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Ein cyf / Our ref: SH/2014/116403

Planning Inspectorate ref. EN010049

Dyddiad/Date: 11 April 2014

Annwyl Syr/Madam / Dear Sir/Madam,

**PROPOSED TIDAL LAGOON SWANSEA BAY (GENERATING STATION),
DEVELOPMENT CONSENT ORDER**

PROJECT REFERENCE: EN 010049

**RELEVANT REPRESENTATION FROM THE NATURAL RESOURCES BODY
FOR WALES (NRW)**

1. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future. Our functions are set out in the Natural Resources Body for Wales (Functions) Order 2012.
2. Our advice and comments to the Planning Inspectorate (PINS) are therefore provided in the context of the above remit.
3. We are a statutory consultee under the Planning Act 2008 and also undertake the function of Marine Licensing within Welsh Waters on behalf of the Welsh Ministers under the Marine and Coastal Access Act 2009. For the purpose of clarity comments from NRW Marine Licensing are titled as such; all other comments pertain to our advisory role. The Marine Licence is determined under distinct and separate legislation however insofar as is possible the process will aim to proceed in parallel with the Planning Inspectorate process, though a Welsh Marine Licence cannot be issued until the Marine Licensing Team is satisfied that the assessment of the project is compliant with the EIA Directive.
4. The purpose of the EIA is to inform the decision making process on how the proposed development may affect the environment throughout the life of the project including the decommissioning phase. With regard to the proposed tidal lagoon we fully recognise the inherent uncertainties in assessing a development of this nature, being the first of its kind in the United Kingdom. The innovative nature of the development and resultant lack of comparable

projects to test assumptions against reinforces the importance of the EIA fully acknowledging uncertainty of impacts. It is also important that, whilst accepting uncertainty will always exist, the best available information and methodology is used in conjunction with the adoption of a precautionary approach to report the full range of potential environmental impacts. Where residual uncertainty or risk exists the EIA should recognise this and identify how these uncertainties or risk will be managed.

5. Our comments are made without prejudice to any comments we may wish to make following a more detailed review of the Environmental Statement (ES) or if consulted on any subsequent versions of the 'requirements', Statements of Common Ground (SoCG) or other documents provided by Tidal Lagoon (Swansea Bay) plc [the Developer], the Examining Body or any of the regulating bodies who are involved in authorising different aspects of the overall development proposals. The following paragraphs comprise our relevant representation as an Interested Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2010.
6. We provided extensive pre-application advice to the developer and their consultants on those elements of the application we were consulted on. In particular we provided responses to the scoping report, Preliminary Environmental Impact Report (PEIR) and draft ES to explore solutions to issues, reach agreement where possible and seek clarification in order to increase levels of confidence in the Environmental Impact Assessment (EIA). We continue to liaise and work with the developer through correspondence and meetings on specific issues where issues still exist with the aim of reaching as many positions of agreement and common ground as possible prior to examination. Our relevant representation is based solely on the information provided within the application documents and therefore includes issues that may be subject to any new positions agreed with the developer following further discussions and meetings. Any change in position will be reflected in our full written representation and SoCG.

7. **Water Framework Directive (WFD) Assessment**

- I. We were not consulted on a draft WFD assessment at the pre-application stage and therefore did not have the opportunity to provide advice on the content and conclusions of the final assessment. The developer was directed to guidance which facilitates the WFD assessment process (NRW comments on the WFD Screening Report, 11th October 2013) but it appears that this guidance has not been fully considered.
- II. We would advise that in our view the WFD assessment does not contain sufficient information to adequately assess the potential impacts of the development and does not fully consider Article 4(7) or Article 4(8) of the WFD. We will discuss this further with the developer with the aim of reaching common ground where possible. It is our view that deterioration of Swansea

Bay water body is likely and deterioration of other water bodies a possibility and therefore Articles 4(7) and 4(8) of the WFD should be fully considered.

