

Appendix B – NRW Scoping Opinion

Sent by e mail

25 April 2019

Dear Ms Parry,

SCREENING AND SCOPING OPINION UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (as amended)

ABERAERON COASTAL DEFENCE SCHEME

I am writing further to your request for a screening and scoping opinion, received on the 22nd January 2019, made in accordance with The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("The Regulations").

The purpose of the Environmental Impact Assessment (EIA) screening procedure is to determine whether the proposed works require an Environmental Impact Assessment and submission of an Environmental Statement (ES). The purpose of the scoping procedure is to determine what information should be provided in the ES.

In reaching our Screening Opinion we have considered the proposed works against Schedule A1 and A2 of the above regulations. In reaching our scoping opinion we have had regard to the information provided in the "Aberaeron Coastal Defence Scheme Scoping Report", dated 21 January 2019, and considered the requirements of Schedule 3 of the Marine Works Regulations. We have also consulted with the bodies that we consider have an interest in the project by reason of their environmental responsibilities, or local or regional competences, as required by the above regulations, and had regard to their comments.

Screening Opinion

It is our opinion that the works fall within the categories of project listed within Schedule A2, paragraph 69 of the above regulations, (Coastal work to combat erosion and maritime works capable of altering the coast through the construction of, for example, dykes, moles, jetties and other sea defence works, excluding the maintenance and reconstruction of such works), and therefore must be considered in terms of its size, nature and location having regard to the relevant criteria listed in Schedule 1 of the above regulations.

We have carefully considered the views of the consultation bodies alongside the criteria as set out in Schedule 1 of the regulations, and have determined, based on the information provided; that the project has the potential to have a significant effect on the environment and therefore a statutory Environmental Impact Assessment is required.

We have come to this conclusion on the basis that limited information is currently known on the design and construction methodologies that will be used therefore significant impact cannot be ruled out. Further information on this will be provided at EIA stage to enable the full assessment of the project and its' impacts on the identified designated sites, Cardigan Bay Special Area of

Conservation (SAC) & West Wales Marine SAC and Aberarth-Carreg Site of Special Scientific Interest (SSSI).

Scoping Opinion

This letter sets out the additional information that we consider necessary to be included and/or assessed in the ES for this Project.

Please note our scoping opinion is based on the information available to us at this time. The information provided is not a definitive list of the ES / EIA requirements and further information may be required following an application for this project, to ensure a full assessment is carried out.

This Screening and Scoping Opinion will be provided to all those bodies that were consulted and will be publicised on our website and on our Public Register.

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Scoping Opinion (SC1901)

Summary of the proposal

Low-lying areas of Aberaeron are at risk of flooding generated by extreme tidal waters and wave overtopping along the northern side of the harbour. The layout of the harbour entrance means that wave heights increase as waves move through the entrance channel (Hyder, 2013a). Several incidents of flooding due to overtopping of the harbour wall and secondary wall at Pen Cei / Quay Parade have been reported by local residents, with incidents dating back to 1960. As the majority of incidents have been reported by local residents there is limited information to verify the details of the flood events, and therefore there is a level of uncertainty surrounding some of these reports.

The proposed Scheme is made up of three linked elements – works along the north harbour wall and in the inner harbour Pwll Cam; works to South Pier; and works on South Beach as outlined below:

The preferred option for the inner harbour comprises the following elements:

- Construction of approximately 180m of new wall along Pen Cei, built along the same path as the existing secondary wall. The new wall will be on average 0.81m above the existing harbour wall (total height of 5.2m AOD). As a result of raising the walls, flood gates will be required to maintain access points;
- Construction of approximately 290m of new wall from The Hive and around Pwll Cam to the rear of The New Celtic Restaurant. The new wall would be 1.2m above the existing harbour wall (total height of 5.2m AOD). As a result of raising the walls, flood gates will be required to maintain access points, including across the slipway;
- Construction of approximately 65m of new wall from the rear boundaries of the properties between the New Celtic Restaurant and the A487 highway bridge crossing the River Aeron. The wall will be 1.45m above the existing wall (total height of 5.2m AOD); and,
- Construction of approximately 400m of new wall and up to 14m deep grout curtain at the rear of the existing harbour walls. A grout curtain is made up of a series of holes drilled into the ground into which grout is injected. The grout 'joins up' between the drilled holes to create a 'curtain' of grout below ground. The aim of the grout curtain is to create a cut-off to reduce permeability and prevent groundwater flooding as a result of rising tide levels.

