

Environmental Impact Assessment Written Confirmation of the EIA Consent Decision

**Marine Works (Environmental Impact Assessment) Regulations
2007 (as amended) (“the Regulations”)**

Replacement Linkspan, Abergwaun, Sir Benfro (Fishguard, Pembrokeshire)

CML2612

03 September 2026

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1. Introduction

- 1.1 This document is the Environmental Impact Assessment ('EIA') Written Confirmation document for CML2612 Abergwaun (Fishguard) Replacement Linkspan ("the Project").

2. The Project

2.1 Project Background

- 2.1.1 An application for a Marine Licence for the Project was submitted to Natural Resources Wales (NRW) Marine Licensing Team (MLT) by Stena Line Limited and considered duly made on 14 May 2026.
- 2.1.2 The Project comprises the replacement of the existing linkspan bridge and jack up barge with new floating linkspan pontoon to serve Stena Line ferry at Abergwaun (Fishguard) Harbour. This will include:
- Removal of existing linkspan bridge, equipment and kiosk including lattice support structure between the buffer dolphins, and Jack up barge.
 - Partial demolition of the inside face of the buffer dolphin towers.
 - Plough dredging of 2,500m³ loose silts and sands to be undertaken in the general footprint of the pontoon, to enable installation of scour protection. Dredge material will be redistributed to the scour hole in berth north of pontoon location.
 - 2 Tubular Steel Guide Piles (circa 2m diameter) to be drilled through bed into bedrock and grouted into place.
 - Rock armour scour protection - clean rock armour stone to be placed onto dredged bed in the general area beneath the new pontoon.
 - Temporary Works – 8 temporary piles (1.22m diameter) to support structural steel frame on the front of the quay wall for the drilling rig to access the pile locations.
 - Piled reinforced concrete bankseat - bankseat structure constructed from precast concrete or fabricated steel and supported on 6 914mm diameter steel tubular piles. Including temporary works – 8 temporary piles (0.610m diameter) to support a temporary structural steel frame to allow install of the permanent bankseat piles.
 - Asphalt deck surface in the area of the existing bankseat to be broken out and replaced with concrete surfacing with new levels to accommodate the new linkspan bridge piled reinforced concrete bankseat.
 - Concrete repairs - to the underside of the open piled reinforced concrete structure. i.e. the soffit of the slabs, beams and column, and defective areas of concrete to be broken out to expose sound steel. Defective steel to be cut out and new steel spliced in, with repair areas to be shuttered to allow cementitious repair grout to be poured to replace defective concrete.
 - Installation of pontoon – towed to site by a tug boat and floated into position and attached to guide piles.

- Installation of new linkspan bridge - bridge to be delivered to site on a floating pontoon towed by a tug, and lifted into place by a floating crane.

2.1.3 All activities listed in 2.1.2 require a Marine Licence under Part 4, (Chapter 1) Section 66 of the Marine and Coastal Access Act.

2.2 Location

2.2.1 The Project is located at Abergwaun (Fishguard) / Wdig (Goodwick), Sir Benfro (Pembrokeshire) (central grid reference 195171.227: 238812.970). The site is a parcel of land spanning an area of approximately 0.9 hectares of the harbour, to include the existing linkspan, hinterland and within the bay foreshore.

See documents reference *CML2612 POR00886-TT-ML-EX-IE-C-1600-A1-C02 Excel-Marine Licence Boundary Coordinates*, *CML2612 POR00886-TT-ML-EX-IE-C-1602-A1-C02 Marine Licence Dredge Coordinate*.

