

## File Note

**Project title** Treborth WwTW  
**Job number** 309537  
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**cc**  
**Prepared by** Bethan Follis/ Caroline Pilat  
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**Subject** Welsh National Marine Plan Compliance Note

4 Pierhead Street Capital Waterside Cardiff CF10 4QP United Kingdom  
t +44 29 2047 3727 d +44 29 2026 6690  
[arup.com](http://arup.com)

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### 1. Introduction

The purpose of this report is to review the Proposed Development against the Welsh National Marine Plan<sup>1</sup> (WNMP), to support the Marine Licence application.

Natural Resources Wales (NRW) Guidance states that all Marine Licence applications (apart from those for small, low risk activities classed under band 1 licensing) should demonstrate their proposed activities are in line with the WNMP, in the form of a WNMP signposting document setting out how the project complies with its policies.

Further to the above, the WNMP states that- “Proposals falling into Bands Two and Three should include a clear supporting statement on which plan policies are relevant, the extent to which the proposal complies with the policies and how the proposal contributes to the Plan vision and objectives.”

This document forms part of a suite of documents to inform the Marine Licence application for the Proposed Development below Mean High Water Springs. The Marine Licence application includes the following documents:

- Appendix A- Risk Assessment and Method Statement (Ref: B17575-111813-ZZ-ZZ-FT-OC-CS1206)
- Appendix B- Construction Environmental Management Plan (Ref: B17575-111813-ZZ-ZZ-RP-NA-EI1205)
- Appendix C- Cured-In-Place Pipe (CIPP) Relining Operations Safe System of Work (Ref: SSOW 004)
- Appendix D- Habitats Regulations Assessment (HRA) Screening (Ref: B17575-102503-ZZ-ZZ-RP-NB-EI1200)
- Appendix E- Water Framework Directive Assessment (Ref: B17575-102503-ZZ-ZZ-RP-NA-EI1201)

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<sup>1</sup> <https://www.gov.wales/welsh-national-marine-plan>

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- Appendix F- Environmental Constraints Maps (Ref: B17575-102503-ZZ-ZZ-DR-NB-EI1203)
- Appendix G- Welsh National Marine Plan (WNMP) Compliance Note (this document) (Ref: B17575-102503-ZZ-ZZ-RP-NA-EI1202)
- Appendix H- Drawing of the works (Ref: B17575-102503-ZZ-ZZ-DR-CA-CI5050)
- Appendix I- Correspondence with Natural Resources Wales (Ref: B17575-102503-ZZ-ZZ-CO-RA-EI1207)

## 2. Project Overview

The Treborth Menai Ville scheme involves remedial works to an existing Dŵr Cymru Welsh Water (DCWW) gravity sewer located near St George's Road, Menai Bridge, Anglesey (NGR 255907, 372286). The purpose of the project is to repair and extend the operational life of the sewer infrastructure by installing an internal liner within existing combined sewer pipes and addressing any structural defects identified during inspection.

Construction activities include temporary removal of manhole covers, sewer cleaning and CCTV inspection, possible over-pumping to maintain flows, installation of the liner, and reinstatement of the manholes. The works will be supported by an existing temporary compound (located at Penmynydd Road, LL59 5RP) traffic management, and environmental protection measures.

The works focus on a short section of sewer network between four existing manholes (MH1–MH4) and a downstream pumping station. The sewer sections include 375 mm diameter and 600 mm diameter pipes, which will be rehabilitated by inserting a liner inside the existing pipes rather than replacing them, thereby reducing excavation and disruption.

The project aims to:

- Repair defects in an existing combined sewer serving the Menai Bridge area.
- Improve the structural integrity and hydraulic performance of the pipework.
- Reduce the risk of leakage, infiltration or sewer failure.
- Extend the operational lifespan of the sewer network while minimising excavation works

## 3. Consideration for the Welsh National Marine Plan

The following section identifies the policies from the Welsh National Marine Plan relevant to the current application for the Proposed Development and how they have been considered in a proportionate way to the Proposed Development's scale, potential impacts and risk.

### 3.1 Policy Review

#### General cross cutting policies

General cross cutting policies have been developed under the five themes of the High-Level Marine Objectives of the UK Marine Policy Statement:

- Achieving a sustainable marine economy.

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- Ensuring a strong, healthy and just society.
- Living within environmental limits.
- Promoting good governance.
- Using sound science responsibly.

