and assessments relating to aviation warning lighting should be prepared in accordance with relevant guidance set out in *Guidance on Aviation Lighting Impact Assessment* prepared by NatureScot (2024).

Proposed Seascape and Landscape Receptors

240. We are satisfied with the list of receptors scoped into the SLVIA and LVIA in Tables 2.11.4 and 3.6.3 of the Scoping Report. Further, paragraphs 894 (SLVIA) and 1260 (LVIA) of the Scoping Report confirm the SLVIA and LVIA will provide an assessment of the effects of the offshore and onshore infrastructure against the special qualities of the PCNP and Gower National Landscape.
241. We advise the special qualities and supporting statements of significance of the designations are conveyed at a high level in the respective management/partnership plans. Any assessment of the effects on these qualities should therefore be informed by detailed supporting evidence, including the descriptions of sensory and perceptual characteristics for the relevant Seascape Character Areas (SCAs) and Landscape Character Areas (LCAs) described in local level assessments (see below), LANDMAP, and NRW evidence e.g. on Tranquillity and Place (Report No: 569) and dark skies (Report No: 514). Assessments should be made using the local SCAs and LCAs as the reporting units. High level, generalised assessments against the PCNP as a whole are not useful and therefore not appropriate.

DL05. RAG = YELLOW

242. In relation to the local level assessments, we advise the Pembrokeshire Coast Seascape Character Assessment, adopted as Supplementary Planning Guidance in September 2023 is missing from the list of regional and local landscape character assessments in section 2.11.2.4 of the Scoping Report. This assessment should be used in the preparation of the SLVIA.
243. We advise the Scoping Report refers to an older version of PCNP special qualities at paragraph 892. The most up to date version is found in Chapter 2 of the Partnership Plan for the National Park 2025-2029, Pembrokeshire Coast National Park Authority, March 2025. This updated information should be used in the preparation of the SLVIA and LVIA.
244. We note cumulative effects will be assessed, although details of the specific approach for the SLVIA and LVIA are unclear. We advise that relevant schemes for SLVIA

include Erebus and Llŷr. LPAs are best placed to advise on relevant developments for inclusion in the LVIA cumulative assessment.

Design Considerations

245. Site selection is the primary mechanism for avoiding landscape and visual harm, particularly for developments of this scale and nature. As the site of the array has already been selected via the Crown Estate's LR5 process, it is expected the only measures that could reduce the potential adverse effects of the wind turbines on receptors within the PCNP concern:

- Turbine numbers;
- Turbine size (tip heights and rotor diameters);
- Turbine arrangement and/or amendments to the array boundary;
- Automatic dimming on / reduction of aviation warning lighting;
- Colour (standard practice).

246. Relevant guidance (*Designing for Renewable Energy in Wales, Design Commission for Wales, November 2023*) emphasises that landscape considerations should inform design from the outset, rather than acting as mitigation for a fixed scheme, where it states:

'Landscape should be the leading consideration in this process and not merely follow on in the form of 'landscape mitigation' of a predetermined engineering proposal and technical appraisal' (page 19).

247. Planning Policy Wales (Paragraph 5.9.21) similarly requires that adverse impacts of renewable energy developments are avoided or minimised through careful consideration of:

- *'Location;*
- *Scale;*
- *Design; and*
- *Other measures'*

248. We advise these aspects will also be relevant to the onshore components such as the transmission substations.

249. The ES should clearly demonstrate how SLVIA and LVIA findings have informed the evolution of the scheme and how impacts on the PCNP and Gower National Landscape have been avoided or acceptably minimised to ensure there are no unacceptable residual adverse effects on either designation.

Summary of Key Scoping Issues

250. In order to demonstrate which scenario within the PDE would likely have the maximum effect on seascape, landscape and visual receptors, further information is required (e.g. underlying design assumptions and comparative wireline visualisations).
251. No cumulative study areas have been identified. The appropriateness of the proposed extent of any cumulative study areas will depend on the location of other relevant schemes and the results of cumulative ZTV analysis.
252. Updated mapping and additional information (hub height ZTV) is required to allow interpretation of the results of the ZTV and verify the appropriateness of the proposed assessment viewpoints.
253. We request to be consulted on the assessment viewpoints and ZTV for the LVIA (onshore components) when available.
254. The Pembrokeshire Coast Seascape Character Assessment, 2023 is missing from the list of regional and local landscape character assessments, and this should be used for the SLVIA.
255. An older version of PCNP special qualities are referred to. The most up to date version found in Chapter 2 of the Partnership Plan for the National Park 2025-2029 should be used for the SLVIA and LVIA.
256. When available, hard copies of the visualisations should be provided to NRW.

Receptor – Designated Sites (Onshore)

General

DS01. RAG = AMBER

257. We note that there is currently no confirmed route identifying how the electricity generated offshore will be brought ashore and subsequently connected to the onshore network. As highlighted in Table 3.1.1 of the Scoping Report, there are a

number of designated nature conservation sites within the Scoping area, including SACs, SPAs, Ramsar sites and SSSIs.

258. Until the landfall location, export cable corridor and associated infrastructure routes are defined in greater detail, it is not possible to fully assess the potential impacts on designated sites and their special features.
259. We note paragraph 3.1.5, which states that statutory and non-statutory designated sites for nature conservation would, where possible, be avoided through design and site selection, but that direct impacts cannot currently be ruled out due to the presence of designated sites at potential landfall locations.
260. The ES will need to demonstrate how site selection has considered all available alternative options that would avoid any development within designated sites. The ES will also need to identify impact pathways (both direct and indirect) on protected sites, clearly assess the possible levels of impact and, where impacts are likely, should provide full details of appropriate mitigation measures to address those impacts. We would also expect a 'Shadow' Habitats Regulations Assessment to be prepared, based on the same supporting information.
261. The ES will need to assess a range of potential impact pathways, including disturbance, habitat loss, habitat fragmentation, hydrological change, and impacts arising during both the construction and operational phases of the development. Particular attention should be given to identifying and assessing indirect effects and impact pathways that may extend beyond the immediate footprint of the proposed works, including those affecting ecological connectivity and supporting hydrological processes.
262. The Applicant should review and utilise the available evidence base relating to protected sites and species. In particular, consideration should be given to Geoff Liles' Carmarthen Bay & Estuaries SAC Otter Report (2010), together with any other relevant SAC-related surveys, management plans, assessments and monitoring reports relating to affected designated sites and qualifying features. We also refer the Applicant to our [Condition Assessments for Otter *Lutra lutra* in Welsh Marine Special Areas of Conservation](#). Further information can be provided on request – please contact our Data Distribution Team (datadistribution@cyfoethnaturiolcymru.gov.uk).
263. With regard to baseline ecological information, we recommend that the Applicant obtains and reviews both Phase 1 Habitat Survey information and National Vegetation Classification (NVC) / Phase 2 survey information, where available. We hold a number of Phase 2 habitat survey reports which may assist in informing the ecological baseline and improving understanding of habitat sensitivities within the study area.

264. The report states that construction of the Onshore Export Cable Corridor would result in temporary impacts on terrestrial habitats and that trenchless techniques, such as Horizontal Directional Drilling (HDD), may be used where feasible.
265. We hold a number of ecohydrology reports relating to protected sites within the area, and these should be reviewed as part of the assessment. These reports are available on request via our Data Distribution team. In particular, Gwel y Coed SSSI should be included within the relevant ecological and hydrological assessments where applicable.
266. Overall, until a defined landfall location and onshore export cable route are confirmed, the ability to provide detailed ecological comments remains limited. Nevertheless, the sensitivity of the Laugharne, Pendine, Pembrey and Kidwelly areas, together with the presence of numerous designated sites and associated qualifying features, should be recognised as significant constraints requiring detailed assessment and avoidance through route selection wherever possible.

HRA Screening Report

DS02. RAG = YELLOW

267. The report also references the Llandyfaelog Substation: Shadow HRA (Stantec, 2025). This document has not been provided as part of the consultation material and therefore cannot currently be reviewed. A copy should be made available, as it may contain information relevant to the assessment of impacts on designated sites and protected features within Carmarthenshire.
268. We advise clarification on the SACs (and their features) screened into the HRA assessment and whether these include Pembrokeshire Marine SAC (otters) and the Limestone Cliffs of South West Wales SAC (greater horseshoe bats). We advise that the final list of sites and features to be screened in is based on the refined study area.

Carmarthen Bay Dunes SAC

DS03. RAG = YELLOW

269. The Shadow HRA should ensure that all qualifying features of Carmarthen Bay Dunes SAC are appropriately assessed. In particular, consideration should be given to the potential for direct and indirect effects on:
- Fen Orchid (*Liparis loeselii*)
 - Petalwort (*Petalophyllum ralfsii*)

270. These qualifying features are particularly sensitive to changes in hydrology, groundwater conditions, habitat quality and disturbance arising from construction activities. Potential impact pathways affecting these features should be clearly identified and assessed, including any changes to surface water or groundwater regimes associated with cable installation, landfall works or other associated infrastructure.

Terrestrial Ornithology

271. We refer you to paragraphs 277-281 below for our advice in relation to terrestrial ornithology and potential impacts on terrestrial SPAs.

Air Quality

DS04. RAG = YELLOW

272. Paragraph 1434 of the Scoping Report identifies the following screening criteria in relation to dust: *“Ecological receptors within 200m of the Onshore Development Area and within 50m of trackout routes used by construction vehicles on the public highway, extending up to 250m from the Onshore Development Area site exit”*. In accordance with [IAQM guidance](#) (2014), NRW(A) advises that ecological receptors are assessed up to 500m from the site entrance (rather than 250m).
273. Paragraph 1434 also refers to Non-Road Mobile Machinery and the need to assess both human and ecological receptors within 200m. However, Table 3.9.2 only refers to the need to consider human receptors. As indicated in paragraph 1434 of the report, NRW(A) advises ecological receptors are assessed.
274. Paragraph 1434 refers to the screening distance of 1km for vessel emissions. NRW(A) advises that a reference is provided in the ES to evidence this screening distance.
275. NRW(A) advises confirmation is provided that the *“concentrations of nitrogen”* to be assessed, as stated in paragraph 1434, will include all the relevant nitrogen species (e.g. nitrogen oxides).

276. Paragraph 1449 refers to “*nominal*” additional maintenance vehicles. NRW(A) advises that the ES includes sufficient information to demonstrate that operation/maintenance works would not generate additional traffic that would trigger the Design Manual for Roads and Bridges screening criteria.

Receptor – Terrestrial Ornithology

TO01. RAG = **AMBER**

277. The Scoping Report has been reviewed with respect to potential impacts on terrestrial ornithological species. Table 3.1.3 indicates that both wintering and breeding bird surveys have been scoped into the EIA.
278. NRW(A) agrees with the proposed ornithological assessment approach. These surveys should be in line with industry best practice (see Bird Survey Guidelines). Additional, species-specific surveys may also be required and should be informed by the habitat on site as well as the results of any desktop surveys. The methods can be species specific and may require different timings (both during the day/night and seasonally). As we are not in receipt of the full results of a desktop survey we are not able to provide an exhaustive list of the species specific surveys we would expect to be included within the EIA.
279. Determining the importance of species and populations identified from surveys should refer to Wales specific resources and publications where practical. Relevant population estimates can be found in, but no limited to, Hughes et al. 2020 (Wales), Birds of Wales/Adar Cymru (Pritchard et al. 2021), Woodward et al. 2020 (UK/Britain), and the UK Rare Breeding Birds Panel. County Bird Reports, and the Welsh Bird Reports may also contain relevant information. The ES should specify the references and population data used to determine the geographical importance of on-site species.
280. The submitted HRA Screening Report confirms that red-billed chough/short-eared owl populations associated with Skomer, Skokholm and the Seas off Pembrokeshire SPA have been screened out due to the distance from the development. NRW(A) agrees that due to the distance involved, a significant impact to these specific populations as a result of the proposals can be ruled out at this stage.
281. However, onshore elements of the project would be expected to consider potential impacts to red-billed chough populations associated with the Castlemartin Coast SPA, which bounds the west of the onshore scoping boundary provided.

Receptor – Protected Species

General

PS01. RAG = AMBER

282. The EIA for this development should include sufficient information to demonstrate the extent of any environmental impacts arising from the proposed scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals.
283. Evaluation of the impacts of the scheme should include: direct and indirect; cumulative; short, medium and long term; permanent and temporary; positive and negative; construction, operation and decommissioning/post operational phases and impacts on long-term site security of the nature conservation resource. Arrangements for maintenance and management of any habitats within the site should be identified in the ES. Artificial lighting requirements, including likely intensity and location of light spill on new and retained green infrastructure (including bat roosts and bat flight paths) should also be identified.
284. The EIA must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

Key Habitats

285. With reference to Table 3.1.3 in the Scoping Report, NRW(A) advises that the key habitats are mapped for a suitably defined terrestrial study area that incorporates the area of landfall area, onshore export cable corridor, onshore transmission station and appropriate buffer depending on the likely extent of impacts of the proposed development works – the *'refined study area'*.
286. Habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.
287. The Phase 1 survey results should be presented alongside details of the current annual management of the study area where these may influence their use by protected species.

Surveys

288. NRW(A) advises that the terrestrial study area and, where necessary, adjacent/connected land, is subject to assessment to determine the likelihood of protected species being present and affected by the proposals. We note the intention to carry out a Preliminary Ecological Appraisal (PEA) from which the scope of further, targeted species-specific surveys to be carried out in 2027/28 shall be determined.
289. Targeted species surveys should be:
- undertaken by qualified, experienced and where necessary, licensed ecologist(s) and,
 - comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the EIA.

Impact Assessment

290. Should protected species be confirmed, information must be provided identifying the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed to offset the impacts identified.
291. NRW(A) advises that comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species.
292. The EIA should consider significance (both alone and in combination) and, where applicable, conservation status. In respect of conservation status, NRW(A) advises consideration be given to the current conservation status of the relevant species. The EIA must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme.
293. Where proposals implicate protected species which are also notified features of designated sites (e.g. SAC, SSSI), the EIA should consider the impacts on those species from both perspectives.
294. NRW(A) advises that the EIA sets out how the long term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.

Bats

PS02. RAG = AMBER

295. The indicated study area supports a diversity of bat species and includes designated sites notified for horseshoe bat species and areas/habitats that support other rare bat species (e.g. Barbastelle).
296. The application should be supported by up to date bat surveys of the refined terrestrial study area in accordance with the [Bat Surveys for Professional Ecologist: Good Practice Guidelines](#) (4th Edition) by Bat Conservation Trust dated 2023.
297. Whilst NRW(A) notes the proposals for bat roost surveys between April and September, we advise that the survey period remains flexible and is amended as appropriate to be able to assess impacts of the development on other types of roost that may be affected (e.g. hibernation roosts, transitional roosts in the spring and autumn). Given the variety of structures that bats use in south-west Wales, consideration may need to be given to the potential impact of proposed development works on other structures (e.g. underground structures such as caves, old forts/defence structures etc).
298. NRW(A) also advises that surveys should be sufficient so as to assess the likely impacts arising from installation of cable infrastructure, not just on land, but also along the foreshore and coast where bats may move between caves. We advise that Geoff Billington's survey of the sea caves of the Castlemartin peninsula (for Countryside Council for Wales (CCW)) would provide useful historic information relevant to the area under consideration for the proposals, however we advise that consideration is given to updating the information to inform the ES.
299. NRW(A) also advises that the project consults with the Vincent Wildlife Trust to ensure that the development works do not compromise their positive conservation works for barbastelle bats in Pembrokeshire.

Otters

PS03. RAG = AMBER

300. The indicated study area is important for otters and includes designated sites notified for the species. NRW(A) therefore advises that the application is supported by specific otter surveys of the refined study area.
301. With reference to Table 3.1.3 we note the proposals to combine otter and water vole surveys for suitable aquatic habitats that may be affected by the development in the period April-September 2027. We do not advocate combining otter and water vole surveys because the scale of the survey required and optimal timing of surveys is very different between the species.

302. Surveys for otters are best carried out late autumn-early spring when vegetative growth is less and allows for better access on foot and better observation of evidence of their presence. NRW(A) advises that this scale of a proposed otter survey would need to be extended beyond the immediate confines of a watercourse if the proposed development has the potential to impact upon other habitats adjacent/close to watercourses where breeding sites or resting places may be located (e.g. dense scrub, woodland). Consideration should also be given to the presence of, and potential impact of the proposed development on, overland dispersal/commuting routes.
303. NRW(A) advises that the project engages the services of an ecologist familiar with otter ecology and experienced with designing the scope and scale of otter surveys. Furthermore, we advise that the project liaises with experienced local otter ecologist, Geoff Liles (The Otter Consultancy) for any recent otter survey data or information pertaining to the refined study area.