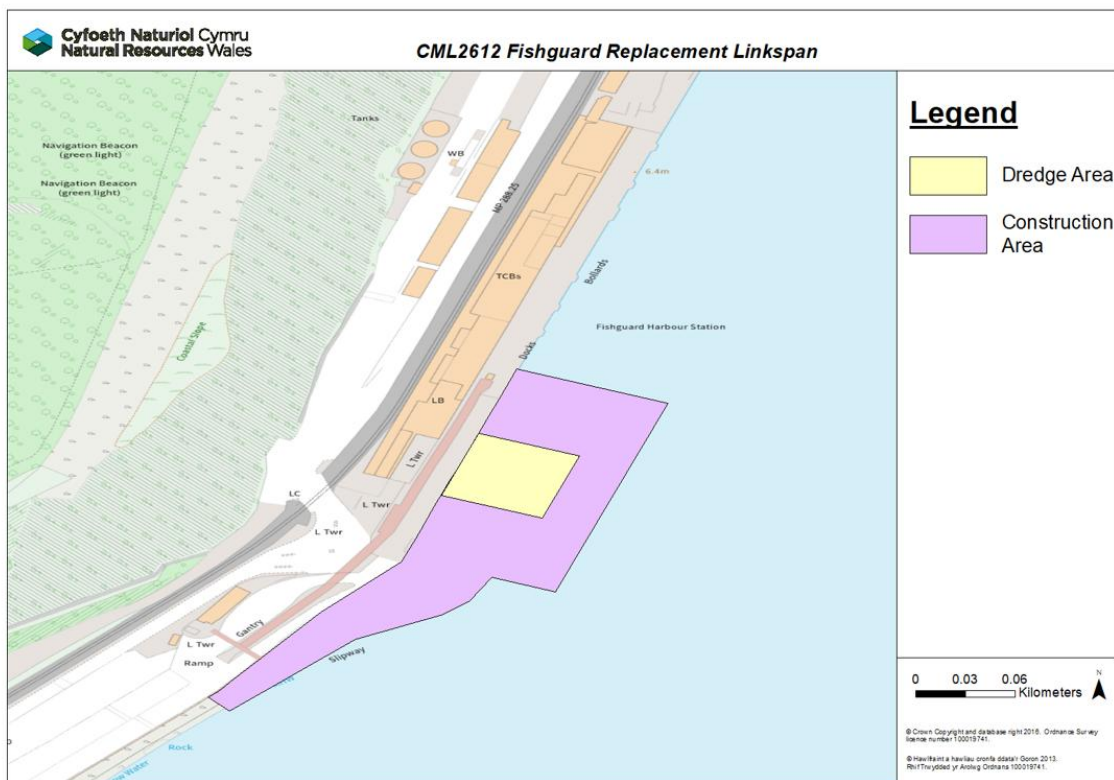


Figure 1 – Map of Proposed Licence Areas

2.3 Statement of need

2.3.1 The objectives of the Project are:

Stena Line Ports Ltd (SLPL) operate the ferry terminal in Abergwaun (Fishguard). Vehicles embark/disembark the ferries via a temporary linkspan structure which is nearing the end of its useful life. To safeguard the future of the port and provide a safe, long-term solution, a replacement linkspan pontoon and associated civil and marine infrastructure will allow the continuation of ferry service from the Abergwaun (Fishguard) Port. Stena Line's overarching driver for this Project is to install a new linkspan bridge and pontoon, to be in place and operational by Spring 2027.

- 2.3.2 Further details regarding the need for the Project and consideration of alternatives have been presented within Chapter 3 of the ES.

2.4. Regulating regimes

- 2.4.1 The Project overlaps between two consenting main regimes.
- 2.4.2 A Marine Licence under the Marine and Coastal Access Act 2009, administered by Natural Resources Wales acting on behalf of the Licensing Authority, Welsh Ministers. Aspects applied for via a Marine Licence are detailed in Section 2.1.2.
- 2.4.3 The Applicant has submitted an application to Planning and Environment Decisions Wales (PEDW) for a Harbour Revision Order (HRO) under the Harbours Act 1964 (as amended), reference CAS-03457-C1Q0T7, which is currently under determination.

3. Environmental Impact Assessment

- 3.0.1 Council Directive 2011/92/EU (as amended) on the assessment of the effects of certain public and private projects on the environment ("the EIA Directive") aims to protect the environment and the quality of life by ensuring that projects which are likely to have significant environmental effects by virtue of their nature, size or location are subject to an EIA before permission is granted.
- 3.0.2 The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("the Regulations") transpose the EIA Directive in Wales and England for Marine Licence applications.
- 3.0.3 Pursuant of Regulation 8 of the Regulations, Natural Resources Wales (NRW) Marine Licensing Team (MLT) considered that the proposed works fell under Schedule A2, paragraph numbers 63 and 69 of the Regulations on the assessment of the effects of the project on the environment, specifically:

63. Construction of harbours and port installations including fishing harbours (unless included in Schedule A1).

69. 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.

