

**Assessment Against the Welsh National Marine Plan to Demonstrate
Dredging Licence Application Alignment to the Marine Plan**

Port of Holyhead

November 2022

A review has been conducted against the Natural Resource Wales's template to demonstrate the proposed maintenance dredging activities in Holyhead Harbour and the associated dredging licence application are in accordance with the policies contained within the Welsh National Marine Plan.

We believe the application to renew the marine licence to dredge and dispose of dredged material is fully in-line with the Welsh National Marine Plan policy and that this view is evidenced by the attached table.

John Goddard.

Harbour Master

WNMP Policy No.	WNMP Policy		Does the project have the potential to impact the Policy?	How Does the Proposed Project Comply with the Policy?
GEN_01	Planning policy	There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales' well-being goals.	yes	The licence will help maintain the port infrastructure allowing it to contribute to Wales' well-being goals by continuing to support sustainable development of trades and revenue opportunities in the plan area be they the local area, district, regional, and Wales in general.
GEN_02	Planning policy	Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making.	Yes	NRW are currently proactive in a proportionate review of the renewal application.
ECON_01	Sustainable economic growth	Proposals for economically sustainable activities are encouraged, particularly where they contribute to: • the sustainable management of natural resources thereby supporting ecosystem resilience; • a more resilient economy; • employment opportunities particularly for coastal communities; • protecting and creating employment at all skill levels; • maintaining communities with a high-density of Welsh speakers; and/or • tackling poverty by supporting deprived coastal communities.	Yes	The planned activities will keep the Port open for sustainable commercial shipping; fishing; and leisure activities. These in turn support and increase employment opportunities; keep local Welsh speakers in the area through employment; generate wealth in an area of deprivation; support local businesses and resilience through maintaining a core trade (the ferries); and a range, of skilled, semi-skilled and unskilled jobs.

ECON_02	Coexistence	Proposals should demonstrate how they have considered opportunities for coexistence with other compatible sectors in order to optimise the value and use of the marine area and marine natural resources.	Yes	Consideration has been given to how the spoil could be used in other projects or industries but no viable opportunities e.g. land reclamation, have been identified at this juncture, though opportunities will always be sought.
SOC_01	Access to the marine environment	Proposals that maintain or enhance access to the marine environment are encouraged.	Yes	Dredging allows the continued access to the marine environment by ships, fishing vessels and leisure craft.
SOC_02	Well-being of coastal communities	Proposals that contribute to the well-being of coastal communities are encouraged.	Yes	Maintaining the harbour in good condition through dredging adds prosperity to the community.
SOC_03	Marine pollution incidents	Proposals should demonstrate how they minimise their risk of causing or contributing to marine pollution incidents.	Yes	The proposed project will be conducted under the Port's Marine Safety Management System and the dredging company's Ship Safety Management system both of which incorporate systems of work which are designed specifically to minimise pollution incidents.
SOC_04	Welsh language and culture	Proposals that contribute to the promotion and facilitation of the use of the Welsh language and culture are encouraged.	Yes	Cruise ship calls directly promote the use of Welsh language and culture with local welcome choirs, displays, and sale of local goods and products arranged for visiting ships

SOC_05	Historic assets	Proposals should demonstrate how potential impacts on historic assets and their settings have been taken into consideration and should, in order of preference: a) avoid adverse impacts on historic assets and their settings; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance historic assets are encouraged.	Yes	a) As operations are sub-sea there is no impact on historic assets and their settings
SOC_06	Designated landscapes	Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference: a) avoid adverse impacts on designated landscapes; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance designated landscapes are encouraged.	Yes	a)As operations are sub-sea there is no impact on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated

SOC_07	Seascapes	Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference: a) avoid adverse impacts on seascapes; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance seascapes are encouraged.	Yes	a)As operations are sub-sea there is no impact on seascapes
SOC_08	Resilience to coastal change and flooding	Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.	Yes	The proposed project has no impact on resilience to coastal change and flooding over its lifetime.
SOC_09	Effects on coastal change and flooding	Proposals should demonstrate how they: avoid significant adverse impacts upon coastal processes; and minimise the risk of coastal change and flooding; Proposals that align with the relevant Shoreline Management Plan(s) and its policies are encouraged.	Yes	The proposed project has no impact on to coastal change and flooding over its lifetime.
SOC_10	Minimising climate change	Proposals should demonstrate how they, in order of preference: a) avoid the emission of greenhouse gases; and/or b) minimise them where they cannot be avoided; and/or c) mitigate them where they cannot be minimised. Where significant emission of greenhouse gases cannot be avoided, minimised or mitigated, proposals for regulated activities must present a clear and convincing case for proceeding.	Yes	Approach 'b' is adopted. The minimum of dredging required will be undertaken. This will minimise the emission of greenhouse gases from dredging vessels.