Water voles

PS04. RAG = AMBER

304. As discussed above (paragraph 301), NRW(A) advises that species-specific surveys for water voles are carried out separately to otter surveys, and are carried out in the period mid-April to end of June, and July to September with at least 2 months apart between visits in accordance with published best practice set out in the [Water Vole Mitigation Handbook](#) (Mammal Society, 2016).
305. The ES should include an assessment of the favourability for water voles of habitat that will be impacted by the development proposals.

Dormice

PS05. RAG = AMBER

306. NRW(A) welcomes that dormice surveys are scoped in but advise that the scope is widened beyond woodlands to other potentially suitable and connected habitats (e.g. hedgerows). We can provide further advice, if required, through our discretionary advice service.
307. We advise that the surveys cover the breeding period and as much of the post-breeding period as possible. Surveys should be carried out which are appropriate to the site and its conditions and, if it is felt that standard techniques may not be successful, then we advise deploying more than one survey method. Habitat surveys should consider the nature, extent, condition for dormice of any potential dormouse

habitat likely to be affected by the proposals, with supporting scaled drawings as appropriate.

308. Where hedgerows will be affected, we advise that the application includes a commitment to hedgerow translocation wherever possible.

Great crested newts

PS06. RAG = YELLOW

309. NRW(A) notes that surveys for great crested newts are scoped in. However we are not aware of verified records of the species for Carmarthenshire or Pembrokeshire. We advise liaising with the relevant LPA Ecologists to confirm the need to scope in great crested newt surveys for the refined study area.
310. Where GCN surveys are scoped in, we agree with the proposals to scope in all ponds and waterbodies within 250m of the proposed works. However in terms of eDNA surveys, we advise that these are carried out regardless of the results of HSI surveys and should follow the guidance set out in: [Natural Resources Wales / The use of environmental DNA test for Great crested newt licensing purposes](#)
311. If the proposed development is within 250m of a pond confirmed to be used by GCN, and the development cannot be designed to avoid the area, we advise that the eDNA survey is supplemented by a suite of traditional surveys (bottle trapping, torching, and egg counts) to determine the population size concerned as per the guidance set out in Great Crested Newt Mitigation Guidelines by English Nature (2001).

Local Biodiversity Interests

PS07. RAG = GREEN

312. NRW(A) recommends that the developer consults the Local Planning Authority Ecologists on the scope of the work to ensure that regional and local biodiversity issues are adequately considered.
313. NRW(A) would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surroundings. These include the relevant Local Records Centre (West Wales Biodiversity Information Centre) and any local ecological interest groups (e.g. bat groups, mammal groups).

Securing Biodiversity Enhancement

PS08. RAG = AMBER

314. NRW(A) also advises that, in accordance with the Environment (Wales) Act 2016 and Planning Policy Wales, the application demonstrates how it can deliver biodiversity enhancements and thus contribute to promoting ecological resilience.

Receptor – Freshwater Fish

FF01. RAG = **AMBER**

315. Fish have the potential to be affected by the works in the vicinity of, or within, watercourses. Paragraph 1104 of the Scoping Report states that a Crossing Schedule would be produced in support of the application. The development must prioritise direct drilling method for all river crossings to minimise impacts to the environment. HDD (or similar technique) should be used for all cable crossings of main rivers to protect fish and fish habitat. Cable crossings routed above water courses must be clear span structures. Cable crossing structures must not obstruct fish passage.
316. In relation to 'In River' Works, we advise:
- No in river works between 15th October and 15th April in any year.
 - Free fish passage must be maintained, at all times during works.
 - Large scale 'in river' works may require a river diversion. For smaller scale in river works, 'over pumping' or use of large pipe work may be required to divert the watercourse.
 - For in river works, fish rescues will be required, using electric fishing methods immediately prior to in river works and prior to any de-watering of river sections. Rescued fish must be moved from the work area and released in the same watercourse at the nearest feature that prevents re-entry to the work site.
 - There should be no flood lighting over rivers at night to protect migrating fish, with working hours kept to between dawn and dusk (Monday to Friday).
 - 'In river' tracking of machines and vehicles must be kept to a minimum.
 - Full pollution prevention measure must be in place (we refer you to paragraph 327 below).
 - NRW's consent under the Salmon and Freshwater Fisheries Act 1975 must be obtained for fish rescue works. NRW's local Environment Teams should be notified of the start date prior to any in river works.

Fish mitigation and/or enhancement

FF02. RAG = GREEN

317. As part of mitigation and/or enhancements for the project, NRW(A) advises that the Applicant liaises with us directly regarding suitable River Habitat Restoration Projects.

Receptor – Flood Risk

FR01. RAG = AMBER

318. The [Flood Map for Planning](#) identifies that some elements of the onshore works may be at risk of flooding and within Flood Zone 2 and /or 3 (for both Rivers and Sea). Paragraph 1110 of the Scoping Report states that the EIA would be supported by a Flood Consequences Assessment (FCA) which would be undertaken in accordance with Technical Advice Note (TAN) 15. Further guidance on undertaking an FCA is available on our [website](#).
319. All designated main river and flood defence infrastructure crossings may be subject to a Flood Risk Activity Permit under the Environmental Permitting Regulations 2016 and crossing methods for each should be detailed in the FCA. We advise that trenchless technology (e.g. HDD) should be the preferred method as it is less intrusive in terms of possible flood and environmental harm. We advise the Applicant to contact our Flood Risk Team for further advice on DFRSouthPlanning@cyfoethnaturiolcymru.gov.uk.

Receptor – Fluvial Geomorphology

FG01. RAG = GREEN

320. We broadly agree with the proposed scope of the Flood Risk and Hydrology assessment and welcome the inclusion of a geomorphology baseline survey. Potential effects on channel form, sediment transport, bed and bank stability, and upstream and downstream connectivity should remain scoped into the EIA.

FG02. RAG = AMBER

321. As the onshore cable route and crossing locations have not yet been identified, the ES should provide a complete watercourse crossing schedule covering the cable corridor, temporary haul roads, construction accesses and compounds. This should

include ordinary watercourses and smaller channels, rather than being limited to named or classified water bodies. The schedule should identify the proposed crossing method, the temporary or permanent nature of the works, and the baseline condition and geomorphological sensitivity of each affected watercourse.

322. The ES should consider direct disturbance of the bed and banks, changes to sediment movement, fine sediment release, temporary flow diversion, runoff from working areas, and the potential for erosion or deposition upstream and downstream. For trenchless crossings, it should also consider drilling fluid breakout, ground settlement and the effects associated with launch and reception areas. Where the crossing method has not been confirmed, the realistic worst-case method should be assessed.
323. Temporary and permanent haul-road crossings should be included within the assessment. Culverts and other structures placed within the channel can interrupt sediment transport, constrain channel adjustment and cause local scour or deposition. The approach should therefore prioritise avoiding crossings and reducing their number and duration. Where a crossing cannot be avoided, clear-span solutions would generally present a lower geomorphological risk than structures placed within the channel, although the appropriate method should be informed by site-specific evidence.
324. Reinstatement should restore the bed, banks and riparian corridor while allowing the watercourse to adjust and recover naturally. The assessment should avoid reliance on a fixed or uniform replacement channel form where this would restrict natural processes. Proportionate post-construction monitoring should be identified where there is a risk of instability, erosion, deposition or unsuccessful reinstatement.
325. The WFD Compliance Assessment should explicitly consider the relevant hydromorphological quality elements, including channel form, river continuity, flow and sediment processes. It should assess whether the development could cause deterioration or prevent achievement of the relevant water-body objectives. We refer you to our comments above (paragraphs 103-105) for further advice on undertaking this Assessment.
326. The cumulative assessment should consider the combined effects of multiple crossings, temporary haul roads, compounds and working areas within the same watercourse or catchment, together with relevant effects from other developments.

Receptor – Water Quality (Freshwater)

WQ01. RAG = AMBER

327. The proposed works have the potential to impact water quality through a number of pathways. The Scoping Report states that standard mitigation measures would be employed and states that any additional mitigation measures would be identified through the EIA. In view of the works proposed, we advise that a Construction Environmental Management Plan (CEMP) should be provided to demonstrate that suitable pollution prevention measures will be put in place. We advise that an Outline CEMP (or similar document) should be submitted alongside the ES as part of any planning application.

Receptor – Groundwater

GW01. RAG = **AMBER**

328. The exact details of the onshore landfall, cable corridors and associated infrastructure have not been confirmed at present and nor have the installation methods for the cable been confirmed. NRW(A) can provide more detailed advice once these matters have been confirmed. Based on the information available, we advise the following is undertaken:

- A Water Feature Survey covering all proposed onshore infrastructure, including the landfall, cable corridors, compounds and substations, with a search radius of 300 metres from all development components (requirements outlined below).
- A Preliminary Risk Assessment (Desk Study) for land contamination within the development area, prepared in accordance with the Land Contamination Risk Management (LCRM) framework.
- A Piling Risk Assessment, where piling is proposed within areas of known or suspected historical contamination. The assessment should consider potential risks to controlled waters. This assessment is not required for piling within previously undeveloped (greenfield) areas where there is no known contamination concern.
- Confirmation of whether the proposed cables will be fluid-filled. Fluid-filled cables may contain substances classified as hazardous. Under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, hazardous substances must be prevented from entering groundwater. Where fluid-filled cables are proposed, an assessment of the risks to controlled waters should be undertaken (more details below).

- Details of the proposed cable trenching and installation methods, together with an assessment of potential impacts on controlled waters along the entire cable route.
- Pollution Prevention Method Statements demonstrating how groundwater quantity (flows and water levels) and groundwater quality will be protected during construction and operation. This information may be incorporated within the CEMP (see paragraph 327 above).

Requirements of a Water Feature Survey

329. The developer must undertake a preliminary site assessment, which should include the following:

- Identification of all water features both surface and groundwater (ponds, springs, ditches, culverts etc.) within a 300 metres radius of the site.
- The use made of any of these water features. This should include the construction details of wells and boreholes and details of the lithology into which they are installed;
- An indication of the flow regime in the spring or surface water feature, for example whether or not the water feature flows throughout the year or dries up during summer months;
- Accessibility to the spring/well;
- This information should identified on a suitably scaled map (i.e. 1:10,000), tabulated and provided as part of the planning submission. It would be useful for the Applicant to photograph each of the identified water features during the survey.

330. Based on the results of the survey the Applicant must assess the likely impacts from the development on both quantity and quality of the surface water and groundwater. This should take into consideration both the preferred methods of construction and the assumed hydrogeology in the vicinity of the development. The information should inform both the ES and the WFD Compliance Assessment.

331. NRW(A) may advise identified groundwater features to be monitored during the proposed workings. We would therefore recommend that the survey be undertaken as soon as possible to enable the Applicant to carry out suitable baseline monitoring.

Preliminary Risk Assessment

332. A Preliminary Risk Assessment (Desk Study) should be undertaken in accordance with the Land Contamination Risk Management (LCRM) framework. Further guidance is available in our [land contamination guidance](#).

Fluid-filled cables

333. NRW(A) notes that underground cables are proposed along the cable corridor route. The Approach to Groundwater Protection (Environment Agency, adopted by Natural Resources Wales, 2018) includes Position Statement C5 (Pipelines and High-Voltage Fluid-Filled Cables) (extract below), which objects to the use of fluid-filled cables where the fluid constitutes a hazardous substance due to the risk of leakage resulting in groundwater pollution.
334. Given that the cables are likely to be installed below ground level and may intersect shallow groundwater, there is potential for any leakage to result in a direct discharge of hazardous substances to groundwater. Such discharges are prohibited.
335. The Applicant should therefore confirm whether fluid-filled cables are proposed and, where applicable, provide a risk assessment demonstrating that groundwater resources and other controlled waters will not be adversely affected. This assessment should be informed by the principles set out in Position Statement C5 of the *Groundwater Protection Position Statements*, adopted by NRW.
336. Extract of position statement:

C5 – Pipelines and high voltage fluid filled cables

We will normally object to pipelines or fluid filled cables that transport pollutants, particularly hazardous substances that:

- pass through SPZ1 or SPZ2 where this is avoidable*
- are below the water table* in principal or secondary aquifers*

Where there is an existing or unavoidable need for pipelines or fluid filled cables to pass through SPZ1 or SPZ2, operators are expected to adopt BAT and operate in accordance with the Energy Networks Association guidance.

Where existing pipelines or fluid filled cables are already below the water table or if the water level subsequently rises, the Environment Agency will work with operators to mitigate the risks. We will only agree to any redevelopment scheme with sub water table pipelines or fluid filled cables for the transport of hazardous substances where there are substantial mitigating factors.

When the opportunity to replace existing fluid filled cables in SPZ1 and SPZ2 arises then we will work with the operators to agree the best environmental option.

We expect operators to carry out a site-specific risk assessment prior to the decommissioning of pipelines or fluid filled cables in SPZ1 and SPZ2. It will then work with operators to agree the best available environmental option.

Please note that this position statement applies to underground and on-ground cables but not aerial cables.

** For the purposes of this position statement, the term 'water table' is taken to mean any laterally continuous groundwater including perched groundwater. Operators should consider the lifetime of the pipeline or cable in their assessment of the depth to groundwater.*

Further position statements in Section D may also apply.

Marine Licensing / Regulatory Comments:

337. The Welsh Ministers functions for the administration and determination of Marine Licence applications under Part 4 of the Marine and Coastal Access Act 2009 have been delegated to Natural Resources Wales. The representation below is provided by Natural Resources Wales's Marine Licensing Team's (often referred to in short as NRW MLT) function in respect of the proposal:

ML1.

Regulation 10 Deferral

338. Following an application for a scoping opinion made to NRW Marine Licensing team by Gwynt Glas Offshore Wind Farm Limited for the Offshore Floating Wind Farm located in the Celtic Sea, NRW Marine Licensing have come to the decision in line with regulation 10(1)(b) that we will defer to the EIA consent decision of the Secretary of State on this proposal who will be carrying out an assessment as part of the Development Consent Order under the Planning Act. This is further detailed within

the deferral letter, dated 08 July 2026, available on the public register under reference SC2605.

ML2.

Marine Licensing Engagement

339. The Scoping Report states that the Applicant intends to seek a deemed Marine Licence for the generation asset as part of the DCO. We strongly advise that the Applicant requests bespoke pre-application advice from the NRW MLT at the earliest opportunity, to advise on the drafting of the deemed Marine Licence and other marine licensing elements, as necessary.

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ANNEX 1 – RAG status definitions

RED

NRW (A) consider that major issues have been identified with a potential significant risk of environmental impact. In order to address this issue we may require provision of (no limited to):

- new baseline or survey data; and/or
- significant revisions to baseline characterisation and/or
- significant revisions to impact modelling and/or
- significant revisions to the environmental assessment and/or
- significant design changes; and/or
- significant mitigation

NRW (A) would expect all issues to be adequately resolved before being able to agree to the assessment. Please note that we may be unable to agree with the conclusion of the assessment even following the provision of additional information.

AMBER

NRW (A) consider that issues have been identified that could make a material difference to the outcome of the decision-making process for this project. NRW (A) considers that these matters may be resolved through:

- Provision of additional information, data or analysis to support conclusions; and/or
- Further justification or clarification to support conclusions; and/or
- Revisions to impact assessment methodology and/or assessment conclusions; and/or
- Minor to moderate revisions to impact modelling; and/or
- Suitable mitigation measures that are adequately secured through any consent or permission given.

NRW (A) would expect all issues to be adequately resolved before being able to agree to the assessment. Please note that we may be unable to agree with the conclusion of the assessment even following the provision of additional information.

YELLOW

NRW (A) consider that issues have been identified that would not make a material difference to the outcome of the decision-making process but that a lack of information has been provided and/or an inadequate assessment.

For future assessment we would expect these issues to be resolved. NRW (A) may not be of the same view with regards to significance or materiality in other cases or circumstances.

GREEN

NRW (A) has no significant outstanding concerns.

BLUE

NRW (A) has identified minor editorial errors with the information provided which would benefit from amendment but make no material difference to the conclusions.



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad 16th July 2026
Direct line Rhif ffôn [REDACTED]
Email Ebost [REDACTED]@npt.gov.uk
Contact Cyswllt [REDACTED]
Your ref Eich cyf [REDACTED]
Our ref Ein cyf P2026/0421

[REDACTED]
PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Dear Sir/Madam

Town and Country Planning Act 1990

Application no. P2026/0421
Proposal Offshore Windfarm – Scoping
Project Name: Gwynt Glas Offshore Wind Farm

Location 42 km off the southwest coast of Pembrokeshire in the Celtic Sea.

The proposed Gwynt Glas Offshore Wind Farm is a large-scale floating offshore wind energy project located approximately 42 km off the Pembrokeshire coast in the Celtic Sea, with a generating capacity of up to 1.5 GW. The development would comprise between 66 and 118 floating wind turbines, associated offshore electrical infrastructure, subsea export cables, and onshore transmission infrastructure connecting to the National Grid near Llandyfaelog, Carmarthenshire.