- III. As the Competent Authority for WFD, we need to ensure developments are compliant with Article 4(7) and 4(8). We must be satisfied that if deterioration cannot be avoided in Swansea Bay water body the conditions of 4(7) are met and that no deterioration will occur in other water bodies as a result of the development in order for it to be compliant with WFD.
- IV. **Article 4(7)** - We would advise that the development is likely to cause deterioration in quality elements and result in a failure of the water body to achieve Good Ecological Potential (GEP) and therefore Article 4(7) is relevant. The ES and WFD Assessment do not consider the application of Article 4(7) which is a fundamental requirement for the development to be compliant with the WFD. It is our view that the development would change the condition of components that define the status of Swansea Bay water body and it will cease to function as a discrete physical and ecological unit and will result in deterioration of quality elements at water body level.
- V. River Basin Management Plan mitigation measures for Swansea Bay Heavily Modified Water Body (HMWB) are not yet in place. In order for the water body to achieve its target of GEP by 2027, these measures must be secured. The proposed development appears to be incompatible with the implementation of some of the required mitigation measures and therefore consideration of Article 4(7) is also relevant in this instance.
- VI. **Article 4(8)** – The implications under Article 4(8) have not been fully addressed in the application. It is considered that elements of other water bodies may be affected including potential impacts to migratory fish and impacts relating to dredging/dredge spoil disposal activities which means we are unable to comment on whether Article 4(8) applies in this instance.
- VII. The application also refers to a necessity to carry out navigational improvement works, namely raising and repositioning of training walls in the Neath Estuary water body. However these works do not appear to form a part of the current DCO application and therefore the scale and detail of this activity has not been assessed.

8. **Habitats Regulations Assessment (HRA)**

- I. We were not consulted on a draft version of The Report to Inform the Habitats Regulations Assessment (Report to Inform the HRA) at the pre-application stage. The report therefore contains several errors regarding incorrect terminology, interpretation of the Conservation of Habitats and Species Regulations 2010 (Habitats Regulations) and screening of sites at the Test of Likely Significant Effect (TLSE) stage.

- II. The development will have a likely significant effect on European designated Special Areas of Conservation (SACs). The European designated sites that we consider are subject to likely significant effects are:
- III. **Kenfig SAC** - We do not agree that this site should have been screened out as having no likely significant effect. We would advise that there is currently insufficient certainty regarding the long-term implications of all proposed dredge spoil disposal options, on the integrity of the features of the Kenfig SAC. Further scrutiny of sediment dispersal patterns, sediment deposition, sea bed properties and sediment properties is required in the areas between the SAC and disposal grounds, to further inform the Report to Inform the HRA and any conclusions of adverse effects on site integrity, therein. An Appropriate Assessment will therefore need to be carried out by the competent authority, in order to assess these issues fully and satisfy the requirements of the Habitats Regulations.
- IV. **Crymlyn Bog SAC** - We consider that this site should be assessed in the Report to Inform the HRA. During the construction phase of the project, Nitrogen deposition born from traffic emissions will increase by up to 2% of the critical load for the Transition Mire and Quaking Bogs feature of this SAC. Furthermore, the background deposition level of Nitrogen exceeds the critical load for this feature. We cannot therefore agree that this represents an insignificant emission and will therefore have no likely significant effect. An Appropriate Assessment will therefore need to be carried out by the competent authority, in order to assess these issues fully and satisfy the requirements of the Habitats Regulations.
- V. **Pembrokeshire Marine (PM) SAC, Cardigan Bay (CB) SAC and Pen Llyn a'r Sarnau (PLS) SAC** – We consider that given the extensive distance that grey seals travel for their whole life cycle, and as they are features of the PLS SAC, that this SAC should have also been included in the initial screening assessment in relation to the Grey Seal feature. The assessment should have considered any potential impacts on this feature in the context of all relevant sites within the SW England and Wales and the Celtic and Irish sea, seal management unit, which encompasses the PM, CB and PLS SACs. We agree with the conclusions of no adverse effect on site integrity for Grey Seal features of the PM and CB SACs, from the development when considered alone. However there may be residual effects on grey seals which could have in-combination effects with offshore wind farms (Burbo Bank & Rhiannon) leading to temporary reduced foraging habitat and likely effects on the favourable conservation status of seals. Combined with increased risk of collision from this development and tidal turbine arrays (Skerries, St Davids Head and others in the future), this may lead to adverse effects on seal features of PM, CB and PLS SACs. We therefore advise that the Burbo Bank and Rhiannon wind farm projects, as well as the Skerries Tidal Array, should be included in an in-combination assessment in relation to Grey Seal features of the above SACs.

