



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: SC2402

Natural Resources Wales, Marine Licensing
Team, Welsh Government Offices, Cathays
Park, King Edward VII Avenue, Cardiff,
CF10 3NQ

Ebost/Email:
maria.alvarez@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000653477

Stena Line Ports Ltd

31 January 2025

Dear Michelle Price,

**SCREENING AND SCOPING OPINION UNDER THE MARINE WORKS
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (as amended)**

FISHGUARD REPLACEMENT LINKSPAN

I am writing further to your request for a screening and scoping opinion, dated 29 November 2024, made in accordance with The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("The Regulations").

The purpose of the Environmental Impact Assessment (EIA) screening procedure is to determine whether the Proposed Development require an Environmental Impact Assessment and submission of an Environmental Statement (ES). The purpose of the scoping procedure is to determine what information should be provided in the ES.

In reaching our Screening Opinion we have considered the Proposed Development against Schedule A1 and A2 of the above regulations. In reaching our scoping opinion we have had regard to the information provided in the "FISHGUARD LINKSPAN REPLACEMENT EIA Scoping Report" (SC2402 - 794-NI-POR-00886 *Fishguard EIA_Scoping_Report V.01 28.11.24*), dated 28 November 2024, and considered the requirements of Schedule 3 of the Marine Works Regulations. We have also consulted with the bodies that we consider have an interest in the project by reason of their environmental responsibilities, or local or regional competences, as required by the above regulations, and had regard to their comments.

Screening Opinion

It is our opinion that the works fall within the categories of project listed within Schedule A2, paragraphs 63 and 69 of the above regulations:

63. *Construction of harbours and port installations including fishing harbours*

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

Therefore, the project must be considered in terms of its size, nature and location having regard to the relevant criteria listed in Schedule 1 of the above regulations.

We have carefully considered the views of the consultation bodies alongside the criteria as set out in Schedule 1 of the regulations, and have determined, based on the information provided; that the project has the potential to have a significant effect on the environment and therefore a statutory Environmental Impact Assessment is required.

We have come to this conclusion on the basis of the likely significant impacts of the project, specifically with regard to the magnitude of the project which involves substantial construction, dredging and land reclamation and its location within the West Wales Marine Special Area of Conservation.

Scoping Opinion

This letter sets out the additional information that we consider necessary to be included and/or assessed in the ES for this project.

Please note our scoping opinion is based on the information available to us at this time. The information provided is not a definitive list of the ES / EIA requirements and further information may be required following an application for this project, to ensure a full assessment is carried out.

This Screening and Scoping Opinion will be provided to all those bodies that were consulted and will be publicised on our website and on our Public Register.

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Scoping Opinion (SC2402)

Summary of the proposal

Stena Line wish to replace their existing temporary arrangement in Fishguard Bay of a linkspan and jack up barge and provide a replacement floating pontoon to allow safe berthing of the ferry at Fishguard in the long term. The berth is also infrequently used by cruise vessels and historic steamboats.

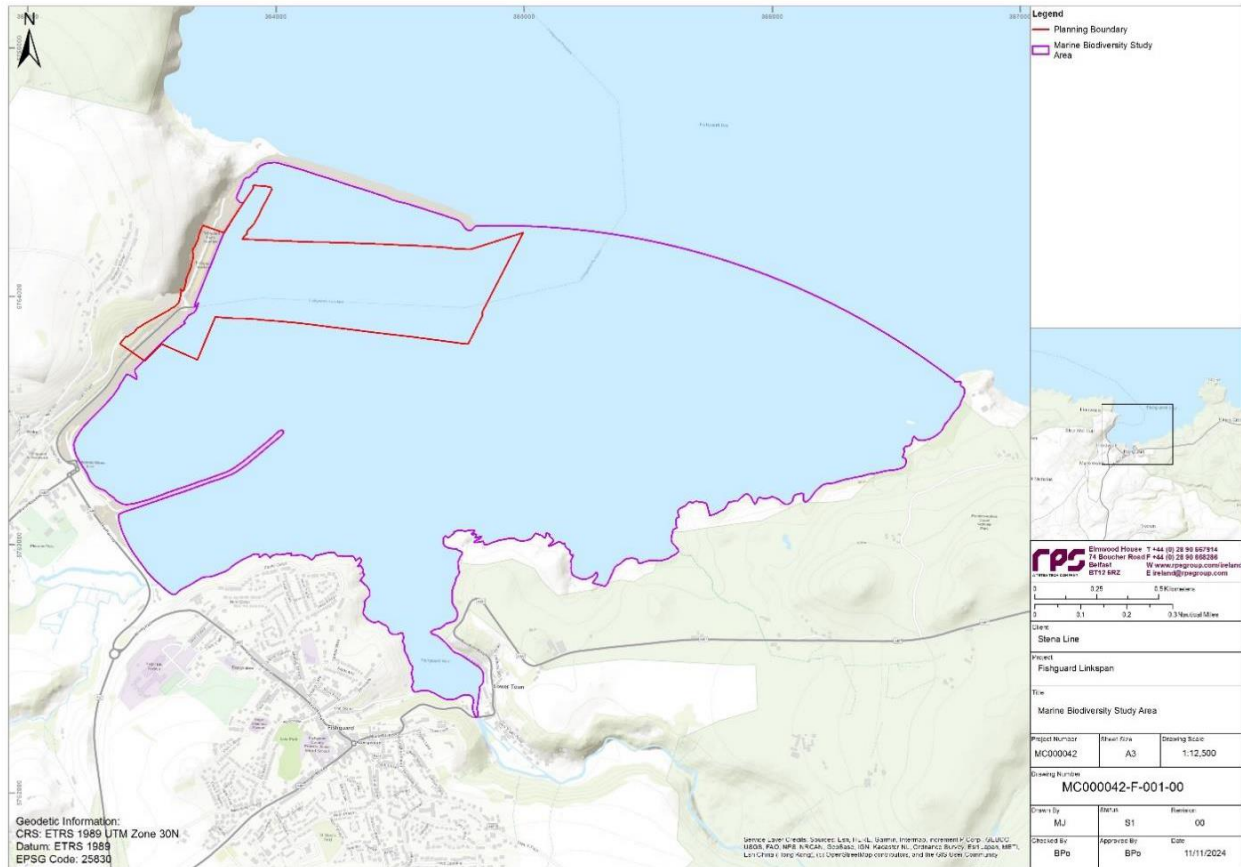
The Proposal requires land reclamation and rock armour revetment construction to enable access and utilisation of the pontoon for the ferry traffic. Landside works will be required to adjust traffic and pedestrian routes to service the new floating pontoon. Dredging works will include maintenance dredging of the berth; capital dredge of the navigation channel and beneath the pontoon, 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 and are summarised below:

1. The construction of a new reclamation area retained using a rock armour revetment and with an asphalt surface. To facilitate the construction of this reclaimed land, dredging of soft material behind the new berth will be necessary.
2. Dredging to a depth of -9mCD beneath the pontoon to ensure sufficient depth for operations.
3. Maintenance dredging of the harbour to maintain depths of -7.3mCD and -5.5mCD.
4. The construction of a reinforced concrete bank seat structure to support the pontoon at the edge of the reclamation which is expected to be a piled bank seat, likely using rotary installed steel tubular piles filled with concrete.
5. The installation of the pontoon and its supporting guide pile, with the pile being rotary bored and partially filled with concrete. The installation of the guide pile will require two steel piles (of approximately 1.22m in diameter) to be installed temporarily.
6. The removal of the existing temporary jack-up barge, which will be floated away without the need for demolition.
7. The demolition of one of the existing 'buffer dolphin' tower structures and the operations room, along with the removal of the steel access bridge and the demolition of the existing suspended concrete deck structure. The existing disused RNLI jetty will also be demolished to enable the reclamation works. The area beneath the existing RNLI slipway will be enveloped into the reclamation.
8. 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.

Location

The application site is located within Goodwick/Fishguard, in Fishguard Bay, Pembrokeshire. See figure below (Figure 4-1 of the Scoping Report):



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 bay foreshore. The site lies within West Wales Marine Special Area of Conservation (SAC).

Consultation Responses Received

In considering the Scoping Report, the NRW Permitting Service (NRW PS) consulted with various consultation bodies. The consultation bodies that responded are listed in **bold** below:

- **The Crown Estate**
- **NRW Advisory (NRW A)**
- **Ministry of Defence (MoD)**
- **Maritime and Coastguard Agency (MCA)**
- **Trinity House (TH)**
- **Royal Yachting Association (RYA)**
- Local Biodiversity Officer (Pembrokeshire)
- Local Planning Authority (Pembrokeshire County Council)

- Local Planning Authority (Pembrokeshire Coast National Park Authority)
- Local Harbour Authority (ABP)
- Local Port Authority (Fishguard)
- Local Port Authority (Stenaline)
- Welsh Fishermen's Association (WFA)
- National Federation of Fishermen's Organisations (NFFO)
- Royal Society for the Protection of Birds (RSPB)
- **Welsh Government Marine and Fisheries Division/WG Marine Enforcement Officers**
- **Cadw**
- **Welsh Archaeological Trusts (Heneb)**
- **Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)**
- **Environmental Public Health Service Wales**
- Chamber of Shipping
- **NERL Safeguarding**

0. General comments

- 0.1. Marine and coastal guidance produced by NRW that may provide useful information to help with your project is available here:
<https://naturalresources.wales/guidance-and-advice/business-sectors/marine/?lang=en>
- 0.2. The ES submitted should demonstrate consideration of the points raised in this scoping opinion. It is recommended that a table is provided in the ES summarising the scoping opinion comments and how they are addressed in the ES.
- 0.3. The EIA must be undertaken by a competent person and the ES must include a competent expert statement.
- 0.4. Where possible, other environmental assessments should be coordinated with the EIA process. However, it is important to note that the Habitats Regulations Assessment (HRA) and Water Framework Directive assessment (WFD), and any other assessment, are separate processes to the EIA.
- 0.5. Throughout the ES robust evidence should be presented so that the potential environmental impacts can be properly understood and evaluated; and appropriate measures identified to avoid, reduce or where necessary compensate for those impacts.
- 0.6. The ES must include:
 - A Non-Technical Summary (NTS);
 - A chart or map identifying where the activity will be carried out;
 - A description of the likely significant effects of the project, whether direct, indirect, secondary, cumulative, transboundary, short-term, medium-term, long-term, permanent, temporary, positive and negative;
 - A description of the methods used to make the assessment of the significant

effects and difficulties encountered in compiling the information and uncertainties involved;

- A description of measures to avoid, prevent, reduce or offset identified significant adverse effects and proposed monitoring arrangements; &
- A description of the expected significant adverse effects of the project on the environment resulting from the vulnerability of the project to risks of major accidents or disasters.