The preferred option for South Pier comprises re-building an approximate 10m length of the head of the pier using the following general methodology:

- Demolition of the head of the existing pier;
- Installation of new piled foundations for the new pier head;
- Construction of new reinforced concrete perimeter walls to form the new pier head;
- Backfilling with general fill between the perimeter walls;

- Externally clad the concrete perimeter wall with the existing masonry produced during the demolition operation in order to maintain the pier's Grade II listed structure status; and
- Construction of a new concrete deck to the pier.

The preferred option for South Beach identified in the Opus (2017) report comprises the following elements:

- Remove and replace the dilapidated groyne field, including the crib groyne at the end of South Pier;
- Improve existing rock armour revetment, where required, and extend defences to South Pier (including accesses); and
- Replenish and/or redistribute shingle on beach.

The design of the Scheme will be in line with the requirements of the Welsh Government's Technical Advice Note, for the development of residential areas in relation to flood risk (TAN15) for a 1 in 200 year design return period for overtopping and wave loading, and, 1 in 100 year for revetment stability. The scheme will also be in accordance with the guidance for flood and coastal erosion risk management and adaptation to climate change (Welsh Government Assembly, 2004 and Welsh Government, 2017).

Limited information is known on the construction methodologies that will be used at this stage. Further information on this will be provided at EIA stage, as the design develops, to enable the full assessment of the Scheme.

Location

Aberaeron is situated on the west coast of Wales in Cardigan Bay, approximately 30km south of Aberystwyth. The main harbour lies directly at the mouth of the River Aeron with many boats moored using a series of 'fore-and-aft moorings' or 'trot moorings' which leave the boats beached in the harbour during low tide. In the north-east corner of the harbour is a smaller, contained harbour (Pwll Cam) in which water is maintained several feet deep by a sill where shallow draft boats are moored on running moorings to the harbour wall.

Consultation Responses Received

In considering the scoping report, the NRW PS consulted with various consultation bodies. The consultation bodies that responded are listed below:

- The Crown Estate
- Natural Resources Wales
- Maritime and Coastguard Agency (MCA)
- Royal Yachting Association (RYA)
- Trinity House Lighthouse Service (THLS)
- Ceredigion County Council, Local Biodiversity Officer.
- Cadw
- Dyfed Archaeological Trust

1. General comments

- 1.1. Marine and coastal guidance produced by NRW that may provide useful information to help with your project is available here:

<https://naturalresources.wales/guidance-and-advice/business-sectors/marine/marine-and-coastal-guidance/?lang=en>

- 1.2. The Environmental Statement (ES) submitted must demonstrate consideration of the points raised in this scoping opinion. It is recommended that a table is provided in the ES summarising the scoping opinion comments and how they are addressed in the ES.
- 1.3. The ES must include all the information set out in Schedule 3 and regulation 12 of the Marine Works (Environmental Impact Assessment)(Amendment) Regulations 2017.
- 1.4. Where possible, NRW PS comments have been provided in relation to the specific sections, paragraphs and tables of the EIA Scoping Report entitled “Aberaeron Coastal Defence Scheme Scoping Report”, dated 21 January 2019.

2. Chapter 1 Introduction

- 2.1. Section 1.1 and 1.2 of the scoping report provide a clear description of the location and construction components of the proposed development.
- 2.2. Section 1.3 of the report identifies the key legislation and policies of relevance to the project. It is expected that the policy and legislation would be referred to throughout the ES to assist in assessing the environmental effects of the project.
- 2.3. It is noted in section 1.3.2 that Planning permission will be required. Therefore a Flood Consequence Assessment (FCA) giving a detailed account of flood risk will be required.
- 2.4. It is noted in section 1.3.5 that a Flood Risk Activity Permit (FRAP) will be required – this may not be necessary if Planning permission and/or a Marine Licence are required.
- 2.5. It is your responsibility to ensure that you obtain all relevant permissions/consents for your project. This includes those that may have been identified within the scoping report or others that have been identified following further assessment whilst drafting the ES.

