

# Marine Advice Memo

To: Pete Morrison- Marine Licensing Team

From: Delyth Rowlands- Marine Area Management and Advice Team

Date: 26/02/2026

Response to email from Pete Morrison dated 30<sup>th</sup> January 2026

## Consultation: A494 River Dee Bridge Replacement Scheme

**Application Reference: CML2563**

**Applicant: North and Mid Wales Trunk Road Agent**

### NRW advisors consultation record

Specialism	Consulted
Marine & Coastal Physical Processes	<input checked="" type="checkbox"/>
Marine Water Quality	<input checked="" type="checkbox"/>
Benthic Ecology	<input checked="" type="checkbox"/>
Marine Mammals	<input type="checkbox"/>
Marine Ornithology	<input checked="" type="checkbox"/>
Marine Fish	<input checked="" type="checkbox"/>
Dee Conservancy	<input checked="" type="checkbox"/>
Dee Cockle Officers	<input checked="" type="checkbox"/>
Development Flood Risk	<input checked="" type="checkbox"/>
Environment Team	<input checked="" type="checkbox"/>
Air Quality	<input checked="" type="checkbox"/>
Waste	<input checked="" type="checkbox"/>

## NRW Advisory comments:

<b>Requires action</b>		
<b>Reference</b>	<b>Summary</b>	<b>RAG</b>
<b>Receptor – Development Flood Risk</b>		
<b>DFR1</b>	No comments provided in regard to development flood risk at this stage. Discussions ongoing with the Applicant via Development Planning Advice Service (DPAS)	
<b>Receptor – Geology and Soils</b>		
<b>G&amp;S1</b>	The proposed development site is located on land with previous potentially contaminative land uses. We are satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing.	<b>AMBER</b>
<b>Receptor - Marine Water and Sediment Quality</b>		
<b>W&amp;SQ2</b>	No details of the proposed remediation of existing infrastructure have been provided.	<b>AMBER</b>
<b>W&amp;SQ3.4 &amp; 3.6</b>	Contaminated sediment remobilisation should be included for assessment under both Water Framework Directive (WFD) and Habitats Regulations Assessment (HRA) regulations.	<b>AMBER</b>
<b>W&amp;SQ 3.5</b>	We do not agree with the conclusions of the Marine Licensing Team WFD assessment that there is no potential for the proposed works to cause deterioration of the Dee (North Wales) waterbody	<b>AMBER</b>
<b>W&amp;SQ 3.9</b>	Further information / justification is required to support the assessment of no impact on designated features of remobilisation of chemical contaminants.	<b>AMBER</b>

<b>W&amp;SQ 3.10</b>	We cannot agree with the conclusions of the HRA at present as insufficient assessment has been undertaken.	<b>AMBER</b>
<b>Receptor – Benthic Ecology</b>		
<b>B2</b>	Production of a Biosecurity Risk Assessment (BRA) is required – with particular attention to Chinese mitten crab ( <i>Eriocheir sinensis</i> ).	<b>AMBER</b>
<b>Receptor – Marine Fish</b>		
<b>F12</b>	We think that the Marine Licensing HRA should be amended to include potential for Likely Significant Effect on sea and river lamprey as fish features of the Dee Estuary and River Dee and Bala lake SACs but would agree that if the same timing restrictions are conditioned, there will be no adverse effect on the fish features.	<b>AMBER</b>

## Detailed Comments:

### Receptor – Development Flood Risk

Please note that we are unable to provide detailed comments on flood risk at this stage. Further information regarding the River Dee Tidal Model is required before we can comment on Chapter 7 of the Environmental Statement (Road Drainage and Water Environment) and the submitted Flood Consequence Assessment. Discussions are ongoing with the Applicant via DPAS regarding this matter.

### Receptor – Geology and Soils

#### Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report

- Chapter 6 Geology and Soils

#### **G&S 1. RAG = AMBER**

The proposed development site is located on land with previous potentially contaminative land uses, above a Secondary aquifer and is adjacent to designated sites

We welcome the inclusion of an outline materials Management Plan (oMMP) as part of the Construction Environment Management Plan (CEMP) and advise that the review and

agreement of these finalised documents with NRW is included as a condition of any licence issued.

