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Marine Licensing Team
Natural Resources Wales
Permitting Service
29 Newport Road
Cambria House
Cardiff
CF24 0TP

30/01/2023

Re: Complex Variation Request – Marine Licence Number CML2152

Dear Marine Licensing Team,

Following recent email correspondence, we wish to request the variations to the Marine Licence CML2152 for the Central Rhyl Coastal Defences Scheme ('the Scheme') as described below.

We are due to commence the construction works on the beach from **14th April 2023**. We have been informed that the change in material quantities needs to be treated as a complex variation and would welcome your assistance and cooperation to enable this to be agreed as quickly as possible to avoid any potential delay to the Scheme as a result.

Applicant and Agent Contact Details

Please amend the applicant contact details to the following:

Name of Contact or individual:	Tim Towers
Position in Company:	Risk and Asset Manager
Telephone Number:	01824 706875
Email Address:	tim.towers@denbighshire.gov.uk
Contact address (remains unchanged):	Denbighshire County Council, Smithfield Road, Denbigh, Denbighshire, Wales, LL16 3RJ

Please amend the agent details to the following:

Name of Contact or individual:	Chris Hull
Company Name:	Balfour Beatty
Position in Company:	Project Manager
Telephone Number:	07845 052860
Email Address:	Chris.Hull@balfourbeatty.com
Contact address:	Balfour Beatty Site Offices, East Parade, Rhyl, LL18 3AS

License Expiry Date

Please can the licence expiry date be extended by 12 months to 31/12/2026.

This is to reflect the actual start date of the Scheme's construction phase and ensure sufficient contingency is maintained for the construction works.

Materials Quantities

We request an amendment to Table 1, Activity 1 which lists the material quantities to be deposited for the Scheme.

At the time of submitting the Marine Licence application the detailed design of the Scheme was still to be completed. The Marine Licence and Environmental Statement were based on worst-case estimates, utilising the Rochdale Envelope approach.

This was discussed and agreed pre-application with Natural Resources Wales. The application submission referenced this approach and stated that, as a result, the materials quantities listed were estimates and subject to change.

Although the materials quantities have changed following the detailed design development, the environmental impact of the Scheme will be less than the worst-case estimate that is reported in the Scheme's Environmental Statement.

Design development (following the submission of the Marine Licence application)

The main changes that have been made to the Scheme's coastal elements are:

- The amount of rock armour required on the scheme has decreased. The detailed design optimised the rock profile to minimise excavation depths and the volume of material needed.
- There has been a removal of the drainage and gabion filled baskets and associated geotextiles beneath the new revetment.
- An additional unreinforced mass concrete foundation will be constructed beneath the new revetment. This replaces the gabions and drainage layer.
- Longer sheet piles/additional sheet piles are required at beach access ramp, however there has also been a reduction in section size along the toe of the new revetment.
- There has been an increase of fill required underneath the revetment and promenade following more detailed topographical review.
- There has been a reduction in concrete reinforcement needed when compared with the assumptions used at the time of the Environmental Statement production.

Environmental assessment

We have undertaken an assessment to review the material quantities associated with the detailed design of the Scheme against the preliminary design that was used to inform the Scheme's Environmental Statement and Marine Licence. We have also assessed the associated impact of any changes on the emissions resulting from the Scheme.

The assessment concludes that there have been increases in some of the main materials and decreases in others; and that these material changes would not change the conclusions of the Scheme's Environmental Statement. This is because an increase in concrete and aggregate quantities is offset by a decrease in steel and rock armour quantities. We enclose a technical note which provides more detail these findings.

Please note that the change in material quantities and environmental impact have been assessed for the whole scheme which also includes the works above MHWS.

We can confirm that the construction methods are not changing from what was included in the Marine Licence and the Scheme's Environmental Statement.

Revised quantities

We therefore request the following amendment to Table 1, Activity 1 to reflect the quantities associated with the detailed design of the Scheme:

Quantities / Dimensions	Material quantities being deposited: • Up to 13,950m³ of concrete (including precast units), • Up to 33,922m³ of aggregate fill, • Up to 7,522m² of sheet piles, • Up to 1,390 tonnes of steel reinforcement (including within precast concrete), • Up to 17,352m³ of rock graded 1 – 3 tonnes, and • Up to 22,672m² of geotextile
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Further information

We submit the following drawings and further information showing the assessment of the change in material quantities; and the detailed design general arrangements / revised revetment cross-section.

CR-MMD-00-00-TN-EN-3097 (Revision P02)	Carbon review technical note
CR-MMD-00-ZZ-DR-SC-7001 (Revision P03)	Coastal Structures General Arrangement Sheet 1 of 3
CR-MMD-00-ZZ-DR-SC-7002 (Revision C02)	Coastal Structures General Arrangement Sheet 2 of 3
CR-MMD-00-ZZ-DR-SC-7003 (Revision C02)	Coastal Structures General Arrangement Sheet 3 of 3
CR-MMD-00-ZZ-DR-SC-7101 (Revision P04)	Stepped Revetment Sections Sheet 1 of 2
CR-MMD-00-ZZ-DR-SC-7102 (Revision P03)	Stepped Revetment Sections Sheet 2 of 2

Please let me know if you need any further information.

Yours sincerely,



Ian Beckett MEng (Hons) CEng MICE

DESIGN MANAGER | Balfour Beatty | UK Construction Services - Regional Civils

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