3. Chapter 2 Overview of the Scheme

- 3.1. Section 2.1. Need for the Scheme states that “Modelled results indicated that the existing secondary wall has a present day 1 in 1 (100% AEP) standard of protection against wave overtopping and a 1 in 50 (2% AEP) standard of protection against still water levels”. No figures have been quoted for the 1 in 50 yr Still Water Level.
- 3.2. Section 2.1 also refers to the flood risk at Aberaeron as shown in Flood Zones 2 & 3 on the Flood Map. It should be noted that the flood zones shown on the Flood Map do not include flood risk due to wave overtopping.
- 3.3. Section 2.2. Proposed Scheme indicates that “*The design of the Scheme will be in line with the requirements of the Welsh Government for the development of residential areas in relation to flood risk (TAN15), which is a 1 in 200 year design return period for overtopping and wave loading*”. Figure 2.8 suggests the secondary wall running along Quay Parade will be “rebuilt to existing levels”. Given the frequency of flooding as highlighted in Table 2.1 it

is questionable whether maintaining the existing crest level will achieve the desired design standard of protection.

4. Chapter 3. Planning Policy Context

- 4.1. Chapter 3 of the Scoping Report fails to identify to what extent the scheme will support the Welsh National Marine Plan. With regards to marine planning, Welsh Government is now developing the first Welsh National Marine Plan. The purpose of the WNMP is to guide the sustainable development of our marine area. Once the plan has been adopted NRW PS must make decisions in accordance with the marine plan, unless relevant considerations indicate otherwise. In preparation for the adoption of the plan, we recommend that any EIA undertaken reviews the contents of the draft Welsh National Marine Plan, and the Environmental Statement considers how the project complies with the draft Policies, or must consider the final policies once the plan is adopted.
- 4.2. The report fails to reference the Environment (Wales) Act 2016 and how the project contributes to the Sustainable Management of Natural Resources in Wales and further, how the project contributes to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015. This must be addressed in the ES.

5. Chapter 4 Consultation Overview

- 5.1. It is noted that the last public consultation took place in 2013 and that further public consultation will take place for consideration prior to the submission of an ES to support a marine licence and planning permission application. Given the length of time since this exercise was undertaken, additional consultation must be carried out.

6. Chapter 5 Approach to Scoping

- 6.1. The scoping report clearly provides maps and plans identifying the location of the development. Areas of development should be identified and defined by co-ordinates within the ES to enable stakeholders to accurately plot them to identify and assess potential effects on their specific Geographical Information Systems.
- 6.2. The project description in terms of the proposed scheme is sufficient however there is limited detail on the design of the scheme or the construction methodology. Options for the location of site compound(s) must also be considered in the construction methodology.
- 6.3. To develop the impact scope for further assessment, the following environmental topics have been reviewed in Chapter 6:
- Physical Environment
 - Flood Risk and Water Quality
 - Ground Conditions, Soils and Contamination;
 - Ecology and Designations;
 - Historic Environment;
 - Seascape, Landscape and Visual;
 - Noise and Vibration;
 - Noise and Vibration;
 - Air Quality;
 - Tourism and Recreation;
 - Traffic and Transportation;
 - Human Health;

- Climate Change; and
- Socio-economics.

6.4. The environmental scoping process within each section is generally as outlined below:

- Subject specific legislation, policies and guidance (if any);
- Baseline;
- Identification of Potential Impacts;
- Assessment Methodology; and
- Summary.

6.5. Generally, NRW PS are content with the proposed approach to the EIA as defined within the scoping report. However, the scoping report makes no detailed reference to a non-technical summary or the vulnerability of the project to major accidents or natural disasters, both of which need to be provided within the ES.

7. Chapter 6 Environmental Baseline, Impacts and Mitigation

7.1. Section 6.1. Physical Environment. 6.1.2.2 – Coastal processes and geomorphology.

Limited evidence has been provided in the scoping report of the baseline environment for coastal processes. The final application must show more detail on the topography of the intertidal area of south beach and how replenishment of the beach will alter this.

7.2. For baseline topographic survey coverage historic LiDAR is available for this area. Data can be downloaded from the Lle portal (<https://lle.gov.wales/home?lang=en>).

7.3. Changes to the physical environment may or may not have a “probable significant effect” on the environment under the EIA Regulations. However, this does not necessarily mean that they will not have an impact on designated habitat features of European Marine sites under the Habitats Directive. More information on the project design and methodology must be provided before reaching any conclusions in a Habitats Risk Assessment (HRA).