We are satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing.

We recommend that developers should:

1. Follow the risk management framework provided in [Land contamination risk management \(LCRM\)](#)
2. Refer to 'Development of land affected by contamination: A guide for developers' (WLGA, 2023) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. [Refer to the Environment Agency's \(2017\) 'Approach to Groundwater Protection'](#)

If dewatering is required, an abstraction licence may be required. For further information please visit [Natural Resources Wales / Find out if you need a licence for dewatering a mine, a quarry or for a civil engineering project.](#)

## Receptor – Marine Water and Sediment Quality

### Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report

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

#### W&SQ 1. RAG = GREEN

We commend the Applicant's reference and commitment to best practice guidelines as set out on the NetRegs website. We note the commitment from the Applicant to ensuring the mitigation provisions to be set out in the proposed final Construction Environment Management Plans (CEMP) are operating as intended through the allocation of Environmental Managers and will contain procedures for checking, auditing and corrective action. We recommend that the commitment to an appropriately detailed CEMP and its adherence forms a part of the conditions of any licence or consent to undertake the proposed works.

- **Chapter 16: Marine Environment, Section 16.5.2 p.30 - Further information and assessment required**

#### W&SQ 2. RAG = AMBER

We do not agree with the Applicant's conclusions of no adverse effect from remediation activities.

The Applicant states that remediation works to the existing structure are assumed to be no more damaging / impactful than the construction works on the new structure. On this basis,

they conclude no adverse effect to site integrity from activities associated with this part of the scheme.

We do not agree with the Applicant's conclusions as insufficient details of the proposed works have been provided rendering any assessment inadequate.

The Applicant should ensure all infrastructure design-details and remediation activity details are made available for analysis and assessment. The results of this assessment should be used in consideration of any adverse effects at the appropriate assessment stage of HRA.

- **Marine Licensing Team Water Framework Directive Assessment**

### **W&SQ 3.1 RAG = GREEN**

*Screening:* We agree with the screening decision to include the Dee (North Wales) waterbody for assessment of compliance with the WFD regulations for the proposed activity and any in combination impacts.

### **W&SQ 3.2. RAG = GREEN**

*Scoping:* We agree with the conclusion that the eco-gen and eco-bio water quality quality-elements are not at risk of impact from the proposed activities and can be scoped out from detailed assessment for the Dee (North Wales) waterbody on the basis that suitable mitigation and avoidance measures will form a condition of any licence or consent to proceed with the proposed development. This condition will be dischargeable subject to adherence to a CEMP.

### **W&SQ 3.3. RAG = GREEN**

*Scoping:* We agree with the conclusion that chemical contamination from accidental pollution can be scoped out from detailed assessment for the Dee (North Wales) waterbody subject to adherence to a CEMP.

### **W&SQ 3.4. RAG = AMBER**

*Scoping:* No justification is presented for not assessing construction activity that may disturb contaminated sediment. No evidence is presented to allow this pressure to be excluded from assessment. In the absence of **either** sediment contaminant assessment, **or other evidence** characterising any chemical pollutants bound within the sediment to be disturbed by the proposed works, we do not agree with the scoping conclusion that chemical contaminants can be scoped out for detailed assessment of effect on the Dee (North Wales) waterbody.

**Recommendation:** We recommend that sediment contaminant analysis of any sediment likely to be disturbed by the works is undertaken, and the results are presented for assessment of effect (detailed assessment) in the WFD assessment.

Alternatively, we recommend an assessment is completed of the quantity of sediment likely to be disturbed, and the assessment is supported by information regarding the expected low levels of contaminants in that sediment.

### **W&SQ 3.5. RAG = AMBER**

*Conclusion:* Upon review of the WFD assessment we are not satisfied that the proposed works have been assessed to be unlikely to have a significant effect on the water quality of the general location or result in deterioration of the WFD classification status of the waterbody in which the proposed works are to be undertaken.

