

Our ref: Fishguard Stena Line

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Date: 27 November 2024

Marine Licensing Team
Permit Receipt Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Dear Sirs,

RE: EIA Screening Opinion Under 'The Marine Works (Environmental Impact Assessment) Regulations 2007'

Location: Stena Line Terminal Fishguard Harbour

Development: Proposed Replacement Linkspan

RPS has prepared this letter in respect of the above-mentioned development proposal at Fishguard Harbour on behalf of our client Stena Line Ports Ltd, to assist in the Screening Opinion to determine as to whether the Proposed Development is or is not Environmental Impact Assessment (EIA) development.

Regulations 11 & 13 of the Marine Works (Environmental Impact Assessment) Regulations 2007, as amended hereafter referred to as the 'Regulations' states that:

'An applicant may request a screening opinion from the appropriate authority at any time before he applies for a regulatory approval in relation to a regulated activity'.

As set out under Schedule 2 a request for a Screening Opinion must be accompanied by the following information: -

(a) a chart or map (or both) sufficient to identify the location of the project and of the regulated activity;

(b) a description of the project, including in particular—

(i) a description of the physical characteristics of the whole project and, where relevant, of demolition works; and

(ii) a description of the location of the project, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

(c) a description of the aspects of the environment likely to be significantly affected by the project; and

(d) a description of any likely significant effects of the project on the environment, to the extent of the information available on such effects resulting from—

(i) the expected residues and emission and the production of waste, where relevant,

(ii) the use of natural resources, in particular soil, land, water and biodiversity; and

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(e) such further information or representations as the applicant may wish to provide or make, including a description of any features of the project or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

In accordance with the Regulations, this letter sets out a brief description of the Proposed Development, its location and potential effects on the environment.

This submission outlines a proposal by Stena Line Ports Ltd (Stena) for removal and replacement of the existing linkspan equipment, for which they intend to submit applications for marine licensing. In anticipation of this, we are seeking a screening opinion on whether an environmental impact assessment (EIA) is required for the proposed works.

We can also confirm that in addition to Stena's intended application to Natural Resources Wales for a marine licence in connection with the Proposed Development, Stena also intends to make an application to Welsh Ministers for a Harbour Revision Order under Section 14 of the Harbours Act 1964 to seek statutory authorisation for the Proposed Development.

BACKGROUND

The Application Site

The application site is located within Goodwick/Fishguard, Pembrokeshire (central grid reference 195171.227: 238812.970).

The site is a parcel of land spanning an area of approximately 36 hectares of the harbour, to include the existing linkspan, hinterland and within the bayforeshore.

The port was created in the 1910s by reclaiming land at the base of the headland. The site is indicated on the Site Location Plan included at Appendix 1 of this correspondence.

The site lies within the northern fringes of Goodwick which is a coastal town immediately west of its twin town of Fishguard, within Fishguard Bay. It is bound by steep cliff faces and the Fishguard Train Station to the western extents; a breakwater to the north and RNLI Lifeboat Station. Residential properties of Harbour Village lie to the west elevated above Fishguard Bay. The site is accessed from the A40/Station Hill to the south. The current Stena operation includes a twice daily ferry service to Rosslare, covering public ferry passengers and accompanied and unaccompanied freight. The berth is also infrequently used by cruise vessels and historic steamboats.

Proposed Development

Stena wish to replace their existing temporary arrangement of a linkspan and jack up barge and provide a replacement pontoon to allow safe berthing of the ferry at Fishguard in the long term.

Stena own a floating pontoon which they wish to relocate to Fishguard. Civils works will be required to enable access and utilisation of the pontoon for the ferry traffic, to include land reclamation and rock armour revetment construction. Landside works will be required to adjust traffic and pedestrian routes to service the new floating pontoon. Dredging works are also proposed, these cover maintenance dredging of the berth, capital dredge of the navigation channel and beneath the pontoon to allow sufficient depth, and soft material removal to allow construction of the reclaimed area.

The project involves several key activities aimed at enhancing the infrastructure and operational capabilities of the harbour.

Firstly, the construction of a new reclamation area will be undertaken. This area will feature an asphalt surface and will be built on reclaimed land, which will be retained using a rock armour revetment. To facilitate the construction of this reclaimed land, dredging of soft material behind the new berth will be necessary.

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Additionally, dredging to a depth of -9mCD beneath the pontoon will be carried out to ensure sufficient depth for operations. Maintenance dredging of the harbour will also be conducted to maintain depths of -7.3mCD and -5.5mCD.

A reinforced concrete bank seat structure will be constructed to support the pontoon at the edge of the reclamation. This structure is expected to be a piled bank seat, likely using rotary installed steel tubular piles filled with concrete. The installation of the pontoon and its supporting guide pile will follow, with the pile being rotary bored and partially filled with concrete. The installation of the guide pile will require two steel piles to be installed temporarily. These will be approximately 1.22m in diameter.

