

Y Grŵp yr Economi, Ynni a Thrafnidiaeth
Economy, Energy and Transport Group



Llywodraeth Cymru
Welsh Government

Siôn Williams
Senior Advisor – Development Planning
Natural Resources Wales

Our Ref: qA2280938 & qA2282120

Date: 28 January 2026

Dear Siôn,

THE WELSH MINISTERS (THE DOLGELLAU TO SOUTH OF BIRKENHEAD TRUNK ROAD (A494) (RIVER DEE BRIDGE REPLACEMENT) ORDER 202-

THE WELSH MINISTERS (THE DOLGELLAU TO SOUTH OF BIRKENHEAD TRUNK ROAD (A494) (QUEENSFERRY INTERCHANGE TO GARDEN CITY IMPROVEMENT) (SIDE ROADS) ORDER 202-

I refer to your letter dated 28 November 2025 that raises concerns regarding the conclusions of the Environmental Statement (ES) and request that the document is updated to address the points you raise.

I welcome NRW's support for the inclusion of an Environmental Monitoring and Management Plan (EMMP) and a Construction Environmental Management Plan (CEMP), and I understand your intent that these documents, together with the Register of Environmental Actions and Commitments (REAC), should be subject to NRW review.

As the Scheme is being progressed under the Highways Act 1980 via Draft Orders, it does not allow for the application of planning-style "conditions" to the Order. Notwithstanding this, Welsh Government is fully aligned with NRW's objective of ensuring appropriate oversight and scrutiny of environmental commitments.

Accordingly, the latest versions of the CEMP, EMMP and REAC will be shared with NRW at least eight weeks prior to site mobilisation. In addition, the Scheme will continue to hold quarterly Environmental Liaison Group (ELG) meetings, of which NRW is a member, through which NRW will also have the opportunity to comment on updates to these documents as the Scheme progresses.

I have reviewed the point raised in your letter with the project team and would like to address these sequentially as follows:

Geology and Soils

1. We acknowledge NRW's reference to the Environmental Statement Volume 1: Technical Assessment Report.
2. We note your acknowledgement that the proposed development is located on land with previous potentially contaminated land uses, above a Secondary aquifer and is adjacent to a designated site of special scientific interest (SSSI) and special area of conservation (SAC).
3. We welcome NRW's support for including the outline Materials Management Plan (oMMP) within the CEMP. In line with the approach set out at the start of this letter, the final oMMP and CEMP will be shared with NRW at least eight weeks prior to site mobilisation. To provide assurance and traceability, these requirements will be secured through the Contractor's Scope and recorded in the REAC with a pre-start milestone.
4. We note that you are satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site, and that you highlight that further details will be required in order to ensure that risks are appropriately addressed prior to development commencing. To give assurance ahead of construction, I will instruct the appointed Contractor to prepare a targeted Controlled Waters Risk Mitigation Strategy (aligned to LCRM and the WLGA/NRW developer guide as referred to in your response point 6) and share this with NRW and Flintshire County Council prior to works commencing. This will be added as a deliverable to the REAC / Contractor's Scope with a pre-start milestone.
5. Thank you for setting out the approach in Planning Policy Wales (PPW) regarding whether further information is obtained prior to determination or secured by condition. For clarity, this Scheme is being progressed under the Highways Act via Draft Orders rather than the Town and Country Planning Act; consequently, formal planning conditions do not apply in the same way as under PPW. Notwithstanding the legislative route, Welsh Government are fully aligned with NRW's intent that further detail on generic remedial options for controlled waters is agreed before construction and I refer you to my response to point 4 above in terms of how I intend that we address this matter.
6. Thank you for setting out the recommended frameworks and guidance. We agree with NRW's approach and will align our submissions and site controls accordingly. Specifically, we will add to the Contractor's Scope that the Controlled Waters Risk Mitigation Strategy will be developed in accordance with these frameworks and guidance documents.
7. Thank you for highlighting the potential need for an abstraction licence if dewatering is required. We will add a pre-start deliverable to the Contractor's Scope and REAC requiring:
 - a Dewatering Assessment & Method Statement (volumes, duration, receptors, controls),
 - confirmation of licensing needs and, where applicable, NRW abstraction licence approval before works commence, and
 - integration of monitoring, treatment and discharge controls within the CEMP.