- 0.7. The ES must consider any potential transboundary impacts where appropriate.
- 0.8. Early engagement with relevant stakeholders is encouraged. You are able to obtain further advice from NRW Advisory (NRW A) through the NRW Discretionary Advice Service, please see here: <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/>
- 0.9. All applications for dredge and/or disposal activities must be supported by the results of the sediment sampling and analysis and a biosecurity risk assessment. This information should be submitted using the forms on our website: <https://naturalresources.wales/permits-and-permissions/marine-licensing/applying-for-a-marine-licence/?lang=en>
- 0.10. No consideration has been given to the relevant Shoreline Management Plan. Since you are carrying out works that will affect (change or maintain) the current shoreline position, you will need to identify within your application the relevant Shoreline Management Plan and policy unit for the area of planned work. This information can be found on our website [Shoreline Management Plans](#) where you can identify the relevant Plan and Policy Unit (West of Wales and policy unit 4.2 for Fishguard Harbour). Further information for the area of planned work is here <https://www.grwparfordirolgorllewincymru.cymru/page/smp2/main-document>
- 0.11. You must ensure that the ES show clear consideration of compliance with the UK Marine Policy Statement and the Welsh National Marine Plan. You can use the Welsh National Marine Plan signposting document available on our website (Natural Resources Wales / Marine licence application forms) to assess how the project complies with its policies within the Plan. The published Welsh National Marine Plan can be found here: <https://gov.wales/welsh-national-marine-plan-document> and guidance on the implementation can also be found here: <https://gov.wales/welsh-national-marine-plan-implementation-guidance>
- 0.12. Please note that The Crown Estate has indicated that it is affected by the Proposed Development and landowner's consent is required. Please contact the Managing Agent for the area: Ellie Hitchings of Cooke and Arkwright on 02920 346345, Ellie.Hitchings@coark.com regarding landowner's consent for the proposed activity.
- 0.13. NRW PS generally agree with the topics that the report has scoped into the EIA. NRW PS have provided specific comment below. Where no comment has been provided the assessment should be carried out as detailed within the Scoping Report.

1. Non-technical Summary

- 1.1. The ES must include a non-technical summary, which concisely and clearly describes the project (the site, design, size, etc.); its likely significant effects on the environment; a description of the features/measures to mitigate the project likely significant adverse effects; and a description of the possible alternatives.

2. Project Description

- 2.1. As included in the Scoping Report, an introductory section would need to be included in the ES setting the background and need for the project, the location, and a description of the methods to be used in the project.
- 2.2. Limited detail surrounding some aspect of the project description and methodology have been presented within the Scoping Report, this therefore has limited advice that can be given at this stage regarding these aspect of works and assessments. Therefore, we would strongly encourage you to engage with all relevant consultees as you carry out your assessment.

Dredge/disposal Activities

- 2.3. NRW PS consider that there is a lack of information on the details of the capital dredging campaign. NRW PS require that specifics on the capital dredging such as the amount of sediment (dredge volume), footprint and type of material (particle size distribution analysis) will be required in the ES.
- 2.4. NRW PS expect that seabed sediment samples and core samples will be taken in areas of proposed capital dredge, excavation for the rock armour revetment and piling. NRW PS remind you that the samples should be analysed by an accredited UK laboratory and the sediment characterised in relation to particle size distribution, type, and contaminants (CEFAS Action 1 and 2).
- 2.5. NRW PS require that the ES includes further detail on:
 - The exact dredge methodology, location and duration.
 - Details on whether the material dredged will be used as infill for the land reclamation. Chapter 17 of the Scoping Report indicates that “onsite reuse of dredged material will be prioritised”, however, no details are given.
 - The ES should make clear any existing dredge maintenance regimes which are in place and identify if ongoing maintenance requirements would be predicted following the proposal.
 - NRW PS will require further details on the disposal of the dredging arisings, including sediment characterisation and disposal site suitability.

Land Reclamation

- 2.6. NRW PS require further details on the land reclamation methodology and the construction of the rock armour revetment. Further information on the proposed approach is needed including clarity on how the sediment will be retained (if any) within the land reclamation area prior to construction of the rock armour revetment. As an example, there are no details on the possible need of a

temporary cofferdam; the amount of material required for land reclamation; the area to be reclaimed resulting on permanent loss of seabed habitat, etc.

- 2.7. NRW A are concerned that permanent removal of soft sediment dredged through capital dredge activities may not be enough to fill the area designated for land reclamation. It is not possible to understand whether more material will be required without more information on the estimated volume to be dredged.

Rock Armour Revetment Toe

- 2.8. Details on the methodology and type of material to be used for the buried toe of the rock revetment will be required.

3. Policy and legislation

- 3.1. The ES should include a policy and legislation section relevant for the project, to include local, national and international obligations. These include but are not limited to:
- The Marine and Coastal Access Act (2009)
 - The Marine Works (Environmental Impact Assessment) Regulations 2007
 - The Wellbeing of Future Generations (Wales) Act 2015
 - The Environment (Wales) Act 2016
 - The Conservation of Habitats and Species Regulations 2017
 - Wildlife and Countryside Act 1981 (as amended)
 - The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
 - The UK Marine Policy Statement 2011
 - The Welsh National Marine Plan
- 3.2. Marine licence determinations must be made in accordance with the UK Marine Policy Statement and the Welsh National Marine Plan. The ES must show full consideration of the Plan policies. Please see point 0.11.
- 3.3. The consenting processes, associated requirements and authorities for the totality of the project should be identified.

4. Population & Human Health - Chapter 3

- 4.1. NRW PS agree that population and human health is scoped into the assessment.
- 4.2. Public Health Wales (PHW) would expect the project to comply in full with best practice techniques. PHW indicates that if good management and maintenance of the works in compliance with current sector guidance is followed, there should not be any adverse impacts to human health, during or after construction.
- 4.3. NRW consider the assessment should be carried out as detailed within the Scoping Report.

