

Ein cyf/Our ref: CAS-262468-Y7W1
Eich cyf/Your ref: A494 Dee Bridge

By Email - j.stoddard@rmlconsult.com

Dyddiad/Date: 31 January 2025

Dear Jon Stoddard,

BWRIAD/PROPOSAL: A494 River Dee Bridge Replacement Scheme

LLEOLIAD/LOCATION: A494 River Dee Bridge, Queensferry

Thank you for consulting us on the scoping opinion request for the above project which we received on the 18 December 2024.

We are commenting because we consider that the proposals are likely to give rise to significant effects.

We advise that the likely significant effects are assessed by the applicant, and we consider that they should be 'scoped in' to any future Environmental Statement (ES).

Please note that the comments provided herein are made without prejudice to any further advice NRW may need to give, or decisions NRW may need to take, should new information emerge that NRW will need to take into account.

We have reviewed the information provided in the 'Environmental Scoping Report' (dated 09/12/24 by Mott Macdonald)

Our following comments include those matters within NRW's remit that we consider will need to be taken into account and applied to the Environment Impact Assessment (EIA) and the resulting ES. For ease of reference, our comments are provided in the order that they are covered in the Scoping report.

Geology and Soils

The 'Environmental Scoping Report' confirms geology and soils will be scoped in with a chapter included in the ES. We agree geology and soils should be scoped in and provide the following comments.

We are satisfied with the proposed methodology and mitigation/enhancements, and if followed, we do not anticipate any likely significant detrimental effects on controlled waters or contaminated land. The Scoping report appears to be comprehensive and references all the relevant guidance and other documents we would expect.

Given that the location is not of the highest environmental sensitivity, and it is already heavily developed, including with existing bridges, and already impacted from past industrial and other contamination, and that the Scoping Report proposes comprehensive assessment, pollution control, remediation and other measures to be included in the environmental statement, we do not have concerns with the Scoping Report at this stage of the process. We will provide further advice once in receipt of further assessment as the ES is developed.

Road Drainage and water environment

Flood Risk

The 'Environmental Scoping Report' confirms flood risk will be scoped in within a road drainage and water environment chapter included in the ES. We agree flood risk should be scoped in and provide the following comments.

Our Flood Risk Map confirms the development site to be located partially within Zone C1 and C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and most of it is within Flood Zone 2 and 3 (Rivers and Sea). The site is located across the tidal river Dee.

No substantial assessment of flood risks or Flood Consequences Assessment (FCA) have been provided because of ongoing hydraulic flood risk modelling work. We note that discussions concerning the approach to be taken to the modelling were held in September 2024 and we provided comments in December 2024. We recommend that this updated modelling is undertaken, and proposals are not progressed further until this is complete.

The flood risk modelling study will need to examine the existing flood risk to the site (baseline) and the flood risk to the proposed development under the design event – the design event being the 0.5% (1 in 200 year) Annual Exceedance Probability (AEP) tidal event with appropriate breach/overtopping analysis and allowance for climate change over the lifetime of the development (120 years). We will need to review this model prior to its use in your FCA.

The design/method of construction and any proposed mitigation, including land raising must also be included in the FCA. To meet requirements of A1.14 of TAN15, it must be demonstrated that the development can be designed to be flood free in the design event. It must also be demonstrated that the proposed development does not negatively impact flood risk elsewhere to comply with A1.12 of TAN15.

Impacts on flood risk assets including the Dee embankment, Queensferry Drain, associated pumping station and others will also need to be fully assessed and agreed as part of the FCA and permit stage. This should include details on maintenance, access and proposed designs.

Section 7.6 of the Environmental Scoping Report sets out some of the impacts of the scheme with section 7.7 summarising some mitigation, however this is not deemed sufficient and will need to be supported by a detailed FCA.

Flood risk activity permits/Marine Licence

Flood risk activity permits (under Environmental Permitting Regulations England and Wales 2016) will be required for some stages of the proposed development. Some of the works will also require a Marine Licence – these are usually works that take place lower than the Mean High-Water Spring. We would welcome a list of the works that are deemed to require permits in the FCA.