I write with regards to your letter dated 26.6.2026, this letter is a consultation which seeks our Authority's views on the scope of an Environmental Impact Assessment (EIA) for the above proposed development. Consideration has been given to the

information provided in the EIA Scoping Report, together with the relevant regulations and information that the Authority holds. Our advice is set out below.

Summary of Key Aspects Relevant to this Authority

The site is located off shore approximately 42 km off the Pembrokeshire coast, at a significant distance from the Neath Port Talbot administrative boundary.

The Environmental Impact Assessment (EIA) is proposed to consider a broad range of environmental, social and economic considerations. These include seascape and landscape effects, ecology (marine and terrestrial), cultural heritage, fisheries, navigation, aviation, traffic and transport, noise, air quality, flood risk and hydrology, land use, human health, socio-economic effects, tourism and recreation, climate change resilience, greenhouse gas emissions, and major accidents and disasters.

Relationship of the development to Neath Port Talbot County Borough

Neath Port Talbot County Borough Council (NPTCBC) has reviewed the Environmental Impact Assessment (EIA) Scoping Report submitted in support of the proposed Gwynt Glas Offshore Wind Farm development. The Authority notes that the proposed turbines and associated infrastructure are located 42 km off the Pembrokeshire coast, however, elements of the development, including potential access arrangements and wider environmental effects, may extend into or affect the administrative area of Neath Port Talbot.

The Authority has therefore reviewed the scoping material with particular regard to potential cross-boundary effects on landscape and visual amenity, landscape effects, access and transport, public rights of way, and any environmental impacts that may arise within Neath Port Talbot County Borough. The comments below are provided to Planning and Environment Decisions Wales (PEDW) to help inform the determination of the appropriate scope of the Environmental Impact Assessment. They focus on matters where Neath Port Talbot County Borough Council considers further assessment or clarification may be required in relation to potential effects within or experienced from the Authority area.

Landscape and Visual Effects

Whilst the proposed viewpoint list includes a range of locations, it does not currently include viewpoints within NPTCBC. It is acknowledged that Neath Port Talbot falls within the project's wider Seascape, Landscape and Visual Impact Assessment (SLVIA) study area. The assessment includes parts of Swansea Bay and surrounding coastal landscapes because turbines up to 310 m high could theoretically be visible from elevated locations under clear weather conditions. Given the potential for theoretical visibility from these areas, the Authority considers that the SLVIA should include representative viewpoints within Neath Port Talbot to assess potential cross-boundary landscape and visual effects. The inclusion of

viewpoints would assist in ensuring that potential cross-boundary landscape and visual effects are appropriately represented within the assessment and that the experience of receptors within Neath Port Talbot County Borough is adequately considered. It is however noted that these views, will be a significant distance from the application site.

Access and Transport

The Authority notes that the current assumption is that most Gwynt Glas turbines would be assembled in port, floated out and towed to the site by tugs, rather than being lifted and installed offshore by large jack-up vessels as is common for conventional fixed-bottom wind farms.

There may be indirect effects if construction traffic uses the strategic road network, including sections of the M4 corridor. At this stage no specific routes, traffic volumes or abnormal-load movements have been identified, and these will be assessed later through the Traffic and Transport Assessment and Construction Traffic Management Plan.

Given the potential for construction traffic to travel via routes within the authority area, the Authority considers that the Transport Assessment should clearly identify the proposed construction access route and the extent to which the highway network within Neath

Port Talbot may be utilised during the construction phase.

In particular, the assessment should consider any potential impacts associated with Abnormal Indivisible Loads (AILs) deliveries and construction traffic on the local highway network. Where relevant, the assessment should also consider potential effects on highway safety, traffic flows and local amenity, together with any mitigation measures that may be required.

Environmental Effects

The Authority notes the information contained within the Scoping Report. The development must maintain and enhance biodiversity and in so doing promote the resilience of ecosystems, as required by Future Wales Policy 9 and the Environment (Wales) Act 2016. It must also demonstrate how the DECCA Framework and Step-Wise Approach has been considered, in accordance with PPW12 requirements.

Having regard to the separation distance, the Council considers that the ecological assessments focus primarily on marine habitats, birds, fish, marine mammals and coastal environments around Pembrokeshire, Carmarthen Bay and the offshore array area. No direct ecological impacts within Neath Port Talbot have been identified at the scoping stage.

Conclusion

Neath Port Talbot County Borough Council trusts that the above comments will assist PEDW in determining the appropriate scope of the Environmental Impact Assessment for the proposed development. The Authority would welcome the opportunity to review the findings of the Environmental Statement in due course, particularly in relation to any potential cross-boundary effects that may arise within or be experienced from Neath Port Talbot County Borough.

Yours faithfully



If you require this information in larger print, or in an alternative format, please contact the above named officer.

From: [REDACTED]@networkrail.co.uk>
Sent: 07 July 2026 12:18
To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>
Subject: EN0110036 - Gwynt Glas Offshore Wind Farm

You don't often get email from [REDACTED]@networkrail.co.uk. [Learn why this is important](#)

OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP26/105

Your Ref: EN0110036

Date: 7 July 2026

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: EN0110036

PROPOSAL: EIA and Scoping Consultation

LOCATION: Gwynt Glas Offshore Wind Farm

Dear Sir/Madam,

Thank you for your email dated **26 June 2026** together with the opportunity to comment on this proposal.

Network Rail's primary interest relates to the Traffic and Transport chapter of the Environmental Impact Assessment, specifically the potential effects arising from the onshore elements of the proposal and any associated construction activity.

Based on the information currently available, it does not appear that the identified traffic and transport study area or the proposed road link assessment includes the use of railway level crossings. However, as the baseline assessment and route appraisal work progresses, consideration should be given to whether any existing or proposed pedestrian, cycle or public right of way routes interact with the railway network via level crossings. Where such crossings exist, the assessment should identify any potential changes in usage patterns, increased footfall or cycle movements, and any consequential implications for the safe operation of the railway.

In addition, the assessment of construction traffic should consider the potential interaction with railway infrastructure, including any routes that pass beneath or over railway bridges. Construction traffic management measures should take account of any height, width and weight restrictions associated with railway bridges, underbridges and associated highway structures to ensure that abnormal loads, plant movements and construction vehicles can be accommodated safely without adversely affecting railway assets or the operation of the railway.

Should the assessment identify any potential impacts on railway infrastructure, railway operations, level crossings or the safety of rail users, Network Rail would welcome further engagement as the proposals progress.

Yours Sincerely,

 **MRTPI**

Town Planner (Wales and Western)

Network Rail

Temple Point, Redcliffe Way, Bristol, BS1 6NL

www.networkrail.co.uk/property

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

Date • Dyddiad 23/7/2026

Your ref • Eich cyfeirnod EN0110036

My ref • Fy nghyfeirnod CO/0151/26

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Please ask for
Os gwelwch yn dda gofynnwch am

Environmental Services Infrastructure Decisions and
Applications Service
The Planning Inspectorate

By email only:
gywyntglas@planninginspectorate.gov.uk

Dear Sir/Madam

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA
Regulations) – Regulations 10 and 11**

**Proposed application by Gwynt Glas Offshore Wind Farm Limited (the
applicant) for an Order granting Development Consent for the Gwynt Glas
Offshore Wind Farm**

Thank you for consulting Pembrokeshire County Council on 26th June 2026 regarding the proposed scope of the Environmental Impact Assessment (EIA) for the above project. While the current uncertainty surrounding the onshore cable routes limits the ability to fully assess the potential environmental effects within the PCC local planning authority area, the LPA wishes to provide the following comments for consideration.

Local Planning Policy

The Scoping Report should provide greater consideration of local planning policy, including emerging Replacement Local Development Plans, relevant Supplementary Planning Guidance (particularly on Seascape Character, landscape, and cumulative wind turbine impacts), local harbours, and a broader range of settlements and receptors. References should also be updated to reflect the latest planning policy context and strategic transport considerations.

Transportation

The proposed transport assessment methodology is supported, noting that most

traffic will use the Trunk Road Network and should be agreed with the Trunk Road Agency. Detailed trip generation, mitigation, and abnormal load management (including early StreetCare coordination) should accompany the planning application. Although operational traffic has been scoped out, the application should demonstrate that operational trips are negligible or justify their exclusion.

Ecology

The ES should provide detailed assessment of impacts on designated sites and protected species, particularly along the Pembrokeshire coast if infrastructure extends into Pembrokeshire. It should include surveys and mitigation for migratory birds (especially Manx shearwater), assessment of impacts on SACs, SPAs and Ramsar sites, underwater noise effects on cetaceans, cable-laying and lighting impacts, turbine lighting, and post-construction monitoring. It is assumed that the Pembrokeshire Coast National Park Authority will be responding under separate cover.

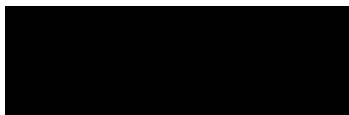
Landscape

The proposed assessment methodology is generally considered appropriate. Key issues include the long-term nature and scale of the development, potential long-distance visual effects, particularly from elevated viewpoints, and uncertainty over the final design requiring a worst-case assessment. Additional viewpoints at Plumstone Mountain and Carn Llidi are recommended. The ES should also assess potential night-time construction lighting impacts and distinguish clearly between offshore and onshore landscape and visual effects.

Comments of the LPA's Public Protection Officer are enclosed.

By all means contact me if you have any queries in respect of the above.

Yours faithfully



Development Manager (Major Projects and Planning Obligations)
Development Management

Memo

To: [REDACTED] - Planning Officer

From: [REDACTED], Lead Officer - Pollution Control, Public Protection Division.

Ref: CO/0151/26 - Gwynt Glas Offshore Wind Farm

Date: 7th July 2026

RE: Request for Scoping Opinion under the Infrastructure Planning (Environmental Impact Assessment) Regulations – Gwynt Glas Offshore Wind Farm

Thank you for consulting the Public Protection Division in relation to the above submission.

The comments set out below are based on evaluation of the information submitted and are without prejudice to any additional information or clarification being made available. The comments are also made based on any letters of objection which have been forwarded to the Public Protection Division, as a matter of course, in order to assist in the overall evaluation.

[REDACTED] – Lead Pollution Control Officer has undertaken the evaluation.

Summary

The proposed Gwynt Glas Offshore Wind Farm is a nationally significant renewable energy project located within the Celtic Sea, off the south-west coast of Wales. The development forms part of the UK Government's programme to increase offshore renewable energy generation and contribute towards achieving net zero greenhouse gas emission targets.

The proposed offshore wind farm would comprise an array of fixed or floating offshore wind turbines together with associated offshore infrastructure, including offshore substations, inter-array cables and offshore export cables. The electricity generated would be transmitted to shore via subsea export cables making landfall along the south Pembrokeshire or Carmarthenshire coastline before connecting to new onshore electrical transmission infrastructure.

At this stage of the Environmental Impact Assessment (EIA) process, the precise locations of the offshore array, export cable landfall, onshore cable corridor and onshore transmission station(s) have not been finalised. Consequently, the Scoping Report identifies a broad Offshore Scoping Boundary and an extensive Onshore Scoping Boundary encompassing potential development locations within Pembrokeshire and Carmarthenshire.

The offshore array is located within the Celtic Sea approximately 42 km offshore from the south-west Wales coastline, occupying an extensive marine area to the south-west of Pembrokeshire and south of Carmarthenshire. The offshore export cable corridor extends eastwards towards the Welsh coast before making landfall at one of a number of potential locations.

The onshore Scoping Boundary extends across a substantial area of south-west Wales, incorporating parts of both Pembrokeshire and Carmarthenshire. The corridor extends from the south Pembrokeshire coastline and the Taf and Tywi Estuary northwards towards Carmarthen, Whitland and surrounding rural areas. The Scoping Boundary encompasses a wide geographical area in order to retain flexibility during the ongoing site selection and engineering design process.

The Scoping Boundary includes a number of environmentally sensitive locations and passes through, or in close proximity to, numerous nationally and internationally designated sites, historic landscapes, residential communities and rural settlements.

The operational offshore wind farm itself is unlikely to give rise to significant pollution control issues affecting residential receptors onshore, however, the construction and operation of the associated onshore infrastructure has the potential to affect residential amenity and public health. Consequently, the Environmental Statement should provide sufficient information to enable the likely significant environmental effects arising from both the construction and operational phases to be fully understood and appropriately mitigated.

The principal onshore infrastructure is anticipated to comprise:

- Landfall works where the offshore export cables transition to the onshore cable route.
- An underground onshore export cable corridor extending inland from the landfall location.
- Temporary construction compounds, haul roads, access tracks and storage areas.
- Horizontal Directional Drilling (HDD) compounds where trenchless crossings are required.
- One or more onshore transmission station(s) (substations) and associated electrical infrastructure.
- Temporary construction working areas together with ancillary infrastructure required throughout the construction period.

Construction of the development is expected to involve extensive civil engineering works over a number of years, including excavation, trenching, cable installation, heavy goods vehicle movements, material importation, construction compounds, plant operation and reinstatement works. These activities have the potential to give rise to temporary environmental effects relating to noise, vibration, dust, traffic, artificial lighting and general disturbance to nearby communities.

The Pollution Control Team's consultation response is therefore focused upon those aspects of the proposed development which fall within its statutory remit, namely the protection of public health and residential amenity through the assessment and

mitigation of potential impacts arising from noise, vibration, air quality, dust, artificial lighting, construction activities, traffic-related disturbance and associated cumulative environmental effects.

Evaluation

The Pollution Control Team welcomes the applicant's commitment to undertaking an Environmental Impact Assessment (EIA) and acknowledges that the principal environmental topics relevant to its remit have been identified within the Scoping Report. The team recognises that, by its nature, the Scoping Report is intended to provide a high-level overview of the proposed assessment methodologies and the scope of the Environmental Statement, rather than detailed impact assessments.

The Pollution Control Team is generally satisfied that the proposed study areas are appropriate to capture the likely significant effects relevant to public health and residential amenity, that the baseline environment has been adequately characterised for scoping purposes, that appropriate data sources and receptors have been identified, and that the proposed assessment methodologies are proportionate to the nature and scale of the development.

Notwithstanding the above, the Environmental Statement will need to provide a significantly greater level of detail to enable the determining authority to undertake a robust assessment of the likely significant environmental effects of the proposed development. In particular, the Environmental Statement should include comprehensive baseline information, clearly defined assessment methodologies, quantitative predictions of impacts where appropriate, a detailed evaluation of mitigation measures, consideration of cumulative and in-combination effects, and a transparent assessment of any residual effects upon public health and residential amenity.

The information presented should be sufficient to demonstrate that all likely significant effects have been appropriately identified, assessed and mitigated, thereby enabling the determining authority to reach a reasoned conclusion in accordance with the requirements of the Environmental Impact Assessment Regulations.

Noise and Vibration

Noise represents one of the most significant environmental issues associated with the proposed development.

The ES should provide a comprehensive assessment of both construction and operational noise.

Baseline surveys should:

- identify representative noise-sensitive receptors;
- include weekday and weekend monitoring;
- include daytime, evening and night-time periods;
- identify prevailing background noise levels;
- identify existing industrial and transportation noise sources;
- characterise seasonal variations where appropriate.

The assessment should include:

- cable installation;
- HDD operations;
- trench excavation;
- compounds;
- substations;
- transmission stations;
- temporary generators;
- piling (if required);
- heavy plant;
- vehicle and ship movements, including whilst those vessels are at berth or anchor;
- material handling;
- restoration works.

The ES should identify:

- predicted noise levels;
- duration of activities;
- hours of operation;
- maximum worst-case scenarios;
- cumulative construction activities.

The assessment should clearly identify receptors likely to experience significant adverse effects.

Operational assessment should include all permanent above-ground infrastructure including:

- substations;
- transformers;
- cooling systems;
- standby generators;
- ventilation systems;
- ancillary plant.

Assessment should be undertaken using BS4142 where applicable.

Where tonal or impulsive characteristics may occur these should be fully assessed.

Low-frequency noise should also be considered where appropriate.

The ES should identify mitigation including:

- selection of quieter plant;
- acoustic enclosures;
- temporary barriers;
- location of compounds;
- equipment maintenance;
- restricted working hours;
- routing of construction traffic;
- monitoring;
- complaint procedures.

Construction vibration should be assessed where activities such as HDD, compaction, piling or heavy construction traffic may affect nearby receptors.

The assessment should:

- identify sensitive buildings;
- assess risks to residential amenity;
- assess risks to historic structures where appropriate;
- identify vibration monitoring requirements;
- propose trigger levels for intervention.

Construction noise and vibration should be assessed in accordance with BS5228.

