



Asiant Cefnffyrdd Gogledd a Chanolbarth Cymru North & Mid Wales Trunk Road Agent

Gofynnwch am/Ask for:

clivebayley@nmwtra.org.uk
enquiries@nmwtra.org.uk

Ein Cyf / Our Ref: 24/NM/CMA/001
Eich Cyf / Your Ref: CML2563

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

29/04/2026

Good afternoon Peter,

RE – Application for a Marine License for works associated with the A494 River Dee Bridge Replacement Scheme – Application CML2563

Further to your letter of 18 March 2026, issued under Part 4, Chapter 1, Regulation 67(4) of the Marine and Coastal Access Act 2009, we provide the further information requested to support the determination of Marine Licence application CML2563. Some of this information has already been submitted to NRW by Welsh Government in their response dated 28 January 2026 (Refs qA2280938 and qA2282120), and you have requested a clear signposting document or matrix demonstrating how the information and clarifications have been addressed. You have also sought further information and clarification in relation to four specific points.

The Marine Area Management and Advice Team (MAAMT) have prepared a table of advisory comments as a Marine Advice Memo (dated 26/02/2026) on the marine license application CML2563 and Environmental Statement Volume 1 Technical Assessment Report. As requested in your letter (dated 18th March 2026), we have now prepared a response tracker to clearly signpost how the points in the memo have been actioned and we attach this for your information along with Welsh Government's response letter to NRW dated 28th January 2026 as previously shared with you via e-mail on 16th March 2026.

You have specifically requested further information on four points that we now address sequentially as follows:-

Partneriaeth rhwng Awdurdodau Lleol Ceredigion, Conwy, Sir Ddinbych, Sir y Fflint, Gwynedd, Powys, Wrexham ac Ynys Môn ar ran Llywodraeth Cymru.

A Partnership between the Local Authorities of Ceredigion, Conwy, Denbighshire, Flintshire, Gwynedd, Powys, Wrexham and Isle of Anglesey on behalf of Welsh Government.



Yn gweithio ar ran
Llywodraeth Cymru
Working on behalf of the
Welsh Government

Unit 5
Llys Britannia
Parc Menai
Bangor
Gwynedd.
LL57 4BN

1. Development Flood Risk

NRW Advisory (NRW A) have noted that they were unable to provide detailed comment on flood risk until further information is submitted regarding the River Dee Tidal Model and the submitted Flood Consequence Assessment.

Further information on development and flood risk has been submitted to and reviewed by NRW as follows:

- River Dee Tidal Model – NRW response dated 18 March 2026 confirms that NRW is satisfied the hydraulic model is fit for purpose, subject to three caveats. Two of these relate to the treatment of climate change allowances, and the third relates to known limitations within the River Dee Model in the Wepre and Chester Racecourse areas. As directed by NRW, these matters can be appropriately addressed during the subsequent detailed design development of the proposed replacement bridge.
- Flood Consequence Assessment (FCA) – the FCA has been updated to reflect the updated River Dee Tidal Model. The latest FCA (P02 dated March 2026) has been submitted to NRW who responded by e-mail to Welsh Government (Sasanka Fernando) on 18 March 2026.

2. Remediation Activity

“NRW A (NRW Advisory) have raised concerns surrounding lack of detail surrounding remediation activity, noting lack of information and assessment (both in relation to WFD and HRA).”

NRW have previously indicated that they are satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. This is providing that further details will be submitted prior to development commencing. (Point 4 NRW letter dated 28 November 2025).

Welsh Government have given NRW assurances (Point 4 WG letter dated 28 January 2026) that they will instruct the appointed Contractor to prepare a targeted Controlled Waters Risk Mitigation Strategy and share this with NRW and Flintshire County Council prior to work commencing. This will be added as a deliverable to the REAC/Contractor’s Scope with a pre-start milestone.

3. Water Quality

NRW A does not agree with the conclusion of the WFD assessment and that further evidence is required to ensure that potential for contaminated sediment does not have an impact on water quality. NRW A also considers that the potential for chemical contaminants to impact upon sensitive habitats has not been appropriately considered.