Water Quality

Chapter 7 p.45 Section 7.7.9, Chapter 18 p.6 Section 18.4.6

8. We welcome NRW's endorsement of our commitment to best practise guidelines as set out in the NetRegs.
9. Thank you for your comments regarding water quality management and the role of Environmental Managers. We will ensure that the latest version of the CEMP is shared with NRW prior to construction.

Chapter 16: Marine Environment, Section 16.5.2 p.30

10. We acknowledge NRW's concern regarding conclusions on remediation of the retained river piers. To avoid prejudging effects without defined methods, any remediation/enhancement to the retained piers is not part of the current A494 River Dee Bridge Replacement Scheme. We will amend the ES (and SIAA, where referenced) to remove assumptions about such future works and to withdraw any conclusion on their effects. If remediation is proposed at a later date, it would proceed as a separate project under the appropriate consenting route at that time, accompanied by the necessary environmental assessments.
11. The statement suggesting that prospective remedial works would be "no more damaging/impactful" than construction of the new structure will be deleted. Without a defined scope, methods and timing, I agree that such a comparison is not evidentially supported. Any future proposal would be assessed on its own design and methods, with conclusions drawn from that evidence.
12. We agree that insufficient detail exists to reach a conclusion now. Should remediation be brought forward in future, we commit to providing NRW with full design and method information and an accompanying effects assessment.
13. At that future point, we will make all infrastructure design details and activity methods available to NRW and will provide the assessments required to inform the Habitats Regulations Assessment, including screening and (if necessary) Appropriate Assessment.

A494 River Dee Bridge Replacement Scheme Statement to Inform Appropriate Assessment (SIAA)

14. We appreciate NRW's clarification on the treatment of construction-method measures within HRA screening and Appropriate Assessment. We agree that method-based pollution prevention (e.g. controls set out in the CEMP and construction standard operating procedures) should not be treated as "embedded mitigation" at the TLSE stage and should instead be assessed at the Appropriate Assessment (AA) stage.

Accordingly, we will:

- Revise Table 7 (screening) in the SIAA to remove references to "embedded mitigation" where these relate to construction methodology and to record that construction-phase pollution risk requires consideration at AA.
- Update the SIAA text and conclusions to reflect this approach and share a tracked-changes version with NRW.

15. Thank you for your comment regarding Table 8 of the SIAA and the statement: “Any oil/fuel leaks from vehicles are unlikely to be of a sufficiently harmful quantity.” We acknowledge that further clarification is required at the TLSE stage.

To clarify, the Scheme comprises a replacement of the existing A494 River Dee Bridge. As noted in Table 8, the operational traffic flows and vehicle composition using the structure will remain consistent with the existing situation. Therefore, the potential for oil or fuel leakage from vehicles during operation is not expected to change from the current baseline.

The existing road drainage outfalls into the Queensferry Drain, which currently provides containment of routine runoff, including minor accidental spillages. The proposed Scheme maintains this drainage pathway. In addition, the realigned Queensferry Drain will incorporate swales and penstocks designed to improve pollution control and reduce the risk of untreated highway runoff entering the River Dee SAC.

We propose to revisit the TLSE stage of the HRA to ensure the justification for screening conclusions is set out more clearly, including reference to pollution control measures, containment features, and the like for like operational context.

It is also noted that the North and Mid Wales Trunk Road Agency (NMWTRA), acting on behalf of Welsh Government, manages the strategic road network in accordance with the Welsh Trunk Road Maintenance Manual (WGTRMM). These established procedures set out the response to pollution events and provide further operational safeguards.

