

Llanfairfechan Coastal Defences: Request for Screening Opinion

**TOWN AND COUNTRY PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT)
(WALES) REGULATIONS 2017**

**MARINE WORKS (ENVIRONMENTAL IMPACT
ASSESSMENT) REGULATIONS 2007 (AS
AMENDED)**

19 September 2024

Dear Sir/Madam,

The Environment, Roads and Facilities Team at Conwy County Borough Council (CCBC) would like to formally request a Screening Opinion as to whether the proposed Llanfairfechan Coastal Defence Scheme constitutes EIA development.

Plans appended to this letter comprise:

- Red Line Boundary Plan (ERCF2305N PLAN 009).
- Outline Design Drawings (ERCF2305N PLAN 010 Proposed Sections, ERCF2305N PLAN 011 Proposed Sections, ERCF2305N PLAN 012 Proposed Elevations and ERCF2305N PLAN 013 Proposed Elevations).

Additional appended assessments, surveys and reporting in support of the Scheme comprise:

- Over Wintering Bird Survey Report 2021/22 (ERCF2305N - Llanfairfechan Coastal Defence Wintering Bird Report).
- Habitats Regulations Assessment (HRA) (ERCF2305N - Llanfairfechan Coastal Defence HRA)
- Water Framework Directive (WFD) Assessment (ERCF2305N - Llanfairfechan Coastal Defence - WFD)

1 Background

1.1 Existing Defences

The sea defences at Llanfairfechan extend for around 1.8km, comprising several forms of construction, including masonry, mass concrete and rock armour. The defences under consideration extend north-east to south-west from Shore Road East to the Afon Ddu (Llanfairfechan) and provide some protection to the promenade and town. However they are subject to overtopping during storm events and with climate change, the frequency and severity of these events is anticipated to increase. A section of the sea wall was breached during a storm in October 2021 with further damage to the frontage occurring in November and December that year. Storm Pierrick in April 2024 resulted in a flooding event across the entire Llanfairfechan frontage, including flooding of the properties lining the promenade.

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As a result, there is a need to improve the coastal defences along the frontage.