Dust and Particulates

Construction activities have the potential to generate significant dust and particulate emissions.

A detailed Air Quality Assessment should therefore be included.

The assessment should include:

- construction dust;
- PM10;
- PM2.5;
- combustion emissions from plant;
- construction traffic emissions;
- cumulative impacts.

Sensitive receptors should be identified.

The ES should include a detailed Dust Risk Assessment following recognised guidance.

The assessment should consider:

- excavation;
- earthworks;
- material stockpiles;
- haul roads;
- crushing;
- concrete batching (where applicable);
- restoration works.

The ES should identify mitigation measures including:

- water suppression;
- wheel washing;
- road sweeping;
- speed restrictions;
- covered loads;
- dust monitoring;
- cessation criteria during adverse weather.

Monitoring locations and trigger levels should be identified.

Traffic and Transport

Whilst transport impacts will be considered separately, the Pollution Control Team considers that the Environmental Statement should also assess the environmental consequences of construction traffic upon nearby communities.

This should include:

- traffic noise, including that arising from vessel movements with the Milford Haven Waterway;
- vibration;
- dust generation;
- diesel emissions;
- impacts on roadside receptors;
- cumulative impacts with existing traffic.

The assessment should identify HGV routes and demonstrate how residential areas will be protected wherever reasonably practicable.

Lighting

Lighting has the potential to affect nearby residents.

The ES should therefore assess:

- construction compounds;
- security lighting;
- temporary lighting towers;
- operational lighting;
- maintenance lighting.

Mitigation should include:

- directional lighting;
- shielding;
- timers;
- motion sensors where appropriate;
- avoidance of unnecessary illumination.

The Environmental Statement should include an assessment of the potential effects of temporary and permanent artificial lighting on residential amenity and public health. The assessment should be undertaken in accordance with the Institute of Lighting Professionals (ILP) Guidance Note 01/21 – Guidance for the Reduction of Obtrusive Light and should identify the applicable Environmental Lighting Zones for all sensitive receptors.

The assessment should consider light spill, glare, sky glow, source intensity and vertical illuminance at nearby residential properties, together with cumulative effects arising from multiple construction compounds and permanent infrastructure. The applicant should demonstrate that lighting has been designed in accordance with the principles of avoidance and minimisation and should provide a detailed Lighting Management Plan identifying operational controls, curfews, monitoring arrangements and mitigation measures to protect residential amenity and maintain the intrinsically dark character of the surrounding rural landscape.

Waste Management

The Environmental Statement should include details of:

- waste generation;
- waste hierarchy;
- storage arrangements;
- hazardous waste;
- contaminated materials;
- disposal routes;
- pollution prevention measures.

Pollution

Although principally considered elsewhere, the Pollution Control Team expects the ES to demonstrate how pollution arising from construction activities will be prevented.

Measures should include:

- fuel storage;
- spill response;
- concrete washout;
- drainage controls;
- pollution incident response procedures.

Contaminated Land

The Pollution Control Team notes that the precise locations of the onshore cable corridor, landfall, temporary construction compounds, Horizontal Directional Drilling (HDD) compounds, access roads and onshore transmission infrastructure have not yet been determined. Consequently, there remains the potential for the proposed development to affect land with a history of potentially contaminative uses.

The Environmental Statement should include a proportionate assessment of the potential for contaminated land to be encountered during construction and the risks this may present to human health, controlled waters, the wider environment and construction workers. The assessment should have regard to the current and historical use of the land, including former industrial sites, made ground, historic landfills, mineral workings, military land, fuel storage areas, agricultural activities and any other potentially contaminative land uses that may be present within the Onshore Development Area.

The Environmental Statement should include, where appropriate:

- A Preliminary Risk Assessment (Phase 1 Desk Study) prepared in accordance with current recognised guidance, including a review of historical mapping, geological and hydrogeological information, environmental records and previous site investigations.
- A Conceptual Site Model identifying potential contaminant sources, pathways and receptors.
- An assessment of risks to human health, controlled waters, groundwater, surface water, ecological receptors and future site users.
- Consideration of the potential for construction activities, including excavation, trenching, dewatering and HDD operations, to mobilise existing contamination or create new pollutant pathways.

- An assessment of the potential for contamination to affect private water supplies, groundwater abstractions and watercourses where these are present.
- Consideration of naturally occurring contaminants, including ground gases where appropriate.
- Details of any intrusive site investigations required to characterise ground conditions and confirm the extent of any contamination.
- An Outline Remediation Strategy where unacceptable risks are identified, including proposals for remediation, validation and verification.
- A Materials Management Plan setting out the proposed handling, re-use, treatment and disposal of excavated materials, together with procedures for dealing with any unexpected contamination encountered during construction.

Particular consideration should be given to areas of historic industrial activity associated with former military land, historic quarrying and mining activities, infilled ground and any other sites identified through the desk study as having the potential to give rise to contamination.

The Environmental Statement should demonstrate that the proposed development can be constructed and operated without giving rise to unacceptable risks to human health or the environment, and that appropriate mitigation measures have been incorporated into the design and Construction Environmental Management Plan (CEMP) to prevent the mobilisation or spread of contamination during construction.

Environmental Monitoring

The Pollution Control Team expects the ES to identify environmental monitoring proposals including:

- construction noise monitoring;
- dust monitoring;
- vibration monitoring;
- complaint investigation procedures;
- reporting mechanisms;
- corrective actions.

Monitoring should continue throughout construction where significant impacts are predicted.

Hours of Work

The ES should clearly define proposed working hours.

Any requirement for night-time working should be fully justified.

Where out-of-hours working cannot reasonably be avoided, additional mitigation and community engagement measures should be provided.

Cumulative Impacts

The cumulative assessment should consider the combined effects of:

- simultaneous construction activities;
- construction traffic;
- other Nationally Significant Infrastructure Projects;

- National Grid reinforcement works;
- renewable energy developments;
- local highway improvements;
- other major developments within Pembrokeshire and Carmarthenshire.

The cumulative assessment should address not only cumulative noise but also combined impacts arising from noise, dust, vibration, lighting and traffic.

Construction Environmental Management Plan (CEMP).

The applicant should commit to preparing a comprehensive CEMP.

The CEMP should include:

- Construction Noise Management Plan;
- Dust Management Plan;
- Vibration Management Plan;
- Pollution Prevention Plan;
- Construction Traffic Management Plan;
- Lighting Management Plan;
- Waste Management Plan;
- Contaminated Land Management Plan;
- Emergency Response Plan;
- Site Environmental Management Procedures;
- Community Liaison Strategy;
- Complaints Management Procedure;
- Environmental Monitoring Programme.

The CEMP should also identify the roles and responsibilities of the Principal Contractor, Environmental Clerk of Works and other suitably qualified specialists responsible for implementing and monitoring these measures. It should demonstrate how compliance with the approved environmental management measures will be monitored, audited and reported throughout the construction period, including the implementation of corrective actions where environmental performance falls below the required standard.

Conclusion

The Pollution Control Team has no objection, in principle, to the scope of the Environmental Impact Assessment as proposed.

Clearly the Environmental Statement will provide greater detail than that contained within the Scoping Report, in order to enable the determining authority to adequately assess likely significant effects upon residential amenity and public health.

The Environmental Statement should include robust baseline surveys, assessment methodologies, quantitative predictions of environmental impacts, clearly defined mitigation measures, comprehensive monitoring proposals and an integrated Construction Environmental Management Plan.

The assessment should demonstrate that all reasonably practicable measures have been incorporated to avoid, minimise and mitigate environmental effects, and that

any residual impacts upon nearby communities will not result in unacceptable harm to residential amenity or public health.

If clarification of any of the content contained within this consultation response is required, then please do not hesitate to contact the Pollution Control Team.


Lead Officer - Pollution Control
Public Protection Division

Advisory

a) Consultee – Port Health Team

The proposed Offshore Scoping Boundary extends across a substantial area of the Celtic Sea to the south-west of Pembrokeshire and Carmarthenshire, with associated offshore construction activities, vessel movements and supporting marine

operations anticipated throughout the construction, operational and decommissioning phases of the development.

Whilst it is understood that there are no designated shellfish harvesting waters identified within the Offshore Scoping Boundary, the proposed development has the potential to increase commercial and construction-related vessel movements within and adjacent to the Milford Haven Waterway. The scale and duration of these activities may have implications for navigation, port operations and the wider marine environment, including potential cumulative effects arising from concurrent marine developments within the Celtic Sea.

In addition, the increased use of ports and associated marine infrastructure may give rise to localised environmental effects including noise, dust, odour and emissions associated with vessel movements, cargo handling, construction logistics and supporting harbour activities. These effects have the potential to impact upon sensitive receptors within and surrounding the Milford Haven Waterway, which is designated as a Site of Special Scientific Interest (SSSI) and supports a range of environmentally sensitive habitats and commercial activities.

Accordingly, the Pollution Control Team recommends that Pembrokeshire County Council's Port Health Team is consulted as part of the EIA Scoping process and throughout the subsequent Development Consent Order application process. The Port Health Team should be afforded the opportunity to review the proposed assessment methodology and provide comments on matters within its remit, including potential impacts on port operations, shipping activity, marine public health considerations, environmental protection, and any cumulative effects associated with increased marine traffic and associated port activities.

From: [REDACTED]@rcahmw.gov.uk>
Sent: 07 July 2026 06:39
To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>
Subject: GwyntGlas - EN0110036

You don't often get email from [REDACTED]@rcahmw.gov.uk. [Learn why this is important](#)

Dear Planning Inspectorate

I am responding to the scoping request for the Gwynt Glas Floating Offshore Windfarm on behalf of the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW). The RCAHMW is a statutory consultee for the marine historic environment, for nationally significant infrastructure projects within Wales that are located in the marine zone, beyond mean high water spring tides (MHWS), and for marine licenses issued by NRW.

We agree with the overall conclusions of the Gwynt Glas scoping report set out in Section 2.10 relating to Offshore Archaeology and Cultural Heritage. In particular, we agree with the scoping report on the following points:

- That the proposed study area is sufficient (Section 2.10.1).
- That the baseline marine historic environment has been suitably characterised at this stage of the process (2.10.2).
- That all the relevant data sources (2.10.2.1) for the marine historic environment have been identified, to the best of our knowledge.
- That all potential impacts that could be reasonably predicted have been identified (2.10.4, 2.10.5).

We agree with the overall assessment of the impacts that have been scoped in/out, and we agree with the proposed approach to assessment (Section 2.10.4). In particular, we welcome the proposed early production of a Written Scheme of Investigation for application to the marine historic environment (Section 2.10.6), and we would welcome early communication with the developer with regard to this.

I would be happy to discuss and of the above points directly, if required.

Yours

[REDACTED]



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

[REDACTED]

[REDACTED]

Uwch Ymchwilydd (Arforol) | Senior Investigator (Maritime)

Ffordd Penglais, Aberystwyth, SY23 3BU

[REDACTED]

[REDACTED] [@rcahmw.gov.uk](mailto:[REDACTED]@rcahmw.gov.uk)

www.cbhc.gov.uk | www.rcahmw.gov.uk

Noddir gan Lywodraeth Cymru | Sponsored by Welsh Government



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: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Sent: 29 June 2026 10:57
To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>
Subject: Re: EN0110036 - Gwynt Glas Offshore Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Hi [REDACTED],

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market and still completing Regulatory processes in order for us to operate an asset base within the UK.

Good luck with the project.

Thanks

[REDACTED]



[REDACTED] | Head of Asset Management &
Operations | Sphere Energy Connect

E: [REDACTED]@[sphere-connections.co.uk](mailto:enquiries@sphere-connections.co.uk) | M: [REDACTED]



200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

**For the attention of: Mr T Brumwell – Senior Environmental Advisor
The Planning Inspectorate**

By Email: gwyntglas@planninginspectorate.gov.uk

17th July 2026

Dear [REDACTED]

Re: EN0110036 - Gwynt Glas Floating Off Shore Wind Farm; Located approximately 42km off South West Coast of Pembrokeshire in the Celtic Sea, connection to proposed Llandyfaelog Substation, Carmarthenshire

Thank you for your notification of the 26th June 2026 seeking the views of the Coal Authority on the above.

The Coal Authority, trading as the Mining Remediation Authority, is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the project area there are coal mining features at surface and shallow depth including; coal workings, mine entries and reported surface hazards. These features pose a potential risk to surface stability and public safety.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

We note that Section 3.2.2.4 of the Scoping Report provides commentary on coal mining. The authors of this report note that additional coal mining data sources will be reviewed as part of the EIA process. Paragraph 1031 states that a Preliminary CMRA will be completed to identify the coal mining features present and the risks that they pose to the Geology and Land Quality Study Area. They comment that the Preliminary CMRA would set out what intrusive works would be required to refine the risk and that further stages of the CMRA would be undertaken as the cable route develops.

We are pleased to see that consideration is going to be given to the potential risks posed by coal mining legacy with the preparation of a CMRA. We have no objections to the scope as proposed, and would be pleased to comment further in due course.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely

[Redacted Signature]

[Redacted Name] *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*

Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority and/or information that has been published for consultation purposes. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided.





Torridge District Council

Riverbank House

Bideford

Devon

EX39 2QG

torridge.gov.uk

Please reply to:

Planning Officer: [REDACTED]

Direct Dial: [REDACTED]

Email: [REDACTED]@torridge.gov.uk

Planning Inspectorate

Our Ref: GE/0437/2026
Date: 24th July 2026
Enquiry: EIA Scoping and Consultation for Gwynt Glas Offshore Wind Farm- Comments by 24 July 2026
Location: Out Of Area Excluding Cornwall And Devon, , ,

Dear Planning Inspectorate,

Thank you for your letter received on 26 June 2026. It is noted that you have consulted Torridge District Council as part of the scoping exercise for the Gwynt Glas Offshore Wind Farm project. Figure 2.2.3 of Scoping Report 1 ("SCR1") indicates that the scoping boundary for the cable route extends into the Marine Conservation Zone to the north-west of Lundy. It is understood, however, that this area primarily falls within the remit of the Marine Management Organisation and other relevant marine stakeholders.

The Council has also reviewed the Seascape, Landscape and Visual Impact Assessment (SLVIA) set out in Section 2.11 of SCR1. The approach presented is considered precautionary for the purposes of scoping, with the expectation that the offshore SLVIA will be refined as the Environmental Impact Assessment progresses. Paragraph 861 states:

Significant effects on seascape, landscape and visual receptors are anticipated to be more likely to occur close to the Array, Offshore Transmission Station(s) and Midpoint Compensation Reactor(s) (if required), with potential for significance reducing with distance towards the edges of the initial Offshore SLVIA Study Area. The initial SLVIA Study Area would be further refined as part of the assessment process to ensure a proportionate approach, focussed on likely significant effect.

In this context, Torridge District Council accepts that significant visual effects from the majority of the district are unlikely. However, some residual effects may arise in relation to Lundy Island, given its recognised natural and tranquil qualities, and the surrounding landscape character. Figure 2.11.5 indicates that theoretical visibility reduces towards Lundy, although some residual effects may still occur. On this basis, the Council agrees that effects on Lundy should remain within the scope of the SLVIA, as set out in Paragraph 915 and Table 2.11.2 ("Relevant seascape, landscape and visual receptors within the Offshore SLVIA Study Area").

At this stage, the Council has no further comments on the scoping exercise. This position does not preclude additional observations being made as the project progresses.

[REDACTED]
Principal Planning Officer

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

Sent: 22 July 2026 15:39

To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>

Subject: RE: EN0110036 - Gwynt Glas Offshore Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Good afternoon Rishabh,

With reference to this proposed project, Trinity House has the following comments to make at this stage:

- Given the consented Erebus project and the recently consented Llyr 1 project, Trinity House has significant concerns regarding the impact the Gwynt Glas project would have on shipping and navigation in this area.
- In particular, Trinity House has reservations relating to any development in the eastern half of the array scoping boundary at this stage.
- Trinity House looks forward to participating in the Navigation Risk Assessment and Cumulative Effects Assessment processes in due course.

As standard, Trinity House would expect the following to form part of the Environmental Statement:

Navigation Risk Assessment

- Comprehensive vessel traffic analysis in accordance with MGN 654.
- The possible cumulative, in-combination and trans-boundary effects on shipping routes and patterns must be adequately assessed.
- The impact of export cable laying works and any subsequent cable protection will have on the approaches to any ports and harbours should be fully assessed and consulted upon.

Risk Mitigation Measures

- We consider that this development will need to be marked with marine aids to navigation by the developer/operator in accordance with the general principles outlined in IALA (International Association of Marine Aids to Navigation and Lighthouse Authorities) Guideline G1162 - The Marking of Offshore Man-Made Structures as a risk mitigation measure. In addition to the marking of the

structures themselves, it should be borne in mind that additional aids to navigation such as buoys may be necessary to mitigate the risk posed to the mariner, particularly during the construction phase. All marine navigational marking, which will be required to be provided and thereafter maintained by the developer, will need to be addressed and agreed with Trinity House. This will include the necessity for the aids to navigation to meet the internationally recognised standards of availability and the reporting thereof.

