

Gherbi Lamia

From: Dr Julian Whitewright <julian.whitewright@rcahmw.gov.uk>
Sent: 19 March 2026 09:16
To: MacKintosh, Bob
Cc: Gherbi Lamia; OConnell, Kevin; Billington Alistair; Mark James; Treby, Stephen
Subject: Re: CML2365 - Discharge of Condition 3.24 - Liverpool Bay CCS WSI and PAD

⚠ CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

Dear Bob,

Happy to confirm that we are happy that the revised WSI/PAD deals with the various comments arising from the last submission, as noted in the consultation table. Likewise, thanks for sending the UXO method statement, we don't have anything to add to that - looking forward to hearing about the SBI results in due course, and good luck with that survey work in the next few weeks.

So from our point of view, we are happy to sign-off discharge of Condition 3.24 of the marine license.

The only remaining element, which is more for the duration of the project, and does not relate to a specific marine license condition, is for Mark and myself to have a meeting to go through the archiving process of any AEZ data for the National Monuments Record.

Yours

Julian



Comisiwn Brenhinol
Henebion Cymru
Royal Commission on the Ancient
and Historical Monuments of Wales

Dr Julian Whitewright

Dysgwyr 🇬🇧

Uwch Ymchwilydd (Arforol) | Senior Investigator (Maritime)

Ffordd Penglais, Aberystwyth, SY23 3BU

+44 (0) 1970 621 217

julian.whitewright@rcahmw.gov.uk

www.cbhc.gov.uk | www.rcahmw.gov.uk

Noddir gan Lywodraeth Cymru | Sponsored by Welsh Government



Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn peri oedi.
We welcome correspondence in Welsh and English. Corresponding in Welsh will not lead to any delay.

Yn unol â Rheoliadau Safonau'r Gymraeg (Rhif 2) 2016, mae gennych hawl i gyfathrebu a gohebu â Chomisiwn Brenhinol Henebion Cymru yn eich dewis iaith. Er mwyn sicrhau ein bod yn cyflawni'r hawl, rhoch wybod i ni a ydych yn dymuno derbyn gohebiaeth a/neu alwadau ffôn oddi wrthym yn y Gymraeg. Bydd yr wybodaeth hon yn cael ei chofnodi gennym ni, a byddwn yn defnyddio'r iaith o'ch dewis ym mhob cyfathrebu yn y dyfodol. Diolch.

Under the Welsh Language Standards (No. 2) Regulations 2016, you have the right to communicate and correspond with the Royal Commission on the Ancient and Historical Monuments of Wales in your preferred language. To ensure we uphold this right, please let us know whether you wish to receive correspondence and/or telephone calls from us in Welsh. This information will be recorded by us, and we will use your preferred language in all future communication. Thank you.

From: MacKintosh, Bob <BOB.MACKINTOSH@tetrattech.com>
Sent: Tuesday, March 17, 2026 15:43
To: Dr Julian Whitewright <julian.whitewright@rcahmw.gov.uk>
Cc: Gherbi Lamia <lamia.gherbi@eni.com>; OConnell, Kevin <KEVIN.OCONNELL@tetrattech.com>; Billington Alistair <alistair.billington@external.eni.com>; Mark James <mark@msdsmarine.co.uk>; Treby, Stephen <stephen.treby@cyfoethnaturiolcymru.gov.uk>
Subject: RE: CML2365 - Discharge of Condition 3.24 - Liverpool Bay CCS WSI and PAD

Dear Julian,

Many thanks again for your time yesterday. In line with our discussions, I attach the updated WSI (Rev03) in tracked and clean versions. Let me know if you like these as word documents also.

I also attach the UXO survey method statement prepared by MSDS. The intertidal survey report is currently being finalised by MSDS and will follow shortly, although the results are included in the baseline section of the WSI.

I have added a table to the WSI (section 1.1.6) detailing relevant consultation and how the issues have been addressed. This includes your comments from 30 January 2026. I've reproduced these in the table below also.