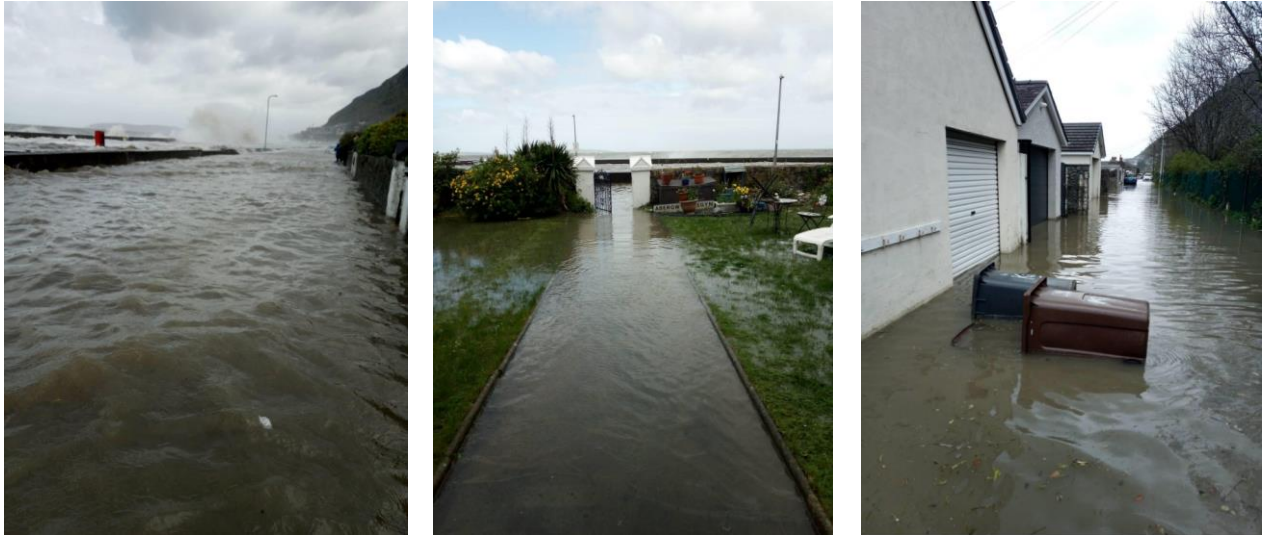


Photo 1: Flooding associated with Storm Pierrick, 9th April 2024

1.2 Site Location and Description

Llanfairfechan is a seaside town in North Wales, within the administrative area of Conwy County Borough Council (CCBC). The A55 trunk road passes through the town, running parallel to the London-Holyhead railway, both of which separate the main town from the waterfront. The Scheme extends from the mouth of the Afon Ddu (Llanfairfechan) to the west, to the eastern extent of the promenade (see Red Line Boundary Plan ERCF2305N PLAN 006). The beach predominantly comprises sand and shingle with regular wooden groynes. A slipway is located in the centre of the Scheme area along with four pedestrian accesses through the sea wall, these are fitted with storm boards and a flood gate over winter periods. A pedestrian promenade and cycleway run along the length of the sea wall and are backed by the Promenade road to the eastern end of the Scheme. In the central section of the Scheme area, the promenade is separated from the road by amenity grassland and boat storage and to the western end, a car park and café. Residential houses, guest houses, a garden, playground and cafes line the vehicular promenade.

The Scheme itself focusses on the sea wall which separates the promenade from the beach. Though the existing sea wall is in relatively good condition, some sections require maintenance works which will be undertaken as part of the Scheme. The national grid references for the western and eastern Scheme boundaries are approximately (SH 67834 75452) and (SH 68544 75570) respectively.

1.3 Proposed Scope of Work

The proposed scope of work (see Design Drawings ERCF2305N PLAN 010 Proposed Sections, ERCF2305N PLAN 011 Proposed Sections, ERCF2305N PLAN 012 Proposed Elevations and ERCF2305N PLAN 013 Proposed Elevations) comprises repairs to, and increasing the height of, 725m of the existing sea wall by approximately 500mm using concrete. The main design consists of a cantilever retaining wall constructed from the promenade on the landward side of the existing sea wall, however approximately 140m will need to be constructed from the seaward side (from the promenade path on the seaward side of the wall).

This 140m length is to be constructed in front of the junction of the Promenade highway with Shore Road East and a private property. The design will consist of a 1.5m excavation in the existing promenade on the seaward side. The works in this location are approx. 3.0m above the Mean High Water Spring (MHWS) and approx. 2.5m from the foreshore, meaning the works will have minimal intrusion on the beach in this area.

1.4 Proposed Methodology

Coastal Defence Works

The Scheme is currently at the outline design stage and the methodology is yet to be formally established, however it is anticipated that works will comprise the following:

- Temporary scaffolding (if required) – for re-pointing works alone, to be lifted from the promenade side of the sea wall onto the beach and which will be removed between tides (the intertidal area will be accessed by personnel on foot for construction of the scaffolding);
- Resin injection of existing cracks/joints on seaward side of the wall;
- Increase in the height of the sea wall and tie-in with the existing promenade on the landward side using concrete;
- Excavation of 1.5m into the existing hardstanding promenade on the seaward side and increase in the height of the sea wall for 140m at the eastern end;
- Installation of weep holes and flap valves along the sea wall (from the landward side); and
- Construction of grasscrete parking on the promenade side of the sea wall.

Access to the foreshore will be gained using existing accesses. Works will be limited to lower tidal states and no plant or machinery will be required on the intertidal area for the works.

Method statements and risk assessments will be produced by the contractor prior to commencement. A Construction Environmental Management Plan (CEMP) will be in place for the construction works.

1.5 Anticipated Programme

As funding is yet to be secured for Scheme construction, the programme has not yet been confirmed. However, is anticipated to take 19 weeks with proposed working hours of 07:00 – 19:00, taking into account tidal constraints (low-tide working).

Works through the winter period 2024/25 are anticipated due to funding constraints and to avoid busy holiday seasons.

2 EIA Screening

The Scheme does not fall within Annex 1 of the EIA Directive (A1 of the Marine Works (EIA) Regulations 2007 (as amended) hereafter referred to as the MW EIA Regulations, Schedule 1 of the Town and Country planning (EIA) (Wales) Regulations 2017 hereafter referred to as the T&C EIA Regulations), within which EIA would be mandatory.

Additionally, given that the permanent works are all to be constructed above MHWS, on areas of existing hardstanding and walls, the Scheme is not considered to fall under Annex 2 of the EIA Directive (Schedule A2(69) in the MW EIA Regulations, Schedule 2 Clause 10(m) of the T&C EIA Regulations) – Infrastructure Projects, which includes certain coastal works and includes:

“Coastal work to combat erosion and maritime works capable of altering the coast through the construction, for example, of dykes, moles, jetties and other sea defence works, excluding the maintenance and reconstruction of such works”.

