

Stijn den Haan

From: Marine Licensing <marinelicensing@cyfoethnaturiolcymru.gov.uk>
Sent: 21 May 2024 14:04
To: Stijn den Haan
Cc: Richard Unsworth; Celia Marlowe; Licensing; Flo Taylor; Conor Laing; Sam Rees
Subject: RE: DEML2248v1 Marine Licence update
Attachments: DEML2248v1 - Application Variation Form (1).pdf; DEML2248v1 - 20231220_DEML2248-Change-Request (1).docx

Categories: Anglesey, Marine licence

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Good afternoon Stijn,

Thank you for providing that additional clarification.

Having reviewed your proposal, unfortunately, you would not be able to vary your licence to include the additional planting areas as they fall outside of the original design envelope. As the new locations are situated within Holyhead Bay, the previous HRA and WFD assessments are no longer valid as the protected sites/waterbodies they impact differ (Anglesey Terns SPA, North Anglesey Marine SAC, Holyhead Bay Waterbody). New assessments would therefore be required to assess their impacts.

Whilst you could vary your licence to include the additional planting methodology (use of the robot), the new planting areas would require a separate Band 2 marine licence.

As such, you'll require two applications:

Complex Variation for DEML2248v1

To add the additional planting methodology to your existing licence, you will need to submit a complex variation application. Information regarding how to apply for a variation can be found here: [Natural Resources Wales / Apply to change or transfer \(vary\) a marine licence](#).

You will need to submit an application form and then a detailed method statement to explain the new methodology and the reason for change. This will be similar to your previous variation in which you added the use of the sled (see documents attached). Complex variations are charged at a rate of £120/hour and have a 4 month SLA, although it's likely we'll process it quicker than that should no concerns be raised during consultation.

Band 2 Marine Licence Application

This will require you to submit a new application form and supporting documents as per the guidance on our website here: [Natural Resources Wales / Applying for a marine licence](#). The list of documents that you provided in your previous email satisfy the majority of the criteria, but I'd also suggest looking at the [aquaculture section](#) to ensure any additional requirements have been covered. Having been through the process for DEML2248, you're most likely familiar with the process, but if you have any questions, feel free to ask.

Band 2 licences are charged a fixed fee of £1920 and have a 4 month SLA.

Hopefully this helps to clarify the situation however, if you have any further questions, please don't hesitate to contact me.

Good luck with your move Stijn and all the best in your new job.

Kind regards,

Jack

Swyddog Trwyddedu Morol / Marine Licensing Officer

Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

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.



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From: Stijn den Haan <Stijn.Denhaan@Swansea.ac.uk>

Sent: Tuesday, May 21, 2024 10:19 AM

To: Marine Licensing <marinelicensing@cyfoethnaturiolcymru.gov.uk>

Cc: Richard Unsworth <R.K.F.Unsworth@Swansea.ac.uk>; Celia Marlowe <celia@projectseagrass.org>; Licensing <licensing@projectseagrass.org>; Flo Taylor <flo@projectseagrass.org>; Conor Laing <conor@projectseagrass.org>; Sam Rees <S.C.Rees@Swansea.ac.uk>

Subject: RE: DEML2248v1 Marine Licence update

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Good morning Jack,

Thanks for your message, good to hear from you!

Sorry for the confusion. In our current marine licence DEML2248v1, we referred to areas included in our licence as "seagrass search areas" within which we could plant seagrass. These areas are larger than the actual areas where seagrass would be planted, but this approach gives us flexibility to find locations where suitable ecological conditions for seagrass co-exist with locations where we have the support of stakeholders to plant seagrass. And yes, prior to planting seagrass at any site, we always survey the area to ensure we are not planting where seagrass is already growing and that we focus on areas where environmental conditions (e.g. sediment type, biota present / absent) suggest that seagrass could grow in the area.

In short, these seagrass search areas are areas we would like to include in our marine licence, with potentially slight adjustments based on discussions with Stena Line.

I hope that clarifies. Looking forward to your response on whether the list of documents I provided is the complete list of documents required for the application. I am happy to have a call for any further clarifications – it's 07888829291.