General cross cutting policies of relevance to the Proposed Development and how these have been considered are detailed in Table 1.

**Table 1 General policies of relevance to the Proposed Development**

<b>Welsh National Marine Plan Policy</b>	<b>Does the project have the potential to impact the policy?</b>	<b>Consideration</b>
<b>GEN_01 Planning policy</b> There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales' well-being goals.	Yes	The Proposed Development contributes to the following well-being goals: <ul style="list-style-type: none"> <li>• A resilient Wales- The Proposed Development will increase resilience of the sewer network.</li> <li>• A healthier Wales- The Proposed Development will reduce the risk of sewage spills/leakage and potentially improve water quality.</li> </ul>
<b>GEN_02: Planning policy</b> Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making.	Yes	As part of the Marine Licence application, a consultation period will be undertaken to include the Local Authority.
<b>ECON_01: Sustainable economic growth</b> Proposals for economically sustainable activities are encouraged, particularly where they contribute to: <ul style="list-style-type: none"> <li>• the sustainable management of natural resources thereby supporting ecosystem resilience;</li> <li>• a more resilient economy;</li> <li>• employment opportunities particularly for coastal communities;</li> <li>• protecting and creating employment at all skill levels;</li> <li>• maintaining communities with a high-density of Welsh speakers; and/or</li> <li>• tackling poverty by supporting deprived coastal communities.</li> </ul>	Yes	The Proposed Development will reduce the risk of sewage spills/leakage and thereby improve marine water quality, such that shellfish produce can be sold in the UK and overseas markets and thereby support economic growth.  During construction, the Proposed Development will contribute to sustainable economic growth, via employment of local contractors.
<b>ECON_02: Coexistence</b> Proposals should demonstrate how they have considered opportunities for coexistence with other compatible sectors in order to optimise the value and use of the marine area and marine natural resources.	Yes	The Proposed Development will reduce the risk of sewage spills/leakage and potentially improve water quality, thus contributing to coexistence with other marine users.
<b>SOC_02: Well-being of coastal communities</b> Proposals that contribute to the well-being of coastal communities are encouraged.	Yes	The Proposed Development will reduce the risk of sewage spills/leakage and potentially improve water quality, thus contributing to the wellbeing of coastal communities.
<b>SOC_03 Marine pollution incidents</b>	Yes	The Proposed Development will improve water network infrastructure to reduce the risk of

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<b>Welsh National Marine Plan Policy</b>	<b>Does the project have the potential to impact the policy?</b>	<b>Consideration</b>
Proposals should demonstrate how they minimise their risk of causing or contributing to marine pollution incidents .		leakage, infiltration or sewer failure within or near the marine environment. Refer to the CEMP and RAMS for specific measures to reduce marine pollution risk during construction.
<p><b>SOC_07: Seascapes</b> Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference:</p> <ul style="list-style-type: none"> <li>• avoid adverse impacts on seascapes; and/ or</li> <li>• minimise impacts where they cannot be avoided; and/or</li> <li>• mitigate impacts where they cannot be minimised.</li> </ul> <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance seascapes are encouraged.</p>	Yes	Construction activities have the potential to affect seascape through introduction of visible machinery, and increased vehicle movements. Due to the minor scale of the works, the Proposed Development is not expected to significantly impact seascapes. Operational activities are not anticipated to affect seascapes.
<p><b>SOC_08: Resilience to coastal change and flooding</b> Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.</p>	Yes	The Proposed Development aims to repair and extend the operational life of the sewer infrastructure, with consideration for coastal change and flooding resilience. Refer to the CEMP and RAMS for specific measures to reduce flooding risk during construction.
<p><b>SOC_09: Effects on coastal change and flooding</b> Proposal should demonstrate how they:</p> <ul style="list-style-type: none"> <li>• avoid significant adverse impacts upon coastal processes; and</li> <li>• minimise the risk of coastal change and flooding.</li> </ul>	Yes	The Proposed Development aims to repair and extend the operational life of the sewer infrastructure, with consideration for coastal processes and flood risk. Refer to the CEMP and RAMS for specific measures to reduce flooding risk during construction.
<p><b>SOC_10: Minimising climate change</b> Proposals should demonstrate how they, in order of preference:</p> <ol style="list-style-type: none"> <li>a. avoid the emission of greenhouse gases; and/or</li> <li>b. minimise them where they cannot be avoided; and /or</li> <li>c. mitigate them where they cannot be minimised.</li> </ol> <p>Where significant emission of greenhouse gases cannot be avoided, minimised or mitigated, proposals for regulated activities must present a clear and convincing case for proceeding.</p>	Yes	Emissions associated with the Proposed Development are not expected to be significant due to the minor scale of the works. Refer to the CEMP and RAMS for energy management measures to be implemented to minimise emissions, which include efforts to obtain grid supplied electricity to reduce dependence on diesel generators.
<p><b>SOC_11: Resilience to climate change</b> Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaptation measures, taking</p>	Yes	The Proposed Development aims to repair and extend the operational life of the sewer infrastructure, with consideration for climate change and climate change adaptation.