9. **Flood Consequence Assessment (FCA) / ES Chapter 17 – Hydrology and Flood Risk**

- I. We provided advice during the pre-application stage on the potential flood consequences associated with the development and the requirements of a FCA as required by Planning Policy Wales Technical Advice Note 15: Development and Flood Risk (TAN15).
- II. The development has the potential to cause increased flooding elsewhere contrary to TAN15 requirements. The ES refers to wave generation scenarios which we consider to show increased flood risk from wave overtopping but this has not been adequately assessed within the FCA. Despite pre-application advice offered the FCA does not compare pre and post development like for like scenarios or consider all events required by TAN15 combined with a relevant climate change allowance over the lifetime of the development. In addition as the FCA does not appear to accept the risk of increased flooding elsewhere from wave overtopping there is no assessment of potential mitigation. Therefore the FCA and responses to our previous advice are not considered to have adequately addressed the issues raised which include the following:
 - Uncertainty in potential changes to coastal processes and effect on flood risk management features, river outfalls and tidal inundation routes.
 - Effect of the development on wave overtopping of coastal features.
 - Comparison of property at risk of flooding now and over the lifetime of the development with and without the development in place.
 - Effect of increased height and number of prevailing SW waves affecting the bay at Mumbles due to reflection of the western lagoon wall.
 - Effect of reflected waves from other directions on other areas of the bay.
 - Effect of climate change on extreme tide levels and resultant wave generation in deeper water over the lifetime of the development.
 - Joint probability of extreme tide levels and large waves.
 - Mitigation proposals to demonstrate no increased flood risk elsewhere.
- III. Considering the large scale of the proposed development and the potential increased flood risk to existing property the FCA is not considered to provide an adequate assessment of potential flood consequences in line with the requirements of national planning policy. We are therefore not satisfied, based on the submitted evidence, that there will be no increased risk of flooding to existing property as a consequence of the development taking place.

10. ES Chapter 12 - Terrestrial Ecology

Designated sites: Sites of Special Scientific Interest (SSSI)

- I. The proposals are adjacent to, within and/or could affect the following nationally designated sites and potential risks to these sites include the following:
- II. **Crymlyn Burrows SSSI** – The need for clarification on details of management of recreational pressure from increased visitor numbers, risk of site damage from alternative option for grid connection through the site and risk to SSSI features from coastal process changes.
- III. **Blackpill SSSI** - We note that the projected short and long term changes at Blackpill comprise increased mud deposition within the shallow sub-tidal area around the SSSI. The potential impact on the bird features (Sanderling and Ringed plover) is dependent upon the predicted changes to coastal processes as noted in our comments on Coastal Birds.
- IV. The uncertainty on coastal processes means the extent of all appropriate mitigation cannot be assessed. The monitoring programme currently identified is not considered to be sufficiently comprehensive given the residual uncertainties identified over the operational phase. We will seek to further explore issues affecting all nationally designated sites in order to reach agreement on potential impacts to SSSI features and key sensitive coastal ecological receptors. We will also seek to agree reasonable measures to mitigate for any impacts where possible.
- V. **Other comments** - We consider the reported baseline conditions to be reasonable and that the ES has addressed the potential terrestrial ecological receptors. The proposed mitigation measures for Protected Species in Tables 12.7 and 12.8 are considered generally appropriate.

11. ES Chapter 6 – Coastal Processes

- I. Despite pre-application consultations there are a number of outstanding concerns associated with the coastal processes assessment. These concerns relate to the predicted impacts on a number of receptors identified in the ES over the lifetime of the proposed development. Whilst some additional information has been provided within the final ES, this has not fully addressed NRW's previous request for information and recommendations. We maintain that a more rigorous assessment and additional measures could reasonably have been undertaken to increase confidence in assumptions made and conclusions reached. As the level of confidence in the coastal processes assessment feeds into a number of other topics it would have been preferable to have had the opportunity to continue work towards further agreement on this aspect at the pre-application stage. However, as time did not allow this

we are attempting to progress agreement and establish common ground, where possible, prior to examination. Principal issues include:

- II. **Baseline Conditions** - Based on the information reviewed, it is considered that insufficient detail concerning present morphology, physical processes, sediment properties and recent historical change in Swansea Bay is provided. In particular for key European or UK designated receptors such as Kenfig SAC, Crymlyn Burrows SSSI or Blackpill SSSI a more robust baseline characterisation would improve confidence in the EIA.
- III. **Assessment Methodology/Modelling** - A broad scale impact assessment has been undertaken and has relied primarily on results from short term numerical modelling. The modelling undertaken does not adequately resolve detailed processes and impacts in the near-shore, intertidal or supra-tidal areas. It is also restricted by a limited number of model runs in relation to the construction and operational phases with no modelling of the decommissioning or post-decommissioning phases. Limited information on the Mike 21 cohesive (mud), non cohesive (sand) and particle tracking modules is provided such as validation and calibration procedures and limited modelling of sand transport has been undertaken. We consider that there are considerable uncertainties remaining regarding a number of aspects of the construction phase assessment such as the exact nature of the construction methods, timing of activities, construction options and whether potential cumulative impacts have been adequately assessed and accounted for. It is also unclear whether a worst case scenario has been assessed for the disposal of dredge material for the construction phase and for maintenance dredging that may be required over the lifetime of the development. In addition the Expert Geo-morphological Analysis undertaken to determine potential impacts for the operational phase over the medium to long-term is limited by the baseline understanding, use of a single modelling tool and a small number of scenarios. It is considered that it would have been reasonable to develop a more robust modelling assessment to address these concerns.
- IV. **Predicted Impacts, Monitoring and Mitigation** – Based on the evidence provided we are not satisfied that the full range of potential impacts has been identified.. There is particular concern over significance of predicted impacts to Kenfig SAC, Crymlyn Burrows SSSI and Blackpill SSSI. It is not considered that monitoring identified is sufficiently comprehensive to assess impact, given the residual uncertainties over the operational phase; accordingly further consultation is recommended on monitoring strategy and potential mitigation or compensation measures.

12. ES Chapter 7 – Marine Water Quality

- I. Swansea Bay is a Designated Bathing Water under the European Bathing Water Quality Directive. To meet the requirements of the Directive a management system is in place to predict bacterial water quality and advise

beach users accordingly. The management system relies on a water quality model to operate. The building of the lagoon would invalidate the current model due to changes in the hydrodynamics in the bay. This is recognised in the ES (Paragraph 7.8.7.4) and the developer proposes to make provision to update the model. We welcome this commitment, but would require clarification on how this provision will be secured and on external auditing of the updated model.

- II. The current proposal recognises that main existing sewerage outfall (both treated and storm effluent) from the Dwr Cymru Swansea Treatment Works will need to be catered for. The developer is currently suggesting two options, either to extend the outfall beyond the boundary of the lagoon or to leave it discharging within the impoundment but to add additional treatment technology. The latter option whilst technically feasible would in our opinion result in residual risks in relation to the bacteriological quality within the impoundment e.g. from equipment failure. This may have implications for the ability of the intended recreational water to comply with Bathing Water Quality Directive if the future intention is for its designation.
- III. Any changes to the treatment or location of the outfall would require consent from NRW under the Environmental Permitting Regulations 2010. We have to date not received a permit application.
- IV. The ES states that the lagoon impoundment is unlikely to affect water quality in respect of nutrients within the Bay. The ES acknowledges the limitations of this assessment. We believe that Nutrients are a consideration for Water Framework Directive (WFD) and we suggest should be included in for completeness in the necessary WFD assessment. Increase in nutrients in particular in the mouth of the Tawe may lead to increase localised algal blooms around the barrage area. Given the uncertainty around the nutrient assessment we request a precautionary approach is taken with monitoring and if required remediation secured via DCO requirement.
- V. Further clarification will be sought from the developer on outstanding issues and, where possible, we will seek to reach agreement on suitable DCO requirements and SoCG.

13. **ES Chapter 8 - Intertidal & Sub-tidal Benthic Ecology**

- I. **Intertidal Ecology** – The residual uncertainty on coastal processes feeds into understanding potential impacts on intertidal ecology. The uncertainty contributes to a number of issues which are not considered to be fully addressed within the ES. Further clarification will be sought from the developer on outstanding issues and, where possible, agreement will be reached on suitable requirements and/or SoCG. Outstanding issues include:

- Loss of Habitats Directive Annex 1 features and Biodiversity Action Plan (BAP) S.42 habitats
 - Degradation of Annex 1 features, BAP S.42 habitats, qualifying SSSI feature
 - Mitigation assessment and proposed biodiversity offsetting measures
 - Omission of baseline data and assessment of impacts (Blackpill SSSI)
- II. **Sub-tidal Benthic Ecology** - The residual uncertainty on physical coastal processes feeds into the understanding of potential impacts on sub-tidal ecology. The uncertainty contributes to a number of issues which are not considered to be fully addressed within the ES. Further clarification will be sought from the developer on outstanding issues and, where possible, agreement will be reached on suitable conditions and/or a SoCG. Outstanding issues include the following:
- Uncertainty on whether all areas of habitat of conservation importance have been identified. (clarification on benthic survey)
 - Uncertainty over long term effects of the lagoon on sediment deposition and transportation processes leading to potential habitat alteration.
 - Uncertainty that proposed mitigation and enhancement will compensate for the likely loss of habitat and over methods used to calculate changes in habitat extent.
 - Proposed monitoring to assess impacts on benthic habitats should be more comprehensive as noted in comments on the coastal processes chapter.
 - Uncertainty over dredge disposal methods
- III. **Bio-security** – We do not consider that this is fully addressed within the ES, in particularly incorporation of a non-native species bio security risk assessment. Under Regulation 52 of the Conservation of Habitats and Species Regulations (2010) it is an offence for a ship in any relevant part of the marine area deliberately to introduce into that area, any live animal or plant of a kind having a natural range which does not include any area in Great Britain. This Regulation applies to all sea areas in England and Wales, not just within European Protected Sites. A full bio-security risk assessment should be carried out.

14. **ES Chapter 9 – Fish**

- I. We have outstanding concerns on the predicted level impacts to a range of Habitats Directive, Red List and BAP fish species. Whilst some additional information has been provided within the final ES, this has not fully addressed our previous advice and we are actively seeking further clarification with the developer on outstanding issues with the aim of reaching agreement and common ground prior to examination. Outstanding issues include:

- IBM and STRIKER v.4 modelling - It is not considered that the ES contains sufficient information on the parameters used and sensitivity testing to have confidence that the models are robust and that worst case scenarios have been assessed, especially in view of the uncertainty around final design.
- Construction impacts - Uncertainties on potential suspended sediment levels, and construction methods in coastal processes feeds into uncertainty on the potential for impacts on fish spawning, foraging and nursery areas.
- Long term effects - It is not considered that these have been sufficiently considered over the lifetime of the development with allowance for climate change and other anthropogenic factors.
- Monitoring – Further work is needed to create a robust and fit for purpose monitoring programme. Such a programme is considered necessary to corroborate assumptions made in the ES and validate modelling conclusions.
- Mitigation - Concern on effectiveness of mitigation measures proposed. We do not consider that sufficient evidence has been provided to demonstrate measures are fit for purpose, provide suitable alternative habitat or have been adequately assessed for viability.
- Assessment approach – Concern over levels of evidence and explanations to support confidence on impacts predicted. The residual uncertainty, limitations and risks around the assessment should be acknowledged in the ES.

15. ES Chapter 10 – Marine Mammals

- I. The ES has highlighted a number of potential impacts to marine mammals at all stages of the development. Given that no dedicated porpoise or seal surveys have been undertaken it has not been possible to accurately assess all impacts. It is however agreed that most potential impacts have been adequately assessed but that there are a number of points of clarification to be discussed and agreed with the developer which also form part of our comments on the Report to Inform the HRA. These points include missing SAC features, in-combination/cumulative effects with other marine based developments, assessment process, loss of foraging habitat, life stage and temporal effects, collision risks, missing impact pathway and noise. Where agreement can be reached a programme of monitoring and mitigation may be established through a Requirement of the DCO to ensure minimal impact to marine mammals during all phases of the development.

16. ES Chapter 11 – Coastal Birds

- I. The residual uncertainty on physical coastal processes feeds into the understanding of potential impacts on coastal bird habitat and in particular potential impact on Blackpill SSSI which is also referred to in our comments on Chapter 12 of the ES. This uncertainty contributes to issues which are not considered to be fully addressed within the ES. Further clarification will be sought from the developer on outstanding issues and, where possible,

agreement will be reached on suitable requirements and/or a SoCG.
Outstanding issues include:

- Sanderling / Ringed Plover – The potential decrease or loss of sandy intertidal biotopes which these birds utilise for feeding within Blackpill SSSI could lead to the loss of their food source and many of the bird features of the SSSI.
- Great- crested Grebe - The nationally important population of Great-crested grebe (12th largest site in GB) could be affected indirectly by loss of food source due to the destruction of herring spawning grounds.

