



The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017

EIA SCOPING OPINION

Name and address of Applicant	Name and address of Agent (if any)
Milford Haven Port Authority	Mr Dafydd Williams RPS (on behalf of Milford Haven PA) Park House Greyfriars Road Cardiff CF10 3AF

Part I - Particulars of application

Date of application: **28-Jun-2018**

Application Number: **18/0332/SO**

Particulars and location of development:

Request for EIA Scoping Opinion in respect of proposed development at Pembroke Port, Pembroke Dock, Pembrokeshire, SA72 6TD

Part II - Particulars of decision

1. The Project for the purposes of the Scoping Opinion is defined in the Scoping Report by RPS dated June 2018 (Ref. 180615 R JPW1115 DW EIA SR v3) (the Scoping Report). In summary the Project comprises:
 - The creation of a single large slipway by combining the two existing westernmost slipways and extending the slipway into the Haven Waterway into deeper water.
 - Provision of large areas of hardstanding.
 - Enhanced interconnectivity between a new gate 4 facility and the existing gate 1 facility via transport corridors including a modified widened highway access point.

- The infilling of the graving dock and the timber/pickling pond.
- Capital dredging around the slipways and within the graving dock.
- Erection of buildings for the assembly, manufacturing and repair of vessels and devices (maximum dimensions provided in the Scoping Report).
- Areas and buildings for the importation and storage of goods and raw materials for fabrication activities.
- Demolition of other buildings (including the former foremen's office).

The Scoping Report includes a Draft Proposed Masterplan Ref. JPW1115-03 Revision H.

2. The whole of the Project falls within the jurisdiction of Pembrokeshire County Council Local Planning Authority (PCC).
3. PCC hereby gives notice in pursuance of the provisions of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 that the scope of the proposed Environmental Impact Assessment as described in the Scoping Report is agreed subject to the matters contained in this Scoping Opinion.
4. In adopting the Scoping Opinion, PCC has taken into account those matters prescribed in Regulation 14(6), specifically the information provided by the applicant about the proposed development, the specific characteristics of the particular and type of development, and the environmental features likely to be significantly affected by the development. Consultation was undertaken in accordance with Regulation 14(4).
5. It is noted that a request for a Scoping Opinion has also been made to Natural Resources Wales under the Marine Works (EIA) Regulations 2007 (as amended) with the EIA to support an application to NRW for a Marine Licence under Part 4 of the Marine and Coastal Access Act 2009. The Scoping Opinion hereby adopted should be read in conjunction with any Scoping Opinion that is adopted by NRW.
6. This adopted Scoping Opinion should be read in conjunction with correspondence dated 31st July 2018 from Natural Resources Wales and correspondence dated 23rd July 2018 from Cadw (in response to the statutory consultation required of Regulation 14(4)). A copy of this correspondence is enclosed. No consultation response was received from the Welsh Government (Transport Wales – Trunk Road Division).
7. The consultation response dated 31st July 2018 from NRW does not include marine aspects which are to form part of the Scoping Opinion to be adopted under the Marine Works (EIA) Regulations 2007 (as amended). This Scoping Opinion should be read in conjunction with any Scoping Opinion that is adopted by NRW particularly as, in this instance, control under the Town & Country Planning Act 1990 (as amended) extends to the mid channel of the Haven Waterway.