Specifically, We do not agree with the WFD assessment that the proposed works have no potential to prevent either the Dee (North Wales) water body, or any WFD Protected Area from meeting its objectives with respect to water quality (and related) elements, and we do not agree with the conclusion that the proposal will not impact the water quality measures or improvement activities (where applicable) for the Dee (N. Wales) waterbody.

**Recommendation:**

If the WFD compliance assessment included an evaluation of the quantity of disturbed sediment, and assessment that the risk of remobilisation of contamination was low, and if that assessment concluded that the impact on the marine environment was minimal, we could support a conclusion of no potential to prevent the Dee (North Wales) waterbody from meeting its objectives.

- **Marine Licensing Team Habitats Regulations Assessment**

**W&SQ 3.6. RAG = AMBER**

*TLSE Section 3.2.2, P.6 - Further evaluation required:* Whilst we do not disagree with the screening decision (Table 3.2.3 p.10) that appropriate assessment is required, a number of additional activities and effects should be included for consideration for assessment and so should be included at Test of Likely Significant Effect (TLSE).

**Recommendation:** We advise that assessment of the remediation of the existing bridge structure should be included within the HRA (see above comments).

The effect of the remobilisation of contaminated sediment should be included for assessment of impacts on the intertidal sand and mudflats feature (mudflats and sandflats not covered by seawater at low tide) and the Estuary feature of the Dee Estuary SAC. Likewise, the Salicornia and Atlantic Salt Meadow features should be identified at TLSE as sensitive to chemicals mobilised through resuspension of contaminated sediment.

Notwithstanding the presence of the aforementioned Annex 1 habitats downstream from the proposed works, we would not expect the remobilisation of contaminated sediment to have an adverse effect on site integrity, but it should be recognised as a pressure of concern in the HRA.

**W&SQ 3.7. RAG = GREEN**

*TLSE Section 3.2.2, P.6:* We note the absence in the Marine Licensing HRA for the operational use of the bridge and withhold comment on the basis that this activity will be covered under the Welsh Government Draft Orders HRA as it is not a marine licensable activity.

**W&SQ 3.8. RAG = GREEN**

*Section 4.1, P.24, Appropriate Assessment Alone:* We agree not to rule out adverse effect of accidental pollution on the basis that the final details of a CEMP have not been made available to the Competent Authority.

We also agree that any increase in suspended sediment concentration (SSC) is likely to be temporary and that since the estuary and the designated SAC features already exist in an environment of high background turbidity, SSC is unlikely to cause an adverse effect on any feature or site integrity.

### **W&SQ 3.9. RAG = AMBER**

*Section 4.1, P.24, Appropriate Assessment Alone - Further assessment required:* Remobilisation of contaminated sediment has not been assessed for Annex 1 habitats (only for Annex 2 features). Since the species that contribute to the function of these designated Annex 1 habitats are sensitive to chemical contaminants, they should be considered and assessed.

We advise that the magnitude of any impact of remobilisation of chemical contaminants is likely to be low and short-lived, but that there is reasonable scientific doubt to this assumption since no sediment contaminant analysis has been presented by the Applicant.

As there is no indication of the quantities of contaminants likely to be mobilised and no data on the sediment contaminant analysis have been presented, there is insufficient evidence presented to conclude no adverse effect.

**Recommendation:** Any assessment of the impact on sensitive habitats of the remobilisation of contaminated sediment should be based upon sediment contaminant analysis data or other evidence characterising any chemical pollutants bound within the sediment to be disturbed by the proposed works.

If no information regarding the amount of sediment to be disturbed, and the levels of contaminants within that sediment can be presented, we advise that contaminant analysis of the sediment should be undertaken and the results should be made available for assessment.

### **W&SQ 3.10. RAG = AMBER**

*Section 6, P.44 - Further assessment required:* As we consider the appropriate assessment to be incomplete (ref. W&SQ 3.9), it is not possible to conclude no adverse effect on site integrity from activities related to the proposed works.