SOC_11	Resilience to climate change	Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaptation measures, taking into account Climate Change Risk Assessments for Wales. Proposals that contribute to climate change adaptation and/or mitigation are encouraged.	Yes	Stena Line promote the use alternate fuel stocks e.g. LNG for their vessels. Sub-contractors where possible will be encouraged to adopt such technologies that contribute to climate change adaptation and/or mitigation.
ENV_01	Resilient marine ecosystems	Proposals should demonstrate how potential impacts on marine ecosystems have been taken into consideration and should, in order of preference: a) avoid adverse impacts; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to the protection, restoration and/or enhancement of marine ecosystems are encouraged.	Yes	Dredging will not damage marine ecosystems in the harbour. The disposal of spoil at sea is restricted to a designated area licenced by the government to avoid impact on marine ecosystems.
ENV_02	Marine Protected Areas	Proposals should demonstrate how they: avoid adverse impacts on individual Marine Protected Areas (MPAs) and the coherence of the network as a whole; have regard to the measures to manage MPAs; and avoid adverse impacts on designated sites that are not part of the MPA network.	Yes	The dredge area and disposal ground both fall within the North Anglesey Marine SAC. NRW are looking at the impact as part of the application assessment.
ENV_03	Invasive non-native species	Proposals should demonstrate how they avoid or minimise the risk of introducing and spreading invasive non-native species. Where appropriate, proposals should include biosecurity measures to reduce the risk of introducing and spreading of invasive non-native species.	Yes	Dredging does not take place where sea squirt have previously been identified. The application has a biosecurity risk assessment.

ENV_04	Marine litter	Proposals should demonstrate how they: avoid the deliberate introduction of litter into the marine plan area; and minimise the risk of accidental release of litter.	Yes	The dredgers will comply with MARPOL chapters covering garbage. The Port of Holyhead offers waste reception facilities.
ENV_05	Underwater noise	Proposals should demonstrate that they have considered man-made noise impacts on the marine environment and, in order of preference: a) avoid adverse impacts; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	Yes	The dredging vessel will not impact on underwater noise levels already experienced in the Harbour (with ferry and vessel movements) and at the dumping ground where ships and fishing vessels transit.
ENV_06	Air and water quality	Proposals should demonstrate that they have considered their potential air and water quality impacts and should, in order of preference: a) avoid adverse impacts; and/or b) minimise adverse impacts where they cannot be avoided; and/or c) mitigate adverse impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	Yes	Covered in the WFD assessment. Minimum dredging will take place to avoid impacting on air quality. The dredge material has been assessed for pollutants. A dredging plume may occur but this is less significant than general seabed lifting that occurs during adverse weather.

ENV_07	Fish species and habitats	Proposals potentially affecting important feeding, breeding (including spawning & nursery) and migration areas or habitats for key fish and shellfish species of commercial or ecological importance should demonstrate how they, in order of preference: a) avoid adverse impacts on those areas; and/or b) minimise adverse impacts where they cannot be avoided; and/or c) mitigate adverse impacts where they cannot be minimised; If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	Yes	feeding, breeding (including spawning & nursery) and migration areas or habitats for key fish and shellfish species of commercial or ecological importance have been reviewed and covered in the WFD assessment which accompanies the application.
GOV_01	Cumulative effects	Proposals should demonstrate that they have assessed potential cumulative effects and should, in order of preference: a) avoid adverse effects; and/or b) minimise effects where they cannot be avoided; and/or c) mitigate effects where they cannot be minimised. If significant adverse effects cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to positive cumulative effects are encouraged.	Yes	A dredging plume may occur but this is less significant than general seabed lifting that occurs during adverse weather. Dredging effectively reverses the negative cumulative effect of silting within the port.
GOV_02	Cross-border and plan compatibility	Relevant public authorities, in making their decisions, should have regard to: any applicable policy in a relevant marine plan; any applicable policy in relevant terrestrial development plans or related documents; the Natural Resources Policy; any relevant local well-being plan(s) (including the local well-being assessment); and evidence in any relevant Area Statement(s) produced by Natural Resources Wales (NRW).	N/A	The NRW is the lead public authority on this occasion.