8. In support of the comments of Cadw, there is a clear need for an in-depth Heritage Impact Assessment including the effects on the Grade I listed Paterchurch Tower, the infilling of the Grade II* listed graving dock, the demolition of the Grade II listed former Foremen's Office, the infilling and covering of the Grade II listed pickling pond as well as other adjacent historic buildings within the Conservation Area, the removal of the central section of the two Grade II listed slipways, and the cumulative effect on the setting of other listed buildings within the Dockyard and on the character and appearance of the Conservation Area. These effects require particular justification having regard to relevant planning policy and legislation relating to the historic environment.
9. Refer to the appendix below in respect of observations on the Scoping Report's consideration of ground conditions, transportation, landscape and visual matters, and surface water drainage.
10. It is noted that the Project will be supported by "additional developments of marine infrastructure" comprising the development of a Marine Energy Test Area (META) and a Pembrokeshire Wave Energy Demonstration Zone (PDZ). PDZ has been subject to EIA Scoping. It is understood that META will soon be subject to pre-application consultation and EIA Scoping. The potential effects of these developments should be considered cumulatively with the Project in so much as current available information will allow.
11. The Scoping Report requests a list of any proposed developments and planning policy allocations to be included within the cumulative assessment where these might have an effect in combination with the proposed development. At 3.35 of the Scoping Report, whilst planning permission for the Martello Quays development has lapsed, there remains the allocation for a marina under policy GN.21 of the adopted Local Development Plan (allocation ref. MAR/096/LDP/01) which is likely to have an effect in combination with the development. The DCO approved at South Hook LNG dated 22nd October 2014 for a Combined Heat and Power Plant (Statutory Instrument 2014 No.2846) remains extant and this may have an effect in combination with the development.
12. Planning permission was approved on 7th December 2017 for a Co-Generation facility at Valero Refinery (Welsh Government ref.qA1312073). There exists an undetermined planning application, albeit resolved to approved by PCC subject to resolution of certain matters, for a major mixed use development at Milford Docks (LPA Ref.14/0158/PA). A Scoping Opinion has been adopted (11th May 2017 - Welsh Government ref.qA1296053) in respect of underground cabling and construction of a converter station at Pembroke Power Station as part of an electricity interconnector between Ireland and Wales. These cases are less likely to have in combination effects with the development but should nevertheless be considered and, if found justified, scoped out of the EIA. At the time of writing, there has been no pre-application submission of any alternative development following the refusal of planning permission issued by the Welsh Government on 27th June 2018 in respect of the construction of a biomass to energy facility on land at Blackbridge and Waterston (Welsh Government ref. qA1314827).

13. This adopted Scoping Opinion comprises the following documents:

- The contents of this adoption notice together with its appendices.
- Consultation responses from NRW and Cadw that are enclosed.
- The Scoping Opinion to be adopted by NRW under the Marine Works (EIA) Regulations 2007 (as amended).

Decision Date: 16th August 2018



**County Hall
Haverfordwest
Pembrokeshire**



HEAD OF PLANNING

Appendix

Ground Conditions

- A list of the guidance that would be used for the land contamination risk assessment is needed. No reference is made and limited reference to any guidance is made within the PRA (Appendix 1). It is therefore not possible to confirm that the risk assessment that forms the baseline conditions will be undertaken in accordance with the correct guidance for human health, ground gas and controlled waters (e.g. CLR11). Whilst section 5.164 discusses a conceptual site model (CSM) will be included, it is also expected that an updated CSM following the intrusive investigations in line with CLR11 will be included.
- Although summarised within the PRA all previous site investigation reports for the site must be appended to the EIA. It is not possible from the data presented to ascertain whether previous testing at the site was suitable given the variety of potential contaminants. The reports would be needed by the LPA to review to establish this.
- Although in principle the proposed site investigation appears satisfactory it hasn't been demonstrated that the historical boreholes proposed to be used for monitoring are still serviceable. Consideration needs to be given to replacing these boreholes should they be found to have silted up or be damaged during the investigation work. Without previous borehole logs it isn't possible to agree to the suitability of the holes for this investigation to ensure the site is properly assessed. It is not possible from the data

presented within the scoping report to agree that only one borehole into bedrock is sufficient given the risk to controlled waters. No testing schedules are presented. It is strongly recommended that the site investigation is agreed with the LPA prior to undertaking it.

- Some of the data reviewed for the baseline would be considered old and usually would require reassessment. It is accepted that this data should be representative of historical contamination but it must be demonstrated that the areas of contamination identified during the walkover for the PRA are assessed to ensure complete coverage.
- All data must be compared to current screening values. As no data is presented within the PRA it is not possible to see the levels of contamination identified. Screening values for certain contaminants have changed since 2006 when a lot of the site investigation works are purported to have taken place and although it is considered acceptable to quote the conclusions of those reports in terms of suitability it is not considered appropriate to rely on these conclusions now without a comparison of the data to current screening values.