Please let me know if you require any other information at all.

Kind regards,

Bob

Date	Consultee and Type of Consultation	Summary of Issue(s) Raised
30 January 2026	RCAHMW Consultation on CML2365 - Discharge of Condition 3.24	The archaeological curators are Cadw and the RCAHMW. The latter holds the e for maritime archaeological matters within Wales.
		This should be revised following the merger of the four Welsh Archaeological Tr such Clwyd-Powys Archaeological Trust should be replaced with Heneb, the Tr Welsh Archaeology who join Cadw and RCAHMW as curators for the area betw and Mean Low Water Springs (MLWS). Ideally, a Heneb contact would be added 1.3.
		There are a number of references in the document to "Section 0"
		We welcome the acknowledgement of the limitations of survey data in some ar welcome the commitment to ensure that full data coverage is achieved, as wel archaeological review of the data that has not been included thus far, and as su been able to inform the development of the WSI. The data gaps, presumably th gaps, were noted in the original draft WSI submitted with the original license ap for CML2365. As such its disappointing that they have not been filled in the inte period. It will be appreciated that we cannot sign-off a WSI that admits that the in the data that need to be addressed, two years after first noting that there wer that need to be addressed. So the further surveys need to be completed and archaeologically assessed in order to allow a final, comprehensive WSI to be cr

The situation regarding a number of the AEZs covered in this paragraph is unclear. If AEZs need potentially amending, then this should be discussed and a decision made in conjunction with the archaeological curators, about amending the AEZ or moving to a more suitable route. It's not clear from the WSI at what point this will take place, or when additional survey work to investigate them will be carried out, or who will make the decision about whether or not the work needs to be done. The further survey work is noted as being discussed in 'Section 0' and it's not clear if this section is within the WSI. With the additional survey data above, this discussion needs to take place and be completed, in order to finalise the AEZs, and therefore finalise the WSI. As with the data gaps, the need/desire to do this work was included in the original draft WSI, but due to the data gaps, it does not seem to have been progressed.

RCAHMW is the MEDIN DAC for marine historic environment data within Wales. As such we can act directly as the archive for project material that requires archiving. We can act as a point of contact for this. This was also part of our feedback on the application in May 2024 as part of the original application.

Our original response to CML2365 noted the following with regard to archiving of data for AEZs:

"we would like to see the survey data for the medium and high potential archaeological anomalies archived with the RCAHMW to ensure that these sites can be monitored in the future, and also to ensure that the knowledge enhancement facilitated by the scheme is properly realised by the archaeological data making its way into the Monuments Record... We would envisage that the data would be constrained to the Archaeological Exclusion Zone for each site, and I am happy to act as the point of contact to arrange the deposition of this material."

Such material has not yet been archived with ourselves, so it would be good to establish a timescale for doing this.

Dr Bob MacKintosh | Senior Consultant - Marine Archaeology and Human Environment

Pronouns: He/Him

Business +44 1315 555 011 | bob.mackintosh@tetrattech.com

Time Zone: Greenwich Mean Time

From: Treby, Stephen <stephen.treby@cyfoethnaturiolcymru.gov.uk>

Sent: 17 March 2026 10:03

To: Dr Julian Whitewright <julian.whitewright@rcahmw.gov.uk>; MacKintosh, Bob <BOB.MACKINTOSH@tetrattech.com>

Cc: Gherbi Lamia <lamia.gherbi@eni.com>; OConnell, Kevin <KEVIN.OCONNELL@tetrattech.com>; Billington Alistair <alistair.billington@external.eni.com>; Mark James <mark@msdsmarine.co.uk>

Subject: RE: CML2365 - Discharge of Condition 3.24 - Liverpool Bay CCS WSI and PAD

⚠ CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.



Thank you Julian,

I'll be happy to discharge Condition 3.24 without further consultation if RCAHMW's comments are submitted alongside the updated WSI/PAD in due course.