Physical Processes

16. Thank you for confirming you agree with conclusion that the baseline and modelling are comprehensive and indicate only minor changes within an already dynamic environment.
17. Thank you for your comment regarding the proposal to leave the existing bridge piers in place and your reference to the Water Framework Directive (WFD) mitigation measure relating to the removal of obsolete structures in highly modified waterbodies. We acknowledge your advice to consider cutting the existing piers to bed level.

River-restoration guidance, including material promoted by the European Centre for River Restoration (ECRR), indicates that removal of obsolete structures can be beneficial where they no longer perform a function and where removal is feasible. Where removal is not practicable due to technical, safety, or cost constraints, guidance also notes that measures to maintain or improve upstream–downstream connectivity, such as enabling fish or eel passage, should be explored. In this case, as the existing river piers do not impede the passage of migratory fish and therefore we consider that the connectivity considerations that normally follow when removal is not feasible do not apply.

The potential removal of the river piers has been carefully examined by the project team (see Appendix E of the Buildability Report, doc ref: 395318-MMD-00-XX-RP-Z-0034). Each pier is approximately 33 m in length and is

supported by nine 1200 mm diameter concrete piles, heavily reinforced with 40 mm steel bars.

Due to their scale, depth, and construction, removing the piers would require complex in-channel demolition works, which would introduce significant health and safety risks, carbon and cost. Based on these factors, removal was not considered a proportionate or environmentally beneficial option. Retaining the structures in situ will not impede current or future migratory fish movement within the river channel.

Taking account of these technical, environmental, carbon, safety, and feasibility considerations, the decision to retain the existing river piers in situ remains unchanged.

Biodiversity

Protected Species

18. Thank you for your advice regarding the legal protection afforded to bats, otters, and great crested newts (GCN) under the Conservation of Habitats and Species Regulations 2017 (as amended). The Environmental Statement has assessed the presence and potential impacts on these European Protected Species, and mitigation measures have been incorporated to ensure no detriment to the maintenance of their favourable conservation status.

Surveys will continue through 2026/2027 to ensure baseline information remains up to date, and any necessary mitigation measures will be reviewed and updated accordingly as part of the ongoing design and environmental management process.

Chapter 8: Terrestrial Biodiversity

19. Thank you for your advice regarding the need to consider current conservation status (CCS) and favourable conservation status (FCS) at appropriate spatial scales. These elements have been incorporated into the assessment methodology, as outlined in paragraph 8.3.74. The assessment has been undertaken in accordance with the relevant methodology and guidance set out in paragraph 8.3.1, and within the defined zone of influence described in paragraph 8.3.6. On this basis, we consider that the requirements relating to CCS and FCS have been addressed within the existing methodology, and no further amendment is required.
20. Thank you for your comments regarding the timing of eDNA surveys and considerations of seasonal conditions and pond functionality. The eDNA surveys were undertaken in May and June, in line with best practice and NRW guidance ([Natural Resources Wales / Using eDNA testing to check for great crested newts](#)), which sets a cut-off date of 30th June. Ponds surveyed in 2025 were recorded as having very low water levels and were assessed as unsuitable habitat for GCN, as reported in Table 8-1. Ponds were surveyed and assessed using standard Habitat Suitability Index (HSI) methodology, no pond functionality was considered as this is not currently a requirement of the methodology.

Further surveys are planned for 2026 to cover the period leading up to construction (scheduled for Winter/Spring 2027). Results will be shared with the Contractor and used to inform any future licensable activities.

21. Thank you for highlighting the importance of referencing the longevity of great crested newts (GCN). While longevity has not previously been raised during consultation, it will be considered as part of any future licence application.
22. Thank you for your advice regarding consideration of maximum dispersal distances for great crested newts (GCN). The assessment currently applies a 500 m buffer, which is considered proportionate to the Scheme extent and consistent with commonly used best-practice guidance from organisations such as Froglife and CIEEM for evaluating terrestrial habitat use in relation to development impacts.