The repointing and repair works are considered to fall under “maintenance”.

A conservative estimate of the area required for the proposed works including a construction buffer totals approximately 0.75ha, which is less than the 10(m) indicative criteria and threshold of 1ha¹.

Given the requirement for a Band 2 Marine Licence for the works, a Habitats Regulations Assessment (HRA) and Water Framework Directive Assessment (WFD) have been undertaken, please refer to the attached documents (ERFCF2305N – Llanfairfechan Coastal Defences HRA and ERFCF2305N – Llanfairfechan Coastal Defences WFD Assessment).

¹ Gov.uk [Online] Available at: [eia-thresholds-table.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61221/eia-thresholds-table.pdf)

3 Potential Environmental Effects

The following provides a summary of the potential effects of the Scheme on the environment and likely mitigation measures.

3.1 Designated Sites

Designated sites within 2km of the Scheme have been outlined in Table 1.

Table 1: Designated Sites

Designated Site	Details	Distance from the Scheme
Traeth Lafan/ Lavan Sands, Conway Bay Special Protection Area (SPA)	The SPA is of importance for wintering waterbirds, especially oystercatcher (<i>Haematopus ostralegus</i>) and curlew (<i>Numenius arquata</i>). In conditions of severe winter weather, Traeth Lafan acts as a refuge area for oystercatchers displaced from the Dee Estuary. The site is also an important moulting roost for great crested grebe (<i>Podiceps cristatus</i>) in late summer/early autumn.	Directly adjacent
Traeth Lafan/ Lavan Sands, Conway Bay Site of Special Scientific Interest (SSSI)	The SSSI is designated for its large intertidal area comprising a range of habitats from sand exposed to waves and tidal currents at the seaward edge, to sheltered sand and mudflats. Freshwater streams flow through the site. This site is the third most important ground in Wales for wintering waders, with an annual peak of 10,000-14,000 waders of ten species. Dwarf eelgrass (<i>Zostera noltii</i>) occurs near Aber.	Directly adjacent
Traeth Lafan/ Lavan Sands, Conway Bay Local Nature Reserve (LNR)	The LNR comprises a mix of shoreline habitats and approximately 2,500ha of intertidal sand and mudflats which are exposed at low tide. Important for a number of bird species, including moulting great crested grebe, oystercatcher, red breasted merganser and goldeneye.	Within
Menai Strait and Conwy Bay SAC	A mostly subtidal site designated for its marine habitats and wildlife. Qualifying features include, mudflats and sandflats not covered by seawater at low tide, reefs and sandbanks which are slightly covered by seawater all the time and supports a significant presence of large shallow inlets and bays and submerged or partially submerged sea caves. The site supports allis and twaite shad (<i>Alosa alosa</i> and <i>Alosa fallax</i>), grey seal (<i>Halichoerus grypus</i>), and sea and river lamprey (<i>Petromyzon marinus</i> and <i>Lampetra fluviatilis</i>)	Directly adjacent
Liverpool Bay/Bae Lerpwl SPA	Designated for the following Annex II species: red throated diver (<i>Gavia stellata</i>), little gull (<i>Larus minutus</i>), common Scoter (<i>Melanitta nigra</i>), little tern (<i>Sterna albifrons</i>) and common tern (<i>Sterna hirundo</i>). Also designated for its internationally important assemblage of waterbirds, in the non-breeding season, the site regularly supports at least 69,687 (2004/05 - 2010/11) individual waterbirds. The main components of the assemblage include all of the non-breeding qualifying features listed above and red breasted merganser (<i>Mergus serrator</i>) and great cormorant (<i>Phalacrocorax carbo</i>).	250m north
Eryri National Park (NP)	The National Park covers an area of 213,000ha with 9,500ha classed as Ancient Semi-Natural Woodland (ASNW), and over 96,000 hectares of moorland. It has complex, varied and renowned geology, vital in influencing the disciplines of geology and geography internationally. Varied biodiversity reflects its landscapes, geology, land management practices and climate. Notable species and habitats of national and international significance are also present, species include black grouse (<i>Tetrao tetrix</i>), brown hare (<i>Lepus europeus</i>), bats, the Snowdon beetle (<i>Chrysolina cerealis</i>) and the Snowdon Lilly (<i>Lloydia serotina</i>).	1.5km south
Nant y Coed LNR	A small ancient woodland at the top of Llanfairfechan surrounding the Afon Ddu.	1.6km south-south-east

In addition, the following are present within 5km:

- Coedydd Aber/ Aber Woods SAC and SSSI, 2.1km south-south-west;
- Coedydd Aber NNR, 3.2km south-south-west; and
- Eryri SAC and SSSI, 3.3km south.