5. Biodiversity Marine – Chapter 4 of Scoping Report

Benthic subtidal and intertidal ecology (Scoping Report section 4.1.1)

- 5.1. NRW PS draw to your attention, as identified by NRW A, that there are records of blue mussel beds within the planning boundary of the development. These beds are listed as 'Habitat of Principal Importance to Wales' under Section 7 of the Environment (Wales) Act (2016), and must be appropriately considered in the ES.
- 5.2. NRW A note that no subtidal surveys are proposed. NRW A have a low confidence in the existing subtidal data identified within the Scoping Report. NRW A indicate that the DDV survey undertaken in 2015, which classified much of the study area as *Arenicola marina* in infralittoral fine sand or muddy sand' (SS.SSA.IMuSa.AreISa), has relatively low confidence due to the age of the data and the lack of associated direct ground-truthing. NRW A also note that there are discrepancies between the habitats maps shown in Figures 4.2 (EUSeaMap) and 6.7 (BGS) of the Scoping Report. NRW A request that a survey programme is conducted to gain an accurate understanding of the benthic habitats present within the Proposed Development and its zone of influence.
- 5.3. NRW PS consider that the baseline subtidal environment must be suitably assessed and see this to be necessary to fully understand the potential impacts on benthic habitats and identify possible mitigation measures. NRW PS would strongly recommend you engage with NRW A to ensure that baseline data relied upon or collected is suitable.
- 5.4. NRW PS recommend engagement with NRW A to understand the extent and sampling effort required to adequately assess the Proposed Developments direct and indirect impacts. NRW A advise that sediment samples are analysed for PSA, macrofauna and contaminants. NRW PS remind you that this has to be undertaken by an accredited UK laboratory in line with the guidelines of the NMBAQC scheme.
- 5.5. NRW PS disagree that accidental pollution should be scoped out of the ES (Table 4.4). NRW PS consider that the details of the proposed post-consent plans are unknown at this stage. Therefore, as mitigation measures are not yet known, accidental pollution should be scoped into the assessment.

Fish and shellfish ecology (Scoping Report section 4.1.2)

- 5.6. NRW PS agrees with the sites included and potential impacts scoped into the assessment for fish and shellfish ecology (Table 4.5). NRW A welcomes the inclusion of nearby designated sites (Cardigan Bay SAC, Afon Teifi SAC, Cleddau Rivers SAC, Pembrokeshire Marine SAC and Carmarthen Bay and Estuaries SAC) in view of the migratory species features.
- 5.7. NRW PS agrees with NRW A that the relevant section 7 species listed within the Environment (Wales) Act 2016 should also be scoped into the assessment.
- 5.8. NRW PS agrees that underwater noise from piling during construction is scoped into the EIA and agrees with the preliminary mitigation measures proposed.

NRW A advises that these standard mitigation measures are likely to be sufficient; however, stresses that measures designed to reduce noise impact for mammals are not always appropriate on fish species. NRW PS would encourage you to engage with NRW A as you carry out your assessment and consider appropriate mitigation measures.

Marine mammals (Scoping Report section 4.1.3)

- 5.9. The activity is located within the West Wales Marine SAC and Celtic and Irish Seas Marine Mammal Management Unit (MMMU) for harbour porpoise. NRW A consider that the Marine Mammal Management Unit are the appropriate spatial scale that should be used when assessing impact. NRW A therefore will expect that North Anglesey Marine SAC is included in the assessment as animals from the SAC population could be found in the area and potentially be impacted. This is particularly relevant for impact pathways that result in injury or mortality. NRW PS will expect that the assessment is carried out in line with NRW's position statement¹.
- 5.10. Regarding grey seals, NRW A indicates that the OSPAR Region III should be used as the assessment's spatial area rather than Seal Management Units (SMU's). However, no change will be required as this will also result in the inclusion of all three Welsh sites for grey seal.
- 5.11. NRW A also requests that common dolphin is included in the assessment of marine mammals.

6. Biodiversity – Terrestrial and Birds - Chapter 5 of Scoping Report

- 6.1. No specific comments were received from consultees regarding the Terrestrial Biodiversity.
- 6.2. NRW PS agree with the scoping out of the ES of non-marine designated nature conservation sites or terrestrial habitats including those listed under Section 7 of the Environment (Wales) Act 2016.
- 6.3. NRW PS welcome that surveys for otter, black guillemot and bat roosts will be conducted to inform the need to include these species in the ES.
- 6.4. NRW A wish to remind the applicant that The Wildlife and Countryside Act (1981) protects all birds and their eggs. NRW PS would expect that the applicant provides further information on how they will ensure no bird nests or eggs are damaged during construction. NRW A suggest the applicant considers the possibility of creating habitat for black guillemots as described in Leonard *et al.* (2015)².

7. Coastal Processes - Chapter 6 of Scoping Report

¹ [NRW \(2023\) Position on Assessing Behavioural Disturbance of Harbour Porpoise \(*Phocoena phocoena*\) from underwater noise and NRW's Position on Assessing the effects of hearing injury from underwater noise for environmental assessments](#)

² Leonard, K., Greenwood, J.G. & Wolsey, S. (2015) Nest Boxes for Black Guillemots. Northern Ireland Seabird Report 2014, 40-41

- 7.1. NRW PS welcome the proposal to carry out numerical modelling to inform your assessment. NRW PS would expect consideration to be given to advice provided by NRW A in relation to modelling proposed.