We note your reference to the 1.6 km dispersal distance cited in the 'Guidelines for the Selection of Biological SSSIs: Part 2, Chapter 18 – Reptiles and Amphibians', and will take this into account should further assessment or survey requirements be identified. It is also recognised that the Queensferry area contains several significant natural and man-made barriers which are likely to constrain the realistic dispersal range of GCN within the local landscape.
23. Thank you for your advice regarding the creation of a new pond to support great crested newts (GCN), given their current unfavourable conservation status. The Environmental Impact Assessment (EIA) identifies potential adverse effects and includes mitigation measures to compensate for impacts arising from the Scheme. At this stage, the creation of a new pond has not been identified as a required mitigation measure. However, we acknowledge the potential benefits of such enhancements and will ensure this option is considered during detailed design. Should the appointed Contractor propose pond creation as part of biodiversity enhancement measures, this will be incorporated into the final Scheme proposals.
24. In addition, we note your advice regarding habitat creation, restoration, and enhancement that could benefit GCN, including the provision of features for breeding / resting. While specific proposals are not defined at this stage, such opportunities will be considered during detailed design and, where appropriate, incorporated into the Scheme through biodiversity enhancement measures.

Otter

25. Thank you for confirming that the content and conclusions within Sections 8.4.59–8.4.62 are accepted. We appreciate your acknowledgment and have noted this for the record.
26. Thank you for acknowledging the proposals to contribute to otter conservation and for highlighting the importance of reducing light spillage across the river. Measures to minimise light spill have been incorporated into the design principles and will be refined during detailed design to ensure compliance with best practice for otter conservation. We appreciate your support for these proposals.
27. Thank you for confirming agreement with the proposals for external lighting to consider otter conservation. We appreciate your support and will ensure that lighting design continues to follow best practice to minimise impacts on otters during the operational phase.
28. Thank you for your advice regarding incorporating features within habitat creation, restoration, and enhancement proposals that could provide shelter for otters. Evidence of otter presence has been recorded along the southern bank of the River Dee near

the existing bridge. While the EIA has not identified specific mitigation measures for otter as a result of the Scheme, existing areas of suitable shelter will remain along the riverbank. We will also consider opportunities for enhancement during detailed design, and any proposals from the appointed Contractor to include otter shelter features will be welcomed.

Water Vole

29. Thank you for confirming that the content and conclusions within Sections 8.4.63–8.4.66 are accepted. We appreciate your acknowledgment and have noted this for the record.

Bats

30. Thank you for confirming that the content and conclusions within Sections 8.4.103–8.4.123 are accepted. We appreciate your acknowledgment and have noted this for the record.
31. Thank you for your advice regarding updating the design of the bat house to accommodate the range of species recorded at the site, in line with EC Guidance. The proposed new roost building is intended to mitigate the loss of two known bat roosts affected by the Scheme. The detailed design will be prepared by the appointed Contractor and submitted as part of the licence application process, and we will ensure that it considers the species recorded on site. We also note and agree with your support for lighting proposals being informed by Bat Conservation Trust guidance.