17. ES Chapter 13 - Seascape Landscape and Visual Impact Assessment (SLVIA)

- I. We consider the SLVIA submitted to be fit for purpose. The baseline is thorough, the methodology follows good practice guidance as set out in GLVIA 3 and assessment of effects on landscape/seascape character is consistent with the method.
- II. The judgements made in relation to the seascape, landscape and visual effects of the proposed development are reasonable, with due consideration having been given to the aspects requested, including effects on Gower Area of Outstanding Natural Beauty (AONB), coastal processes and night-time impacts.
- III. **Designated Landscapes** - The SLVIA concludes that there may be localised impacts on the character and visual amenity on areas within the Gower AONB but that the overall existing character will not be eroded nor will policies set out in the Management Plan be contradicted resulting in no significant effect. We consider that these conclusions are reasonable and backed by the detailed assessment of landscape and visual effects.
- IV. **Registered Landscapes of Historic Interest and Landscapes of Special Historic Interest** - The consideration of historic landscape designations appears to lack an assessment of effect on heritage values. Impacts on views are assessed but implication for heritage values is not explored. Whilst we consider significant effects are unlikely, the ES currently provides no certainty in respect of potential impacts on these nationally significant heritage assets or their settings. We will seek clarification on the assessment of heritage values and a number of other limited areas of uncertainty whilst accepting that they are unlikely to alter the findings of the SLVIA.
- V. Although the development will give rise to a major change to landscape/seascape character and views, based on the findings of the SLVIA we consider that the development can be accommodated within the partially developed and urbanised setting of Swansea Bay.

18. ES Chapter 16 – Air Quality

- I. A Construction Environmental Management Plan is proposed by the developer and we are satisfied that any concerns can be addressed through negotiation and agreement on the contents of this plan. In addition, as previously advised, the report to inform the Habitats Regulations Assessment should also assess the potential impact on Crymlyn Bog SAC of increased nitrogen deposition from traffic emissions during the construction phase.

19. ES Chapter 18 – Land Quality and Hydrogeology

- I. We are generally content with the assessment. There are a number of minor issues which we will seek clarification with the developer and will also be seeking relevant DCO Requirements. We hope these matters can be fully addressed via SoCG

20. DCO Requirements

- I. DCO requirements will play an important role in securing appropriate environmental risk management measures. We would like to assist all parties in developing these as we move through the Examination process and as issues are clarified further.

21. ES Chapter 23 – Mitigation and Monitoring

- I. The lifetime of the development in conjunction with uncertainties on impacts raises questions on how potential mitigation/compensation measures can be identified and secured. It is possible that mitigation/compensation measures will be required on land outside of the developer's control. We also recognise that considering all uncertainties an adaptive environmental monitoring arrangement is appropriate. The input and agreement of key bodies will be required over the lifetime of the plan and arrangements for this need to be secured.

22. Marine Licence

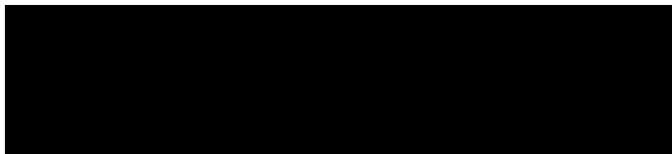
- I. As the Marine Licence technical consultation and public consultation does not end until 21st and 25th April 2014 respectively NRW in its marine licensing function is not yet in a position to provide detailed comments on the potential impacts of the project pending the passing of the aforementioned deadlines. Were PINS to require copies of Marine Licence consultation responses then these can be provided upon request once the consultation responses are received. Whereas a Draft Marine Licence has been submitted by the developer in support of the DCO application, at this stage we are unable to

comment on the weight that should be given to it and it will not form part of the Marine Licence determination process.

- II. The DCO should not incorporate activities which are exclusively licensable under the Marine and Coastal Access Act 2009 (MACAA 2009). It appears that certain draft requirements would need to be omitted, most notably but not limited to conditions 16 to 22. For works which comprise both development under the Planning Act 2008 and licensable activities under MACAA 2009 consistency between the respective provisions must be ensured. We also
- III. All comments pertinent to the Marine Licensing function of NRW are without prejudice to any further comments we wish to make during the course of the determination.

Please contact Steve Allison (stephen.allison@cyfoethnaturiolcymru.gov.uk) should you require further advice or information regarding this representation.

Yn gywir / Yours faithfully,



Martyn Evans

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Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.

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