Numerical modelling:

- 7.2. NRW PS agree with NRW A requirements for physical numerical modelling (2D and 3D) of real time series data sets from fixed point current velocities and direction (normally through a fixed point seabed mounted ADCP) as well as accurate water depth measurements, wave data (available from wave buoys or AWACs), and accurate high resolution bathymetry for the study area. If the model will be used for sediment transport estimates, then seabed sediment characteristics (size, distribution, type etc) will also be required.
- 7.3. NRW PS understand that that numerical modelling for Fishguard Harbour was conducted in support of the earlier Fishguard Linkspan licence in 2018 (CRML1806) and requests it is incorporated to inform the baseline. However, NRW A requires clarity on the data used to calibrate and validate the earlier numerical model (hydrodynamic survey data (waves, currents and water levels) and bathymetric studies carried out).
- 7.4. NRW A welcomes the intention to conduct further numerical modelling to quantify the potential changes to the waves, currents and sediment transport regime caused by the dredging activities and the construction and operation of the rock armour revetment and land reclamation proposed, including the fixed pontoon.
- 7.5. NRW PS agree with NRW A that the numerical modelling calibration and validation results and the scenario test outputs should be included as a separate technical annex to the coastal processes ES chapter so that the model calibration and validation outputs and the model scenarios proposed to assess the physical processes impacts can be reviewed.

Modelling of SSC plumes:

- 7.6. NRW PS agree with NRW A that proposed modelling should also assess the duration, as well as the dispersion and settlement of SSC plumes generated during the construction phase and its impacts (e.g. on benthic ecology, water quality, etc).

Scour Protection

- 7.7. NRW PS agree with NRW A that the possible formation of secondary scour pits around toe of the rock armour needs to be assessed when considering the placement of scour toe protection in front of the rock armour revetment.

Coastal Erosion

- 7.8. NRW PS agree with NRW A that consideration needs to be given to the potential for increased erosion at the end of the revetment and the potential for seabed lowering in front of the revetment caused by partial wave reflection.

8. Water Resources & WFD - Chapter 7 of Scoping Report

- 8.1. As identified in the Scoping Report, Water Resources should be included in the ES and a WFD compliance assessment should be undertaken in support of the application.
- 8.2. NRW PS agree that the potential impacts on the water and benthic environment arising from the resuspension of sediment-bound contaminants through dredging during the construction and operation phases is scoped into the EIA.

9. Flood Risk - Chapter 8 of Scoping Report

- 9.1. NRW PS have received no comments in relation to Flood Risk and agree an assessment of impacts should be carried out as set out in the Scoping Report.

10. Noise & Vibration - Chapter 9 of Scoping Report

- 10.1. NRW PS have received no direct comments in relation to Chapter 9 Noise and Vibration of the Scoping Report, and agree that construction noise and vibration should be scoped into the EIA.
- 10.2. However, please note that no information has been provided within the Scoping Report regarding how material will be transported to site. There is an indication on Table 3.4 that there will be no road transport increase. If the materials to site will be transported by sea, then an increase in vessel traffic is expected and should be appropriately considered.

11. Underwater Acoustics - Chapter 10 of Scoping Report

- 11.1. NRW PS agree that underwater noise from piling during construction is scoped into the EIA with the preliminary mitigation measures proposed.
- 11.2. The assessment should be based on the 'noisiest' dredging and piling method proposed to ensure the worst-case scenario is assessed.
- 11.3. Please note advice included in point 5.11. NRW A indicate that standard mitigation measures are likely to be sufficient; however, stresses that measures designed to reduce noise impact for mammals are not always appropriate on fish species.
- 11.4. NRW A also advise that assessments for fish focus on fish as a stationary receptor (this is contrary to the proposal within section 10.4 of the Scoping Report) as this will represent the worst case scenario. NRW PS would encourage you to engage with NRW A as you carry out this assessment and consider appropriate mitigation.

12. Air Quality & Climate - Chapter 11 of Scoping Report

- 12.1. No specific comments regarding Air quality and Climate have been received. However, please note Public Health Wales comments in section 4.2 in relation to using best practice techniques.
- 12.2. NRW PS consider that the ES should include an assessment of the impacts as set out in the Scoping Report.

13. Archaeology, Architectural & Cultural Heritage - Chapter 12 of Scoping Report

- 13.1. NRW PS agree that archaeology and cultural heritage is scoped into the assessment.
- 13.2. NRW PS agree with the proposal to produce a Historic Environment Desk Based Assessment as well as preparing a Written Scheme of Investigation. NRW PS would strongly encourage that you engage with RCAHMW, HENEB and Cadw for guidance on these documents.
- 13.3. NRW PS agree that there is potential for the Proposed Development to impact designated and undesignated historic environment. NRW PS welcome the proposal to produce and implement a Protocol for Archaeological discoveries to cover any dredging works.
- 13.4. Due to the nature of the material, the RCAHMW request that the intertidal historic environment (from mean high water spring mark) is assessed as part of the marine historic environment rather than the terrestrial historic environment. NRW PS would advise that you engage with RCAHMW, HENEB and Cadw as you carry out your assessment.
- 13.5. Cadw have indicated they are in agreement with the approach for assessing the historic environment. This includes the production of a Historic Environment Desk-based Assessment (as per the Chartered Institute for Archaeologist), and recommends a search area of 3km for designated historic assets (see Annex) and 1km for non-designated historic assets. The impact should be assessed in accordance with the Welsh Government guidance given in the document “The Setting of Historic Assets in Wales”. Cadw expects a stage 1 assessment to be carried out for all of the designated historic assets listed in the Annex, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific historic assets.
- 13.6. Cadw also indicates that section 12.2.2 of the Scoping Report identifies the legislation and guidance relevant to the historic environment, however, Cadw notes that The Historic Environment (Wales) Act 2023 was enacted on the 4 November 2024 and therefore The Ancient Monuments and Archaeological Areas Act 1979 and The Historic Environment (Wales) Act 2016 should be removed from this list of relevant legislation.