## **Receptor – Physical Processes**

### **Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report**

#### **PP1 RAG = GREEN**

We welcome the comprehensive the baseline and modelling study provided in [A494 River Dee Bridge replacement scheme environmental statement volume 3a](#) (Appendix 7E). The report suggests that there will only be minor changes to an already dynamic environment.

This is summarised in the ES and so we have no concerns from a physical processes' perspective.

## Receptor – Benthic Ecology

### Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report

- Chapter 16 Marine Environment:

#### B1 RAG = GREEN

We agree with the assessment and proposed mitigation measures in relation to direct impacts on intertidal and subtidal benthic ecology features particularly in relation to impacts on the Afon Dyfrdwy (River Dee) Site of Special Scientific Interest (SSSI) intertidal mudflat and sandflats and saltmarsh features, and indirect impact on the Dee Estuary Special Area of Conservation (SAC). We welcome the inclusion of an Environmental Monitoring and Management Plan (EMMP) and Construction and CEMP and advise that review of agreement of these documents with NRW is included as a condition of any licence issued

#### B1 RAG = AMBER

*Chapter 16.6.81:* Invasive non-native species (INNS): Chinese mitten crab (*Eriocheir sinensis*). Although the canalised section of the Dee River is unlikely to provide permanent habitat for adult Chinese mitten crabs, the life cycle of this species means that juveniles may be present in the development area throughout the year, and adults migrating downstream August – Nov. Therefore, this element should be considered and addressed through undertaking a Biosecurity Risk Assessment as part of the CEMP. Special attention and mitigation measures should be applied to ensure that all activities avoid both ingress and onward spread of this and other species of INNS from the development site.

## Receptor – Marine Ornithology

### Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report

#### O1 RAG = YELLOW

We note that overwintering bird surveys were conducted in three wintering months (December, January and February). We advise for future applications, that overwintering bird surveys should be carried out through the entire wintering period (October to March inclusive). However, given that there is four years' worth of data, and low numbers of wintering species recorded in all surveys, we conclude that there are no concerns for marine ornithology.

- Marine Licensing Team Habitats Regulations Assessment

#### O2 RAG = GREEN

We agree with the conclusions of the HRA assessment undertaken for the ornithological features of the Dee Estuary Special Protection Area (SPA) and Ramsar site.

## **Receptor – Marine Fish**

### **Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report**

- **Chapter 16 Marine Environment:**

#### **F1 RAG = BLUE**

*Section 16.6.13* – The Dee Estuary / Aber Dyfrdwy SAC is also designated for river lamprey, and 16.6.14/16.6.15 European smelt are also features of the river Dee and Dee Estuary/ Aber Afon Dyfrdwy SSSIs.

#### **F2 RAG = BLUE**

*Section 16.6.36* - We advise that in accordance with the rationale set out on in Table 16-5, migratory fish features of National Site Networks in the vicinity (Dee Estuary and River Dee and Bala Lake SACS) should be categorised as Very High and that some marine fish are also listed under Section 7 of the Environment (Wales) Act 2016 and should be classed as High.

#### **F3 RAG = BLUE**

*Section 16.6.51* – Salmon in both the River Dee and the Wye are currently classed as being 'At risk'.

#### **F4 RAG = BLUE**

*Table 16-9* - We advise that smelt (*Osmerus eperlanus*) is also listed under Section 7 of the Environment (Wales) Act 2016.

#### **F5 RAG = YELLOW**

*Section 16.7* - Please confirm that in addition to the avoidance and mitigation measures proposed within this section, all piles and pile casings will be installed using nonpercussive piling methods. Furthermore, we advise that any piling, whether for installation of pile casings or installation of temporary sheet piling should be subject to the timing restrictions as specified in 16.7.4 a).

#### **F6 RAG = YELLOW**

*Section 16.9.20* - We advise that any piling, whether for installation of pile casings or installation of temporary sheet piling, should be subject to the timing restrictions as specified in 16.7.4 a), which includes the restriction of no work to be undertaken in the 3hr period leading up to high water at Chester weir.

#### **F7 RAG = GREEN**

Section 16.9.20 - Provided the above-mentioned mitigation measures are implemented we agree that disturbance to migratory fish features from underwater noise and vibration can be classed as not significant. We agree that other construction and operational effects on fish can be classified as not significant.