Details of the FRAP application process, including timescales, can be found on our website: [Natural Resources Wales / Apply for a flood risk activity permit \(FRAP\)](#)

Details of what to include with a FRAP application can also be found online: [Natural Resources Wales / Flood risk activity permit application \(FRAP\): Information you will need to provide](#)

Given location and scale of development a Habitats Regulations Assessment (HRA) will be required and should be included in the EIA.

In summary, flood risk from the Tidal Dee and Queensferry drain is likely to be significant. Flood risk is included in the scope of the EIA and at this preliminary stage flood risk hydraulic modelling to inform the Flood Consequences Assessment (FCA) should be completed to enable us to provide further advice.

Flood risk asset impacts will need to be assessed, and clarification should be provided on what aspects will need a marine licence and what will require a flood risk activity permit to advise on methods/design etc.

We advise that proposals should not be progressed further than preliminary EIA stage, prior to the completion of an FCA/modelling and the above addressed and discussed with NRW.

We also recommend Flintshire lead local flood authority (LLFA) are included in consultation of FCA and proposed surface water attenuation/SAB approvals.

Water Quality and Water Framework Directive (WFD)

The 'Environmental Scoping Report' confirms water quality and WFD will be scoped in within a road drainage and water environment chapter included in the ES. We agree water quality and WFD should be scoped in and provide the following comments.

With reference to Section 5.2.1, we advise that the ES should include specific sections covering the effects of the proposal on the marine environment. We note the inclusion of marine designated features of the Dee Estuary SAC in this scoping report. We advise that the impacts from increased suspended sediment, sediment contaminant remobilisation, increased water turbidity and release of dissolved contaminants to surface water should be included for assessment specifically for the marine environment.

Sections 2.5.2 and 7.7 we welcome the worst-case scenario approach and welcome the use of the construction environmental management plan (CEMP) to set out mitigation and controls to minimise adverse effects during construction.

Sections 6.6.7 and 7.6.1 we note the reference to sediment disturbance during foundation works within the River Dee and the reference to dredging at the Airbus Load Out Facility. It should be ensured that any sediment disturbed and/or mobilised into the water column has

been analysed for contaminants and compared with suitable reference values for the marine environment (e.g. Centre for Environment, Fisheries and Aquaculture Science (CEFAS) action levels) [Marine Licensing: sediment analysis and sample plans - GOV.UK](#). The effects of the increase in suspended sediment concentration (SSC) and the risk of remobilising contaminants into the water column from dredging should be included in the ES.

Section 6.6.6, we advise that the effects of contaminated water from dewatering activities entering the surface water environment and the impact on the marine environment should be included for assessment. Suspected or known sources of contaminated soils from previous land-use should be assessed. Mitigation of the effects of accidental release of contaminated water into the marine environment should be developed and included in the ES and the CEMP.

Mitigation, we welcome the use of a CEMP to control any discharge of contaminated runoff generated during the construction phases of the proposal. We advise reference should be made to guidance for the prevention of pollution during construction works: [Guidance for Pollution Prevention \(GPP\) documents | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)

Physical Processes

We advise that physical process should be scoped in and included within the road drainage and water environment chapter of the ES, we provide the following comments.

Section 7.5, we advise the baseline condition should include a baseline description of the River Dee and Dee Estuary hydrodynamics including: tidal currents, tidal excursion limits, wave and wind regime, freshwater river flow, saline stratification); the existing sediment transport processes; riverbed morphology and sediment type.

We advise the applicant reads the NRW guidance document GN41 Marine Physical Processes Guidance to inform Environmental Impact Assessment (EIA) [Natural Resources Wales / Marine and coastal physical processes assessments](#)

We advise that the applicant reads Evidence Report No: 243 Guidance on Best Practice for Marine and Coastal Physical Processes Baseline Survey and Monitoring Requirements to inform EIA of Major Development Projects.