14. Soils, Geology and Geohydrology - Chapter 13 of Scoping Report

- 14.1. NRW PS have received no comments in relation to Soils, Geology and Geohydrology and agrees it should be scoped into the EIA. NRW PS consider that the ES should include an assessment of the impacts as set out in the Scoping Report.

15. Land Use and Material Assets - Chapter 14 of Scoping Report

- 15.1. NRW PS have received no comments in relation to Land Use and Material Assets and agrees it should be scoped into the EIA. NRW PS consider that the ES should include an assessment of the impacts as set out in the Scoping Report.

16. Transport - Chapter 15 of Scoping Report

- 16.1. NRW PS have received no specific comments in relation to Transport and agrees it should be scoped into the EIA. NRW PS consider that the ES should include an assessment of the impacts as set out in the Scoping Report.
- 16.2. NRW PS stress that it is not clear how materials will be transported to site and this should be made clear as part of the EIA, and impact on traffic and transport assessed if necessary.

17. Seascape, Landscape & Visual - Chapter 16 of Scoping Report

- 17.1. NRW PS have received no specific comments in relation to Seascape, Landscape & Visual and agrees it should be scoped into the EIA. NRW PS consider that the ES should include an assessment of the impacts as set out in the Scoping Report.

18. Waste - Chapter 17 of Scoping Report

- 18.1. NRW PS have received no specific comments in relation to Waste and agrees construction and operation should be included in the EIA. NRW PS consider that the ES should include an assessment of the impacts as set out in the Scoping Report.
- 18.2. Please note that adequate disposal of dredging arising will be required. NRW A note their guidance in relation to undertaking sediment management activities sustainably [Natural Resources Wales / Managing sediment: marine coastal and estuarine](#)
- 18.3. Please note that if you require to dispose of sediment at sea, you will require to identify a suitable disposal site within the application. The location of the disposal sites and their status (open, closed or disused) can be found in the [Wales Marine Planning Portal](#).

19. Risk of Major Accidents & Disasters - Chapter 18 of Scoping Report

- 19.1. NRW PS have received no specific comments in relation to the Risk Major Accidents & Disasters and agrees it should be included in the EIA for construction and operation.

20. Conclusion - Chapter 19 of Scoping Report

- 20.1. NRW PS have received no specific comments in relation to the Conclusions of the Scoping Report

21. Shipping and Navigation

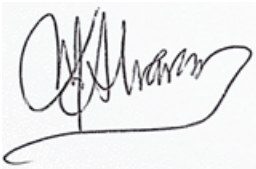
- 21.1. No reference is made in the Scoping Report to Shipping and Navigation. NRW PS consider that Shipping and Navigation should be scoped in the EIA. NRW PS understand that there will be a Navigation Safety Plan and Vessel Management Plan which we agree should be used as mitigation measures.
- 21.2. The MCA considers that the impact on recreational sea users should be included in the EIA. NRW PS therefore request recreational activity is included in the EIA.
- 21.3. Little information has been provided within the Scoping Report regarding how material will be transported to site.. There is an indication on Table 3.4 that

there will be no road transport increase. The MCA would like to understand if materials will be transported on site by sea, as the impact of increased vessel activity should be assessed as part of the EIA.

22. Cumulative impacts and in-combination effects

- 22.1. NRW PS have received no specific comments in relation to the cumulative and in combination assessment approach.
- 22.2. NRW PS understand that the following data sources may provide useful information on other projects for the assessment of cumulative effects:
- The Nationally Significant Infrastructure Projects register:
<https://infrastructure.planninginspectorate.gov.uk/projects/register-of-applications/>
 - The Developments of National Significance Register:
<http://gov.wales/docs/desh/publications/180312-dns-register-en.pdf>
 - Planning Policy e.g. Local Development Plans, Transport Plans (National and Local) and National Policy Statements.
 - An up to date list of marine licensable developments can be found at the following link:
<http://lle.gov.wales/catalogue/item/MarineLicences>

Yours sincerely



Dr. Maria Alvarez
Lead Specialist Officer
Marine Licensing Team
Natural Resources Wales

Approved by:



Dr. Emmer Litt
Marine Licensing Team Leader
Natural Resources Wales

Cc: All Consultation Bodies

Annex

Scheduled Monuments

PE030 Garn Wen Burial Chambers
PE031 Carn Wnda Burial Chamber
PE033 Pen-Rhiw Burial Chamber
PE096 Castle Point Old Fort
PE258 Incised Cross at Cemetery Cross Roads
PE485 Inscribed Stone 130m E of Penwaun
PE518 Parc Hen Standing Stone

Registered Parks and Gardens

PGW(Dy)22(PEM) Plas Glyn-y-Mel
PGW(Dy)63(PEM) Fishguard Bay Hotel
PGW(Dy)64(PEM) Manorowen

Registered Historic Landscape:

HLW (D) 11 Pen Gaer: Garn Fawr and Stumble Head

Listed Buildings:

12247	Training Ship Skirmisher	II
12248	Fishguard Bridge	II
12249	,2,Bridge Street,Lower Town,Fishguard,DYFED,SA65 9LX	II
12250	,6,Bridge Street,Lower Town,Fishguard,DYFED,SA65 9LX	II
12251	,10,Bridge Street,Lower Town,Fishguard,DYFED,SA65 9LX	II
12252	,1,Glyn-y-Mel Road,Lower Town,Fishguard,DYFED,SA65 9LY	II
12254	Glyn-y-Mel Cottage (Cwm Cwsgi)	II
12256	Plas Glyn-y-Mel, including quadrant wall & gatepier to W service court	II*
12257	,20,Glyn-y-Mel Road,Lower Town,Fishguard,DYFED,SA65 9LY	II
12258	Cleals	II
12261	,7,Hamilton Street,Fishguard,Fishguard,DYFED,SA65 9HL	II
12262	,11,Hamilton Street including area railings,Fishguard,Fishguard,DYFED,SA65 9HL	II
12265	Sycamore Lodge	II
12266	Premises occupied by The Dragon House	II
12267	Ffynnon Clun farmhouse & adjoining outbuilding	II
12269	,5,High Street,Fishguard,Fishguard,DYFED,SA65 9AN	II
12270	,11,High Street,Fishguard,Fishguard,DYFED,SA65 9AN	II
12271	Cartref Hotel	II
12272	,21,High Street,Fishguard,Fishguard,DYFED,SA65 9AW	II
12273	Hermon Baptist Church including forecourt walls and steps	II*
12274	Mileplate in forecourt wall of Hermon Chapel	II
12275	Cottage occupied by St John's Fishguard Nursing Division	II
12276	Bank House	II
12278	Mount Pleasant	II

12279	,43,High Street,Fishguard,Fishguard,DYFED,SA65 9AW	II
12280	Nevern House	II
12281	,61,High Street, including forecourt railing,Fishguard,Fishguard,DYFED,SA65 9AW	II
12283	,12,High Street,Fishguard,Fishguard,DYFED,SA65 9AR	II
12284	,14,High Street,Fishguard,Fishguard,DYFED,SA65 9AR	II
12287	Llys Mair	II
12288	,1,Hill Terrace,Fishguard,Fishguard,DYFED,SA65 9LU	II
12289	,2,Hill Terrace,Fishguard,Fishguard,DYFED,SA65 9LU	II
12290	,4,Hill Terrace,Fishguard,,DYFED,SA65 9LU	II
12291	,1,Hottipass Street,Fishguard,Fishguard,DYFED,SA65 9LJ	II
12292	Bodlondeb	II
12294	Kensington House	II
12295	,17,Kensington Street,Fishguard,Fishguard,DYFED,SA65 9LH	II
12296	,12,Kensington Street,Fishguard,Fishguard,DYFED,SA65 9LB	II
12297	,16/18,Kensington St,Fishguard,,DYFED,SA65 9LB	II
12298	Maesgwynne	II
12299	Parish Church of St Mary	II
12300	Inscribed stone in St Mary's Churchyard	II
12301	Railings to churchyard of Church of St Mary	II
12302	,1,Main Street,Fishguard,Fishguard,DYFED,SA65 9HG	II
12303	,3,Main Street,Fishguard,Fishguard,DYFED,SA65 9HG	II
12304	,5,Main Street,Fishguard,Fishguard,DYFED,SA65 9HG	II
12306	Sally Port	II
12307	Manor House Hotel	II
12308	Elim Lodge	II
12309	Ty Rhos	II
12310	Sail Cottage	II
12311	,16,Main Street,Fishguard,Fishguard,DYFED,SA65 9HJ	II
12312	,22,Main Street,Fishguard,Fishguard,DYFED,SA65 9HJ	II
12313	The Globe Inn	II
12314	Black Fox Bar	II
12315	Swansea House (Ty Abertawe)	II
12316	The Town Hall	II
12317	The Farmer's Arms	II
12318	Nos 15 and 16,,Market Square,Fishguard,Fishguard,DYFED,SA65 9HA	II
12319	Nos 17 and 18,,Market Square,Fishguard,Fishguard,DYFED,SA65 9HA	II
12320	,20,Market Square, including Boots the Chemists.,Fishguard,Fishguard,DYFED,SA65 9HA	II
12321	The Royal Oak	II
12323	Berachah Cottage	II
12324	,1,Newport Road,Lower Town,Fishguard,DYFED,SA65 9NA	II
12325	,15,Newport Road,Lower Town,Fishguard,DYFED,SA65 9NA	II
12328	The Dinas Arms	II
12329	Bodmor	II
12330	West wall and railings to garden at Bodmor	II
12331	Fishguard Fort	II

12332	Former store building	II	
12333	Tabernacle Independent Chapel	II	
12334	Walter Brearley House	II	
12335	,2,Park Street,Fishguard,Fishguard,DYFED,SA65 9HN	II	
12336	,4,Park Street,Fishguard,Fishguard,DYFED,SA65 9HN	II	
12337	Greenwood House	II	
12338	Park House	II	
12339	Bridge Cottages	II	
12341	Church of St Peter	II	
12345	Fishguard Bay Hotel	II	
12347	,19,Quay Street,Lower Town,Fishguard,DYFED,SA65 9NB	II	
12348	,21,Quay Street, incl decorative cobbled forecourt.,Lower Town,Fishguard,DYFED,SA65 9NB	II	
12349	,33,Quay Street,Lower Town,Fishguard,DYFED,SA65 9NB	II	
12350	,37,Quay Street,Lower Town,Fishguard,DYFED,SA65 9NB	II	
12352	The Quay, including slipway, bollard and flights of steps.	II	
12353	Dyffryn House	II	
12354	,1,The Slade, including front garden walls & gates,Fishguard,Fishguard,DYFED,SA65 9PE	II	
12356	The Monthly Tutor's Cottage	II	
12357	Rosslyn	II	
12360	Hill House	II	
12361	Tower House	II	
12362	Talarfor	II	
12363	Court House, front railings and gatepiers to right	II	
12364	Ardwyn and railings to front	II	
12365	Capel Pentour, including forecourt railings and gates	II	
12366	Prospect House	II	
12367	,29,Wallis Street,Fishguard,Fishguard,DYFED,SA6 59HP	II	
12369	,5,West Street,Fishguard,Fishguard,DYFED,SA65 9AE	II	
12370	The Old Post Office	II	
12373	Victoria Wine	II	
12374	,39,West Street,Fishguard,,DYFED,SA 65 9AD	II	
12379	Seaways Bookshop	II	
12380	,14,West Street,Fishguard,Fishguard,DYFED,SA65 9AE	II	
12381	Pen-rhiw	II	
12980	Church of St Gwyndaf	II*	
12981	Three walled enclosures at SE.Angle of churchyard of Church of St. Gwyndaf	II	
12982	Cartref	II	
12987	Pontiago Moor	II	
13029	Manorowen	II	
13048	Telephone Call-box adjoining No 2	II	
13072	,32,Main Street, including area railings.,Fishguard,Fishguard,DYFED,SA65 9HJ	II	
13073	Vincent House	II	
13084	Goodwick Institute	II	
14951	Former Farmhouse at Castell Farmyard	II	