Warm regards,
Stijn

From: Marine Licensing <marinelicensing@cyfoethnaturiolcymru.gov.uk>

Sent: Tuesday, May 21, 2024 9:20 AM

To: Richard Unsworth <R.K.F.Unsworth@Swansea.ac.uk>; Stijn den Haan <Stijn.Denhaan@Swansea.ac.uk>

Cc: Celia Marlowe <celia@projectseagrass.org>; Licensing <licensing@projectseagrass.org>; Flo Taylor <flo@projectseagrass.org>; Conor Laing <conor@projectseagrass.org>; Sam Rees <S.C.Rees@Swansea.ac.uk>

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Good morning Stijn and Richard,

Thank you for clarifying the changes you wish to make to your licence.

On the map that you've provided, the areas marked are labelled as "seagrass search areas". I just wanted to clarify whether these search areas are the planting areas? Is your plan to check for the presence of seagrass before committing to planting in them?

Kind regards,

Jack

Swyddog Trwyddedu Morol / Marine Licensing Officer

Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu | Evidence, Policy and Permitting Directorate

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From: Richard Unsworth <R.K.F.Unsworth@Swansea.ac.uk>

Sent: Monday, May 20, 2024 11:00 PM

To: Stijn den Haan <Stijn.Denhaan@Swansea.ac.uk>; Marine Licensing <marinelicensing@cyfoethnaturiolcymru.gov.uk>
Cc: Celia Marlowe <celia@projectseagrass.org>; Licensing <licensing@projectseagrass.org>; Flo Taylor <flo@projectseagrass.org>; Conor Laing <conor@projectseagrass.org>; Sam Rees <S.C.Rees@Swansea.ac.uk>
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Thanks Stijn for clarifying the detail with Sian.

Just one slight amendment, the so called 'Autonomous Underwater Vehicle' (robot) isn't in fact "autonomous" and isn't a "vehicle". Its on an umbilical power control chord (controlled from the surface) analogous to the current sled. The key difference being that the sled is dragged/towed by the boat whereas the Robot has its own propulsion and can move and plant according to the instructions from surface control.

Thanks,

Rich

Dr Richard K.F. Unsworth FRSB, FHEA
Chief Scientific Officer of Project Seagrass | Prif Swyddog Gwyddonol Project Seagrass
Associate Professor in Marine Conservation | Athro Cyswllt mewn Cadwraeth Forol

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✉ r.k.f.unsworth@swansea.ac.uk
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Website: www.projectseagrass.org

NOTE: I work flexible hours – often outside 9-5 Mon-Fri – just because I email outside normal working hours doesn't mean you have to respond – and it doesn't mean I will always respond outside normal hours

From: Stijn den Haan <Stijn.Denhaan@Swansea.ac.uk>
Sent: 20 May 2024 18:11
To: Marine Licensing <marinelicensing@cyfoethnaturiolcymru.gov.uk>
Cc: Richard Unsworth <R.K.F.Unsworth@Swansea.ac.uk>; Celia Marlowe <celia@projectseagrass.org>; Licensing <licensing@projectseagrass.org>; Flo Taylor <flo@projectseagrass.org>; Conor Laing <conor@projectseagrass.org>; Sam Rees <S.C.Rees@Swansea.ac.uk>
Subject: RE: DEML2248v1 Marine Licence update

Hi Siân,

Thank you for your quick message! My apologies for my lack of clarity in the previous message.

Please find attached a map of the areas we would like to add to our existing marine licence DEML2248v1. The areas do not overlap with SSSI sites or definite Article 17 marine features aside from Mudflats and Sandflats, as seagrass is a component of this feature. These areas are within the boundaries of the seabed owned by

Stena Line, and please note that these areas are not definitive and may slightly change based on discussions with Stena Line.

Regarding the mechanisation methods update, it would be to:

- Include the use of a device that electronically injects seagrass seeds into the ground, in addition to our current method of planting seeds.
 - o At present, we drag a sled over the sand that opens up furrow and pumps seeds into the furrow. We would like to continue using this method, but we are collaborating with a company that uses electronic injection of seeds and hence would like to add this method to the marine licence.
- Include the use of an Underwater Autonomous Vehicle (UAV) to plant seagrass (e.g. with electronic injections or a different method of injecting seeds into the ground) in addition to what is currently in our licence, i.e. using a sled that is dragged behind the boat. This UAV is to be operated from the water (e.g. from a boat) or from shore.
- Include the use of an alternative vessel than what we currently use. We currently have our research vessel Gwenhidw (8.5 m aluminium landing craft) registered as part of our marine licence, but in case it is not available, that we can use a vessel of similar nature a locally sourced charter vessel in case that the former is not possible.