- Assessment of impact on existing aids to navigation, to include both offshore and shore based (where any cabling reaches landfall) aids to navigation.
- A decommissioning plan, which includes a scenario where on decommissioning and on completion of removal operations an obstruction is left on site (attributable to the wind farm) which is considered to be a danger to navigation and which it has not proved possible to remove, should be considered. Such an obstruction may require to be marked until such time as it is either removed or no longer considered a danger to navigation, the continuing cost of which would need to be met by the developer/operator.
- The possible requirement for navigational marking of the export cables and the vessels laying them. If it is necessary for the cables to be protected by rock armour, concrete mattresses or similar protection which lies clear of the surrounding seabed, the impact on navigation and the requirement for appropriate risk mitigation measures needs to be assessed.

Kind regards,

[REDACTED]

Navigation Services Manager | Navigation Directorate | Trinity House

[REDACTED] [@trinityhouse.co.uk](mailto:[REDACTED]@trinityhouse.co.uk) | [REDACTED]

www.trinityhouse.co.uk





UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110036
Our Ref: 95466

Mr [REDACTED]
Senior Environmental Advisor
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

20th July 2026

Dear [REDACTED]

Nationally Significant Infrastructure Project Gwynt Glas Offshore Wind Farm EN0110036 Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report, we wish to make the following specific comments:

Environmental Public Health

We recognise the applicant's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which

ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, applicants should fully explain and justify this within the submitted documentation.

We have assessed the Environmental Impact Assessment Scoping report supplied with the scoping request and can provide the following comments.

Air Quality Impacts

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Electric and Magnetic Fields (EMF)

For potential EMF impacts on human health, please refer to the following code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines, including the operational conditions for scoping out electrical infrastructure:

<https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf>

It should also be noted that Public Health Wales (PHW) is the national public health agency in Wales who will take the lead in health and wellbeing considerations.

¹

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

From: [REDACTED] (Velindre - Place, Portfolio and Partnerships)
[REDACTED]@wales.nhs.uk>
Sent: 01 July 2026 20:26
To: Gwynt Glas <gwyntglas@planninginspectorate.gov.uk>
Cc: [REDACTED] (Velindre - Director of Place, Portfolio and Partnerships)
[REDACTED]@wales.nhs.uk>; [REDACTED] Velindre - Estates)
[REDACTED]@wales.nhs.uk>
Subject: EN0110036 – Gwynt Glas Offshore Wind Farm Scoping Consultation Response

Dear Sir/Madam,

Thank you for your letter dated 26 June 2026 regarding the scoping consultation for the proposed Gwynt Glas Offshore Wind Farm.

Velindre University NHS Trust has reviewed the consultation documentation and considered the proposed scope of the Environmental Statement in relation to the Trust's estate, operations and services.

The Trust has no comments to make regarding the scope of the Environmental Statement at this stage and has not identified any matters requiring specific assessment in relation to its interests.

Yours faithfully,

[REDACTED]

[REDACTED]

Cyfarwyddwr Cynorthwyol Dros Dro: Ystadau, yr Amgylchedd a Datblygu Cyfalaf

Ymddiriedolaeth GIG Prifysgol Felindre

Ffôn: [REDACTED]

E-bost: [REDACTED]@wales.nhs.uk

[REDACTED]

Interim Assistant Director of Estates, Environment & Capital Development

Velindre University NHS Trust

Tel: [REDACTED]

Email: [REDACTED]@wales.nhs.uk



Planning Inspectorate Reference: EN0110036

Llywodraeth Cymru
Welsh Government

Sent to: gwyntglas@planninginspectorate.gov.uk

24 July 2026

Dear Todd,

**Gwynt Glas Offshore Wind Farm
Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 – Welsh Government
EIA Scoping Response**

Thank you for the opportunity to comment on the Environmental Impact Assessment (EIA) Scoping for the Gwynt Glas offshore windfarm project. This response from the Welsh Government is made on a without prejudice basis.

This response is framed to provide you with a cross-government initial view of proposed scoping areas.

Policy and Legislative Context

Energy is a central part of the Welsh Government's economic strategy. Our aim is for Wales to have secure and resilient energy generation, competitively priced, reliable and increasingly clean.

Further, our ambition is to unleash Wales' renewable energy potential and achieve greater energy security and net zero by 2040, ensuring communities benefit from their natural resources. We want to ensure renewable energy generation has tangible economic and social benefits that are retained and realised by local communities across Wales.

The Welsh Government is in general agreement with the policies and legislation identified in the scoping document.

We welcome that the scoping document recognises the Welsh National Marine Plan as a relevant policy document. In addition to this, we would like to signpost to supporting material which should also be considered:

- Marine Planning Notice for tidal stream safeguarding - [Welsh National Marine Plan: Marine Planning Notice](#)

- Marine Planning Technical Statements relating to safeguarding of existing activity (ports and shipping, cabling, recreational boating) and also resilient marine ecosystems - [Marine planning technical statements | GOV.WALES](#)

Biodiversity (marine and terrestrial)

We defer to Natural Resources Wales and the Joint Nature Conservation Committee as the relevant statutory nature conservation advisors for comments on biodiversity. As such, please have regard to their advice.

Commercial Sea Fisheries

The data in Fish and Shellfish Ecology section suggests there are no or limited catches in the Bristol channel (table 2.3.1 p118 and map p127) of Seabass. Seabass is an important stock for Welsh fishers. As such, we recommend this data is double checked to avoid under-accounting.

The scoping report identifies the fisheries data sources in Table 2.6.1 and paragraph 553, acknowledging the data is partial. Earlier this year, the Welsh Government shared IVMS data (2022-2025) for under 12m fishing vessels to inform the spatial constraints analysis. We would welcome confirmation that this data has been used to inform the EIA scoping report.

Further, we wish to note there is a high-value cockle fisheries in Three Rivers and Burry Inlet which fall within the development boundary area. It will be necessary and important to consider any potential impact on these fisheries.

With regards to cumulative impacts, we would like to note that offshore wind projects Llŷr 1&2, Erebus, Whitecross, Equinor and Ocean Winds and respective cables should be considered in any cumulative impact assessment, alongside any potential effects from other adjacent existing or proposed developments.

With the changing nature of fisheries due to climate change, species, abundance, the value of seafood for the timeframe of the development should be considered, not just historical data.

When considering impacts on commercial sea fishing businesses, developers should consider the high costs and small margins within which most fishers operate. Fuel required to travelling further to fishing grounds could, for example, make some businesses unviable. Further, increased competition in remaining areas is likely to see catches decrease which would have the same effect. These matters should be taken into consideration.

We consider the fishing industry to be an important stakeholder for consultation and engagement through all stages of this proposal. We are aware that fishers do not always have the capacity to engage with projects and would welcome consideration being given to any opportunities for co-ordinating communications and engagement between other windfarms in the vicinity of the development and fisheries to ease pressures and ensure fishers are able to voice any concerns they may have.

Shipping and Navigation

The Welsh Government agrees with the consultees proposed in the scoping document and suggests that the British Ports Association and UK Major Ports Group should also be included.

It is noted that the scoping report identifies all the major ports that are of interest to the Welsh Government; Milford Haven, The Port of Swansea, Port Talbot & Fishguard Harbour.

Archaeology and Cultural Heritage

Section 2.10 of the scoping report asks six questions regarding the contents of the data and methodology proposed to assess offshore archaeology and cultural heritage. Cadw, the Welsh Government's historic environmental service, is in agreement with the questions posed.

Section 3.5 of the scoping report asks six questions in regard to the contents of the data and methodology proposed to assess onshore archaeology and cultural heritage. Cadw does not agree that all relevant data sources have been identified in the scoping report, and the following data sources should also be included:

- Information on Placenames is available from the [Royal Commission on the Ancient and Historical Monuments of Wales](#).
- LiDAR data is available from [DataMap Wales](#).

Cadw does not fully agree with the proposed approach to the assessment of onshore archaeology. The impact of the proposed development on Registered Historic Landscapes will need to be assessed using the [Assessment of the Impact of Development on Historic Landscapes methodology](#). Furthermore, the Historic Landscape Character Areas that will be included in this assessment should be agreed with Cadw before work commences on this assessment.

Cadw is in agreement with the remaining questions posed in Section 3.5 of the scoping report.

Traffic and Transport

The Welsh Government, as highway authority for the Strategic Road Network (SRN), requests that the following information be provided as part of any future application:

- Sufficient information to demonstrate that access for the transportation of Abnormal Indivisible Loads (AILs) can be achieved from the point of entry onto the Welsh trunk road network to the point of egress, whilst minimising any impact on the safety and free flow of traffic on the SRN. This information will be required prior to the determination of any planning application.
- Details of the full route to the site, including anticipated AIL traveling weights, dimensions, numbers of movements and swept path analyses for the worst-case AILs. Swept path analyses should be provided for all potential horizontal

and vertical constraints along the access route, as a minimum, this should include all junctions on the SRN.

- A draft abnormal load notification (see Appendix A for a template). We appreciate there may be many unknowns at this time, so further information may be required. As an absolute minimum we would need best estimates for the following, without these details a viable route cannot be confirmed:
 - Full route details
 - Vehicle weight
 - Vehicle length
 - Vehicle width
 - Vehicle height
 - Number of transporting AILs

Further to the above, you may wish to review Section 5 of Appendix B attached *Procedure and Advice Guidance – ‘Pulling Together’ – Best Practice for Transporting Abnormal Loads in Wales*, which details the likely conditions and further requirements the Welsh Government will require to support any application and/or any subsequent planning permission granted.

Freight and Logistics

Further to the above comments on traffic and transport. From a freight & logistics policy perspective, we would welcome consideration of use of the A465 as a freight corridor for HGVs to help ease congestion on the M4. We would also recommend consideration of moving heavier construction components via rail freight paths, where possible. For advice on any suitable rail freight paths please contact the Welsh Government’s Rail Policy Team: Rail@gov.wales and Network Rail. We are happy to provide a contact for Network Rail if needed.

Climate Change Resilience

Circular Economy and Decommissioning

[Beyond Recycling – The Circular Economy Wales strategy](#) aim is to keep resource in use for as long as possible and find these resources new uses at the end of their first useful life. We expect producers/developers to reduce waste at the end of life of an installation, including reusing as much as possible, and then recycling what cannot be prevented or reused.

We recommend, when developing any decommissioning plan that you have regard to this strategy and our legal obligations for the removal of marine infrastructure at the end of its life under the [United Nations Convention on the Law of the Sea](#) and the [Oslo and Paris Convention](#).

Our circular economy ambition is supported by general terrestrial policy in [Planning Policy Wales](#), which empathises the need to make sustainable resource choices and to promote the principals of a circular economy when proposing a development. The potential for designing out waste should be considered at an early stage when formulating proposals and should include using materials and products which are or can be deconstructed and reused, refurbished, remanufactured, or disassembled and

recycled. As this industry is in its infancy, in terms of technological development, it is considered it could have a positive influence on such considerations at early design stages, and it is recognised by Welsh Government that this industry has been considering such key issues whilst designing the technology.

Non-EIA Comments

The following comments are not directly relevant to the EIA scoping report, however, the Welsh Government would like to take this opportunity to provide general comments for consideration as the project proposal develops.

Welsh Language

The Welsh Government would expect the applicant to have consideration to the below throughout the development of the proposal, including when consulting and engaging with local communities:

- [The Welsh language strategy, Cymraeg 2050](#): a million Welsh speakers (2017), highlights the possible impacts large structural developments can have on the Welsh language.

Skills and Supply Chain

As noted at the start of our response, the Welsh Government has an expectation that all renewable energy projects hosted in Wales includes an element of community benefit. Welsh Government recognises that there are some requirements as part of the Crown Estate Leasing agreement but urges the applicant to make every effort to ensure the project can meet this expectation by engaging with local communities and grassroots organisations. We would also expect the community benefits element of the project to be aligned as closely as possible with existing Welsh Government programmes with a view to ensuring maximum benefit in terms of key outcomes such as tackling poverty, decarbonisation, Cymraeg 2050, and future skills, improving productivity in Wales.

Under Wales' refreshed economic mission, the offshore wind sector has the potential to deliver high quality sustainable career opportunities to people in Wales, which directly aligns with our productivity mission. We have supported a number of supply chain activities with project developers, such as Gwynt Glas. Welsh Government will align existing business, finance and skills support packages to better support the offshore wind sector.

In addition, we would be keen to explore how this project could enable a lasting legacy for Welsh communities. Welsh Government intends for offshore wind to be the foundation of an industrial economy. As such, Welsh Government officials will continue to work with the company to support the delivery of such economic benefits.

Welsh Government continues to work hard to improve certainty in the offshore wind sector and enabling Ports across Wales to support the construction and maintenance of offshore wind.

Conclusion

The Welsh Government remains committed to engaging constructively throughout development of the Gwynt Glas offshore windfarm project, and any future Examination undertaken by the Planning Inspectorate. The applicant is welcome to contact us for further and more detailed information on the matters raised above if necessary.

Yours sincerely,

Renewable Energy Policy Team, Welsh Government

Renewables.DCOConsultations@gov.wales

Copy to: info@gwyntglas.com

DfT regulations - Form of Notice to Police (Construction and Use Regulations (C & U) 1986 & the Road Vehicles (Authorisation of Special Types) (General) Order (STGO), 2003 Schedule 5 or Schedule 9 Part 1) and to Highway and Bridge Authorities (STGO)

(Subject to the prior agreement of each of the authorities to which this notice is sent, it may be used to give notice of additional journeys, different vehicles, routes and destinations.)

1. General Details:

List of all Police Forces, Highways and Bridge Authorities to which this form is being sent.

Select and copy the list of Police Forces, Highways and Bridge Authorities by [clicking here](#). Then, paste the list generated into the box below*.

Once this form is complete send to notifications@esdal2.com

Fields marked with an '*' are mandatory

Company/Organisation Name*:	Company/Organisation Address*:
Contact Name*:	
Other contact details.:	
Email Address*:	Telephone No.*:
Operator Licence No.*:	Operator Reference No.:
On Behalf Of (Name of haulier for whom the notification is being submitted)	
Load Description*:	
No. Of Loads*:	
Notes:	

2. Route Details:

Movement Start Date and Time*:	Movement End Date and Time*:
Movement From Address*:	Movement To Address*:
From Address Postcode:	To Address Postcode:
Route Description:	
Tick to confirm you have an indemnity:	Include Return Leg:
Return Leg Description (If different to the outward route) (optional):	

Note: To provide additional detailed route information complete section '4. Additional Information'.

3. Vehicle Details: Movement Classification*:

Vehicle Type*:

Configuration*:

All dimensions are to be entered in metres/kilograms (where applicable).

VR1 No. (Applicable for VR1)		Special Order No. (Applicable for Special Order)	
Registration no. of motor vehicle or substitute(s)* <i>(Multiple registration numbers to be separated with comma (,))</i>		Max. Height*	
Overall/total length of vehicle*		Reducible Height	
Rigid Length*		Gross Weight*	
Projection Front*		No. Of Axles	
Projection Rear*		No. Of Wheels	
Overall Width*		Max Axle Weight	
Projection Left*		No. Of Vehicle Components*	
Projection Right*		<i>(Including Tractor and Trailers)</i>	

3.1 Vehicle Axle Details (not required for C&U vehicles)

Tractor/ Trailer								
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

Note: To provide additional 'Vehicle Axle Details' complete the section below.

3.2 Additional Vehicle Axle Details (not required for C&U vehicles)

Tractor/ Trailer								
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

Tractor/ Trailer								
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

Tractor/ Trailer								
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

Points through which the route travels.

Address: Address should be in the format <Address>, <PostCode>
E.g.: BANBURY ROAD, CV35 0AA
Or
Highways England, Quinton Business Park, 3 Ridgeway, Quinton, Birmingham, B32 1AF

Co-ordinates: This should be British National Grid(BNG) Easting and Northing co-ordinate to refer a point on the map. The BNG co-ordinate value can be retrieved from <https://gridreferencefinder.com> E.g.: 455090,228177

Either address or co-ordinates must be present. Giving co-ordinates is always the most accurate information for a route.

[illegible]



Welsh Government Motorway and Trunk Road Network

‘Pulling Together’ Best Practice for Transporting Abnormal Loads in Wales

Instructions for use:

This guidance document is intended for use by hauliers and developers planning to generate abnormal load movements on Trunk Roads and Motorways in Wales.

It outlines the statutory process for planning and conducting safe and effective abnormal load movements in agreement with all relevant authorities and organisations.

This document supersedes any previous advice issued by the Welsh Government regarding this process.

