

Our ref: EOR0808

Unit 23, Beaufort Park,
Riverside Court
Chepstow, Monmouthshire
NP16 5UH
T +44 1483 746 500

Date: 22 November 2021

Natural Resources Wales Marine Licensing Team
Cambria House
29 Newport Road
Cardiff
Cf24 0TP

Dear Sir/Madam,

On behalf of Pembrokeshire Coastal Forum - DEML 1875 META Phase 1 Sites Marine Licence Variation Application

Further to the above application to vary the META Phase 1 Marine Licence (DEML 1875) please find enclosed the following documents:

- Environmental Appraisal for the META Phase 1 Marine Licence variation (Rev 02); and
- Pembroke Dock Infrastructure / META Phase 1 Pontoon Marine License Variations: Summary of Implications for Assessment (reference: EOME0506 / EOR0808 Rev 02).

Background

On 10 June 2019, Pembrokeshire Coastal Forum (PCF) was awarded a Marine Licence (DEML 1875) under the Marine and Coastal Act (2009) for the Marine Energy Test Areas (META) Phase 1 project. The META project provides a series of pre-consented, non-grid connected, marine energy test areas that enables the deployment and testing of devices, components and subassemblies, ancillary activities, and equipment, in support of marine energy testing, thereby de-risking marine energy projects prior to larger scale or array deployments and reducing the consenting burden on device developers.

The META Phase 1 project comprises five sites (Site 1 – Carr Jetty, Site 2 – Mainstay Quay, Site 3 – Ferryside, Site 4 – Quay 1, and Site 5 – Criterion Jetty) within the Pembroke Dock area of the Milford Haven waterway. The proposed variation to the awarded Marine Licence is relevant to the META Phase 1 Site 3 - Ferryside only.

The awarded META Phase 1 Marine Licence included for the installation of a permanent floating pontoon (comprising four pontoons A-D) at Site 3 - Ferryside. Milford Haven Port Authority (MHPA), who are undertaking the pontoon installation works, has recently undertaken the early contractor design process with their consultant engineers. As a result of the new Irish Ferries vessel, which is significantly more powerful than its predecessor causing larger water forces to be experienced in the area (and to future proof for changes to ferry vessel type/power), for health and safety reasons it is necessary relocate the pontoons slightly further south, increase their size and install new monopiles/columns to the seabed to fix them to.

Due to the change in installation method for the pontoons and the increase in size it is necessary to submit a complex Marine Licence variation application for their installation.

Proposed Development

The pontoon design increases the number of pontoon from four to five and standardises the size so that each pontoon will now measure 5 m x 25 m (total 125m long), compared to the current licensed sizes of 2 m x 26 m to 5m x 25 m per pontoon. The revised design also required the installation of 10 new monopiles to the south of the existing dolphins which the pontoons will be secured to.

The new monopiles will be installed via rotary bored piling or top drive drilling.

As per the originally approved Marine Licence, the pontoons will be fabricated on land and slipped/towed into position in 2-3 days, and the access brow will also be fabricated on land and lifted into position from a barge crane over 2-3 days.

The enclosed Environmental Appraisal Report provide further detail regarding the installation methods and construction activities. In summary, the pertinent proposed activities are as follows:

Parameter description	Licensed parameter value	Variation parameter value
Construction		
Number of new workboat pontoons	4	5
Total combined length of new berths	104 m	125 3 m
Pontoon width	2 m	5 m
Pontoon material	Steel or concrete	Steel or concrete
Pontoon restrain system	Guides mounted to existing dolphins	Guides mounted on new independent monopiles
Number of piles	0	10
Pile diameter	n/a	1,220 mm
Pile installation methodology	n/a	Rotary drilling or top drive drilling
Total duration of activities	21 days	60 days (July-September 2022)
Operation and Maintenance		
Design life	50 years	50 years

Environmental Assessment

An Environmental Appraisal has been undertaken to consider the effects of the installation of the monopiles on the following key receptors:

- Physical processes;
- Benthic ecology;
- Fish and shellfish;
- Marine mammals; and
- Shipping and navigation.

The Environmental Appraisal has been informed by a project-specific subsea noise assessment to assess the implications of the proposed drilling activities on sensitive receptors. The Environmental Appraisal concludes that, despite the design and installation methodology changes, the proposed development will continue to have a largely negligible impact on the marine environment requiring no mitigation.

Summary

In summary, following a change in the vessel used by Irish Ferries that is significantly more powerful, it is necessary for health and safety reasons to change the location and design of the pontoons required as part of the Marine Licence for the META Phase 1 project at the Ferryside site. The pontoons are to be relocated

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slightly further south, increased slightly in size and require the installation of 10 new monopiles to the seabed to fix the pontoons to.

An Environmental Appraisal of the amended proposed development has been undertaken and confirms that despite the design and installation methodology changes, the proposed development will have a largely negligible impact on the marine environment requiring no mitigation.

I trust the enclosed and above is sufficient to allow the prompt consideration and determination of the application. If, however, you require any additional information, please do not hesitate to contact me.

Yours sincerely,
for RPS Energy Consultants Ltd



Anna Prior

Principal Marine Consultant

anna.prior@rpsgroup.com

+44 1291 645021

cc: Mr J Hester, Port of Milford Haven Authority
Ms Jess Hooper, PCF