Kind regards,
Stephen

Stephen Treby

Uwch Swyddog Trwyddedu Morol / Senior Marine Licensing Officer

Cyfarwyddiaeth Strategaeth, Polisi a Thystiolaeth / Strategy, Policy and Evidence Directorate

0300 065 4068



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.



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

**Byd natur a phobl
yn ffynnu gyda'n gilydd**

**Nature and people
thriving together**



**cyfoethnaturiol.cymru
naturalresources.wales**

From: Dr Julian Whitewright <julian.whitewright@rcahmw.gov.uk>

Sent: 16 March 2026 10:49

To: MacKintosh, Bob <BOB.MACKINTOSH@tetrattech.com>

Cc: Treby, Stephen <stephen.treby@cyfoethnaturiolcymru.gov.uk>; Gherbi Lamia <lamia.gherbi@eni.com>; OConnell, Kevin <KEVIN.OCONNELL@tetrattech.com>; Billington Alistair <alistair.billington@external.eni.com>; mark@msdsmarine.co.uk

Subject: Re: CML2365 - Discharge of Condition 3.24 - Liverpool Bay CCS WSI and PAD

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

Caution: This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Dear Stephen,

A quick update on CML2365.

I have had a meeting with the License Holder's maritime archaeological team this morning to address the comments relating to the WSI sign-off, and we are all satisfied that the main comments have been address in terms of the filling in of data gaps, AEZs and archiving. In most cases the WSI needed updating to reflect work undertaken since it was drafted.

As such, and to expedite the WSI sign-off within the overall project timetable, they are going to send me a draft updated WSI for review this week, following which it can be submitted to yourselves for formal sign-off.

Yours

Julian



Comisiwn Brenhinol
Henebion Cymru
Royal Commission on the Ancient
and Historical Monuments of Wales

Dr Julian Whitewright

Dysgwr 🇬🇧

Uwch Ymchwilydd (Arforol) | Senior Investigator (Maritime)

Ffordd Penglais, Aberystwyth, SY23 3BU

+44 (0) 1970 621 217

julian.whitewright@rcahmw.gov.uk

www.cbhc.gov.uk | www.rcahmw.gov.uk

Noddir gan Lywodraeth Cymru | Sponsored by Welsh Government



Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn peri oedi.
We welcome correspondence in Welsh and English. Corresponding in Welsh will not lead to any delay.

Yn unol â Rheoliadau Safonau'r Gymraeg (Rhif 2) 2016, mae gennych hawl i gyfathrebu a gohebu â Chomisiwn Brenhinol Henebion Cymru yn eich dewis iaith. Er mwyn sicrhau ein bod yn cyflawni'r hawl, rhochwyd i ni a ydych yn dymuno derbyn gohebiaeth a/neu alwadau ffôn oddi wrthym yn y Gymraeg. Bydd yr wybodaeth hon yn cael ei chofnodi gennym ni, a byddwn yn defnyddio'r iaith o'ch dewis ym mhob cyfathrebu yn y dyfodol. Diolch.

Under the Welsh Language Standards (No. 2) Regulations 2016, you have the right to communicate and correspond with the Royal Commission on the Ancient and Historical Monuments of Wales in your preferred language. To ensure we uphold this right, please let us know whether you wish to receive correspondence and/or telephone calls from us in Welsh. This information will be recorded by us, and we will use your preferred language in all future communication. Thank you.

From: MacKintosh, Bob <BOB.MACKINTOSH@tetrattech.com>

Sent: Thursday, February 19, 2026 15:05

To: Dr Julian Whitewright <julian.whitewright@rcahmw.gov.uk>

Cc: Treby, Stephen <stephen.treby@cyfoethnaturiolcymru.gov.uk>; Gherbi Lamia <lamia.gherbi@eni.com>; OConnell, Kevin <KEVIN.OCONNELL@tetrattech.com>; Billington Alistair <alistair.billington@external.eni.com>

Subject: CML2365 - Discharge of Condition 3.24 - Liverpool Bay CCS WSI and PAD

You don't often get email from bob.mackintosh@tetrattech.com. [Learn why this is important](#)

Dear Julian,

Many thanks for your comments on the offshore WSI and PAD for Liverpool Bay CCS relating to the discharge of Discharge of Condition 3.24 of CML2365. It was good to see your name pop up! I hope you're enjoying being back in Wales, although you must have been there a while now?