- 3.0.4 Accordingly, the Marine Licence application required for the Project was accompanied by an Environmental Statement (ES).
- 3.0.5 NRW MLT issued a Screening and Scoping Opinion (reference SC2402) on 31 January 2025 for works to the linkspan at Fishguard however as the Project had changed in scope since this opinion had been issued, a further screening of the application was carried out by NRW MLT upon receipt of the application. NRW MLT issued a screening opinion on the 15 May 2026 confirming that the Project required an Environmental Impact Assessment. The application was accordingly accompanied by an Environmental Statement.

3.1 The Environmental Statement (ES)

- 3.1.1 The Environmental Statement outlined the proposed project organised under the following topic headings.

- 3.1.2 Technical chapters:

- Chapter 1 Introduction
- Chapter 2 Project Description
- Chapter 3 Project Need & Alternatives
- Chapter 4 EIA Process and Methodology
- Chapter 5 Scoping & Consultation
- Chapter 6 Policy & Legislation
- Chapter 7 Population & Human Health
- Chapter 8 Marine Biodiversity
- Chapter 9 Terrestrial Ecology
- Chapter 10 Coastal Processes
- Chapter 11 Water Quality
- Chapter 12 Flood Risk
- Chapter 13 Noise & Vibrations
- Chapter 14 Underwater Noise
- Chapter 15 Air Quality
- Chapter 16 Cultural Heritage
- Chapter 17 Soils, Geology & Contaminated Land
- Chapter 18 Land Use & Material Assets
- Chapter 19 Traffic & Transport
- Chapter 20 Seascape, Landscape & Visual
- Chapter 21 Waste Management
- Chapter 22 Climate Change
- Chapter 23 Risk of Major Accidents & Disasters
- Chapter 24 Shipping & Navigation
- Chapter 25 Interaction

- 3.1.3 Technical Appendices:

- Appendix 2.A oCEMP
- Appendix 2.B Contractors Methodology

- Appendix 4.A Cumulative Longlist
- Appendix 5.A EIA Screening and Scoping Opinion
- Appendix 5.B Crown Estate
- Appendix 5.C NRW Request for Further Information and Clarifications
- Appendix 6.A Fishguard Replacement Linkspan Pontoon WNMP Signposting Document
- Appendix 8.A Subtidal Benthic Survey
- Appendix 8.B INNSMP Biosecurity Risk Assessment
- Appendix 8.C Intertidal Survey
- Appendix 9.A Fishguard Harbour PEA Report
- Appendix 9.B Black Guillemot Survey
- Appendix 10.A Coastal Processes Modelling
- Appendix 11.A Water Framework Directive Assessment
- Appendix 13.A Baseline Noise Monitoring
- Appendix 13.B Noise Monitoring Results and Analysis
- Appendix 13.C Construction Noise Assessment
- Appendix 14.A Underwater Acoustics
- Appendix 14.B Taranis
- Appendix 14.C Weston Propagation Model Validation
- Appendix 15.A Detailed Dust Assessment
- Appendix 15.B Air Quality Impacts on Designated Nature Conservation Sites
- Appendix 16.A Heritage Desk Based Assessment
- Appendix 17.A Preliminary Risk Assessment
- Appendix 17.B Ground Investigation Report Geotechnical Report
- Appendix 17.C Particle Size Analysis and Results
- Appendix 18.A Lighting Existing
- Appendix 18.B Lighting Proposed
- Appendix 19.A Traffic Flows
- Appendix 21.A Waste Management
- Appendix 21.B Asbestos Report

3.1.4 The ES is considered to satisfy the requirements of Regulation 12 (2) and Schedule 3 of the Regulations. Specific comments pertinent to each ES chapter can be found in section 7.

3.2 Other Legislative and Policy Framework

Relative considerations under other legislation and / or policy are set out below:

3.2.1 Water Framework Directive (Council Directive 2000/60/EC)

3.2.1.1 The sea from the mean low water mark up to 1 nautical mile from shore is protected under the WFD which requires a project or activity does not cause or contribute to deterioration in status of European Union (EU) water bodies or 'prevent the water body achieving 'good status'.