<https://naturalresources.wales/media/689057/guidance-on-best-practice-for-marine-and-coastal-physical-processes-baseline-survey-and-monitoring-requirements-to-inform-eia-of-major-development-projects.pdf>

Section 7.6.1, we acknowledge and welcome that under construction impacts (section 7.6.1) it includes: *“Localised dredging may be required at the former Airbus Load Out Facility (ALOF) to ensure there is sufficient depth of water to float the jack up barge”*.

We advise that maintenance dredging will cause SSC plumes upstream and downstream of the proposed dredge area and that there is a potential for release of contaminants, both of which must be assessed in the ES. The volumes of sediment to be dredged and the type of sediment must also be included in the ES.

In the event dredging is required at the former ALOF, we request clarification as to the fate of the dredge material. For example, will it be disposed of at designated disposal sites, or used for beneficial use on shore. We request that the developer takes account of NRW

position statement: (<https://naturalresources.wales/guidance-and-advice/business-sectors/marine/managing-sediment-marine-coastal-and-estuarine/?lang=en>).

We advise that the assessment of impact to other receptors (e.g. benthic ecology, water quality, fisheries) caused by the generation of SSC plumes during the construction phase (e.g. piling for bridge supports, dredging at the ALOF, disturbance of the river bank caused by plant activity) needs to use the maximum spring tide excursion of the tidal River Dee, to define the spatial extent of impact upstream and downstream of the proposed works.

Section 7.6.2, we acknowledge and welcome the intention to include “Changes to flow, velocity or sediment dynamics within the River Dee as a result of additional piers”. We further note in Table 7.2 the intention of the developer to conduct hydrodynamic and sediment transport modelling to support the impact. We request the opportunity to review the model calibration and validation outputs, and the model scenarios proposed to assess the physical processes impacts. We recommend that the numerical modelling calibration and validation results and the scenario test outputs are included as a separate technical annex to the ES Road drainage and water environment chapter.

NRW has developed an Evidence Report (*Advice to Inform Development of Guidance on Marine, Coastal and Estuarine Physical Processes Numerical Modelling Assessments*) which sets out the recommended approach to hydrodynamic and sediment transport modelling for EIA projects. We recommend that the proposed modelling work for this project is developed in accordance with this Report.

Link to Evidence Report No: 208 Advice to Inform Development of Guidance on Marine, Coastal and Estuarine Physical Processes Numerical Modelling Assessments.
<https://naturalresources.wales/media/686254/eng-report-208-guidance-marine-coastal-and-estuarine-physical-processes-numerical-modelling.pdf#>

We advise the inclusion of the potential for riverbed scour around the bridge supports over medium to long term. We advise that the applicant includes the potential impact that the presence of the new infrastructure in the River Dee will have on the morphology of the system including adjacent intertidal areas and shorelines both in the short-term and long-term.

Section 7.7, if there is a potential for primary scour of the riverbed around the base of the bridge supports to arise, the effects of scour can be mitigated through the placement of scour protection. However, if primary scour protection is considered an option, then the impact of secondary scour on the riverbed should be included in the assessment of impacts over the operational phase of the project.

Biodiversity

The ‘Environmental Scoping Report’ confirms biodiversity will be scoped in with a chapter included in the ES. We agree biodiversity (in respect of species and protected sites) should be scoped in and provide the following comments.

Protected Species

The Scoping report states that the proposed site has the potential to support great crested newts (GCN), bats, otters and water voles. GCN, bats and otters are European Protected

Species protected under Conservation of Habitats and Species Regulations 2017. Water voles are protected under the Wildlife and Countryside Act 1981.

Description of Biodiversity

The environmental statement (ES) must identify protected species within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.

Significance and Favourable Conservation Status

We advise that ES considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise consideration to be given to current conservation status (CCS), and demonstration of no likely detriment to maintenance of favourable conservation status (FCS) during construction operation and decommissioning phases of the scheme. Reference to CCS and FCS in accordance with [EC Guidance](#)¹ is advocated.