Transportation

- At 5.83 of the Scoping Report, The Well Being of Future Generations Act (2015) should be referenced.
- DfT's 'Guidance on Transport Assessment' should be considered as "good practice".
- At 5.112 of the Scoping Report reference is made to IMEA guidelines (there is no explanation as to what the IMEA is) suggesting assessment only if flows increase by 30%. This is far too high. Some Pembroke Dock junctions are congested at peak times. Marginal increases in flows are likely to be detrimental and require amelioration measures. 5% has previously been used as a guide in these circumstances.
- 5.110 of the Scoping Report seems to contain a presumptive statement about collisions which needs to be explored first in the TA.
- At 5.127, the Scoping Report states that capacity analysis would be undertaken for full implementation +15 years. Normally assessments are only required for full implementation +10 years.
- At 5.118 of the Scoping Report, it is noted that the scope of the TA is to be agreed with PCC. This implies that there will be an update on the approach to be taken within the TA and thus no further comment can be provided at this stage.
- Fig 1.1 'Junction Locations' must also include the Tesco/London Road signals.

Landscape & Visual

- At 5.172 of the Scoping Report, there is no AONB in Pembrokeshire. Reference should be to the National Park.
- In respect of the Seascape Character Assessment, work undertaken by LUC on Marine Character Areas for Wales (MCA Area 21) should be considered.
- Whilst a matter ultimately for the EIA, 5.175 of the Scoping Report potentially underplays the effects of the proposed buildings with the potential need for more than 10 viewpoint locations thus needing to be considered. It is advised that viewpoints and photomontages are further discussed with PCC.
- The detailed design, including materials, of the proposed buildings will be one of the determining factors in considering landscape and visual effects. This matter should be given detailed consideration as part of the EIA.

Surface Water Drainage

- From the information provided in the Scoping Report, it would appear that the site is served or partially served by surface water drainage systems. It is not clear whether these systems convey surface water directly into the Haven Waterway or whether other methods of disposal are utilised.
- In order to gain a better understanding of the current mechanism for surface water disposal it would be advisable to undertake further investigations/tracing of the system. This should include any culvert/drain currently discharging into the pickling pond and graving docks both of which are intended to be infilled. Any existing watercourses, drains, ditches and outfalls which are disturbed by the proposals should be suitably intercepted and redirected, to ensure that the existing local drainage network is not adversely affected.
- If there are any ordinary watercourses/culverted ordinary watercourses that may be affected by the development, the applicant should note that under no circumstances should any structure be built over ordinary watercourses or within 3 metres from the top of bank of any watercourse, or within 3 metres of a culverted watercourse, without the prior agreement of PCC. This will ensure that access can be maintained for future maintenance. The applicant should also be made aware that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without the prior written consent of Pembrokeshire County Council under Section 23 Land Drainage Act 1991 as amended by the Flood & Water Management Act 2010. Consent is also required to alter a culvert in a manner that would be likely to affect the flow of an ordinary watercourse, and for temporary as well as permanent works.



Llywodraeth Cymru
Welsh Government

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Planning
Pembrokeshire County Council

planningenquiries@pembrokeshire.gov.uk

Eich cyfeirnod
Your reference 18/03325/SO

Ein cyfeirnod
Our reference

Dyddiad
Date 23 July 2018

Llinell uniongyrchol
Direct line 03000 256007

Ebost
Email: amadminplanning@gov.wales

Dear Sir / Madam,

Request for Scoping Opinion, Pembroke Port, Pembroke Dock, Pembrokeshire, SA72 6TD

Thank you for your letter of 3 July 2018 asking for Cadw's view on the above scoping opinion.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Our records show that the following historic assets are potentially affected by the proposal.