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1 INTRODUCTION

1.1 Document purpose

Our highways are, in the most part, built to accommodate a certain maximum vehicle size and weight. These vehicle limits are defined and upheld by UK law and most daily movements can be completed within them. However, some particular vehicle types and indivisible freight loads fall outside these limits and so are known as 'abnormal loads'. These typically include:

- Vehicle carrying an oversize or overweight load
- Mobile cranes
- Engineering plant
- Road recovery vehicles

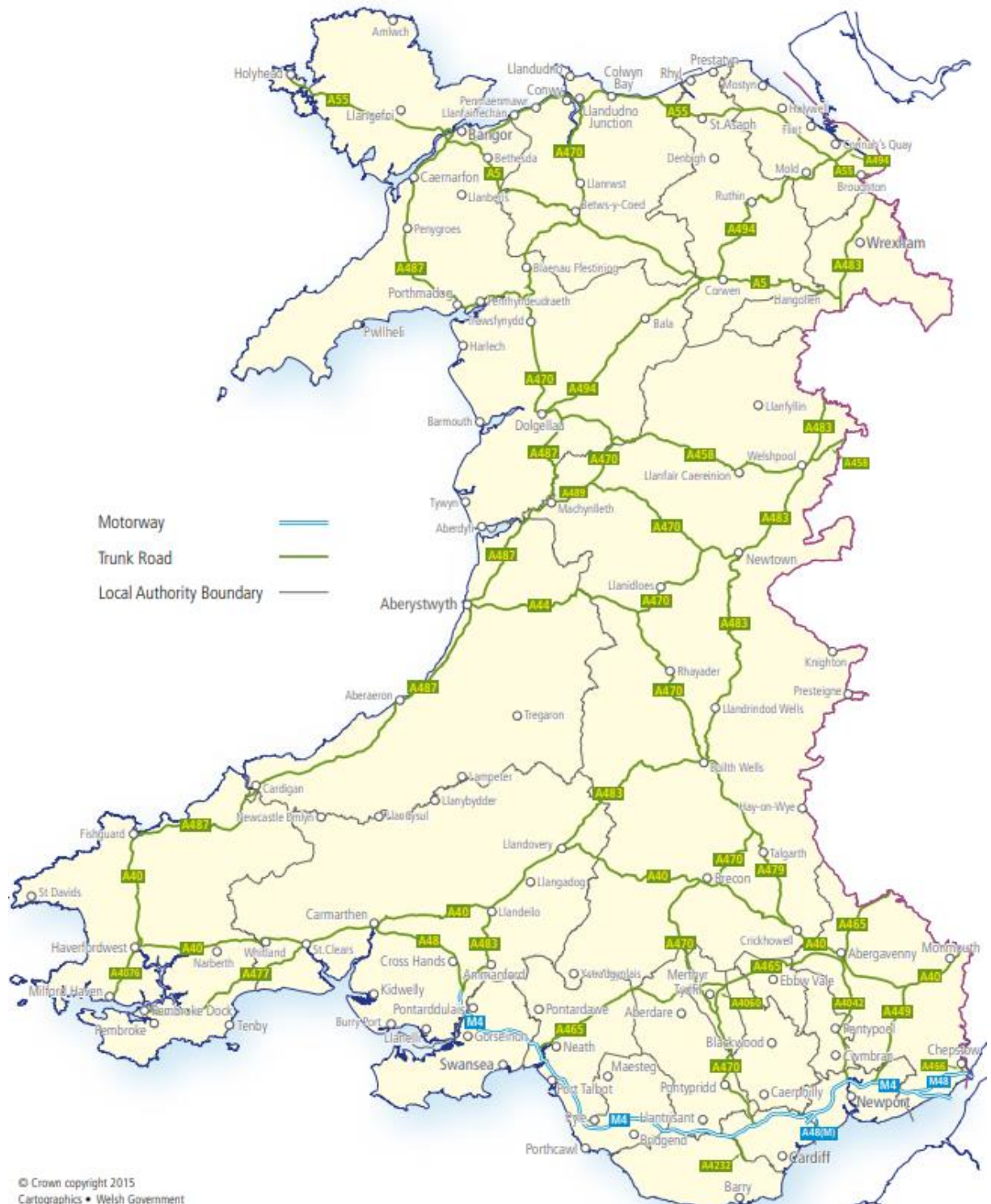


The movement of these types of loads by road is essential for supporting the UK economy, but it is also essential that the movements are carefully planned and executed to ensure they can be safely accommodated by the highway network. Movements of abnormal loads on the Welsh trunk road network (see Figure 1) can include vehicles as large as 8m wide, 55m long and 135te, while many thousand abnormal load movements take place in Wales every year. The consequences of these types of journeys being unplanned or poorly executed can therefore be significant, and include:

- Damage to the network when abnormally wide or heavy loads travel over weak structures or along narrow roads
- Delay to all road users if movement timing or route is poorly planned
- Harm to wider public if mismanaged movement results in an accident

- Delays and cost implications to industry when vehicles unable to complete journey on time

Figure 1 Trunk Road Network Wales (Traffic Wales, 2015)¹



¹ <https://traffic.wales/sites/default/files/2018-10/151021-wales-trunk-roads-map-en.pdf>

To avoid such impacts and their potential legal consequences, those responsible for transporting abnormal loads by road in the UK are required by law to plan and execute each movement in agreement with relevant authorities to ensure the incident-free passage of every load from origin to destination.

Welsh Government is the devolved government for Wales. The Welsh Ministers are the Highway Authority for trunk roads and motorways in Wales under the Highways Act 1980. They are supported by civil servant officials who work across devolved areas that include key areas of public life, including transport and the management of trunk roads and motorways.

This document therefore comprises a Welsh Government Procedure and Advice Guidance (PAG) document which aims to summarise the legal process which must be followed in the planning and execution of all abnormal load movements on trunk roads within Wales and to clarify the roles and responsibilities of the various parties involved.

By pulling together, we make roads in Wales safer and more effective.

1.2 Document structure

The document is structured as follows:

- The legal definition of an abnormal load is discussed in Section 2
- Guidance on vehicle preparation is provided in Section 3
- Guidance on journey preparation is provided in Section 4
- Planning for abnormal loads through the development control process is outlined in Section 5
- A summary of roles and responsibilities is presented in Section 6, and
- A list of useful contacts is provided in Section 7

1.3 Intended audience

This document is primarily addressed at the party responsible for conducting an abnormal load movement on Welsh trunk roads (most commonly the haulier), but is relevant to all parties involved in its safe planning and execution, as follows:

- Consigners/agents
- Hauliers
- Attendants
- Escorting services

- Police
- DVSA
- Highway Authorities and other bridge owners
- Planning authorities
- Developers / agents or consultants
- Statutory utilities

1.4 List of abbreviations

The following abbreviations are used throughout this document:

- AIL – Abnormal Indivisible Load
- ALO – Abnormal Loads Officer
- AWR – Road Vehicles (Authorised Weight) Regulations 1998
- STGO – The Road Vehicles (Authorisation of Special Types) (General) Order 2003
- C&U – The Road Vehicles (Construction and Use) Regulations 1986
- DBFO – Design, Build, Finance, Operate companies
- DMRB – Design Manual for Roads and Bridges
- HA&BO – Highway Authorities and other Bridge Owners
- NH – National Highways (*previously Highways England*)
- DVSA – Driver and Vehicle Standards Agency
- LA – Local Authority
- NMWTRA – North and Mid Wales Trunk Road Agent
- SWTRA – South Wales Trunk Road Agent
- TAA – Technical Approval Authority
- TMP – Traffic Management Plan
- TTRO – Temporary Traffic Regulation Order
- WG – Welsh Government

2 CATEGORIES OF ABNORMAL LOAD

Abnormal loads, and the obligations of those moving them, are defined in the UK by legislation. This section provides a summary of the different legal categories of abnormal load and their implications.

2.1 Normal vehicle definition

The maximum size and weight of vehicles which can use the UK road network without journey notification having to be provided to relevant authorities is defined by the following regulations:

- The Road Vehicles (Construction and Use) Regulations 1986 – “C&U”
- Road Vehicles (Authorised Weight) Regulations 1998 – “AWR”

These permit a vehicle and its load to use UK roads without notification as long as the combination falls within the following maximum size and weight limits:

- Rigid length: up to 18.65m
- Width: up to 2.9m
- Weight: up to 44,000kg
- Axle load: up to 10,000kg (or 11,500kg for single driving axle)

If a vehicle and its load lie outside any of these limits, it is referred to as an abnormal load.

There is no legal height limit for vehicles but, wherever possible, the overall height of a vehicle and load should not exceed 4.95m so that the maximum use can be made of the motorway and trunk road network. This will ensure that loads are less than 5.03m in height, which is the minimum maintained headroom requirement on UK highways.

2.2 Categories of abnormal loads

Legal categories of abnormal load vary to cover different combinations of vehicle size and weight. This is because different types of abnormal load have implications for both:

- Vehicle choice, and
- Route choice

The implications in each case are considered in the following subsections.

2.2.1 Abnormal loads and vehicle choice

The size of an abnormal load has implications for the size of the transporting vehicle, with larger loads generally requiring larger vehicles.

In addition, heavier loads put greater demands on a vehicle's chassis, suspension, tyres, brakes and engine, so heavier abnormal loads also require a higher specification of vehicle.

These distinctions between the impacts of size and weight result in the following abnormal load vehicle legal categories:

- C&U/AWR compliant vehicles are permitted within that legislation to carry oversized abnormal indivisible loads up to a limit, but not overweight loads
- Overweight loads, and those beyond C&U size limits, can be carried by three categories of higher specification vehicles designed to standards prescribed by The Road Vehicles (Authorisation of Special Types) (General) Order 2003 ("STGO") and are subject to lower speed limits depending on load weight
- Loads heavier and/or larger than those permitted by STGO require Special Order approval by the UK Secretary of State under Section 44 of the UK Road Traffic Act 1988

The application of these categories to abnormal load sizes and weights is summarised in the following table.

Table 1 Abnormal load legal category by size/weight combination

Gross weight	Axle weight	Load Dimensions				
		W ≤2.9m L ≤18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
≤44,000kg	≤11,500kg	C&U	C&U	STGO Category 1	STGO Category 1	Special Order
>44,000kg	≤11,500kg	STGO Category 1	STGO Category 1	STGO Category 1	STGO Category 1	Special Order
>50,000kg	>11,500	STGO Category 2	STGO Category 2	STGO Category 2	STGO Category 2	Special Order
>80,000kg	>12,500	STGO Category 3	STGO Category 3	STGO Category 3	STGO Category 3	Special Order
>150,000kg	>16,500kg	Special Order	Special Order	Special Order	Special Order	Special Order

Key: = Abnormal load legislation

This table highlights that:

- C&U vehicles are limited to carrying abnormal loads which are oversized but not overweight
- STGO categories increase with abnormal load weight up to 150,000kg
- Special Order vehicles are for extra heavy and/or very large abnormal loads

2.2.2 Abnormal loads and route choice

As well as vehicle type implications, abnormal loads also present route choice implications, as follows:

- The wider and longer a load, the greater the potential for conflict with other road users and roadside furniture / structures
- The heavier a load, the greater the potential for damage to underlying infrastructure and for delays to other road users due to slower speeds

The transporting of abnormal loads therefore presents increased road safety, infrastructure damage and traffic management risks to the network which need careful management and mitigation in liaison with relevant authorities. This is required by legislation covering abnormal load movements and the following table summarises:

- The organisations requiring pre-trip notification of the abnormal load journey details, and
- The minimum notification period in each case, where 'd' refers to working days (excluding Sundays and Bank Holidays) and 'w' refers to weeks

Table 2 Pre-journey notification requirements by abnormal load category

Gross weight	Axle weight	Load Dimensions				
		W <=2.9m L <=18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
<=44,000kg	<=11,500kg	N/A	Police – 2d			
>44,000kg	<=11,500kg	HA&BO – 2d	Police – 2d HA&BO – 2d		Police – 2d HA&BO – 2d NH – 2w	
>50,000kg	>11,500		Police – 2d HA&BO – 2d			
>80,000kg	>12,500	Police – 2d HA&BO – 5d			Police – 2d HA&BO – 5d NH – 2w	
>150,000kg	>16,500kg					

Key:  = Abnormal Load legislation  = VR1 form notice  = C&U
 = STGO C1  = STGO C2  = STGO C3  = Special Order

HA&BO = Highway Authority and other Bridge Owners NH = National Highways

This table highlights that:

- Where just load size increases, only the Police require notification, until the size reaches such that HA&BOs and National Highways require notifying also
- Conversely, where just load weight increases, HA&BOs require notification, until the weight reaches such that the Police and National Highways require notifying also
- For combinations of size and weight increases, both the Police and HA&BOs need notifying, together with National Highways for the largest/heaviest loads
- In all cases, the minimum notification period increases with load size and weight
- For loads over 5m wide, UK Secretary of State approval must be sought through submission of a VR1 form²

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/471962/VR1_form.pdf

- For loads over 6.1m wide, UK Secretary of State approval must be sought through submission of a Special Order form³

The approval of VR1 and Special Order forms has not been devolved by the UK Government to Welsh Government and so currently remains the responsibility of National Highways. However, for Special Order movements which will result in trips on the Welsh trunk road network, and for any other abnormal load movement deemed applicable, Welsh Government may require a Traffic Management Plan (TMP) to be submitted for approval before the proposed journey date. TMP requirements are defined in Section 4.1 below.

VR1 and Special Order load movements should also be planned with due cognisance of Highway England's 'Water preferred policy guidelines'⁴ which require such journeys to be completed as far as possible by either inland or coastal waters wherever it is practical, economic and environmentally desirable to do so.

2.3 Summary

UK law defines abnormal load categories based on the degree of vehicle and route preparation required in each case to ensure a smooth and safe movement, with preparation requirements increasing with load size and weight.

Further guidance on vehicle and route preparation is provided in the following two sections.

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503102/BE16_form_revised_Sept_15.pdf

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799833/WPP_guidelines_2019_DfT_consultation_revision.pdf

3 VEHICLE PREPARATION

Ensuring that an abnormal load vehicle meets legal requirements and is fit-for-purpose is essential for ensuring safe and reliable journeys. This short section is not intended to cover all legal matters relating to abnormal load vehicle preparation but summarises key requirements that contribute to safe movements through Wales.

3.1 Vehicle choice

Where the carrying of a load causes the vehicle and load to lie outside of normal C&U/AWR size and/or weight limits, the party responsible for its transportation is legally required to divide the load into smaller components wherever possible, except where this would involve undue expense or risk of damage.

Assuming the load cannot be further subdivided and so is considered an abnormal indivisible load, the selected vehicle must comply with the legislation applicable to the dimensions and weight of the combination, as set out in Table 1 above.

3.2 Signage, markings and lighting

It is both a legal requirement and best practice to clearly sign, mark and light an abnormal load vehicle to ensure the visibility of vehicle size and extremities for other road users. For a summary of requirements and best practice, refer to the following documents:

- ‘Special types enforcement guide’, by Gov.UK⁵
- ‘Lighting and marking for abnormal loads vehicles code of practice’, by National Highways⁶

3.3 Attendants

Both C&U and STGO legislation require that an attendant travel with the vehicle where:

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it is 3m or less but the length of any lateral projection of a load carried on it exceeds 305mm.

⁵ <https://www.gov.uk/government/publications/lighting-and-marking-for-abnormal-loads-vehicles-code-of-practice>

⁶ <https://www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide#abnormal-loads>

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it exceeds 3.5m where a rigid unit and any projection of the load exceeds 18.75m in length.
- Special types combination exceeds 25.9m, the length of any forward projection of the load exceeds 2m, the length of any rearward projection of the load exceeds 3.05m.

Where attendants are required on special types vehicles and three or more vehicles are involved travelling in convoy, attendants need only be carried in the first and last vehicles of that convoy.

The attendant's duty is to warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road and to ensure road signs and notices are complied with.

3.4 Documentation

If UK Secretary of State approval is required and obtained for the journey via either a VR1 or Special Order form, the approval documents must be carried in the vehicle during the approved journey as the means of demonstrating authorised exemption from C&U/AWR regulations.



4 JOURNEY PREPARATION

The key to an effective and safe abnormal load journey is good preparation in liaison with relevant authorities, as required by legislation and by this document. This section provides guidance on the journey planning and notification process.