I hope this clarifies – I look forward to hearing your thoughts.

Warm regards,
Stijn

From: Marine Licensing <marinelicensing@cyfoethnaturiolcymru.gov.uk>

Sent: Monday, May 20, 2024 11:04 AM

To: Stijn den Haan <Stijn.Denhaan@Swansea.ac.uk>

Cc: Richard Unsworth <R.K.F.Unsworth@Swansea.ac.uk>; Celia Marlowe <celia@projectseagrass.org>; Licensing <licensing@projectseagrass.org>; Flo Taylor <flo@projectseagrass.org>; Conor Laing <conor@projectseagrass.org>; Sam Rees <S.C.Rees@Swansea.ac.uk>

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Stijn,

Thank you for your email.

Please could you provide further information regarding your query below:

- A map outlining the 'several seagrass search areas in the Holyhead Bay where we could plant seagrass.'
- Details of the 'small update on our mechanisation methods when planting seagrass.'

Diolch yn fawr,
Siân

Trwyddedu Morol / Marine Licensing
Cyfoeth Naturiol Cymru / Natural Resources Wales

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From: Stijn den Haan <Stijn.Denhaan@Swansea.ac.uk>

Sent: Friday, May 17, 2024 3:25 PM

To: Marine Licensing <marinelicensing@cyfoethnaturiolcymru.gov.uk>

Cc: Richard Unsworth <R.K.F.Unsworth@Swansea.ac.uk>; Celia Marlowe <celia@projectseagrass.org>; Licensing <licensing@projectseagrass.org>; Flo Taylor <flo@projectseagrass.org>; Conor Laing <conor@projectseagrass.org>; Sam Rees <S.C.Rees@Swansea.ac.uk>

Subject: DEML2248v1 Marine Licence update

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Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Dear Marine Licensing team,

I hope this email finds you well! We at Project Seagrass currently hold Marine Licence DEML2248v1 to plant seagrass in North Wales and we would like to apply for a variation in our marine licence to add two things:

- Several seagrass search areas in the Holyhead Bay where we could plant seagrass. We have already received initial permission from landowner Stena Line to plant seagrass in the Bay.
- A small update on our mechanisation methods when planting seagrass, in addition to our recent update from January 2024.

I am quite certain this is considered a complex change, hence I am sending you a message [as outlined in the NRW marine licence guidelines](#). Could you confirm this, please?

Moving ahead, could you please confirm that I will need to produce the following documents for this update - are there any documents that I am missing in this list and are there any documents in the following list that I do not need to produce for this marine licence variation?

- Habitats Regulations Assessment
- Water Framework Directive
- Biosecurity Assessment and Management Plan

- A tabular overview how our seagrass restoration work will contribute to the Welsh National Marine Plan as we did for the original DEML2248.
- Coordinates of proposed Holyhead Bay sites
- Digimaps of the proposed Holyhead Bay sites
- Shapefiles of the proposed Holyhead Bay sites in BNG and WGS84 as coordinate reference systems.
- An outline of the proposed mechanisation update
- Marine Historic Assets Management Plan, updated with information on historic assets in the Holyhead Bay
- Written approval from landowner Stena Line

Furthermore, please note that in March 2024 we conducted stakeholder engagement efforts together with the NWWT and PLAS SAC to obtain input from stakeholders on planting seagrass in the Holyhead Bay; so far we have only received positive responses from local communities and we have been in touch with the RCAHWW and the GAT to ensure that marine historic assets are not negatively affected by our work, just like on Pen Llyn. I know that the marine licence variation will require a consultation process, but I wanted to make you aware of our efforts so far.

Lastly, on a personal note, I thoroughly enjoy the seagrass restoration work in North Wales and appreciate all of the excellent support you have given us over the past years to restore seagrass in the region. At the same time, I would like to be closer to my family and friends and have decided to move back to The Netherlands (where I fortunately will be continuing with seagrass restoration). Hence, I will leave my current position on 1 June. Nevertheless, the seagrass restoration work will continue. Knowing that the marine licence update process requires more time than the two weeks I have left, one of my colleagues will be taking over the correspondence with you on this marine licence (and variation) after I have left the UK. I had informed Maria Alvarez about my leaving earlier this year, but I wanted to make sure everyone was on the same page on the upcoming change.

I look forward to your response.
Warm regards from Swansea,
Stijn