15199	Walled Garden at Manorowen	II	
15200	Gazebo in walled garden at Manorowen	II	
15201	Home Farm Buildings, Manorwen north range.	II	
15202	Home Farm Buildings, Manorwen East range	II	
15203	Home Farm Buildings Manorwen South Range	II	
15204	Home Farm Buildings	II	
15205	St Marys Church	II	
15206	Tre-Llewelyn	II	
15881	,23,Glyn-y-Mel Road,Lower Town,Fishguard,DYFED,SA65 9LY	II	
22760	Berachah Presbyterian Church	II	
26026	,52,High Street,Fishguard,Fishguard,,SA65 9AR	II	
26028	,3,Hottipass Street,Fishguard,Fishguard,,SA65 9LJ	II	
26029	,35,Quay Street,Lower Town,Fishguard,,SA65 9NB	II	
26030	Emscote	II	
26031	Solway House	II	
26032	,4,Bridge Street,Lower Town,Fishguard,,SA65 9LX	II	
26033	The Ship Inn	II	
26034	,9,Newport Road,Lower Town,Fishguard,,SA65 9NA	II	
26035	Justin Cottage	II	
26036	Well Cottage/Bwthyn Ffynnon	II	
26037	,12,Bridge Street,Lower Town,Fishguard,,SA65 9LX	II	
26038	,2,The Slade, including front garden walls & gates,Fishguard,Fishguard,,SA65 9PE	II	
26039	,5,Newport Road,Lower Town,Fishguard,,SA65 9NA	II	
26040	Bryn Haulwen	II	
26041	Moonstone	II	
26042	,8,Hill Terrace,Fishguard,Fishguard,,SA65 9LU	II	
26043	,30a,Main Street,Fishguard,Fishguard,,SA65 9HJ	II	
26044	The Fishguard Arms	II	
26045	,26,Main Street,Fishguard,Fishguard,,SA65 9HJ	II	
26046	,18,Main Street,Fishguard,Fishguard,,SA65 9HJ	II	
26047	,20,Main Street,Fishguard,Fishguard,,SA65 9HJ	II	
26048	,16,High Street,Fishguard,Fishguard,,SA65 9AR	II	
26049	Llys-Teg	II	
26050	,47,High Street,Fishguard,Fishguard,,SA65 9AW	II	
26051	Old Pump House	II	
26052	,79,High Street,Fishguard,Fishguard,,SA65 9AW	II	
26053	,21a,High Street,Fishguard,Fishguard,,SA65 9AW	II	
26054	,11a,High Street,Fishguard,Fishguard,,SA65 9AN	II	
26055	,13,High Street,Fishguard,Fishguard,,SA65 9AN	II	
26056	,7,High Street,Fishguard,Fishguard,,SA65 9AN	II	
26057	,9,High Street,Fishguard,Fishguard,,SA65 9AN	II	
26058	,7,Newport Road,Lower Town,Fishguard,,SA65 9NA	II	
26059	,9,Hamilton Street,Fishguard,Fishguard,,SA65 9HL	II	
26060	,13,Hamilton Street including area railings,Fishguard,Fishguard,,SA65 9HL	II	
26062	,25,Quay Street,Lower Town,Fishguard,,SA65 9NB	II	
26063	,22,Glyn-y-Mel Road,Lower Town,Fishguard,,SA65 9LY	II	

26064	,3,Hamilton Street,Fishguard,Fishguard,,SA65 9HL	II
26065	,5,Hamilton Street,Fishguard,Fishguard,,SA65 9HL	II
26066	Penrhyn	II
26067	Lime Kilns	II
26068	Lifeboat Memorial	II
26069	,5,Hill Terrace,Fishguard,Fishguard,,SA65 9LU	II
26070	Range of outbuildings at Maesgwynne	II
26071	Cartshed at Maesgwynne	II
26072	,16,West Street,Fishguard,Fishguard,,SA65 9AE	II
26073	Ty Twt	II
26074	,37,West Street,Fishguard,Fishguard,,SA65 9AD	II
26075	,41,West Street,Fishguard,Fishguard,,SA65 9AD	II
26076	Halifax Building Society	II
26077	,73,High Street, including forecourt railings.,Fishguard,Fishguard,,SA65 9AW	II
26078	Bennett's Navy Tavern	II
26079	New Villa	II
26081	,7,Main Street including area railings,Fishguard,Fishguard,,SA65 9HG	II
26791	The Drim	II
26792	Outbuilding at The Drim	II