Monitoring

- 32–34. Thank you for your advice regarding monitoring during construction, including the recommendation for an ecological compliance audit (ECA) and the inclusion of defined key performance indicators (KPIs) for otter, bats, and GCN, as well as additional KPIs for saltmarsh and water vole. Monitoring and reporting against objectives and targets will be addressed through the Construction Environmental Management Plan (CEMP), as outlined in Appendix 18A. Welsh Government supports the principle of setting KPIs and is willing to consider implementing these during the construction phase. We propose that this matter is discussed further at the next stage of the project when a Contractor is appointed, and raised through the ELG meetings that will continue throughout the construction phase.
35. Thank you for your advice regarding monitoring beyond the initial five-year aftercare period to account for multiple generations and conservation status. Section 8.9.9 confirms that monitoring requirements for protected species will be set out in the EPS licence Method Statement and undertaken during the five-year post-construction aftercare period. While extended monitoring is not currently specified, we will consider your recommendation during discussions at the detailed design stage and through the ELG to ensure long-term conservation objectives are appropriately addressed.
36. Thank you for your advice regarding the inclusion of specific measures within the biodiversity management and maintenance plan, including maintenance and enhancement of saltmarsh communities, habitat retention/creation for otter, GCN pond creation, and biosecurity. The CEMP will address management and maintenance activities for the soft estate and off-site saltmarsh areas during construction and the five-year post-construction period. Following this, a third iteration of the Environmental Management Plan will be prepared at the end of construction in accordance with

DMRB LA120 (formerly the Handover Environmental Management Plan), which will set out long-term management, maintenance, and monitoring requirements. These measures will be considered as part of that process.

37. Thank you for your advice regarding the inclusion of a long-term Environmental Monitoring and Management Plan (EMMP) of not less than 25 years, and for setting out the detailed requirements for its content. The Scheme will be maintained and managed in accordance with the Environmental Management Plan prepared under DMRB LA 120, as noted in point 36. Following the post-construction period, responsibility for long-term maintenance of the soft estate and associated mitigation measures will transfer to NMWTRA, acting on behalf of Welsh Government. NMWTRA manages the Strategic Road Network in accordance with the Welsh Government Trunk Road Maintenance Manual (WGTRMM) and the Highways Act 1980. I will pass on your recommendations to NMWTRA for consideration and inclusion within their long-term management duties.
38. Thank you for welcoming the inclusion of the outline ecological management plan (oEMP) within the CEMP. We note your advice that review and agreement of the EMMP and CEMP with NRW should be included as a condition of the Order.
- As outlined above, the EMMP and CEMP requirements will be secured through the Contractor's Scope and the REAC. NRW will be sent the latest versions of these documents prior to construction, with ongoing engagement provided via the Environmental Liaison Group.

Marine Fish

39. Thank you for highlighting that the Dee Estuary / Aber Dyfrdwy SAC is designated for river lamprey, and that European smelt are features of the River Dee and Dee Estuary / Aber Afon Dyfrdwy SSSIs. Both species have been considered within the Environmental Statement and are referenced across Chapters 8 and 16. We will review Sections 16.6.13–16.6.15 to ensure these designations and features are clearly referenced.
40. Thank you for your advice regarding the sensitivity categorisation in Section 16.6.36. Migratory fish listed under National Site Network (NSN) designations have been assessed as Very High sensitivity, and species protected under the Wildlife and Countryside Act 1981 have been assessed as High sensitivity, which includes marine fish listed under Section 7 of the Environment (Wales) Act 2016.
- We are satisfied that the current assessment appropriately reflects the sensitivity of migratory fish features and Section 7 species.
41. Thank you for highlighting the current 'At Risk' status of salmon populations in both the River Dee and River Wye. The Environmental Statement reflected the latest data available at the point of drafting; however, we acknowledge that more recent information is now available, including NRW's recent consultation on net fishing controls.
- Section 16.6.51 will be updated to reference the current 'At Risk' status and provide the latest regulatory context.
42. Thank you for confirming that European smelt are listed under Section 7 of the Environment (Wales) Act 2016. This is noted.

No amendment is considered necessary, as smelt have already been assessed appropriately within the ES.