3.2.1.2 The Potential effect of the Project was also screened against the Water Framework Directive objectives for the following Water Bodies:

- GB621009580000 Cardigan Bay South
- GB521006110500 Gwaun Estuary

3.2.1.3 A Water Framework Directive Compliance Assessment was concluded that the proposal, when considered alone and in-combination, will not pose a risk to deterioration of the above listed waterbodies or jeopardise their attainment of good surface water status when undertaken in accordance with appropriate mitigation which can be secured through the Marine Licence including:

- Production and adherence to an Environmental Management Plan (EMP).
- Production and adherence to a Marine Pollution Contingency Plan (MPCP).
- Production and adherence to a Biosecurity Risk Assessment and Management Plan (BRAMP).
- Production and adherence to a Construction Environmental Management Plan (CEMP).
- Production and adherence to a Construction Method Statement (CMS), to be incorporated within the CEMP.
- Production and adherence to a Construction Surface Water Drainage Management Plan (CSWDMP), to be incorporated within the CEMP.
- Production and adherence to a Code of Construction Practise (CoCP), to be incorporated within the CEMP.
- Production and adherence to a Marine Mammal Mitigation Plan (MMMP).

3.2.1.4 Further details are described within the Water Framework Directive Compliance assessment.

3.2.2 Waste (England and Wales) Regulations 2011 (2011/988)

3.2.2.1 'Establishes a legal framework for treating waste in the EU. This is designed to protect the environment and human health by emphasising the importance of proper waste management, recovery and recycling techniques to reduce pressure on resources and improve their use.' Waste generated by a project or activity must be dealt with in an environmentally friendly way. To do this it applies the waste hierarchy from the Waste Regulations, which gives an order of preference for how waste is dealt with (prevention, re-use, recycling, recovery, disposal at sea).

3.2.2.2 See consideration under section 7.

3.2.3 The Conservation of Habitats and Species Regulations 2017 (as amended)

3.2.3.1 European sites are those designated under The Conservation of Habitats and Species Regulations 2017 (as amended) ("Habitats Regulations") as Special Protection Areas ("SPAs"), Special Areas of Conservation ("SACs") or Sites of Community Importance ("SCIs").

3.2.3.2 The proposal is located within a European Protected Site.

3.2.3.3 The effects of proposal on the following European Sites, their features and conservation objectives have been considered by NRW MLT during the licence determination:

- West Wales Marine/Gorllewin Cymru Forol SAC [UK0030397] (0km)
- Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC UK0030396 (82.4km)
- North Anglesey Marine/Gogledd Môn Forol SAC UK0030398 (134.8km)
- Cardigan Bay/Bae Ceredigion SAC [UK0012712] (14.9km)
- Pembrokeshire Marine/Sir Benfro Forol SAC UK0013116 (21.5km)
- Llyn Peninsula and the Sarnau/Pen Llŷn a'r Sarnau SAC UK0013117 (66.5km)
- River Teifi/Afon Teifi SAC UK0012670 (22.8km)

3.2.3.4 It was concluded that the proposal, when considered alone and in-combination, will not adversely affect the integrity of the European sites concerned when undertaken in accordance with appropriate mitigation which can be secured through the Marine Licence including:

- Production and adherence to an Environmental Management Plan (EMP).
- Production and adherence to a Marine Pollution Contingency Plan (MPCP).
- Production and adherence to a Biosecurity Risk Assessment and Management Plan (BRAMP).
- Production and adherence to a Construction Environmental Management Plan (CEMP).
- Production and adherence to a Construction Method Statement (CMS) contained within the CEMP.
- Production and adherence to a Code of Construction Practise (CoCP), contained within the CEMP.
- Production and adherence to a Marine Mammal Mitigation Plan (MMMP).
- Implementation of precautionary measures outlined within JNCC guidelines for minimising the risk of injury to marine mammals from piling (JNCC, 2010).
- Use of soft-start procedures for percussive piling.

3.2.3.5 Further details are described within the Habitats Regulations Assessment.

3.2.4 Marine Conservation Zones

3.2.4.1 Section 116 of the Act provides powers to Welsh Ministers to designate Marine Conservation Zones ("MCZs") with the aim of contributing to the achievement of a network of ecologically coherent and well-managed marine protected areas.

