

## **Gimlet Rock - Pwllheli**

**Application for Marine Licence for new pontoons and access gangway**

**Case Ref number CML2531**

**Supporting documentation for WFD and Welsh National Marine Plan**

**April 2025**



The next section discusses the proposal in relation to WFD and Welsh National Marine Plan.

### **Pontoon concept - WNMP Policy SOC 1 – Access to the Marine Environment**

The pontoon is to be provided to allow uses of the caravan park to safely berth vessels at high to mid tide to visit the site. At present there is little facility to allow visitors to use the park facilities, this new pontoon provides a safe berthing facility. Access is via an access gangway that rises and falls with the tide to allow access throughout the tide cycle.

The form of pontoons will be a proprietary pontoon manufacturer, secured to piles driven into the seabed.

The drawings attached show the outline design of the pontoon layout. The pontoons have a total length of 36m and will rest on the seabed on very low tides

## **Matters relating to WFD and Welsh National Marine Plan**

In the course of preparing the Marine licence application the project team have identified 6 main issues which may arise in consultation with stakeholders in regards marine pollution, safeguarding the environment both during construction and operation as well as some potential wider impacts. In no particular order these are;-

- Pollution of marine environment during construction
- Pollution of marine environment during operation
- Impact on Marine Mammals during construction
- Impact on sea birds during construction
- Impact on fisheries and migratory fish during construction
- Invasive species

An EIA is also attached as supporting information.

The following section details the WNMP and the relevant policy number and matters that are dealt with above.

### **Pollution of the marine environment during construction**

*WNMP Policy numbers, SOC\_3, Env\_01,02,05 and 07*

#### **Site investigations**

Part of the application is the exercise to undertake boreholes on the line of the new pontoons to inform engineering design. It is proposed to undertake up to 10 boreholes along the length of the new pontoon. The boreholes will be undertaken by land-based plant. It is appreciated that there would be concern about potential invasive species and pollutants brought to site from other regions on the rigs. To mitigate this risk the plant will be pressure washed clean prior to being delivered to site to ensure the removal of any potential harmful contaminants and invasive species that may present a biohazard.

### **Site Investigation Methodology**

- A temporary trackway will be laid onto the beach and a working area will be created at the required locations in the same material
- A Sampling rig will access the locations
- The rig will sink bore holes and take samples for later investigation.
- Waste will be returned to the bore holes.
- The working areas and trackway will be recovered

### **Piling Methodology**

- The type of piles required will be subject to the Site Investigation results
- A temporary trackway will be laid onto the beach and a working area will be created at the required locations in the same material
- A piling rig will access the specified locations
- It will create a bore hole and will line this with a casing
- A pre made reinforcement “cage “ will be inserted and the casing will be filled with concrete
- No spillage of concrete will be permitted and close monitoring will take place
- The operation will take several days
- Once the piling has been completed the trackway and working areas will be removed
- The tidal movements will quickly restore the surface condition of the foreshore

### **Pontoon Installation Methodology**

- The proprietary pontoons will be delivered assembled
- They will be launched using a HIAB or crane and will be towed to an agreed storage location.
- Each unit will be brought to its location and attached to the relevant pile.
- As each unit is fixed it will be linked to the adjacent units
- It is possible, subject to design, that an inconspicuous support frame will be required to support part of the pontoon at low tides.

### **Access Gangway Installation Methodology**

- The Gangway will be brought to site complete having been manufactured off site
- The landward end will have been modified to receive the pivoting end of the gangway
- The gangway will be lifted into place with a large, tracked excavator operating on the beach
- It will be attached at the landward end
- The Gangway will roll along a track on the surface of the first pontoon as it adjusts to variations in tidal levels

The construction works will be undertaken by land-based plant. It is appreciated that there would be concern about potential invasive species and pollutants brought to site from other regions on the plant. To mitigate this risk the plant will be pressure washed clean prior to being delivered to site to ensure the removal of any potential harmful contaminants and invasive species that may present a biohazard.