**F8 RAG = YELLOW**

Table 16-12 - We advise that the proposed mitigation as detailed above should be included in the table. Also, we advise that the table is corrected to reflect that several migratory fish features have an assigned value of 'International', but all fish appear to be assessed together in the table with a value of 'National'.

**F9 RAG = GREEN**

Section 16.12 - We agree that provided the above mitigation measures are secured, no in-combination effects are likely to be significant.

- **Appendix 18B REAC**

**F10 RAG = YELLOW**

We note the inclusion of the mitigation measure coded RDb8 and ME3, to minimise disturbance to fish, and note that non-percussive piling techniques are specified under ME6. We seek clarification that these mitigation measures apply to any piling required, including for piles and temporary sheet piling.

- **Appendix 16D – Fish Survey Data**

**F11 RAG = BLUE**

- We note that this does not include records of smelt, and request that these be submitted to NRW (A) for consideration.

- **Chapter 2: Section 2.3.26 – 2.3.28 Works to Watercourses**

**F13 RAG = GREEN**

We advise that a Flood Risk Activity Permit (FRAP) application will be required for the works to watercourses described in Sections 2.3.26 – 2.3.28. We advise that there will be no fisheries embargo on this watercourse as there is no salmonid spawning. There will be eels present here so the applicant will have to demonstrate how they will mitigate potential impacts to eels in their FRAP application. We will be able to provide further comments on impacts to the freshwater environment once we receive the FRAP application.

- **Marine Licensing Team Habitats Regulations Assessment & WFD Assessments**

**F12 RAG = AMBER**

We agree with the conclusions of the WFD assessment, and with the overall conclusion of the HRA of no Adverse Effect on Site Integrity (AEOSI) on Atlantic salmon provided the timing restrictions are conditioned in any licence granted. However, we have previously

advised the applicant in response to the Report to Inform Appropriate Assessment (RIAA) that river and sea lamprey should be scoped in for underwater noise. We advised that *'although river and sea lamprey have only been recorded infrequently in the seine netting surveys, records from the Dee trap at Chester (see Appendix 16D) confirms that lamprey utilise the river corridor for migration and consequently they should be included for assessment of Likely Significant Effect, as Atlantic salmon.'*

We therefore advise that the Marine Licensing HRA should be amended to include potential for LSE on sea and river lamprey as fish features of the Dee Estuary and River Dee and Bala lake SACs but would agree that if the same timing restrictions are conditioned in the ML, there will be no AEOSI for the fish features.

## Receptor – Terrestrial Biodiversity

### **Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report – Protected Species**

Bat, otter, great crested newt (GCN) and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). We refer you to the protected species comments provided in the Development Planning Advice Service (DPAS) response to the draft orders consultation dated 28<sup>th</sup> November 2025.

## Receptor – Dee Conservancy

Impacts on users of the Dee Estuary waterway are well covered by the applicant, noted that users of the Dee Estuary are not mentioned in the Construction Buildability and Phasing Report. Whilst road traffic is the major transport mode impacted by the work, it important to consider the impact of the work on users of the waterway including the ability of NRW as the Harbour Authority to carry out statutory duties (afloat inspections) and emergency response. In river works that will affect and sometimes obstruct safe passage from August 2027-April 2029, may at times cut off 11km of river above the A494 bridge. All efforts should be made to keep the waterway available for access, and liaison with the Dee Conservancy Harbour Master ([harbourmaster@deeconservancy.org](mailto:harbourmaster@deeconservancy.org)) is essential to enable Notices to Mariners to be issued to users warning of hazards associated with the A494 bridge work. We would like to see this noted in the Site Environmental Control Plans in the CEMP.

With reference to drawing called Highways General Arrangement (Ref 396318-MMD-00-XX-DR-C-0002) - NRW land ownership is described erroneously as *National* Resources Wales, typo to be corrected. We expect the footprints of the remnants of the old bridge piers to be marked as 'Permanent land take', with an inspection and maintenance plan in place, which must include navigation markers (include maintenance plan) approved by the Harbour Master.