Listed Buildings

14340	THE MARKET (FORMERLY ONLY NE ELEVATION LISTED)	II
14341	PATERCHURCH TOWER, THE DOCKYARD	I
14342	CENTENARY MEMORIAL STANDARD LAMP, ALBION SQUARE (IN CENTRE)	II
14352	NO 28, COMMERCIAL ROW (E SIDE)	II

Mae'r Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



14353	THE SOUTH WEST MARTELLO TOWER, FORT ROAD (W END)	II*
14354	NORTH EAST MARTELLO TOWER, FRONT STREET (N SIDE)	II*
14371	DRY-MOAT WALLS, PRESELY VIEW (W END)	II*
14372	BARRACKS PLATFORM, PRESELY VIEW (W SIDE)	II*
14374	FORMER NATIONAL SCHOOL (NOW EMPLOYMENT EXCHANGE), VICTORIA ROAD (N SIDE)	II
14376	THE DOCKYARD WALLS, THE DOCKYARD	II
14377	DOCKYARD GATES, THE DOCKYARD	II*
14378	PIERS AND LODGES (FORMERLY LISTED WITH DOCKYARD WALL), THE DOCKYARD	II*
14379	THE PORT HOTEL (FORMERLY LISTED AS THE COMMODORE CLUB), THE DOCKYARD	II*
14380	LONG STABLE RANGE TO S, THE DOCKYARD	II*
14381	NO 3, THE TERRACE, THE DOCKYARD	II*
14382	GARDEN WALLS TO REAR OF NO 1, THE TERRACE THE DOCKYARD	II
14383	GARDEN WALLS TO REAR TO NO 2, THE TERRACE, THE DOCKYARD	II
14384	GARDEN WALLS TO REAR TO NO 3, THE TERRACE, THE DOCKYARD	II
14385	COACH-HOUSE BUILDING TO REAR OF NOS 1 AND 2 THE TERRACE, THE DOCKYARD	II
14386	NO 5, THE TERRACE, THE DOCKYARD	II
14387	NO 1, HANGAR AND ANNEXES, THE DOCKYARD	II
14388	NO 2 HANGAR AND ANNEXES, THE DOCKYARD	II
14389	FORMER FOREMEN'S OFFICE, THE DOCKYARD	II
14390	PATER FORT SW AND W WALLS, THE DOCKYARD	II
14391	BUILDING SLIP NO 1 (FORMERLY LISTED WITH OTHER BUILDING SLIPS), THE DOCKYARD	II
14392	BUILDING SLIP NO 2 (FORMERLY LISTED WITH OTHER BUILDING SLIPS), THE DOCKYARD	II
14393	THE GRAVING DOCK INCLUDING BOLLARDS AND CPSTANS (FORMERLY LISTED WITH 13 BUILDING SLIPS AND CARR JET	II*

14394	THE WESTERN CAMBER (FORMERLY LISTED AS SLIP NO 3)	II
14395	BUILDING SLIP NO 4 (FORMERLY LISTED WITH BUILDING SLIPS NOS 1-13 GRAVING DOCK AND CARR JETTY), THE D	II
6338	NO 18, COMMERCIAL ROW (E SIDE)	II
6339	NO 27 AND 27A, COMMERCIAL ROW (E SIDE)	II
6347	NO 10, FRONT STREET (S SIDE)	II
6434	THE DOCKYARD WALLS, THE DOCKYARD	II
6435	FORMER CAPTAIN SUPERINTENDENT'S OFFICE, THE DOCKYARD	II
6436	FORMER GUARD HOUSE, THE DOCKYARD	II*
6437	THE TIMBER POND, THE DOCKYARD	II
6438	FORMER OAKUM STORE, THE DOCKYARD	II
6441	THE OLD STOREHOUSE (FORMERLY LISTED AS MAIN STORES OF R HAYES INVESTMENTS LTD), THE DOCKYARD	II*
6442	SUNDERLAND HOUSE (FORMERLY LISTED AS BUILDING OCCUPIED BY OFFICES OF GOVAN DAVIES ESTATES LTD), THE	II
6443	CARR JETTY (FORMERLY LISTED WITH BUILDING SLIPS ANS GRAVING DOCK)	II
6448	THE DEFENSIBLE BARRACKS PRESELY VIEW (W END)	II*
6454	NO 1, THE TERRACE (FORMERLY LISTED TOGETHER WITH THE COMMODORE CLUB)	II*
6455	NO 2, THE TERRACE, THE DOCKYARD	II*
6456	COACH-HOUSE TO REAR OF NO 3, THE TERRACE (FORMERLY LISTED AS STONE STRUCTURE AT SE.END OF REAR GARDE	II
6457	NO 4, THE TERRACE, THE DOCKYARD	II
6458	FORMER DOCKYARD CHAPEL (FORMERLY LISTED AS PREMISES OCCUPIED BY PEMBROKE MOTOR MUSEUM)	II*