43. Thank you for your comment on piling methods and timing restrictions.
The timing restriction in Section 16.7.4 applies to all works below Mean High Water Springs (MHWS) to minimise risk to migratory fish within the active river channel. Temporary sheet piling required above MHWS, associated with the jetty and crane pad, lies outside the active river channel and presents a low risk to migratory fish. We therefore propose to retain timing restrictions for all in-river works below MHWS, as secured through the REAC (ES Appendix 18B).
No amendment is proposed for piling works above MHWS.
44. The timing restrictions in Section 16.7.4 are already secured for all in-river works below MHWS and will be applied accordingly. No further amendment is required.
45. We welcome NRW's agreement that, with the proposed mitigation in place, effects on migratory fish from underwater noise, vibration, and other construction and operational activities are not significant. No further action required.
46. Thank you for your comments on Table 16-12. Migratory fish have been assessed as of International value under their respective National Site Network designations, and we are satisfied that this is reflected in the assessment.
Table 16-12 will be updated to include the relevant timing restrictions within the mitigation column for clarity.
47. We welcome NRW's agreement that, subject to securing the proposed mitigation, no significant in-combination effects are anticipated. No further action required.

Appendix 18-B – Register of Environmental Actions and Commitments

48. Thank you for seeking clarification regarding mitigation measures RD8, ME3 and ME6.
As noted in response to Comment 43, the timing restrictions apply to piling works below MHWS to protect migratory fish within the river channel. For piling works above MHWS, these restrictions are considered unnecessary due to the low risk of impact. It should also be noted that the piling methods above MHWS are still to be confirmed. No further amendment is proposed.

Statement to Inform Appropriate Assessment

49. Thank you for highlighting the need to explicitly include lamprey in the LSE assessment.
Although lamprey have been recorded infrequently in seine netting surveys, the Dee trap at Chester confirms their use of the river corridor for migration.
While lamprey were not assessed separately due to low numbers, the mitigation measures proposed for Atlantic salmon are considered sufficient to address potential impacts on lamprey.
The SIAA will be updated to explicitly include lamprey within the LSE screening for completeness.
50. Thank you for confirming NRW's position regarding the conclusion of no adverse effect on site integrity. We can confirm that the mitigation measures include a commitment to use non-percussive piling techniques, as set out in Section 16.7 and Appendix 18B (ME6).

On this basis, we agree that the conclusion of no adverse effect on the migratory fish features of the Dee Estuary / Aber Dyfrdwy and River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SACs remains valid.

51. Thank you for noting the absence of smelt records in Appendix 16D. We confirm that smelt records were obtained from NRW Fisheries in 2025 and will be incorporated into Appendix 16D. The revised appendix will be re-issued to NRW for consideration.

Chapter 2: Section 2.3.26 – 2.3.28 Works to Watercourses

52. Thank you for advising on the requirement for a Flood Risk Activity Permit (FRAP) for works to watercourses described in Sections 2.3.26–2.3.28. We confirm that a FRAP application will be submitted by the appointed Contractor prior to works commencing. We also note NRW's advice that there is no fisheries embargo on this watercourse and that eels may be present. The Contractor will ensure that the FRAP application demonstrates appropriate mitigation measures for eels, in line with NRW guidance. We appreciate NRW's offer to provide more detailed comments once the FRAP application is received and will engage accordingly.

Receptor – Dee Cockle Fishery

53. Thank you for highlighting the potential impact pathway to the Dee Cockle fishery and the sensitivity of the May–July period for newly settled cockle spat. We acknowledge the importance of controlling dust, debris, and sediment to prevent smothering impacts on filter feeders.

We welcome NRW's involvement in reviewing and agreeing the CEMP. We also note your advice that review and agreement of the EMMP and CEMP with NRW should be included as a condition of the Order. As outlined at the start of this letter these documents will be shared with NRW prior to site mobilisation.

The CEMP will include detailed measures to manage sediment and debris during works, ensuring appropriate protection for the Dee Cockle fishery.

Receptor – Dee Conservancy and Navigation

54. Thank you for highlighting the requirements for in-river works and coordination with the Dee Conservancy Harbour Authority. We confirm that all activities involving the waterway—including the transit and operation of the jack-up rig, use of safety boats, temporary pontoons, and associated works—will be planned and agreed in advance with the Harbour Master, and the necessary Harbour Permits will be obtained prior to commencement.