3.2.4.2 The Project is not within a Marine Conservation Zone, and was not identified to have an impact on any Marine Conservation Zone.

3.2.5 Wildlife and Countryside Act 1981 (as amended)

3.2.5.1 Sites of special scientific interest ("SSSIs") are protected by law to conserve their wildlife or geology. The Wildlife and Countryside Act 1981 (as amended) ensures that SSSIs are protected and managed effectively.

3.2.5.2 See consideration under section 7.

3.2.6 Marine Policy Statement and Welsh National Marine Plan (WNMP)

3.2.6.1 The UK Marine Policy Statement (“MPS”) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. NRW MLT must make licensing decisions in accordance with the MPS and the WNMP unless relevant considerations indicate otherwise.

3.2.7 Environment (Wales) Act 2016

3.2.7.1 Article 4 of the Natural Resources Body for Wales (Establishment) Order 2012, as amended by the Environment (Wales) Act 2016 requires NRW to pursue the sustainable management of natural resources in relation to Wales, and apply the principles of sustainable management of natural resources in the exercise of its functions, so far as consistent with their proper exercise.

3.2.7.2 NRW MLT considers that the procedures outlined in this Written Confirmation in the consideration of EIA consent are consistent with this requirement.

3.2.8 Well-being of Future Generations (Wales) Act 2015

3.2.8.1 This Act requires NRW, as a public body, to take reasonable steps in exercising its functions to work in accordance with the sustainable development principle, as set out in Section 5 of the Act.

3.2.8.2 NRW considers that the EIA process is consistent with the sustainable development principle described in the Act, and that the processes outlined in this Written Statement are sufficient to properly demonstrate the sustainable development principle. In particular, NRW acknowledges that the principles of sustainable management include taking account of all relevant evidence and gathering evidence in respect of uncertainties, and taking account of the short-, medium-, and long-term consequences of actions. NRW further acknowledges that it is an objective of sustainable management to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing meet the needs of present generations of people without compromising the ability of future generations to meet their needs, and contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015.

3.3 Further information provided by the Applicant pursuant to a notification under regulation 14(1)

3.3.1 No further information was requested from the Applicant pursuant to a notification under Regulation 14 (1).

4. Consultation with the public

4.1 Public Notices

- 4.1.1 Pursuant to Regulation 16, public notices were advertised to notify interested parties of the proposed works and give any interested parties or members of the public an opportunity to make representation on the application as necessary.
- 4.1.2 The application documents were made available as follows;
- A translated public notice was placed in the Western Telegraph on 27 May 2026 & 17 June 2026. The second public notice was published 2 weeks late, therefore the public consultation ran for 2 additional weeks, until 22 July 2026, to ensure the consultation ran for the full 35 days from the date of the publication of the second public notice. Notices were also placed on NRW Consultation Hub.
 - The application documents were made available to the public at: Stena Line Ltd., Fishguard Harbour, Goodwick, Pembrokeshire SA64 0BU during the public notice period until 22 July 2026. Documents were also available for inspection via the NRW online public register.
- 4.1.3 No public representations were received.

5. Consultation of EEA States

- 5.0.1 A Transboundary Screening Assessment did not identify potential for effects to any other EEA State.
- 5.0.2 Consequently, no material was provided to other EEA member States in relation to the application.

6. Technical consultation

- 6.0.1 In accordance with Regulation 17 of the regulations, NRW MLT considered it appropriate to consult the bodies listed in the table below on 29 May 2026 due to their particular expertise. These bodies were consulted for a period of 42 days. For those bodies which responded to the consultation an 'Y' can be found in the response received column, and those which did not respond to the consultation an 'N':

Consultee	Response Received (Y/N)	Date of receipt
Natural Resources Wales Advisory (NRW A)	Y	10 July 2026
Ministry of Defence (MoD)	Y	08 July 2026
Maritime and Coastguard Agency (MCA)	Y	22 June 2026
The Crown Estate (TCE)	Y	07 July 2026
Pembrokeshire County Council Local Planning Authority (LPA)	Y	03 June 2026
Pembrokeshire Coast National Park Authority (PCNPA)	Y	01 July 2026
Fishguard Pembrokeshire County Council Port Authority	N	