Scheduled Monuments – located within 3km buffer

PE380	Paterchurch Tower
PE332	South west dockyard tower
PE570	Bomb stores at west end of Fort road
PE379	Defensible Barracks
PE005	Pembroke Castle
PE015	Pembroke Town Wall
PE057	Bowett Wood Camp
PE262	West Pennar Camp

PE339	Fort Scoveston
PE415	Monkton Priory Dovecot
PE435	Priory Farm Cave
PE452	American War of Independence Redan at Bath House
PE531	Burton Beach Overlord Hard

ADVICE

The Port Development will include changes to the present layout of Gate 4 area including

- Widening and extension of slipway towards deeper water – creating a single slipway in place of two existing smaller slipways
- Provision of hard standings in proximity to the quayside
- Use of flat land as 'laydown' or to be developed to create buildings
- Interconnectivity between new Gate 4 and Existing Gate 1 facilities via transport corridors

Marine components include:

- Creation of a single large slipway combining the two existing western slipways
- Extending slipway into deeper water
- Infilling Graving Dock
- Capital dredging around slipways and within Graving Dock
- Infilling timber / pickling pond

Historic Pembroke Dock has considerable importance linked to its role in the naval history and defence of Britain. The creation of the Dock as an Admiralty dockyard in 1802 and the establishment of the town – with its regular planned layout - reflects a key period of naval history. Since then the town has seen its share of boom and slump in shipbuilding, fishing and a new role as an ocean terminal. However, despite changes in the 20th century it still retains its distinctive character and waterfront and much remains of the Naval Dockyard. This is reflected in the numbers of designated buildings and archaeological monuments both within and adjacent to the Dockyard.

The surviving archaeological and built heritage evidence for the history of Pembroke Dock remains visible and coherent. The quality of the survival of individual structures, many of which are designated, is important – but also highly significant is the historic character of the area which is derived from the survival of the inter-related buildings and structures and their spatial relationships with each other. This significance extends beyond the immediate boundaries of the Dockyard and includes functional links with historic buildings within the town and also further afield including the wider network of 19th century fortifications constructed to protect the Dockyard and the Haven from attack.

The proposed masterplan suggests actions that have the potential to cause significant change and adverse impact to a number of designated historic assets within the Dockyard including infilling the Grade II* former graving dock and timber pond, demolition of the Grade II dockyard Foreman's office and removal of sections of the Grade II listed slipways. These actions are of concern, not just for their impact on those individual structures, but also for the wider impact that such changes could have on the historic values and significance of the Dockyard as a whole. The scheme needs to be fully evaluated through a comprehensive heritage impact assessment which takes due account of Planning Policy Wales, Chapter 6 paragraph 6.11 which states "there should be a general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage".

The environmental assessment needs to give due weight to the significance of historic assets both as individual structures and also for their group value and consider the impacts of the proposals at both levels. The Environmental Statement needs therefore

to address both the direct effects on historic assets within the immediate locale and the effect on the settings of historic assets both within the Dockyard and within a buffer zone around the development. For illustration of the density of historic survival, we have listed designated assets within a 500m buffer but for the purposes of the study, we advise application of a wider 3km buffer which can be refined for detailed analysis during the process.

We confirm that consideration also needs to be given to the impact of the proposed scheme on the Registered Historic Landscape by application of the ASIDOHL2 assessment process as proposed in para. 5.80 of the scoping document.

Key documents that should be consulted in support of the assessment include:

- Planning Policy Wales, Chapter 6 – the Historic Environment
- TAN24 The Historic Environment
- Managing Setting of Historic Assets in Wales
- Managing Heritage Impact Assessments in Wales
- Managing Change to Listed Buildings in Wales

It is also recommended that contact be made with Cadw at the start of the evaluation process to agree appropriate key viewpoints and key built heritage elements to take account of in support of the assessment of the scheme within both the immediate and wider historic environment.