7.4. Section 6.1.2.3 – Hydrodynamics. indicates that MHWS at Aberaeron is 2.26m AOD. This value should be checked. The scoping report quotes the ‘West of Wales Shoreline Management Plan 2 (Royal Haskoning, 2011a, 2011b and 2011c)’. The West of Wales Shoreline Management Plan 2 report highlights that Mean High Water Spring should be 2.46m AOD for New Quay, section 1.2. Section 6.1.2.3 also indicates that extreme levels can be up to 2m higher (than MHWS). If extreme levels are to be referred to a return period should be quoted. This must be considered in the Flood Consequence Assessment in compliance with TAN 15.

7.5. Section 6.1.2.3 also refers to the local wave climate and quotes “*During north-westerly storms, waves are generated, but these waves are largely prevented from entering the harbour by the piers,*”. This statement should be checked as waves from a North westerly direction will have direct access into the harbour between the piers.

7.6. Section 6.1.3.1 – Identification of Impacts. We note that the disturbance and direct loss to designated features within Aberarth – Carreg Wylan SSSI has been considered during the construction of the project. Disturbance and loss of habitat within Cardigan Bay Special Area of Conservation (SAC) must also be considered. This is because at this stage there is not enough information to be able to conclude that there will not be changes to

hydrodynamics and sediment transport as a result of the scheme which may have an impact on the features of the SAC. Particularly given that increases in suspended sediment and changes to hydrodynamics have been scoped in to the assessment.

- 7.7. Section 6.1.3.2 – Post-construction. Both “Changes to beach morphology and sediment transport” and “Changes to hydrodynamics (waves and currents)” have been scoped out of further assessment. NRW PS consider that it is too early to reach this conclusion since the final design and construction of the scheme has not yet been provided. In section 6.1.4 it is noted that a review of existing modelling work to inform the design of the scheme is to be undertaken. Without the presentation of this evidence it is difficult to reach a conclusion to scope out post-construction changes. NRW PS request that these be scoped in.
- 7.8. Mitigation measures have not yet been considered for this project. These can be agreed at a later date following the detailed scheme design.
- 7.9. The assessment methodology for the physical environment presented in section 6.1.4. is considered appropriate.
- 7.10. It would be useful if the topographic surveys of South Beach could be compared to any historic monitoring profiles undertaken of this area, if available (data available from Ceredigion County Council). This is in order to justify the requirement for shingle redistribution or replenishment. LiDAR data is also available for this frontage, this can be downloaded from the Lle portal (<https://lle.gov.wales/home?lang=en>).
- 7.11. Section 6.2. Flood Risk and Water Quality The baseline evidence is appropriate but should be supplemented by a detailed Flood Risk Assessment.
- 7.12. It is noted in section 1.3.2 that Planning permission will be required. Therefore a Flood Consequence Assessment (FCA) giving a detailed account of flood risk will be required.
- 7.13. For further information in relation to undertaking Flood Consequence Assessments please see the following link:

<https://naturalresources.wales/evidence-and-data/research-and-reports/reports-evidence-and-data-on-flooding/flood-and-coastal-erosion-risk-in-wales/?lang=en>
- 7.14. It is noted in section 1.3.5 that a Flood Risk Activity Permit (FRAP) will be required – this may not be necessary as Planning permission and/or a Marine Licence are also required and relevant FRAP related conditions can be incorporated into these other permissions.
- 7.15. With respect to section 6.2.4 of the Scoping Report NRW PS support the applicant’s intention to submit a Water Framework Directive assessment together with the marine licence application.
- 7.16. Whilst the information required to inform the Habitats Regulations Assessment (HRA) and Water Framework Directive (WFD) assessment should be coordinated with the EIA, it is important to note that there is distinction between the EIA, HRA and WFD processes; We therefore recommend that the ES should include sections containing

'information to inform the HRA' and 'WFD compliance assessment' and separate reports must be provided.

7.17. The WFD assessment must consider:

- all activities carried out; and,
- each stage of the activity, for example construction, operation, maintenance and (potentially decommissioning)
- The WFD compliance assessment process needs to also consider the zone of influence of the project in its entirety and any WFD waterbodies that fall within it, not just where there are direct impacts.

7.18. Consideration should be given to whether the potential impacts are short term effects (< 6 years) or will cause a non-temporary/permanent change (e.g. direct habitat loss, alteration to sediment transport pathways, interference with migratory fish pathways etc). If the impacts are considered a non-temporary/permanent effect on the biological, chemical or hydro morphological elements of the WFD water body in question then the impact must be carried forward for consideration in the WFD compliance assessment process.