The project will also involve the removal of the existing temporary jack-up barge, which will be floated away without the need for demolition. One of the existing 'buffer dolphin' tower structures and the operations room will be demolished, along with the removal of the steel access bridge and the demolition of the existing suspended concrete deck structure. It is not a piled structure; the columns are placed directly on the seabed (rock). The existing disused RNLI jetty will be demolished to enable the reclamation works. The area beneath existing RNLI slipway will be enveloped into the reclamation. The landside in this area around the slipway consists of concrete or block retaining walls, rock rubble revetment or exposed bedrock,

On the landside, changes will be made to road markings, car parking, and the movement of passenger access and footways. No works are planned for the railway station or rail line. In terms of services, the pontoon will be equipped with electricity. Drainage provision will be made for the new surfacing, and ducting will be installed for communications and future provisions.

A Pre-Application Discussion (PAD) (A request for a pre-application discussion with the Council's Planning Department has been submitted and the consultation process is underway). In tandem with a working scheme proposal, there may be changes to some elements of the scheme subject to receipt of statutory consultation responses through the PAD process.

There is considered to be sufficient detail enclosed to enable an opinion to be formed on likely significant environmental effects for the purposes of the Regulations.

Determining whether Environmental Impact Assessment (EIA) is required

Schedule Screening Methodology

Screening is the initial part of the EIA process through which it is determined whether a development is EIA development, and a planning application should therefore be accompanied by an Environmental Statement (ES) Proposed Developments may fall within Schedule A1 or Schedule A2 of the Regulations.

In the case of a Schedule A1 development, EIA is mandatory. Schedule A2 developments do not automatically require EIA, but EIA must be formally considered. For a development classified as Schedule A2 it must be listed in Schedule A2 and have consideration of whether or not it is likely to have significant effects on the environment.

Schedule A1 Assessment

The Site does not fall within any category with Schedule A1.

Schedule A2 Assessment

It is considered that the Proposed Development may fall within the following categories;

10. Marine Dredging

63. Construction of Port Installations

69. Maritime works capable of altering the coast through construction

Likely Significant Environmental Effects

What may constitute a significant effect must be assessed on the basis of the individual quantifiable facts and evidence base available relative to a particular development proposal. It is often not possible to make a screening opinion based on full information and thus it is the likelihood of significant effects which should be assessed.

Schedule 1 sets out matters relevant to consideration of whether or not a Schedule A2 project is likely to have significant effects on the environment. In considering these criteria, a rational view must be taken on the likelihood of effects arising.

The test for the need for environmental assessment is that of 'likely significant effects' on the environment. This is not an absolute test but one based on judgement.

Schedule 1 Selection Criteria

In considering whether EIA is required regard should be had to the following criteria set out in Schedule 1 to the Regulations:

- Characteristics of the Project
- Location of the Project
- Types and characteristics of the Potential Impact

Characteristics and Location of the Project

The characteristics and location of the Proposed Development have been set out in the preceding paragraphs.

The site lies within the jurisdiction of Pembrokeshire Council and as such the prevailing Local Development Plan for the area was adopted in 2013. A review commenced in 2017 and a second deposit consultation commencing in October 2024. The coastal areas outside of Fishguard/Goodwick lie within the jurisdiction of Pembrokeshire Coast National Park with separate Local Development Plan adopted in 2020. The site is designated as A Special Area of Conservation – West Wales Marine. Goodwick Conservation Area and Fishguard Bay Hotel a Registered Historic Park and Garden lies to the south-west and Pen Gaer Historic Landscape lies to the north-west.

The Proposal is one of need of Stena Line to continue and facilitate the current ferry offering from Fishguard.

Types and Characteristics of the Potential Impact

The Proposed Development has the potential for a number of different environmental effects which will be outlined in a further Scoping document with particular attention to the environmental sensitivity of geographical areas to include the coastal zones and the marine environment.

Topics which will be considered are outlined below:-

- Human Health
- Marine Biodiversity
- Terrestrial and Birds Biodiversity
- Coastal Processes
- Water Resources and WFD
- Flood Risk
- Noise and Vibration
- Underwater Acoustics
- Air Quality and Climate
- Archaeology, Architectural and Cultural Heritage
- Soils, Geology and Hydrogeology
- Material Assets

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- Transport
- Landscape and Visual
- Waste
- Risk of Major Accidents and Disasters

It is considered that the proposed development may have potential effects on the environment, including:

- Potential impact on terrestrial, ornithology, and marine ecology;
- Potential impact on marine archaeology.

Conclusion

In consideration of the above, we are seeking a formal screening opinion on the need for an EIA, for the proposed works set out above, in accordance with Regulation 11, Part 2, the Marine Works (EIA) Regulations 2007 (as amended).

It is considered that the project triggers the requirements for an EIA project and respectfully request that Natural Resources Wales confirm agreement with this screening opinion.

In addition, if the screening opinion determines that an EIA is required for the works, we also seek a formal scoping opinion on the information to be provided in the Environmental Statement (ES), in accordance with Regulation 13, Part 3, the Marine Works (EIA) Regulations 2007 (as amended) following submission of a scoping document. In order to expedient and facilitate this an EIA Scoping report is also attached with this submission.

If you would like any further information or clarification in relation to this project, please do not hesitate to contact me.

Yours sincerely,
for R P S Group Limited

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cc: Ian Davies, Stena Line
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Enc

Site Location Plan

Admiralty Chart

Proposed General Layout

Longsection through Proposed Works

EIA Scoping Report