Yours sincerely

Nichola Davies
Diogelu a Pholisi/ Protection and Policy

Llys Afon
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Mike Simmons
Pembrokeshire County Council
Development Management
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

Dyddiad/Date: 31 July 2018

Annwyl / Dear Mr Simmons

Proposal: Request for a scoping opinion
Site Address: Pembroke Port, Pembroke Dock, Pembroke SA72 6TD

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the above request for a scoping opinion, which we received on 03 July 2018.

The purpose of the Environmental Impact Assessment is to assess the significant effects of a development on the environment. In this respect we provide the following information, to assist your Authority in this process.

Protected Species and Designated Sites

The Environmental Statement (ES) must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with an assessment of the significance of any likely impacts.

Key Habitats

A Phase I survey of the site should be undertaken to describe and map the key habitats of the site and species of importance. This should be undertaken in accordance with the NCC Phase 1 survey guidelines (NCC (1990). Handbook for Phase 1 habitat survey. NCC, Peterborough) and should be undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

Protected Species

The site should be comprehensively assessed for its potential to support protected species.

Surveys for protected species should be undertaken by suitably qualified, experienced and where necessary, licensed surveyors in accordance with published guidance, where this exists, and best practice.

We advise that bats and otters are not only considered in the context of being European Protected Species, but also as mobile features of the Pembrokeshire Bat Sites and Bosherton Lakes SAC and Pembrokeshire Marine SAC respectively (and the SSSIs that underpin these designations).

We note that some bat survey work has already been undertaken, and the reference to an interim report in November 2017 suggests that there may more to complete in this respect (E.g. emergence-re-entry surveys in the 2018 season).

If protected species are likely to be affected by the proposals, the ES should detail all the measures that will be put in place to mitigate and/or compensate the anticipated impacts. Such details may include, but not be limited to, retained roosts/holts or provision of alternatives where they may be lost, timing of works, long-term habitat management and who will be responsible for this, proposed lighting (including location and specification of lights to be used and measures to control light spill), and post-construction monitoring.

Designated Sites

Given that mobile features of nearby SAC sites may be implicated by the proposals, the ES should contain sufficient information for the application to be considered under Regulation 63 of The Conservation of Habitats and Species Regulations 2017.

We also advise that the applicant agrees the full scope of ecological surveys required to support the application with your Local Authority Ecologist.

Marine

We have also received a scoping document under the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). As that consultation is set to a different timescale, our advice on all marine aspects of the proposed development will be included under the marine licence consultation only.

Flood Risk

We agree with the scope of work to be undertaken as part of the ES, however, we would add that the applicant should consider a 75 year lifetime of the development and as such the applicant must consider the 0.1% Annual Probability of Flooding plus climate change as per:

<https://gov.wales/docs/desh/publications/140109planning-policy-on-flood-risk-and-insurance-changes-en.pdf>

Groundwater and Contaminated land

A preliminary Risk Assessment must be carried out and the results along with any form of remediation required should be included within the ES

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency's 'Guiding Principles for Land Contamination' 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 our groundwater protection advice on www.gov.uk

Contaminated arisings:

Part of the proposal involves dredging out and filling in the Graving Dock and the Pickling Pond. There could be contaminated arisings from this, the ES would need to address the best way forward to deal with contaminated material. First, to assess the nature of the contamination, then decide - is it better to leave in situ (creating a legacy of contamination) or treating it in situ (e.g. by permitted mobile plant techniques) before placing it back, or just removing it.

Foul drainage

The ES should contain details of any considerable increase in foul flows discharging to the public foul sewer, if the flows are disproportionate the applicant would need to assess whether the extra flows would have an adverse impact upon the performance of the sewers and if required whether they could mitigate any effects in conjunction with Dwr Cymru/Welsh Water.

We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn ddiffuant / Yours sincerely

Miss Louise Edwards



**Cyfoeth
Naturiol**
Cymru
**Natural
Resources**
Wales

**Uwch Ymgynghorydd Cynllunio Datblygu / Senior Development Planning
Advisor**