SCI_01	Using sound science responsibly	Relevant public authorities should make decisions using sound evidence and a risk-based, proportionate approach. Where appropriate they should apply the precautionary principle and consider opportunities to apply adaptive management.	Yes	NRW are reviewing the application and supporting scientific evidence and taking a proportionate approach.
AGG_01a	Aggregates (supporting)	Proposals for new aggregate extraction will be supported, within any tonnage limits, where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	
AGG_01b	Aggregates (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities: for the sustainable use of wider marine aggregate natural resources; to define and, once in place, further develop and refine Strategic Resource Areas for aggregates in order to support the sustainable development of the aggregate sector through marine planning.	Not applicable	
AQU_01a	Aquaculture (supporting)	Proposals for new aquaculture developments will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	

AQU_01b	Aquaculture (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for the sustainable use of aquaculture resources including the identification of: natural resources that provide aquaculture potential opportunities to define and, once in place, further develop and refine Strategic Resource Areas for aquaculture in order to support the sustainable development of the aquaculture sector through marine planning.	Not applicable	
D&D_01	Dredging and disposal (supporting)	Proposals that maintain navigable channels and long term access to open at-sea disposal sites for appropriate material will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Yes	The proposal contributes to the objectives of the plan and thus should be supported.
ELC_01a	Low carbon energy (supporting) wind	Proposals for offshore wind energy generation will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations. Proposals for wind >350MW will be considered by UK Government in accordance with relevant national policy. In determining an NSIP for a wind proposal, the decision maker will have regard to this plan. Any determination in relation to energy developments of any scale will be taken in accordance with this plan alongside any other relevant considerations.	Not applicable	

ELC_01b	Low carbon energy (supporting) wind	In order to understand future opportunities for offshore wind development, including floating technologies, this plan supports strategic planning for the sector. Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for the sustainable use of wind energy resources including identification of: • natural resources that provide potential opportunity for future use; • evidence to de-risk consenting for the sector; and • opportunities to define and, once in place, further develop and refine Strategic Resource Areas for offshore wind energy resource safeguarding; in order to support the sustainable development of the sector through marine planning. Relevant public authorities should make appropriate evidence available to support planning and decision making in order to support the sustainable development of the sector through marine planning, where it is appropriate to do so.	Not applicable	
ELC_02a	Low carbon energy (supporting) wave	Proposals for wave energy generation will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	

ELC_02b	Low carbon energy (supporting) wave	In order to understand future opportunities for wave energy development, relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for the sustainable use of wave energy resources including identification of: • natural resources that provide potential opportunity for future use; • evidence to de-risk consenting for the sector; and • opportunities to define and, once in place, further develop and refine Strategic Resource Areas for wave energy resource safeguarding; in order to support the sustainable development of the sector through marine planning. Relevant public authorities should make appropriate evidence available to support planning and decision making in order to support the sustainable development of the sector through marine planning, where it is appropriate to do so.	Not applicable	
ELC_03a	Low carbon energy (supporting) tidal stream	Proposals for tidal stream energy generation will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	

ELC_03b	Low carbon energy (supporting) tidal stream	In order to understand future opportunities for tidal stream energy development, relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for the sustainable use of tidal stream energy resources including identification of: • natural resources that provide potential opportunity for future use; • evidence to de-risk consenting for the sector; - and • opportunities to define and, once in place, further develop and refine Strategic Resource Areas for tidal stream energy resource safeguarding; in order to support the sustainable development of the sector through marine planning. Relevant public authorities should make appropriate evidence available to support planning and decision making in order to support the sustainable development of the sector through marine planning, where it is appropriate to do so.	Not applicable	
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ELC_04	Low carbon energy (supporting) tidal range	In order to understand future opportunities for tidal range development, strategic planning for the sector is encouraged. Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to: • collect evidence to support understanding of environmental constraints and opportunities for the sustainable use of the tidal range resource; • support understanding of the optimal siting of tidal lagoon developments across Wales as part of a wider, UK perspective; and • identify opportunities to define and, once in place, further develop and refine Strategic Resource Areas for tidal lagoon safeguarding purposes. Relevant public authorities should make appropriate evidence available to support planning and decision making in order to support the sustainable development of the sector through marine planning, where it is appropriate to do so.	Not applicable	
O&G_01a	Oil and gas (supporting)	Proposals that maximise the economic recovery of oil and gas sustainably will be supported where they comply with the objectives of this plan, and fully meet the environmental safeguards contained within the statutory processes of awarding production licences and subsequent activity-specific approvals. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	