We have been liaising directly with the Harbour Authority since the start of the project and greatly appreciate their support and guidance to date, including site meetings. This engagement will continue throughout the construction phase to ensure that logistical planning accounts for tidal constraints and the safe movement of large rigs, barges, and abnormal loads.

Details of these arrangements, including installation of temporary landing stages and pontoons, will be set out in the Construction Environmental Management Plan (CEMP), which NRW will have the opportunity to review and agree. We also confirm that the original navigational clearances beneath the bridge have been maintained in the new design, and that the depth of the main channel will not be adversely affected.

Benthic Ecology and Invasive Non-Native Species (INNS)



Chapter 16 Marine Environment

55. Thank you for confirming agreement with the assessment and proposed mitigation measures for intertidal and subtidal benthic ecology features. We welcome NRW's support for the inclusion of the EMMP and the CEMP

We note your advice that review and agreement of these documents with NRW should be included as a condition of the Order. As outlined at the start of this letter these documents will be shared with NRW prior to site mobilisation.

Chapter 7 and 8

56. Thank you for confirming agreement with the assessment and proposed offsite compensation for saltmarsh loss, including the removal of rubble from Greenfield Marsh within the Dee Estuary SAC. We welcome NRW's support for these measures and note your advice that review and agreement of the EMMP and CEMP should be included as a condition of the Order.

As outlined at the start of this letter these documents will be shared with NRW prior to site mobilisation.

Appendix 18B Register of Environmental Actions and Commitments

57. Thank you for noting the inclusion of the compensation measure and the commitment to environmental monitoring and management following construction. The governance for the EMMP, CEMP and REAC is as set out in at the start of this letter. The REAC will continue to operate as a live, controlled document, with pre-construction sharing of the most up-to-date version for NRW review and comment and subsequent updates considered through the ELG.

16.6.81 Invasive non-native species (INNS)

58. Thank you for highlighting the potential presence of Chinese mitten crab and the associated biosecurity considerations. We confirm that Chinese mitten crab is referenced as a potential invasive non-native species (INNS) in Annex C and that a Biosecurity Risk Assessment will be undertaken as part of the Construction Environmental Management Plan (CEMP), in line with NRW's advice.

Biosecurity measures are also secured within the REAC under Codes RDb12 and TB13 to prevent ingress and onward spread of INNS from the development site. These measures will be implemented and monitored throughout the works.

Marine Ornithology

59. Thank you for noting the approach to overwintering bird surveys and for confirming that, given the four years of data and low numbers recorded, there are no concerns for marine ornithology. We acknowledge your advice that future applications should include surveys covering the full wintering period (October to March inclusive) and will take this into account for any future applications.

Air Quality

Chapter 11: Air Quality

60. Thank you for confirming that Chapter 11 is comprehensive and references all relevant guidance. We also note your acknowledgement of the ecological receptor content and your support for the commitment to include best practice working practices and dust mitigation measures within the draft CEMP.

61. Thank you for advising that review and agreement of the final Dust Control Plan as part of the CEMP should be included as a condition of the Order. The Dust Control Plan forms part of the CEMP (see Appendix 18A – Table 8-1, Annex J) and will be shared with NRW in accordance with the process described at the start of this letter.

Material assets and waste

62. Thank you for noting the inclusion of the Outline Site Waste Management Plan (oSWMP) within the Outline CEMP and for confirming agreement with this approach. The final Site Waste Management Plan will form part of the CEMP and will be shared with NRW prior to construction as outlined at the start of this letter.

In light of the above, I would be grateful if you could confirm that I have adequately addressed the concerns raised in your letter.

Should you require clarification or wish to discuss further, please contact our consultant, Gethin Morgan at Mott MacDonald: Tel: 01492 588332 | Email: gethin.morgan@mottmac.com.

Yours sincerely



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