Fishguard Stena Line Ports Limited Harbour Authority	N	
Milford Haven Port Authority	N	
Associated British Ports (ABP)	N	
Local Biodiversity Officers (LBO) for Pembrokeshire	N	
Royal Yachting Association (RYA)	Y	01 June 2026
Royal Society for the Protection of Birds (RSPB)	N	
Trinity House (TH)	Y	15 July 2026
Cadw	Y	06 July 2026
Welsh Government Fisheries Branch	N	
Marine Enforcement Officers (MEO)	N	
The Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	Y	12 June 2026
The Welsh Archaeological Trust	Y	05 June 2026
Chamber of Shipping,	N	
The Welsh Fisherman Association	N	
Public Health Wales (PHW)	Y	13 July 2026
National Federation of Fishermen's Organisations (NFFO)	N	
National Air Traffic Services (NATS) En Route PLC Safeguarding (NERL Safeguarding)	Y	02 June 2026
Department for Transport	N	
Associated British Ports Marine Environmental Research (ABPmer)	Y	10 July 2026

6.0.2 Pembrokeshire County Council, Coastal, Rivers and Drainage Team provided a response following the close of consultation on the 24 August 2026. The response provided information surrounding requirements for further consent that the applicant may require from the Coastal Protection Authority, as well as recommending engagement with the Council on future management and development at the site. This advice was shared with the Applicant on 25 August 2026.

6.0.3 Details of the issues raised by the Consultation Bodies and how they have been addressed is set out in section 7.

6.0.4 Consultees who did not provide a response were assumed to have no comment.

- 6.0.5 All consultation responses received have been shared with the Applicant via the public register.

7. Issues arising during the consideration of the Environmental Statement, Marine Licence Application and representations received

- 7.0.1 Material issues that were highlighted by the ES and consultation process and the extent to which they have been addressed are detailed in this section.

7.1 Chapter 6: Policy and Legislation

- 7.1.1 The adherence of the Project to relevant Policy and Legislation was presented within Chapter 6 of the ES. This included adherence of the Project to EU Legislation and Policy, Marine and Planning Policy, The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, and additional statutory consents.
- 7.1.2 The PCNPA raised that the reference to the Pembrokeshire Coast National Park Partnership Plan 2025-29 at section 6.2.11.3 of the ES is welcomed, however the text could be supplemented by reference to the Environment Act 1995 section 62 (Duty of certain bodies and persons to have regard to the purposes for which National Parks are designated).
- 7.1.3 The Crown Estate raised that they are affected by the proposed works, and landowner's consent is required. The full response from TCE was shared with the Applicant. NRW MLT note that should a Marine Licence be granted it would not absolve the Applicant of its responsibility to obtain any other consent or permission that is required in order to carry out the proposed works.
- 7.1.4 As the PCNPA comments are editorial only, and TCE's request that the Applicant contacts the managing area has been shared with the Applicant, NRW MLT are content that the comments do not impact upon the conclusion of the assessment, and no further action is required.

7.2 Chapter 7: Population and Human Health

- 7.2.1 Impacts of the Project on Population and Human Health were assessed and presented within Chapter 7 of the ES. The assessment focused on potential impacts of the works on bio-physical, social, behavioural, economic and institutional determinants of health and population. Potential impact pathways assessed included health-related travel times, accessibility, active/sustainable travel, road safety, dust emissions from project activities, effects on water quality, noise and vibration from construction activities and machinery, along with impacts on the local community through improved access and connectivity. Subject to mitigation, the assessment concluded that proposal would not lead to any significant adverse effect.