7.19. Guidance on the WFD assessment can be found on our web pages:

<https://naturalresources.wales/permits-and-permissions/marine-licensing/marine-licensing-and-the-water-framework-directive/?lang=en>

7.20. Section 6.3. Ground Conditions, Soils and Contamination The 2009 Groundwater body classification is referenced to in Section 6.3 of the Scoping Report (page 39); please note that a more recent classification has been undertaken since then. The 2015 classification reports that this groundwater body is at poor status. The groundwater chemical status was poor as a result of the chemical surface water test failing; this is because of discharges into surface water from abandoned metal mines. A more recent classification must be included in the submitted ES.

7.21. It is recommended that the requirements of Planning Policy Wales and the Guiding Principles for Land Contamination (GPLC) should be followed.

7.22. The above comments are based on our assumption that gross contamination is not present at this location. If, during development, gross contamination is found to be present at the site, the local authority must re-consult Natural Resources Wales.

7.23. Section 6.4. Ecology and Designations Although Sabellaria alveolata reef was not identified during the walk over survey in October 2018. NRW PS request that a more detailed pre-construction survey of the working corridor and construction area is carried out as biogenic reef can settle and develop rapidly. Should Sabellaria alveolata be found further discussion regarding construction methodology can be discussed at a later date with NRW Technical Experts. More information on the project design and methodology will be required before reaching any conclusions on whether or not the proposed scheme will have an impact on designated habitat features of European Marine sites under the Habitats Directive.

- 7.24. Paragraph 6.4.3.1 – Construction. With respect to terrestrial protected species it is agreed that the proposal is unlikely to have a significant impact on bats or water voles. It has been identified that the proposal has the potential to have a significant effect on otters and this species should be scoped into the EIA. This information must be submitted in support of the marine licence application to assess the impact of the proposed development on otter.
- 7.25. Currently there is not enough information on the construction methodology to be able to rule out indirect impacts from the works and to scope out subtidal ecology from the assessment and therefore we disagree with the conclusion within the Scoping Report. Particularly given the close proximity of biogenic reef feature which may be vulnerable to changes in suspended concentrations or contaminants for example.
- 7.26. Mitigation measures have not yet been considered for this project. We accept that these can be agreed at a later date following the detailed scheme design.
- 7.27. Paragraph 6.4.4 states that information on habitats and species in areas where compounds and access routes may be located will be used to inform the assessment. We request that at a minimum a pre-construction survey of habitats and species within the working corridor and construction site is undertaken.
- 7.28. Information about options for a site compound and its' impacts on subtidal ecology and subtidal pollution must be provided. The EIA must cover potential impacts of these options or eventualities as, even if unlikely, the impact could be significant e.g. an oil spill from vessel or plant, or site compound on an area where there are Environment Act (Wales) 2016 Section 7 species or habitats.
- 7.29. Section 6.5. Historic Environment The report includes a section scoping the proposed Historic Environment Section of the EIA. This has identified 305 heritage assets within the study area comprising:
- 241 Listed Buildings;
 - 1 Conservation Area;
 - 57 Undesignated heritage assets; and
 - 6 historic landscape types.
- 7.30. However it has been determined that the impact on the historic landscape during construction and post-construction will be negligible and therefore this issue has been scoped out of the proposed EIA. We concur with this decision.
- 7.31. The Scoping Report adequately assesses the potential impact of the scheme on heritage. We agree that the assessment of heritage should be scoped into the EIA and confirm that the scope of the assessment is sufficient. This assessment is required to be undertaken in accordance with the standard and guidance of the Chartered Institute for Archaeologists (CIfA).
- <https://www.archaeologists.net/codes/cifa>
- 7.32. Section 6.6. Landscape, Townscape, Seascape and Visual. No comments were received from consultees in relation to landscape character and visual amenity detailed

within the Scoping Report and we have no comment to make on this section of the report. The ES must however include an assessment of impacts as set out in the scoping report.