Key Habitats

Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present. We also advise that Habitats Directive Annex 1 habitats are identified as part of this assessment.

Assessment and mitigation

We advise the site is subject to assessment to determine the likelihood of protected species and that targeted species surveys are undertaken for all species scoped in. These should comply with current best practice guidelines and if the surveys deviate or there are good reasons for deviation that full justification for this is included within the EIA.

Should protected species be found during the surveys, information must be provided identifying the species-specific impacts in the short, medium, and long term together with any mitigation and compensation measures proposed to offset the impacts identified. We advise that the ES sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial, tenure, and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES. In respect of European protected species, we advise consideration of Section 3.3.2 of [Guidance on the strict protection of animal species of Community interest under the Habitats Directive](#).

Where a European Protected Species is identified and the development proposal is predicted to likely contravene the legal protection they are afforded, a licence should be sought from NRW. The ES must include consideration of the requirements for a licence and set out how the works will satisfy each of the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

¹ [EUR-Lex - C\(2021\)7301 - EN - EUR-Lex \(europa.eu\)](#). See section 3.2.3.b) re conservation status.

- it satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.
- there is no satisfactory alternative; and
- the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are translated into planning policy [through Planning Policy Wales \(PPW\) Edition 12](#) dated February 2024, sections 6.4.35 and 6.4.26 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The planning authority should take them into account when considering development proposals where a European Protected Species is present.

Local Biodiversity Interests

We recommend that the developer consults the local authority ecologists on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and areas that are considered important for the conservation of biological diversity in Wales.

We would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (E.g. bat groups, mammal groups).

Legislation and Policy Compliance Review

We advise that provisions of the EIA audit compliance in respect of relevant nature conservation legislation (UK and Wales) together with relevant local and national policies including BS 42020:2013.

Fisheries

The 'Environmental Scoping Report' confirms fish will be scoped in with a chapter included in the ES. We agree with the sites and features scoped in for further assessment, i.e. Migratory fish features of the river Dee and Bala Lake and Dee Estuary Special Area of Conservation (SACs). However, we advise that European smelt (*Osmerus eperlanus*) is a feature of both the river Dee and Dee estuary SSSI and should be included in the assessment. We agree that no surveys are required for baseline data collection and the key migration period for protected fish features is March to August inclusive based on fish trap data from the weir in Chester. Please be advised that some in-river work and use of percussive piling in the river should not take place during this period. We advise that the proposed methodology, and potential impacts revised to incorporate the specific comments detailed below.

Table 5-1: Significance Matrix. It should be noted that where the matrix spans two possible outcomes e.g. Slight or Moderate, the assessment should clearly set out the rationale and supporting evidence for the level of significance assigned in the assessment, and for protected features a precautionary approach should be taken in line with HRA guidance.

Section 7.6.1. Potential construction impacts. We advise that underwater noise from construction and demolition work (e.g. percussive piling) on bridge piles/supports or caissons should be included in the list of potential construction impacts. Furthermore, artificial light pollution should be included if works need to be lit to facilitate work during hours of darkness, as light can disrupt fish migration.

Section 7.6.1. Potential operational impacts. As above, artificial light pollution should be included in the potential operational impacts.

Table 8-1: Biodiversity resources importance. We advise that under Value (sensitivity) Marine Protected Areas includes Special Protected Areas, and consequently should be afforded International or European importance, rather than UK or National.

Table 8-3: Significance matrix. See comment above regarding use of matrices.

Paragraph 8.5.34. It should be noted that European smelt (*Osmerus eperlanus*) is a feature of both the river Dee and Dee estuary SSSI and should be included in the assessment.