We note that the mobilisation and pier construction may cross over with in river works currently being considered by Uniper as part of their Low Carbon Project (2027-2030). It is critical that the applicant provides the Dee Conservancy and Port of Mostyn Harbour Masters and Pilot with as much advance notice as possible with respect to any barge/rig movements, and temporary platform construction.

We note the applicant is planning on using a jack-up barge and a flat-top barge, which will both require tugs to support transit up river. As part of this phase of logistics the applicant will need to apply to the Dee Conservancy Harbour Master ([harbourmaster@deeconservancy.org](mailto:harbourmaster@deeconservancy.org)) for temporary moorings (along the bank) within the Dee Conservancy.

## Receptor – Dee Cockles

NRW advise that there is an impact pathway to the Dee Cackle fishery. Any dust, debris, and sediment that could be generated from the work and enter the water environment, reaching the River Dee Water body, may impact the cockles as they are filter feeders. May to July is a particularly sensitive time for the newly settled cockle spat as they would be vulnerable to smothering from sediment. With this in mind, we would require Pollution Prevention measures to be followed via an agreed CEMP.

## Receptor – Air Quality

### **Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report**

- **Chapter 11: Air Quality**

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

Section 11.3.37 – 11.3.43 - Ecological Receptors - the content of the submission is acknowledged.

Section 11.5.1 – 11.5.2 - Construction Dust. We note the commitment to include best practice working practices and mitigation measures as a control against the impact of airborne dust within the draft CEMP.

We advise that review and agreement of the final Dust Control Plan as part of the final CEMP with NRW is included as a condition of any licence granted.

## Receptor – Material Assets and Waste

### **Environmental Statement Vol 1: A494 River Dee Bridge replacement scheme: environmental statement volume 1 technical assessment report**

We note the Outline Site Waste Management Plan (oSWMP) forms a part of the Outline Construction Environmental Management Plan. We agree with this approach and consider that waste will be appropriately managed. We advise that review and agreement of the final Site Waste Management Plan as part of the final CEMP with NRW is included as a condition of any licence granted

Kind regards,

Delyth Rowlands

Marine Advisory Officer  
**Marine Area Advice and Management Team**

## ANNEX 1 – RAG status definitions

**NB – The difference between RED and AMBER categories is the scale/magnitude of the request. If a significant amount of additional work is required then this should always be identified as RED.**

### RED

NRW (A) consider that major issues have been identified with a potential significant risk of environmental impact. In order to address this issue we may require provision of (no limited to):

- new baseline or survey data; and/or
- significant revisions to baseline characterisation and/or
- significant revisions to impact modelling and/or
- significant revisions to the environmental assessment and/or
- significant design changes; and/or
- significant mitigation

NRW (A) would expect all issues to be adequately resolved before being able to agree to the assessment. Please note that we may be unable to agree with the conclusion of the assessment even following the provision of additional information.

### AMBER

NRW (A) consider that issues have been identified that could make a material difference to the outcome of the decision-making process for this project. NRW (A) considers that these matters may be resolved through:

- Provision of additional information, data or analysis to support conclusions; and/or
- Further justification or clarification to support conclusions; and/or
- Revisions to impact assessment methodology and/or assessment conclusions; and/or
- Minor to moderate revisions to impact modelling; and/or
- Suitable mitigation measures that are adequately secured through any consent or permission given.

NRW (A) would expect all issues to be adequately resolved before being able to agree to the assessment. Please note that we may be unable to agree with the conclusion of the assessment even following the provision of additional information.

### YELLOW

NRW (A) consider that issues have been identified that would not make a material difference to the outcome of the decision-making process but that a lack of information has been provided and/or an inadequate assessment.

For future assessment we would expect these issues to be resolved. NRW (A) may not be of the same view with regards to significance or materiality in other cases or circumstances.

## **GREEN**

NRW (A) has no significant outstanding concerns.

## **BLUE**

NRW (A) has identified minor editorial errors with the information provided which would benefit from amendment but make no material difference to the conclusions.