4.1 Notification requirements

4.1.1 Authorities to be notified

As summarised in Table 2 above, the relevant authorities who require notification of abnormal load movements may include:

- Police
- Highway authorities and other bridge owners
- National Highways

In Wales, highway authorities comprise:

- Local authorities for non-trunk roads, and
- Welsh Government for trunk roads (with functions delegated to NMWTRA/SWTRA and DBFO companies)

Bridge authorities/owners most commonly comprise:

- Local authorities for non-trunk road structures
- Welsh Government for trunk road structures (with functions delegated to NMWTRA/SWTRA and DBFO companies)
- Network Rail for rail bridges
- Canal and River Trust for canal bridges

4.1.2 Notice periods

Notification to relevant authorities must be provided before any abnormal load journeys take place. The minimum notification periods for each authority are summarised by abnormal load category in Table 2 above. Depending on the type of abnormal load, this shows that:

- Each Police force area traversed by the route must be given at least 2 to 5 days' notice

- Each HA&BO area traversed by the route must be given at least 2 to 5 days' notice
- If VR1 form approval is required, National Highways must be given at least 2 weeks' notice
- If Special Order approval is required, National Highways must be given at least 10 weeks' notice

Where a Temporary Traffic Regulation Order is required, it should be noted that this can also take up to 12 weeks to process (see Section 4.3.1.3 below for more information).

The reason for requiring minimum notification periods is to allow due time for notified authorities to assess the proposed journey and for applicants to satisfactorily address any issues raised before the journey takes place. More information on the notification assessment process is provided in Section 4.3 below, but it should be noted that notified journeys can only legally take place:

- If all relevant authorities are notified with sufficient notice period and either no response is received before the journey date or any response received before the journey date is addressed by the applicant to the satisfaction of the responding authority, and
- In the case of VR1 or Special Order movements, explicit written approval is received

In addition, where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

It is important to note that notifications which do not satisfy the legal minimum notice periods will generally not be accepted by authorities unless a movement is required as part of a genuine emergency and the notification is accompanied by a telephone call. Equally, notifications can be submitted earlier than the minimum notice period, while pre-notifications and consultations with authorities are also encouraged where there is uncertainty about whether a journey notification would be accepted.

4.1.3 Information required

4.1.3.1 Statutory notification requirements

The level of notification information required depends on the category of abnormal load being moved, with information requirements increasing with movement size and/or weight. A summary of requirements per movement category is provided in the following table.

Table 3 Information required by notification type

Information	C&U	STGO	VR1	Special Order
List of authorities notified	☒	☒	☒	☒
Operator details	☒	☒	☒	☒
Movement route, time and date	☒	☒	☒	☒
Description of load	☒	☒	☒	☒
Vehicle type and registration	☒	☒	☒	☒
Vehicle dimensions and laden weight	☒	☒	☒	☒
Axle weights and spacing		☒		☒
Proof of current indemnity to HW&BO		☒		
More detailed journey information			☒	
More detailed vehicle and load information				☒

4.1.3.2 Traffic Management Plan requirements

Where a TMP is required to be submitted to Welsh Government (see sections 2.2.2 and 4.1.2), the following journey details should be provided:

1. Proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
2. Loaded dimension and weight of AIL
3. Anticipated escort arrangements
4. Methodology for managing trunk road traffic during journey, including identification of passing places and holding areas as necessary
5. Journey contingency plans in the event of incidents or emergencies
6. Estimated journey duration and timings along the route
7. Evidence of trial run that mimics the movement of the AIL along the access route where appropriate, at the discretion of the Highway Authority
8. Swept path analysis modelling at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
9. Proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed and reinstated

4.1.4 Notification submission

All relevant notification and indemnity forms can be found on the Gov.UK website⁷ which can be emailed, faxed or posted to relevant authorities.

However, it is recommended that an online notification portal is used to submit C&U and STGO abnormal load notifications. The standard UK system is ESDAL⁸, maintained by National Highways, which allows users to:



- Plan an appropriate route according to vehicle size and weight
- Notify all relevant Police, highway authorities and other bridge owners of the planned journey
- Get advance notice of any possible route problems
- Save vehicle details and routes for future use

Subject to the preferences of individual authorities and Police forces, other online notification portals can also be used, but the applicant should satisfy themselves that any system employed satisfies all legal requirements for making abnormal load journey notifications.

The TMP, if required, should be submitted to the Welsh Government ALO, as detailed in Table 7 below.

4.1.5 Notification dispensations

Dispensations may be issued by Police to hauliers to move abnormal loads through their area without prior notification if they satisfy the following requirements:

- Abnormal loads no wider than 3.5m
- Multiple loads of a like nature on a regular basis
- Routes limited to motorways and selected A roads only

The granting of a dispensation has the potential to significantly reduce the number of notifications hauliers will have to submit. However, the dispensation should reference specific vehicles in the fleet and so are not transferable without prior notice to the Police. Drivers should also carry a copy of the dispensation and present it to an officer on request. Dispensations must be renewed annually on application and are not automatically renewed.

⁷ <https://www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms>

⁸ <https://www.gov.uk/esdal-abnormal-load-notification>

Any dispensation granted will not take account of any roadworks commencing during the dispensation period or ongoing at the point of issue and hauliers will still be expected to check their route.

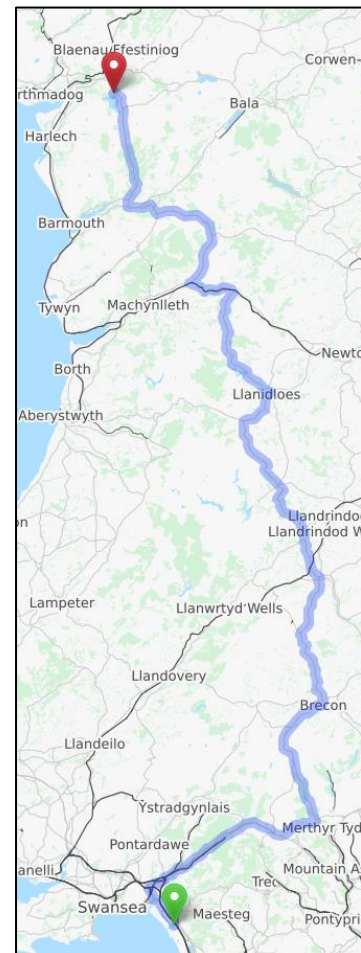
4.2 Route planning guidance

4.2.1 General principles

It is ultimately the haulier's responsibility to identify a route and execute a journey which ensures the legal, safe and least disruptive passage of an abnormal load from trip origin to trip destination. Relevant authorities will provide guidance and, where necessary, require journey amendments, but the legal responsibility and liability for the safe completion of each journey lies with the haulier.

In selecting an appropriate route for inclusion in an abnormal load journey notification, the following general principles should be followed:

- Routing preference should always be given to using the highest classification roads, with as much of the journey as possible being routed along motorways, trunk roads and A-roads. These routes are best equipped to carry large and heavy loads, and are least likely to present size and weight restrictions (the busiest abnormal load routes on the Welsh trunk road network typically include the A55, A494 dual carriageway, A483 dual carriageway and the A5 near Chirk)
- Routes should also avoid passing through population centres wherever possible to minimise conflict with both infrastructure constraints and other road users
- Routes must avoid roads presenting size and/or weight restrictions which fall within the parameters of the vehicle/load combination being transported
- One key advantage of using online journey notification systems like ESDAL is that it allows users to plot a route based on vehicle size and weight based on mapping which contains information on network size and weight restrictions.



Potential applicants should also be aware of Ordnance Survey 'Mastermap Highways Network' products which allow point-to-point route planning and contains a comprehensive and continuously updated national database of:

- Road classification and name
- Height, weight, width and length restrictions
- Turn restrictions
- Access restrictions
- Locations of bollards and traffic calming
- Narrow roads and pinch points
- Maintenance responsibility

In addition, it is recommended that applicants consider potential planned roadworks at the route planning stage using the online resources detailed in Section 4.4.1 below.

In combination with online notification portals, hauliers therefore now have access to route planning tools which maximise the chances of both successful abnormal load notifications and successful abnormal load journeys.

4.2.2 Other considerations

4.2.2.1 Travel timing

In planning an abnormal load route, the following timing related factors should also be considered:

- Journey times which exceed statutory driver working time limits will require a stopping place to be identified along the route which can accommodate abnormal load vehicles
- Journey distances which require vehicle refuelling will require a fuel station to be identified along the route which can accommodate abnormal load vehicles
- During hours of darkness, most Police forces only allow abnormal load movements to take place on motorways and on some lit dual carriageways. Journeys on all other road types which cannot be completed during daylight hours will therefore need to be routed via an abnormal load layby where layover can take place
- Some authorities will not allow abnormal load movements through their area or parts of their area during peak traffic hours. This can affect both route choice and journey timing

For planning stops and/or refuelling, National Highways publish on the Gov.uk website a list⁹ and map¹⁰ of laybys and motorway service stations which can accommodate abnormal loads.

In calculating journey times, typical congestion on the planned day of travel should be taken into account, as well as the speed limit applicable to the abnormal load vehicle type. STGO loads are speed limited by category and road type. The most common categories are limited as follows:

Table 4 STGO speed limits by category and road type

STGO category	Speed limit		
	Motorway	Dual carriageway	Other roads
Category 1 (width ≤ 4.3m)	60mph	50mph	40mph
Category 1 (width > 4.3m) & Categories 2 & 3	40mph	35mph	30mph
Special Order ¹¹	20mph	20mph	20mph

Source: Special Types Enforcement Guide

4.2.2.2 Escort considerations

Consideration should also be given during route planning as to whether either a private or Police escort is required to accompany the abnormal load movement.

There is no legal requirement for a vehicle moving under STGO or a Special Order to be accompanied by an escort vehicle, but National Highways advises that the following dimensions may be applied to decide if the movement of an abnormal load requires an escort:

Table 5 National Highways guidelines on escort requirements

Abnormal load measurement	Motorway	Other
Width	>4.6m	>4.1m
Length	-	>30.5m
Weight	130t	100t

Source: Lighting and marking COP for abnormal load self escorting vehicles, National Highways

The above measures are for guidance and may differ between individual Police forces who may wish to vary these requirements. The final decision rests with the Police (see Section 4.3.1.2 below).

See the full National Highways Code of Practice¹² for further details on escorting abnormal load movements.

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494606/Location_of_Abnormal_Load_Laybys_-_1143.pdf

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494607/Lay-by_and_MSA_Map_-_1143.pdf

¹¹For girder frame trailers over 150 tonnes and draw-bar trailers over 250 tonnes, the limit is 12mph

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503105/Lighting_and_marking_COP_for_abnormal_load_self_escorting_vehicles_HE_rebranding_v1.pdf

4.3 Notification processing

4.3.1 Police notification assessment process

4.3.1.1 Public Safety Risk Assessment

In processing an abnormal load journey notification, the primary concern of the Police is to assess the potential impact of the journey on public safety. The relevant duty officer within the Police will therefore check the notification and carry out a risk assessment based on the agreed 'risk category' levels set out below:

- Low risk notifications – no necessity for further action. General advice provided to the haulier and information on control measures if necessary.
- Medium risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered medium risk.
- High risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered high risk.

Based on this risk assessment, the Police forces may reject or amend any time, date or route that they consider may have an impact on public safety. If a route is deemed unsuitable, the haulier will be notified and will then be responsible for identifying an alternative route or additional traffic management measures sought from local authorities, National Highways or the Police.

4.3.1.2 Escort requirements

If the risk assessment determines that the safety of road users may be compromised to an unacceptable extent, an escort may be specified regardless of the vehicle dimensions specified in Table 5 above. The haulier will therefore be responsible for provision of an escort vehicle which conforms to the type specified by National Highways.

As per ACPO guidance, Police escorts will only be provided if specifically requested by a haulier or if the risk assessment identifies the need for temporary road closures to ensure safe passage of the load through restricted sections of the route. A minimum of 8 days notice will be required for a Police escort. If necessary, charges for Police escorts will be incurred by the haulier at 'Special Policing



Services' rates. For journeys where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

4.3.1.3 Temporary Traffic Regulation Order

If the risk assessment identifies the need for a temporary road closure on any section of the route, the haulier will be required to apply for a Temporary Traffic Regulation Order (TTRO) under the Road Traffic Regulation Act 1984 to allow officers and other Accredited Persons¹³ to stop and direct moving traffic or to suspend on-street parking. Applications for TTROs on the non-trunk road network should be made through the relevant local authority, and through NMWTRA/SWTRA for trunk road applications.

Hauliers should be advised that TTROs can take up to 12 weeks to process.

4.3.2 HA&BO notification assessment process

In processing an abnormal load journey notifications, the primary concern of highway authorities and other bridge owners is to assess the potential impact of the journey on highway structures.

4.3.2.1 Check for height and width restrictions

On receipt of a notification or notification enquiry, the Abnormal Loads Officer (ALO) for each of the affected HA&BOs will use details of the vehicle configuration to undertake audit checks of known height and width restrictions at structures along the route, and any other known structural constraints (temporary or permanent). Alternative routes or configurations may be suggested to avoid any identified structural constraints.

The ALO may request the haulier or enquiring party provides horizontal and/or vertical swept path analysis as necessary, based on topographical survey data. If the submitted swept path analysis is considered inadequate, the ALO may request the haulier or enquiring party undertakes a trial run to mimic the movement of the abnormal load vehicle through the constraint. The trial run vehicle should demonstrate the extent of the load envelope in terms of width and height in a clearly visible manner using a collapsible template. It should be noted that this may require a Police escort.

If the ALO is not satisfied that the constraint can be negotiated by the load, the HA&BO shall inform the haulier or enquiring party, as well as other relevant authorities as appropriate, that the load cannot be moved. WG can also implement Permanent or Temporary Traffic Regulation Orders under the Road Traffic Regulation Act 1984 to limit the maximum gross vehicle weight on a structure if required.

¹³ The Police Reform Act allows DVSA and other agencies to use Policing Powers to be able to replace officers at planned events, under the provisions of the Community Safety Accreditation Scheme (CSAS), as long as they are "employed" by the Accredited Agency to do so.

4.3.2.2 Check for structural capacity

On receipt of a notification or notification enquiry, the ALO will undertake checks referring to existing structural certification along the notified route, in consultation with the HA&BO's structures team if necessary, based on the loading and vehicle configuration.

If checks identify structures which may not be able to carry the load, the haulier may suggest an alternative route which will then need to be submitted to the relevant HA&BO for approval.

Further checks will be undertaken if an alternative route cannot be found. This will be undertaken by the ALO or a structural engineer. If these checks identify structures which would not be able to carry the load, the haulier may propose alternative vehicle configurations until a suitable configuration is found.

If neither a suitable route nor suitable vehicle configuration can be found and the HA&BO rejects the proposal to move on this basis, then the haulier may commission the assessment of route structures by a suitably qualified and experienced consultant at their own expense. All load assessments require Technical Approval according to BD2, 'Technical Approval Of Highway Structures'¹⁴. WG are the Technical Approval Authority (TAA) for Trunk Roads in Wales.



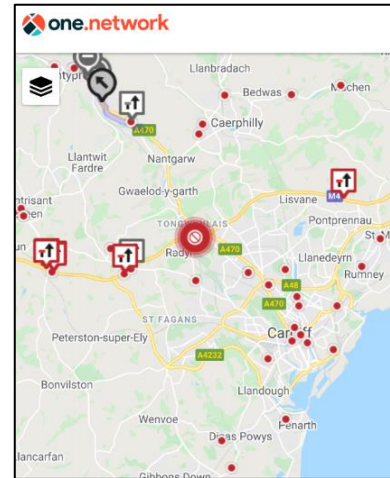
¹⁴ <https://www.croftse.co.uk/wp-content/uploads/2018/04/BD2-12-Highways-Structures-Approval.pdf>

4.4 Post-notification considerations

4.4.1 Roadworks and disruptions

The haulier should check for roadworks and disruptions along the route on the day of travel before commencing an agreed journey. Roadworks can particularly affect the passage of wide loads, and national details of live roadworks can be checked at <https://one.network/> or at <https://traffic.wales/> (also see Section 7 for Traffic Wales' contact details).

The haulier should consult in advance with the relevant ALO and the party responsible for the works if there is any doubt about whether the works affect the agreed route for the journey.



In the event where roadworks make the agreed route impassable, an agreement should be reached with the party responsible for the works to make passage possible at an agreed time, if feasible.

If not feasible, or if an unforeseen disruption makes a section of the agreed route impassable, the haulier is expected to assess where it is most appropriate and safe to park up and to contact the Police. If there are no safe areas then traffic management may be required to safely control traffic around the abnormal load vehicle. In addition to Police contact details, all hauliers are also recommended to carry contact details of the relevant local highway authorities and national traffic management firms to aid swift action in case of such an event.