### **Fuelling site equipment**

To mitigate risk of fuel spill when filling up excavators, dump trucks etc there will be a site spill kit at the fuel bowsers / tanks & in the working area, all plant is to carry a suitable size spill kit. Other mitigation will be;-

- Personnel are to be briefed on the location of the Spill Kits & their application during site inductions.
- All used spill kit pads, absorbents, etc. are to be disposed of in the site oil waste bin.
- Any fuel is to be stored no closer than 10m from any water course/ tidal body & surface water drainage.
- Fuel is to be stored either within a bunded storage tank/bowser with a minimum of 110% of the capacity of the drums volume.

### **Pollution of marine environment during operation**

The only maintenance operation in the scheme life will be the occasional pressure washing of pontoons and piles to remove marine growth, this will be undertaken by using clean water only.

### **Impact on Marine Mammals during construction**

*WNMP Policy numbers, Env\_01,02,05 and 07*

There are marine mammals in the area that could be impacted by the works. Piling will be used for the pile to support the pontoons and the boreholes, therefore there will be some noise and vibration. Piling the support piles and Boreholes will take place at low water when access can be gained by land-based plant.

Given no works will take place off floating plant, it is still proposed that by tracking plant on the beach in many ways 'soft starting techniques' will be used. The Borehole works will be

relatively quick to undertake, 10 boreholes will likely take place over 12 days, 1 day per bore hole and piling over 10 days or so allowing for tide. No works will take place at night as mitigation for fish and otters, and some days there may be no work due to tide restrictions

As all activities will take place at low water, the impact on Mammals ( Seals, Dolphin etc) is anticipated to be minimal and not a concern. If any reports of mammals in the river are reported or sighted when work is to take place, then work will cease for that shift if possible ( if halfway through concrete pour it may not be possible).

### **Impact on sea birds during construction**

*WNMP Policy numbers, SOC\_3, Env\_01 and 02*

There is various birdlife in the area that could be impacted by the works, including the Red throated diver. The noise of piling may disturb the birdlife during the works, the EIA enclosed with the application highlights possible disturbance to wintering non-breeding waders (Curlew, Oystercatcher, Ringed Plover and Turnstone).

The works will take place over a number of weeks, with activities confined to several hours a day due to tidal restrictions, some days there may be no works at all due to neap tides etc. Installation of pontoons and access gangway is a relatively quiet operation no noisier than any daily activity in Pwllheli harbour and only requires a few days using a crane or excavator to lift things into place.

### **Impact on fisheries and migratory fish during construction**

*WNMP Policy numbers, SOC\_3, Env\_01,02,05 and 07*

Migratory fish transit the Afon Erch at certain time of the year, as well as other fish which transit past the slipway location on a daily basis. As with the marine mammals as discussed above, there will be noise and vibration due to piles installation and bore holes. Piling the support piles and Boreholes will take place at low water when access can be gained by land-based plant.

Given no works will take place off floating plant, it is still proposed that by tracking plant on the beach in many ways 'soft starting techniques' will be used. The Borehole works will be relatively quick to undertake, 10 boreholes will likely take place over 12 days, 1 day per bore hole and piling over 10 days or so allowing for tide. No works will take place at night as mitigation for fish and otters, and some days there may be no work due to tide restrictions . As main construction works will take place at low water, it is postulated that the fish will not be impacted by the works. At low water on a spring tide, the river channel is some 20m from the toe of the slipway.

The works will take place over a number of weeks, with activities confined to several hours a day due to tidal restrictions, some days there may be no works at all due to neap tides etc. No works will take place at night.

### **Invasive species**

*WNMP Policy number Env\_03*

As highlighted above, it is proposed to undertake up to 10 boreholes along the length of the new slipway. At this stage it is anticipated that the boreholes will be undertaken by a small borehole rig that is delivered by lorry and tracked onto the beach. It is appreciated that there would be concern about potential invasive species and pollutants brought to site from other regions on the rig. To mitigate this risk the rig will be pressure washed clean prior to being delivered to site to ensure the removal of any potential harmful contaminants and invasive species.

No material apart from timber for supports, new piles and the pontoons, will be brought to site. Any plant brought to site will be cleaned prior to delivery to reduce risk of any biohazards and invasive species being brought to site from other locations.