O&G_01b	Oil and gas (supporting)	Welsh Government policy is to avoid the continued extraction of fossil fuels in intertidal areas and estuaries and coastal inlet waters that fall within the Welsh onshore licence area. Applications for new petroleum licenses in these areas should not be supported, unless required for mine safety or scientific purposes. Proposals for the development and extraction of oil and gas in these areas with land based elements must provide robust and credible evidence to demonstrate how they conform to the Planning Policy Wales Energy Hierarchy for Planning, including how they make a necessary contribution towards decarbonising the energy system.	Not applicable	
O&G_02	Oil and gas (supporting)	Proposals that support the long-term development of carbon capture and storage technology will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	
FIS_01a	Fisheries (supporting)	Proposals that support and enhance sustainable fishing activities will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	

FIS_01b	Fisheries (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities to develop a strategic evidence base to improve understanding of opportunities for the sustainable development of fisheries in order to support the sustainable development of the fisheries sector through marine planning.	Not applicable	
P&S_01a	Ports and shipping (supporting)	Proposals for ports, harbours and shipping activities will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	
P&S_01b	Ports and shipping (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities to support the sustainable development of the ports and shipping sector through marine planning.	Not applicable	
P&S_02	Ports and shipping (supporting)	Proposals that provide for the maintenance, repair, development and diversification of port and harbour facilities will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Yes	The proposal contributes to the objectives of the plan and thus should be supported.

CAB_01	Subsea cabling (supporting)	Proposals that facilitate the growth of digital communications networks and/or the optimal distribution of electricity will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	
T&R_01a	Tourism and recreation (supporting)	Proposals that demonstrate a positive contribution to tourism and recreation opportunities and policy objectives (for the sector) around the Welsh coast will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.	Not applicable	
T&R_01b	Tourism and recreation (supporting)	Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for sustainable tourism and recreation around the Welsh coast, including: a) developing a strategic evidence base to improve understanding of current and potential tourism and recreation activities, including eco-tourism and other low impact activities; and b) opportunities to define areas of future opportunity for tourism and recreation; in order to support the sustainable development of the tourism and recreation sector through marine planning.	Not applicable	

SAF_01	Safeguarding existing activity	a: Proposals likely to have significant adverse impacts upon an established activity covered by a formal application or authorisation must demonstrate how they will address compatibility issues with that activity. Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for the proposal to progress under exceptional circumstances. b: Proposals likely to have significant adverse impacts upon an established activity not subject to a formal authorisation must demonstrate how they will address compatibility issues with that activity. Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for proceeding. Under SAF 01 a and b, compatibility should be demonstrated through, in order of preference: a. Avoiding significant adverse impacts on those activities, and/or b. Minimising significant adverse impacts where these cannot be avoided; and/or c. Mitigating significant adverse impacts where they cannot be minimised.	Not applicable	
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SAF_02	Safeguarding strategic resources	Proposals which may have significant adverse impacts upon the prospects of any sector covered by this plan to engage in sustainable future strategic resource use (of resources identified by an SRA) must demonstrate how they will address compatibility issues with that potential resource use. Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for proceeding. Compatibility should be demonstrated through, in order of preference: a. Avoiding significant adverse impacts on this potential strategic resource use, and/or b. Minimising significant adverse impacts where these cannot be avoided; and/or c. Mitigating significant adverse impacts where they cannot be minimised.	Not applicable	
DEF_01	Defence (safeguarding)	Proposals that: • potentially affect Ministry of Defence (MOD) Danger Areas, Exercise Areas or strategic defence interests; and/or • potentially interfere with communication, surveillance and navigation facilities necessary for defence and national security; should only be authorised with the agreement of MOD.	Not applicable	

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