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<b>Welsh National Marine Plan Policy</b>	<b>Does the project have the potential to impact the policy?</b>	<b>Consideration</b>
<p>into account Climate Change Risk Assessments for Wales.</p> <p>Proposals that contribute to climate change adaptation and/or mitigation are encouraged.</p>		
<p><b>ENV_01: Resilient marine ecosystems</b></p> <p>Proposals should demonstrate how potential impacts on marine ecosystems have been taken into consideration and should, in order of preference:</p> <ol style="list-style-type: none"> <li>avoid adverse impacts; and/or</li> <li>minimise impacts where they cannot be avoided; and/or</li> <li>mitigate impacts where they cannot be minimised.</li> </ol> <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to the protection, restoration and/or enhancement of marine ecosystems are encouraged.</p>	Yes	<p>A Habitats Regulations Assessment (HRA) screening has been carried out to consider impacts to European designated sites. The Proposed Development will not result in likely significant effects on any European site, either alone or in combination with other plans or projects</p> <p>Refer to the CEMP and RAMS for standard construction measures to be implemented to minimise impacts to marine ecosystems and marine protected areas.</p>
<p><b>ENV_02: Marine Protected Areas</b></p> <p>Proposals should demonstrate how they:</p> <ul style="list-style-type: none"> <li>avoid adverse impacts on individual Marine Protected Areas (MPAs) and the coherence of the network as a whole;</li> <li>have regard to the measures to manage MPAs; and</li> <li>avoid adverse impacts on designated sites that are not part of the MPA network.</li> </ul>	Yes	
<p><b>ENV_03: Invasive non-native species</b></p> <p>Proposals should demonstrate how they avoid or minimise the risk of introducing and spreading invasive non-native species.</p> <p>Where appropriate, proposals should include biosecurity measures to reduce the risk of introducing and spreading of invasive non-native species.</p>	Yes	<p>Risk of spread of invasive non-native species as a result of the Proposed Development is considered minimal.</p> <p>Operational activities are not anticipated to effect spread of invasive non-native species.</p> <p>Refer to the CEMP and RAMS for standard construction measures to be implemented to minimise the spread of invasive species.</p>
<p><b>ENV_04: Marine litter</b></p> <p>Proposals should demonstrate how they:</p> <ul style="list-style-type: none"> <li>avoid the deliberate introduction of litter into the marine plan area; and</li> <li>minimise the risk of accidental release of litter.</li> </ul>	Yes	<p>Risk of litter being introduced into the marine environment as a result of the Proposed Development is considered minimal.</p> <p>Operational activities are not anticipated to cause marine litter.</p> <p>Refer to the CEMP and RAMS for standard construction measures to be implemented to minimise the risk of marine litter.</p>
<p><b>ENV_05: Underwater noise</b></p> <p>Proposals should demonstrate that they have considered man-made noise impacts on the marine environment and, in order of preference:</p> <ol style="list-style-type: none"> <li>avoid adverse impacts; and/or</li> </ol>	Yes	<p>All works in the intertidal zone will be undertaken at low water, avoiding underwater noise generation.</p> <p>Operational activities are not anticipated to generate underwater noise.</p>