Paragraph 8.5.35. We disagree with the statement that all the protected species do not feed on the journey up the estuary. European eels will likely feed and be resident in the channelised section. In addition, river lamprey primarily reside in estuaries feeding on estuarine fish, such as herring and flatfish (Maitland 2003). The redirecting/diversion of Queensferry Drain will need further consideration for Eels that may be inhabiting the drain. e.g. vigilance on site for any fish that may be present if de-watering is undertaken. Whilst this is of low fisheries value keeping the drain 'open' rather than culverted would be better for biodiversity in general.

Paragraph 16.1.4 (and associated footnote 277) We advise that the cumulative assessment should not just consider *significant* effects_and that any effects of greater than negligible significance should be included in the cumulative assessment, as the overall effect of many minor impacts over several projects may act up (cumulatively) to a significant effect overall.

Table 16-3 to p.205, Table 16-6 Lists of projects identified for potential cumulative effects. We note that several projects in the Dee estuary, such as Port of Mostyn expansion, and Port of Mostyn maintenance dredging appear to be missing from the list and advise that further scoping is required to ensure the list is comprehensive.

Protected Sites

The 'Environmental Scoping Report' confirms protected sites will be scoped in to the biodiversity chapter included in the ES.

Table 8-8 provides a list of the designated sites and justification for scoping in. We agree with the protected sites and features to be scoped in and provide the following additional comments.

Benthic Ecology and Invasive Non-Native Species (INNS)

Indirect impacts on marine Dee Estuary SAC features should be included in the assessment in relation to piling/dredging activities of the bridge construction as well and decommissioning of the existing bridge. Although the proposed site is outside of the Dee

Estuary SAC (approx. 1km upstream) there is potential for secondary impacts on the SAC features i.e. intertidal mudflats and sandflats and Estuaries features, from sedimentation and/or release of contaminants from piling and dredging activities. Although these impacts will likely be temporary, full details should be included as part of the ES. Inclusion of marine biosecurity to minimise the risk of introduction and spread of marine invasive non-native species (INNS).

Section 2.3, we note the reference to the use of a jack-up barge of installation of the two sets of piers in the river section as well as installation of new culverts that divert drainage into the river Dee. Although the proposed site is outside of the Dee Estuary SAC (approx. 1km upstream) there is potential for indirect impacts on the SAC features i.e. intertidal mudflats and sandflats and Estuaries features, in relation to the construction of the bridge piles in the river section of the River Dee, as well as decommissioning of the old bridge. Indirect impacts may include smothering due to sedimentation from piling/dredging activities and potentially resuspension of contaminants that may be trapped in the sediments. These potential impact pathways as well as the potential introduction and spread of marine invasive non-native species, should be included in Section 5.2 of the current document and included in the main ES.

The applicant should consider the potential impacts of contaminant run-off from the newly constructed bridge on marine habitats and species if these are to enter the river system. [Highway runoff and the water environment report combined LR.pdf](#)

Marine Ornithology

Further assessment should be provided to understand if the works have the potential to displace or disturb overwintering and passage bird features of the Dee Estuary SPA, RAMSAR and SSSI. If the construction works are undertaken outside of the months of August to March inclusive, there will be no impact pathway to the overwintering and passage bird features of the Dee Estuary SPA, RAMSAR and SSSI.

Section 8.6.7, for marine ornithology, we agree that the following potential effect pathways (as noted in the Environmental Scoping Report section 8.6.7) should be considered further: 1. Pre-construction activities, 2. Construction phase, 3. Operational phase.

Loss of habitat

Further information should be submitted to understand if the works will lead to any permanent or temporary loss of habitat within the Dee Estuary SPA, RAMSAR and SSSI or any functionally linked supporting habitat associated with the SPA.

Disturbance / Displacement

Further information / assessment is needed to understand if the works have the potential to disturb or displace overwintering and passage bird features of the Dee Estuary SPA, RAMSAR and SSSI (e.g. through noise and/or visual disturbance). If there is the potential for disturbance or displacement due to pre-construction activities, the construction phase, or the operational phase we advise that further consideration should be given as to how this will be minimised and/or mitigated. There would be no overlap between construction activities and the overwintering and passage bird features of the Dee Estuary SPA, RAMSAR and SSSI if these works were undertaken outside of the overwintering and passage periods of August to March inclusive.