As you will have seen in the WSI, Tetra Tech RPS Energy have been contracted by Liverpool Bay CCS Ltd to act as Retained Archaeologist and so we'll be working to implement the mitigation and to discharge the relevant licence condition. We've also subcontracted MSDS Marine as an archaeological contractor for some aspects of this, they also undertook the assessment for the ES, so are very familiar with the project.

I was wondering if you would be free for a meeting in the near future to discuss some of your comments? I believe most of them can be solved by relatively simple updates to the WSI, but some would obviously benefit from some discussion. In advance of that though, I include some responses to the more substantial comments below:

1.3.8 Data Limitations

Surveys over the 'data gap' were completed by Boskalis in 2025. This includes a magnetometry survey, as well as lidar and orthomosaic, covering the intertidal area between MLWS and the HDD exit pits. In addition, there was an intertidal walkover survey conducted in April 2025 relating to the TCPA consent. We propose to have this data analysed by MSDS and reported on prior to works commencing.

1.5.2.4 AEZs

The pre-construction survey situation has progressed somewhat since the WSI was drafted in November. I think this would particularly benefit from a discussion to explain and agree the methodology as soon as possible. We can also submit a method statement covering the approach. The plan is to now conduct UXO surveys starting late February using Sub Bottom Imaging (SBI), rather than having an ROV and/or diver based UXO ID campaign. This will consist of:

- Stage 1 – Gradiometer survey over a wider proposed cable corridor
- Route finalisation and workshops
- Stage 2 – SBI survey covering smaller corridor of final route

As this is a novel method in the UK, we are working out how to properly account for archaeology in the process, but the current plan (subject to your approval of course) is that MSDS will assess the initial gradiometer data, input into the route workshops where the final route is determined, and then also analyse or check the resulting SBI data in the impact corridor. I suspect this interim stage following the gradiometer survey will be key in order that the AEZs and TAEZs can be avoided, or highlighted to RCAHMW for refining if appropriate (particularly the TAEZs of course). SBI should be very good for precisely determining the extents of anomalies.

This SBI survey should also have other advantages over ROV based UXO ID surveys as it will cover everything in the whole impact corridor, rather than picking particular targets. Also, the outcome will favour avoiding everything, with no ROV inspection and relocation planned. So the process is novel, but the client have agreed to MSDS analysing all relevant data and inputting into the route selection, as well as obviously already committing to the AEZs. I think frequent consultation with RCAHMW would be beneficial throughout this process.

1.6.5.2. Archiving

Eni have confirmed that they will archive the survey data for the medium and high potential archaeological anomalies/AEZs with RCAHMW. This will include the 2023 data that was used to identify the anomalies in the ES and Technical Report, and we will also check whether the marine survey undertaken by Boskalis in 2025 also covers these anomalies and archive any relevant data from that too. This will be done as soon as possible. If there is any relevant data from the UXO SBI surveys (it may avoid everything relevant), that can be archived also.

I'd be very grateful if you could let us know when you might be available for a meeting to discuss this further and I look forward to hearing from you.

Kind regards,

Bob

Dr Bob MacKintosh | Senior Consultant - Marine Archaeology and Human Environment

Pronouns: He/Him

Business **+44 1315 555 011** | bob.mackintosh@tetratech.com

Time Zone: Greenwich Mean Time

Improving the lives of 1 billion people by 2030

Tetra Tech RPS Energy | *Leading with Science*[®]

3rd Floor, Quay 2, 139 Fountainbridge | Edinburgh, EH3 9QG | United Kingdom | tetratech.com



CELEBRATING
20 YEARS
IN OFFSHORE WIND



This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.