Overwintering bird surveys (see report ERFCF2305N - Llanfairfechan Coastal Defence Wintering Bird Report) were undertaken in 2021/22. Given the presence of the SPA, if works are being undertaken during the wintering bird period, a watching brief will be implemented.

Given the presence of international sites in proximity to the Scheme, a HRA Stage 1 and 2 has been produced (ERFCF2305N - Llanfairfechan Coastal Defence HRA). The Stage 2 Appropriate Assessment concluded that there will be no adverse effects on the qualifying features of the Traeth Lafan / Lavan Sands, Conway Bay SPA, Liverpool Bay / Bae Lerpwl SPA and Ynys Seiriol / Puffin Island SPA, following the implementation of the suggested mitigation. Therefore, the works will not adversely affect the integrity of

these Habitats Sites during construction or in operation. SSSI Assent will not be required as a Band 2 Marine Licence is being applied for.

3.2 Biodiversity

Section 7 habitats present² include the following:

- Blue mussel (*Mytilus edulis*) beds, located adjacent to the east of the Scheme and 60m north of the Scheme in the western end; and
- Sublittoral mixed muddy sediments, located 440m north of the Scheme.

No Section 7 species were recorded within the Scheme area, with only one record within 2km, the ocean quahog (*Arctica islandica*), located 1.9km west south-west².

The intertidal habitats at the upper littoral comprise shingle, coarse sand and mixed sediments, the sea wall itself features lichens and algae².

Given the potential presence of blue mussel beds in the area, an intertidal walkover survey will be undertaken to identify and map any notable habitats and species. If present, an exclusion zone will be established and a suitable buffer implemented.

3.3 Transport and Access

Given the works are taking place to sea defences on the promenade, there will be some limited impacts to traffic and access.

Temporary traffic management may be necessary and diversion or temporary closure of the public rights of way will be required during construction for public safety. There will also be a temporary loss of parking spaces. These temporary effects are not considered significant.

3.4 Noise

There may be temporary elevated levels during construction. Construction noise will be managed in accordance with best practice and no significant environmental effect is envisaged.

No increase in operational noise levels are envisioned from the Scheme.

3.5 Landscape and Visual

During construction a slight landscape and visual effect is anticipated due to the presence of construction equipment, scaffolding and personnel however, these temporary effects are not considered significant. As above, any impacts to designated features will be assessed within the HRA.

A minor operational impact is anticipated due to the 500mm increase in the height of the sea wall however, this is required to prevent future overtopping and increased damage to the promenade area and adjacent properties, and is not considered significant.

3.6 Historic Environment

No designated historic assets are located within the Scheme area. Two listed buildings are located in close proximity to the Scheme:

- The Towers, a Grade II listed building located south of the promenade car park; and
- Gwynfor, a Grade II listed building located on the east side of Shore Road at the western end of the Promenade.

Given the location separated from the Scheme and the small-scale nature of the works, no impacts are anticipated with respect to designated historic assets.

3.7 Water Resources and Drainage

The Scheme is located directly adjacent to the Menai Strait Coastal Waterbody and Afon Ddu River waterbody, and is hydrologically connected to the Conwy Bay Coastal Waterbody. A Water Framework

² Welsh Government, 2024. DataMapWales [online] Available at: [New map | DataMapWales \(gov.wales\)](#)

Directive Assessment has been undertaken to assess any potential impacts, (see document ERFCF2305N - Llanfairfechan Coastal Defence WFD).

The 3-stage assessment identified that the potential impact pathways present are of low risk, and the construction activities are unlikely to affect or cause deterioration of the WFD waterbodies identified with the proposed mitigation in place.

3.8 Air Quality

Given the small-scale and temporary nature of the works, impacts arising from air quality during construction are not considered to be significant. Standard dust management measures will be used during construction. No operational impacts are anticipated.

4 Summary

Based on the evaluation set out above, we believe that the Scheme does not fall under either Schedule 1 or Schedule 2 of the T&C Planning EIA Regs or Marine Works EIA Regs and there are not anticipated to be significant environmental effects associated with the proposals. Therefore, we do not believe EIA is required for this Scheme.

We would like to request a screening opinion to understand whether you agree with our conclusions and look forward to receiving your response within 3 weeks from the date of receipt of this letter.

If you have any further queries, please do not hesitate to contact me.

Yours faithfully,

G.B. Edwards

Head of Environment, Roads & Facilities