Sediment and chemical pollution control measures during the construction phase will seek to prevent any impact on water quality and sensitive saltmarsh habitat. Pollution control measures will be implemented in accordance with best practice during the construction phase and further detail will be set out in the Construction Environmental Management Plan (CEMP) that will incorporate Guidance for Pollution Prevention (GPPs) and will be shared with NRW prior to works commencing. The requirements for pollution control measures are also set out in the REAC (items RD) under Road Drainage and Water Environment (ES Appendix 18B). This includes measures such as;

- RDa6: Runoff will be controlled during construction through suitable drainage, including the incorporation of Sustainable Drainage Systems (SuDS) to manage sediment and pollution in construction runoff.
- RDa10: Temporary piles for the construction pier are planned to be installed from the bank during low tide to reduce sediment mobilisation during installation of temporary works.
- RDa12: To contain disturbed sediments and limit water ingress during borehole creation steel casings will be installed into the riverbed to seal the boreholes.
- RDa13: displaced drilling fluids will be pumped off and recycled to reduce contamination risk from drilling fluids.
- RDa17: Concrete mixing and washing areas will be contained and sited at least 10m from drainage channels and concrete for piers will be delivered by a watertight tremie pipe to prevent contamination from concrete works.
- GS15: If contamination is present or suspected, a Remediation Strategy will be created to detail on-site treatment or off-site disposal requirements.

Since submission of the draft Orders, an additional 3 months of baseline water quality data has been collected. Regular water quality monitoring will be carried out during construction and compared against the baseline data and relevant water quality standards to confirm the pollution prevention measures are effective.

In the operational period, road drainage will be controlled within the road drainage network and realigned Queensferry Drain. This will incorporate swales and penstocks designed to improve pollution control compared to the existing highways drainage network, which reduces the risk of untreated highway runoff entering the River Dee SAC and impacting sensitive habitats (see Drainage Strategy). North and Mid Wales Trunk Road Agency (NMWTRA) is responsible for managing the strategic road network on behalf of Welsh Government and has appropriate and well-established procedures and operational safeguards to deal with pollution incidents and events, as set out in the Design Manual for Roads and Bridges (DMRB) GM701¹ Asset delivery asset maintenance requirements.

With the embedded drainage network design and pollution prevention measures, a deterioration in status of WFD water body elements or impact on sensitive habitats is not anticipated and therefore the Scheme is assessed as being in compliance with WFD.

¹ Downloaded from <https://www.standardsforhighways.co.uk> on 21-Apr-2026, GM 701 Revision 1, published: Mar-2020

4. Mitigation Measures

NRW A has requested clarification surrounding the piling operations and confirmation whether all the piles and pile casings will be installed using non-percussive piling measures. You seek confirmation that the timing restrictions proposed in section 16.7 of the ES includes all piling including the installation of temporary sheet piling.

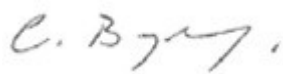
We can confirm that ES stipulates that the piles and pile casings will be installed using non-percussive piling measures and that the timing restrictions set out in section 16.7 of the ES form the basis of the assessment. Should the appointed Contractor wish to seek variations to these construction methods and restrictions, then this would be set out in their CEMP that is subject to approval from Welsh Government and NRW. However, during the tendering process and in tender clinics, it has been made clear to all Contractor's tendering, that these are commitments made as mitigation measures and are an important part of the Scheme proposals.

We hope that we have interpreted the request for further information correctly and that alongside the Welsh Government response to NRW letter dated 28 January 2026, we have now addressed all NRW A's concerns and provided sufficient information for you to conclude the marine license application.

Please note that there will be some minor amendments to the HRA and ES Chapter 16 Marine Environment. These will be issued later this month and form part of the orders made under the Highways Act 1980. We will make sure you are issued these documents as soon as they are available. The main change is the removal of any potential or future works to the existing river piers that will remain in-situ and will not form part of the scheme. If remediation of the river piers is required at a later date, it would proceed as a separate project under the appropriate consenting route accompanied by the necessary environmental assessments.

We trust that we have now provided all further information requested and sufficiently clarified matters to enable NRW to conclude determination of marine license application CML2563.

Yours sincerely,



Clive Bayley
Business and Statutory Operations Manager
North and Mid Wales Trunk Road Agent