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<b>Welsh National Marine Plan Policy</b>	<b>Does the project have the potential to impact the policy?</b>	<b>Consideration</b>
b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.		Refer to the CEMP and RAMS for standard construction measures to be implemented to minimise noise disturbance during construction.
<b>ENV_06: Air and water quality</b> Proposals should demonstrate that they have considered their potential air and water quality impacts and should, in order of preference: a. avoid adverse impacts; and/or b. minimise adverse impacts where they cannot be avoided; and/or c. mitigate adverse impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	Yes	Operational activities are not anticipated to negatively impact air or water quality. The Proposed development has the potential to offer localised benefits to water quality. Refer to the CEMP and RAMS for standard construction measures to be implemented to reduce impacts to air and water quality during construction.
<b>ENV_07: Fish Species and Habitats</b> Proposals potentially affecting important feeding, breeding (including spawning & nursery) and migration areas or habitats for key fish and shellfish species of commercial or ecological importance should demonstrate how they, in order of preference: a. avoid adverse impacts on those areas; and/or b. minimise adverse impacts where they cannot be avoided; and/or c. mitigate adverse impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	Yes	The Proposed Development aims to contribute to the achievement of the required marine water quality for shellfish beds. Refer to the HRA Screening for rationale for effects to European Protected Sites. Refer to the CEMP and RAMS for standard construction measures to be implemented.
<b>GOV_01: Cumulative effects</b> Proposals should demonstrate that they have assessed potential cumulative effects and should, in order of preference: a. avoid adverse effects; and/or b. minimise effects where they cannot be avoided; and/or c. mitigate effects where they cannot be minimised. If significant adverse effects cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to positive cumulative effects are encouraged.	Yes	Due to the minor scale of the works, the Proposed Development is not expected to give rise to cumulative effects. Refer to the HRA Screening and WFD Compliance Assessment for an assessment of cumulative effects from the Proposed Development on relevant environmental receptors.

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## Sector Policies

Sector-specific policies operate alongside the general policies within the WNMP and relate to particular activities. Sector policies include supporting policy (to support the sustainable development of a sector) and safeguarding policy (to protect certain sectors' interests from adverse impacts from other activities). Sector policies must be considered alongside all other Plan policies.

Sector-specific policies of relevance to the Proposed Development and how these have been considered are detailed in Table 2.

**Table 2: Policies of relevance to the Proposed Development and their considerations**

<b>Welsh National Marine Plan Policy</b>	<b>Does the project have the potential to impact the policy?</b>	<b>Consideration</b>
<p><b>SCI_01: Risk-based decision making</b></p> <p>Relevant public authorities should make decisions using sound evidence and a risk-based, proportionate approach. Where appropriate they should apply the precautionary principle and consider opportunities to apply adaptive management.</p>	Yes	The Proposed Development underwent a risk and value assessment to inform the selection of options, thus aligning with a risk-based, proportionate approach to improve water and wastewater management.
<p><b>SAF_01: Safeguarding existing activity</b></p> <p>SAF_01 a. Proposals likely to have significant adverse impacts upon an established activity covered by a formal application or authorisation must demonstrate how they will address compatibility issues with that activity.</p> <p>Proposals unable to demonstrate adequate compatibility must present a clear and convincing case for the proposal to progress under exceptional circumstances.</p> <p>Under SAF 01 a, compatibility should be demonstrated through, in order of preference:</p> <ul style="list-style-type: none"> <li>• Avoiding significant adverse impacts on those activities, and/or</li> <li>• Minimising significant adverse impacts where these cannot be avoided; and/or</li> <li>• Mitigating significant adverse impacts where they cannot be minimised</li> </ul>	Yes	The purpose of the Proposed Development is to repair and extend the operational life of the sewer infrastructure, safeguarding the existing sewer network activities.
<p><b>T&amp;R_01: Tourism and recreation (supporting)</b></p> <p>T&amp;R_01 a: Proposals that demonstrate a positive contribution to tourism and recreation opportunities and policy objectives (for the sector) around the Welsh coast will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations.</p> <p>T&amp;R_01 b: Relevant public authorities and the sector are encouraged, in liaison with other interested parties, to collaborate to understand opportunities for</p>	Yes	The Proposed Development involved improvements to the sewer infrastructure which would support tourism.

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<p>sustainable tourism and recreation around the Welsh coast, including:</p> <ul style="list-style-type: none"> <li>a. developing a strategic evidence base to improve understanding of current and potential tourism and recreation activities, including eco-tourism and other low impact activities; and</li> <li>b. opportunities to define areas of future opportunity for tourism and recreation;</li> </ul> <p>in order to support the sustainable development of the tourism and recreation sector through marine planning.</p>		