- 7.33. Section 6.7. Noise and Vibration. No comments were received from consultees in relation to onshore noise and vibration detailed within the Scoping Report and we have no comment to make on this section of the report. The ES must however include an assessment of impacts as set out in the scoping report.
- 7.34. Section 6.8. Air Quality. No comments were received from consultees in relation to air quality detailed within the Scoping Report and we have no comment to make on this section of the report. The ES must however include an assessment of impacts on air quality, as set out in the scoping report.
- 7.35. Section 6.9. Tourism and Recreation. The Scoping Report does not contain a specific section on Shipping & Navigation. Section 6.9 notes that the Harbour is host to a small commercial fishing fleet, as well as numerous recreational vessels. 6.9.3.1 also notes that demolition works to the South Pier may impact entrance to the navigation channel. If this occurs this is likely to have an impact on local vessel's ability to navigate, and without further detail on the works, potential safety hazards. These must be considered under the Harbour's Safety Management System in line with the Port Marine Safety Code.
- 7.36. From the Guide to Good Practice, section 7 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port, and a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 7.7 Regulating harbour works covers this in more detail and the extract below is taken from the Guide to Good Practice.

"7.7 Regulating harbour works

7.7.1 Some harbour authorities have the powers to license works where they extend below the high watermark, and are thus liable to have an effect on navigation. Such powers do not, however, usually extend to developments on the foreshore.

7.7.2 Some harbour authorities are statutory consultees for planning applications, as a function of owning the seabed, and thus being the adjacent landowner. Where this is not the case, harbour authorities should be alert to developments on shore that could adversely affect the safety of navigation. Where necessary, consideration should be given to requiring the planning applicants to conduct a risk assessment in order to establish that the safety of navigation is not about to be put at risk. Examples of where navigation could be so affected include:

- high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation;*
- high constructions, which potentially affect wind patterns; and*
- lighting of a shore development in such a manner that the night vision of mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous.*

There is a British Standards Institution publication on Road Lighting, BS5489. Part 8 relates to a code of practice for lighting which may affect the safe use of aerodromes, railways, harbours and navigable Inland waterways."

Specific detail on the above must be provided in the ES in support of the marine licence application.

- 7.37. Section 6.10. Traffic and Transportation. No comments were received from consultees in relation to the effect of the project on traffic and transportation detailed within the Scoping Report and we have no comment to make on this section of the report. The ES must however include an assessment of impacts as set out in the scoping report.
- 7.38. Section 6.11. Human Health. No comments were received from consultees in relation to the effect of the project on human health detailed within the Scoping Report and we have no comment to make on this section of the report. The ES must however include an assessment of impacts as set out in the scoping report.
- 7.39. Section 6.12. Climate Change. No comments were received from consultees in relation to the effect of the project on climate change detailed within the Scoping Report and we have no comment to make on this section of the report. The ES must however include an assessment of impacts as set out in the scoping report.
- 7.40. Section 6.13. Socio-economics. No comments were received from consultees in relation to the effect of the project on socio-economics detailed within the Scoping Report and we have no comment to make on this section of the report. The ES must however include an assessment as set out in the scoping report.

8. Chapter 7 Cumulative Impacts

- 8.1. The following data sources may provide useful information on other projects for the assessment of cumulative effects:
- 8.2. The Nationally Significant Infrastructure Projects register:
<https://infrastructure.planninginspectorate.gov.uk/projects/register-of-applications/>
- 8.3. The Developments of National Significance Register:
<http://gov.wales/docs/desh/publications/180312-dns-register-en.pdf>
- 8.4. Planning Policy E.g. Local Development Plans, Transport Plans (National and Local) and National Policy Statements.
- 8.5. An up to date list of marine licensable developments can be found at the following link:
<http://lle.gov.wales/catalogue/item/MarineLicences/?lang=en>

9. Chapter 8 Summary

- 9.1. The summary table provided in the Scoping Report should be repeated within the ES and carefully cross referenced to the information provided within it.

10. Chapter 9 Next Steps

- 10.1. The items highlighted in this letter must be addressed in the Environmental Impact Assessment. However, this letter should not be considered as a definitive list of all

Environmental Statement / Environmental Impact Assessment requirements as other subsequent work may prove necessary following further assessment.

- 10.2. For further technical advice on certain issues scoped in by the report NRW PS suggest contacting the Discretionary Advice Service directly at the following link:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/?lang=en>

- 10.3. If you have any further questions in relation to the marine regulatory requirements of this development please do not hesitate to contact NRW PS at:

marinelicensing@naturalresourceswales.go.uk.

Yours sincerely

Z McMellin

Marine Licensing Team
Natural Resources Wales

Cc: All Consultation Bodies

References:

(Hyder, 2013a) Hyder Consulting (2013a) Aberaeron Harbour Project Appraisal Report

Opus (2017) OPUS (2017) Aberaeron Coastal Defence Scheme Design Strategy