Overwintering bird surveys

We note that overwintering birds associated with the Dee Estuary SPA have been recorded in surveys to date. NRW looks forward to receiving the overwintering bird surveys when completed.

Passage Redshank feature of the Dee Estuary SPA

Given the dates of the overwintering bird surveys (November – February), clarification should be provided on how the assessment of the potential effects on the passage Redshank feature of the Dee Estuary SPA will be undertaken.

Environment (Wales) Act 2016

Effects on species listed under Section 7 of the Environment (Wales) Act 2016 should be considered.

Cumulative effects

We note that several projects in and around the Dee Estuary SPA (e.g. the Port of Mostyn expansion) appear to be missing from the list and advise that further scoping is required to ensure that this is comprehensive.

Air Quality

The 'Environmental Scoping Report' confirms air quality will be scoped in and a chapter included in the ES. We agree air quality should be scoped in and provide the following comments.

The Scoping report appears to be comprehensive and references all the relevant guidance and other documents we would expect.

With regards to the use of future predictions of the reductions in traffic emissions within this air quality chapter we advise caution. The level of certainty of the predicted reductions are very low with many variables means that under the Habitats Regulations Assessment there may not be sufficient certainty to use such predictions. It may not be an issue for this proposal; however, it must be demonstrated that case law has been taken into account. Therefore, we strongly advise that consideration should be made of the Wealden case law in relation to Air Quality impacts and traffic predictions. The competent authority needs to demonstrate that the [Wealden](#) case law has been considered and applied in relation to traffic emissions on designated sites. Appendix 12c CEH Report Risks from air pollution on the integrity of Ashdown Forest SAC demonstrated in Wealden that the high level of uncertainty in future traffic emission predictions make them unusable in such Habitats Regulations Assessments. Therefore, we will be in a position to provide full comments once further information which has taken into account the Wealden case law has been submitted within the ES.

Material assets and waste

The 'Environmental Scoping Report' confirms material assets and waste will be scoped in and a chapter included in the ES. We agree material assets and waste should be scoped in and provide the following comments.

All work carried out shall be done in accordance with Natural Resources Wales Guidance for Pollution Prevention (GPP) 5: Works and Maintenance in or near water. The operator must ensure that silt, mud and debris generated by the works do not affect the watercourse downstream; measures will need to be put in place in order to minimise this.

Any construction or demolition work must be carried out in accordance with Natural Resources Wales Guidance for Pollution Prevention (GPP) 6: Working at Construction and Demolition Sites. The activity of importing waste into the site for use as, for example hardcore, must be registered with Natural Resources Wales as an exempt/permitted activity under Environmental Permitting Regulations 2016. Natural Resources Wales should be contacted to discuss the necessity for an exemption or permit for any waste material imported to, treated on, and exported from the site.

No material is to be deposited within 10m of any watercourse without discussion with Natural Resources Wales. Should any contaminated water or materials enter or pollute the watercourse or groundwater, Natural Resources Wales must be notified on 03000 65 3000.

Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be 110% of the capacity of the tank, all filling points, gauges, vents and sight glasses must be located within the bund. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund, refuelling should be supervised at all times - and preferably done on an impermeable surface.

If during construction/excavation works any contaminated material is revealed, then the movement of such material either on or off site must be done in consultation with Natural Resources Wales. Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily and in accordance with Section 34 of the Environmental Protection Act 1990. Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the site must be accompanied by Hazardous waste consignment notes.

Other Matters

Our comments only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

Our advice is made without prejudice to comments we may subsequently wish to make when consulted on any planning application, the submission of more detailed information or an ES.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

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

Yn gywir / Yours sincerely,

Siôn M. Williams

Uwch Cynghorydd - Cynllunio Datblygu / Senior Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

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.