4.4.2 Enforcement considerations

Once in transit, abnormal load vehicles can be subject to enforcement checks by either Police or DVSA officers. The vehicle may be escorted to a safe stopping place if any of the following conditions are met:

- Police have not received notification of movement
- Notification of movement is invalid due to inaccuracies
- Movement is not taking place in accordance with approved notification or authorised amendments
- Abnormal Indivisible Load vehicle or load is incorrectly marked or lit
- Abnormal Indivisible Load vehicle does not have the required attendant

- Abnormal Indivisible Load vehicle does not have the escort vehicle required by Police
- Driver is currently committing a 'driving hours' offence under tachograph regulations or will have committed an offence before reaching next stopping point
- Driver is currently committing an 'insufficient rest' offence under tachograph regulations
- Any C&U offences not exempted by STGO 2003 are evident

Where non-compliance is evident, the driver and operator are liable to prosecution under C&U regulations. Penalties for non-compliance can range from a fine¹⁵ to the temporary restriction or suspension of the haulier's operating licence by the Traffic Commissioner for Wales¹⁶. Officers might also prevent onward travel of the vehicle until any areas of non-compliance are adequately addressed.

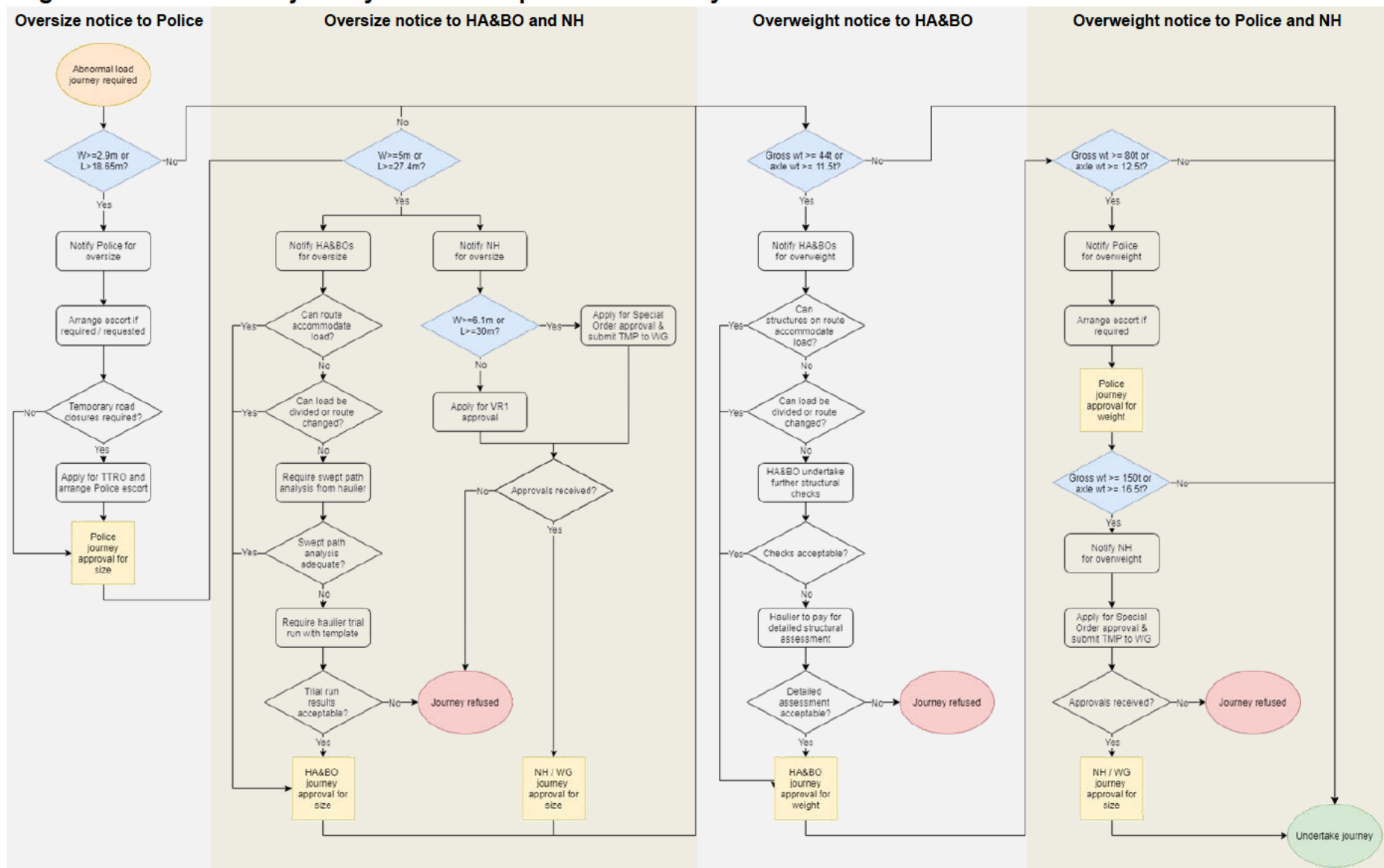
4.5 Process summary

A summary of the main steps in the legally required notification process is shown in the following figure.

¹⁵ <https://www.gov.uk/government/publications/guide-to-graduated-fixed-penalties-financial-deposits/dvsa-roadside-checks-fines-and-financial-deposits>

¹⁶ <https://www.gov.uk/traffic-commissioner/decision-and-penalties>

Figure 2 Abnormal load journey notification process summary



5 ABNORMAL LOADS AND DEVELOPMENT CONTROL

5.1 Planning applications

Planning applications for developments which are likely to generate abnormal load movements, either during construction or operation, may be required to be submitted with a Transport Assessment in accordance with Welsh Government Planning Policy Technical Advice Note 18: Transport¹⁷ Regarding abnormal load movements, the Transport Assessment should identify:

- Estimated movement volumes of abnormal loads to and from the site
- The most appropriate abnormal load routes to and from the site
- Mitigation proposals where necessary for route to safely accommodate load

Failure to demonstrate that the site can be safely accessed by the loads it will generate can be grounds for refusal of planning permission.



5.2 Planning conditions

Where planning permission is granted for a development which will generate abnormal load movements on the Welsh trunk road network, the following planning conditions will be attached.

¹⁷ <https://gov.wales/sites/default/files/publications/2018-09/tan18-transport.pdf>

5.2.1 Structural assessment

No on-site development works shall be undertaken until:

- a. an assessment of the capacity and impact on all structures along those parts of the highway network which shall be utilised during the construction of the development including bridges, culverts, retaining walls, embankments, and
- b. details of any improvement works required to such structures as a result of construction of the development

have been submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The required improvement works identified in the assessment shall be completed prior to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.

5.2.2 Condition surveys

Condition surveys of all highway features along those parts of the highway network which shall be utilised during the construction of the development shall be undertaken prior to, during and on completion of the construction phase of the development. The survey reports shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) within 28 days of the surveys.

5.2.3 Liability for incidental damage

Prior to the commencement of development works, a scheme to provide for the remediation of any incidental damage directly attributable to the development to the parts of the highway network which will be utilised during the construction of the development including street furniture, structures, highway verge and carriageway surfaces shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The scheme shall be implemented as approved throughout the construction phase of the development.

5.2.4 Traffic Management Plan

AILs associated with the development shall be delivered strictly in accordance with a Traffic Management Plan (TMP) as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any works. The TMP shall include:

- a. proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
- b. evidence of trial runs that mimic the movement of the worst case AILs along the access route where appropriate, at the discretion of the Highway Authority
- c. number and size of AILs, including loaded dimensions and weights
- d. number and composition of AIL convoys, including anticipated escort arrangements
- e. methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary
- f. convoy contingency plans in the event of incidents or emergencies
- g. estimated convoy journey durations and timings along the route, including release of forecast traffic queues
- h. swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
- i. proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed
- j. plans for the reinstatement of any temporary works after completion of the construction phase
- k. land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition and reinstatement of all third party land including re-instatement of boundary features
- l. proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements
- m. consideration of the cumulative impact of other abnormal load generating schemes proposing to use all or part of the same access route

AILs associated with the maintenance and decommissioning of the development shall leave the site strictly in accordance with a TMP as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any removal, replacement of decommissioning works.

5.2.5 Highway works

No development works shall be undertaken until full details of any highway works associated with the construction of layover areas, passing places and highway improvements as agreed with each relevant highway authority including:

- a. the detailed design of any works
- b. geometric layout
- c. construction methods
- d. drainage, and
- e. street lighting

have been submitted to and approved in writing by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The highway works shall be completed in accordance with the approved details prior to the commencement of any AIL deliveries to the development site.

No development works shall be undertaken until the developer demonstrates rights of access to all proposed works that are not part of the highway network to the satisfaction of the local planning authority.

5.2.6 Road Safety Audit

The applicant shall undertake a Road Safety Audit of the scheme (Stages 1 – 4) in accordance with the Design Manual for Roads and Bridges GG 119¹⁸. The applicant shall agree the required measures with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of works on site.

5.2.7 Section 278 Agreement

The applicant shall enter into an Agreement with the Welsh Ministers under Section 278 of the Highways Act 1980 to enable the Applicant to undertake agreed improvement works on the trunk road. This Agreement will contain details of the improvement works, construction conditions and financial arrangements under which agreed measures can be put in place, including indemnifying the Welsh Ministers against third party claims. Without such an

¹⁸ <http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/C%20-%20Core%20Documents/6.%20Transport%20and%20Engineering/DMRB/vol5/section2/hd1915.pdf>

agreement in place, any consent that may be granted cannot be implemented.

For further information on this matter please refer to Welsh Government Procedure & Advice Guidance PAG 109/18: Section 38, 184, and 278 Agreements under the Highways Act 1980¹⁹.

5.2.8 Access onto the trunk road

Full details of the highway works associated with the proposed new access onto the trunk road shall be submitted by the applicant to WG, as the Welsh trunk road highway authority, prior to the commencement of any works on the development site. Details of proposed highway works should be as indicated on the submitted plans including the detailed design, geometric layout, construction and drainage.

The visibility splays shown on the submitted plans of the proposed new access onto the trunk shall at all times be kept free of any planting, tree or shrub growth, or any other obstruction in excess of 1.05m above the adjoining carriageway.

All highways works shall achieve full compliance with DMRB.



¹⁹ <https://gov.wales/sites/default/files/publications/2018-04/109-18-section-38-184-and-278-agreements-under-the-highways-act-1980.pdf>

6 SUMMARY OF ROLES AND RESPONSIBILITIES

The roles and responsibilities for each party set out in this document are summarised in the following table.

Table 6 Summary of roles and responsibilities of parties involved in abnormal load movements

Party	Role	Responsibilities
Consigners/agents	Generating/commissioning abnormal load movement	Commissioning of fully compliant haulier for planning and executing abnormal load movements. Preference should be given to hauliers with FORS accreditation (see https://www.fors-online.org.uk/cms/)
Haulier	Preparing and executing abnormal load movement	- Planning subdivision of loads wherever possible to avoid need for abnormal load movements (see Section 3.1) - Ensuring selected vehicle complies with the legislation applicable to the dimensions and weight of the combination (see Table 1) - Ensure vehicle and load is clearly signed, marked and lit according to regulations (see Section 3.2) - Ensure attendants accompany vehicle if required (see Section 3.3) - Carry VR1 or Special Order documents in vehicle where applicable (see Section 3.4) - Notify relevant authorities of abnormal load journey with sufficient notice period, including a Traffic Management Plan if required (see Section 4.1.2) - Address and, if necessary, pay for any requirements emerging from notification assessment process (see Section 4.3) - Undertake/procure structural assessment if required (see Section 4.3.2.2) - Accommodate for roadworks and disruptions on day of travel (see Section 4.4.1) - Execute journey according to approved notification (see Section 4.4.2) and, where applicable, to approved Traffic Management Plan (see Section 2.2.2)
Abnormal load attendant	Accompanying abnormal load on journey where required	- Accompany abnormal load vehicle for full journey where legislation requires - Warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road (see Section 3.3)
Abnormal load escort	Escorting abnormal load on journey where required	- Comply with National Highways guidance in vehicle preparation and abnormal load escort protocol (see Section 4.2.2.2) - Comply with any specific instructions provided by Police (see Section 4.3.1.2)
Police	Assessing public safety impacts of abnormal load notifications, escorting where required and enforcing regulations in transit	- Undertake public safety risk assessment for all abnormal load notifications (see Section 4.3.1.1) - Advise haulier with sufficient notice if any amendments required to notified journey or if notification refused (see Section 4.3.1.1) - Advise haulier with sufficient notice if private or Police escort required and if TTRO required (see Section 4.3.1.2 and 4.3.1.3) - Resource the Police escort, as required (see Section 4.3.1.2) - Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
DVSA	Vehicle standards, licencing and enforcement	Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
HB&BOs	Assessing infrastructure impacts of abnormal load notifications	- Assess relevant journey notifications in terms of capacity of route infrastructure to accommodate proposed abnormal load dimensions and weight (see Section 4.3.2) - Advise haulier if journey notification is rejected or approved (see Section 4.3.2 Error! Reference source not found.)
Planning authorities	Determining planning applications for abnormal load generating developments	- Ensure planning applications consider abnormal load trip generation and demonstrate suitable routeing and, where necessary, mitigation (see Section 5.1) - Apply planning conditions where necessary to ensure abnormal load routes are fully planned and approved and that all journeys are undertaken according to an approved Traffic Management Plan (see Section 5.2)
Developers	Seeking planning consent for abnormal load generating developments	- Submit Transport Assessment with planning application to identify abnormal load trip generation, suitable routeing and, where necessary, mitigation (see Section 5.1) - Discharge planning conditions, where applicable, by ensuring abnormal load routes are fully planned and approved and by committing to all journeys being undertaken according to an approved Traffic Management Plan (see Section 5.2)

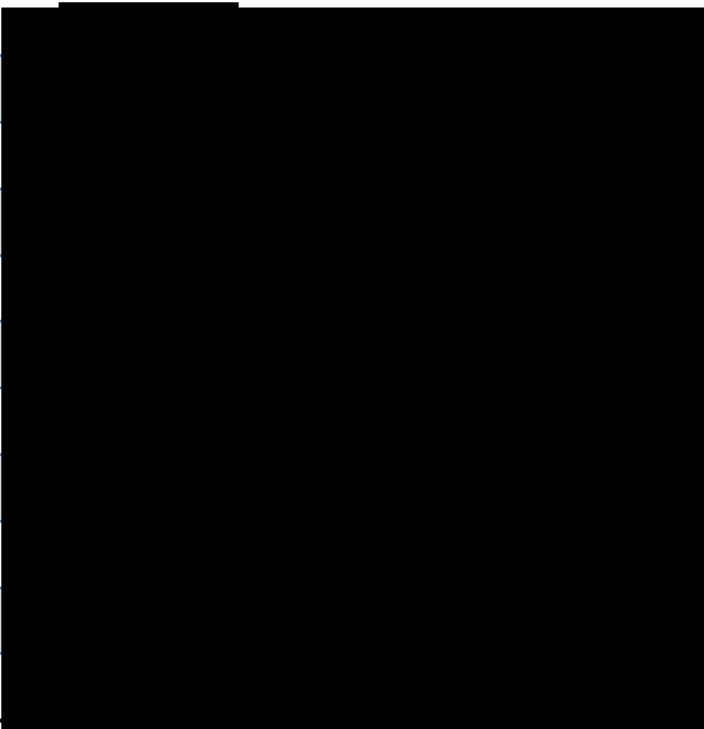
7 USEFUL CONTACTS

The process outlined in the above sections requires input from and contact with a number of organisations in order to ensure all relevant authorities are notified, and that abnormal load movements occur safely and without causing disruption to the network.

The following table provides a list of key contacts and contact details for queries associated with the movement of abnormal loads in Wales.

Table 7 Useful contacts for abnormal load related queries

Organisation	Contact details
Welsh Government ALO	[REDACTED]
Dyfed-Powys Police	[REDACTED]
Gwent Police	[REDACTED]
North Wales Police	[REDACTED]
South Wales Police	[REDACTED]
NMWTRA	[REDACTED]
SWTRA	[REDACTED]
Traffic Wales	[REDACTED]
National Highways Abnormal Loads Tea	[REDACTED]
Network Rail Abnormal Loads Team	[REDACTED]
Blaenau Gwent County Borough Council	[REDACTED]
Bridgend County Borough Council	[REDACTED]
Caerphilly County Borough Council	[REDACTED]
Cardiff City & County Council	[REDACTED]
Carmarthenshire County Council	[REDACTED]
Ceredigion County Council	[REDACTED]
Conwy County Borough Council	[REDACTED]
Denbighshire County Council	[REDACTED]
Flintshire County Council	[REDACTED]
Gwynedd County Council	[REDACTED]
Isle of Anglesey County Council	[REDACTED]

Organisation	Contact details
Merthyr Tydfil County and Borough Council	
Monmouthshire Council	
Neath Port Talbot County Borough Council	
Newport City Council	
Pembrokeshire County Council	
Powys County Council	
Rhondda Cynon Taf County Borough Council	
Swansea Council	
Torfaen County and Borough Council	
Vale of Glamorgan Council	
Wrexham County Borough Council	