- 7.2.2 PHW commented that their public health risk assessment concluded that there are minor adverse effects on public health from this development, including potential for dust and emissions from machinery and traffic impacting local air quality, temporary increases in noise (especially during piling and demolition), risk of sediment-bound contaminants being released into the environment and access disruption around the site.
- 7.2.3 PHW noted these impacts can be minimised by adhering to Best Available Techniques (BAT) for construction methods, including pollution prevention measures, adherence to a Marine Pollution Contingency Plan (MPCP), undertaking of appropriate sediment sampling analysis, dust suppression, use of low-emission machinery and consideration of the location of the nearest sensitive receptors.
- 7.2.4 PHW's position is that any activity that can demonstrate full compliance with BAT, in line with the Regulator's requirements, presents a low risk to human health and so does not require a detailed public health risk assessment.
- 7.2.5 PHW would expect the Regulator to ensure the activity and construction works are well managed, maintained and remain in compliance with current sector guidance and do not give rise to any adverse impacts to human health, during or after construction.
- 7.2.6 NRW MLT are content that the Applicant has included the above-mentioned techniques within their ES. The Applicant has also committed to the production and adherence to a Construction Environmental Management Plan (CEMP), which can be secured through a Marine Licence condition. The Applicant has also committed to the production and adherence to a MPCP which can also be secured through a Marine Licence condition. Both plans will only be approved in consultation with PHW. NRW MLT are therefore content that all concerns have been addressed.
- 7.2.7 Subject to a CEMP and MPCP being implemented, which will be secured through licence conditions, NRW MLT is satisfied that impact on Population and Human Health has been adequately assessed and any impacts are not considered significant.

7.3 Chapter 8: Marine Biodiversity

- 7.3.1 Impacts of the Project on Marine Biodiversity were assessed and presented within Chapter 8 of the ES. The assessment focused on potential impacts of the works on benthic subtidal and intertidal ecology, fish and shellfish ecology and marine mammals. Potential impact pathways assessed included habitat loss, increased suspended sediment concentration, changes in water quality, increased risk of Invasive Non-Native Species (INNS) and impacts associated with underwater noise during piling. Subject to mitigation the assessment concluded that proposal would not lead to any significant effect.
- 7.3.2 NRW A noted that the Applicant assessed the sensitivity of benthic receptors using the Marine Life Information Network (MarLIN) sensitivity assessment methodology which was replaced and superseded by the Marine Evidence-based Sensitivity Assessment (MarESA) approach in 2014. However, NRW A considered that that

the outcome of using the updated approach would draw the same conclusions as those outlined in Chapter 8 of the ES. NRW A advise that the MarESA approach is used in any future assessments when considering the sensitivity of the biotopes recorded in the 2025 Fishguard subtidal benthic survey.

- 7.3.3 NRW A also raised that that Table 8-13 in the ES presents the fish and shellfish ecology Important Ecological Features, where Spotted ray is included. However, the table has not included that the Spotted ray is a Priority Species under the Environment (Wales) Act 2016. No concern was raised surrounding how the Spotted ray was assessed. This information was shared with the Applicant as advice.
- 7.3.4 NRW A welcomed the commitment to reduce potential impacts from INNS through adherence to a Biosecurity Risk Assessment and Management Plan. NRW A provided minor comments on the Plan provided as part of Appendix 8.B. NRW MLT are satisfied that potential impacts through the introduction of INNS can be effectively managed through the production and adherence of a Biosecurity Risk Assessment and Management Plan (BRAMP) which can be secured through licence conditions. NRW A's response was shared in full with the Applicant.
- 7.3.5 NRW A welcome the adoption of the JNCC guidelines for minimising the risk of injury to marine mammals from piling (JNCC, 2010) and the commitment to produce a Marine Mammal Mitigation Plan (MMMP). NRW MLT are satisfied that the mitigation proposed can be secured within the Marine Licence.
- 7.3.6 NRW A welcomed additional information provided regarding the CEMP, and management of concrete and cement to prevent water pollution. NRW A is satisfied with the information included in spillage emergency procedures documentation. NRW A agree with the inclusion of mitigation measures including a CEMP, and the requirement for the submission and approval of a CEMP to be secured through a Marine Licence condition. NRW A also agree with the inclusion of other measures such as Construction Surface Water Drainage Management Plan (CSWDMP), toolbox talks, refuelling guidance in accordance with Guidance for Pollution Prevention (GPP) 8, Emergency spill kit and oil spill equipment, and planning and guidance to support the Port Authority's Oil Spill Contingency Plan.
- 7.3.7 The Applicant has also committed to submitting a Vessel Management Plan (VMP) which will include mitigation measures to reduce impacts from vessel use to the marine environment, a MPCP which will include mitigation to prevent pollution to the marine environment, and an EMP which will outline best practise measures to be followed to minimise impacts to the environment.
- 7.3.8 NRW A confirmed that appropriate impacts had been identified and assessed and subject to the mitigation presented agreed with the conclusion of the ES that no significant impact on the marine biodiversity is predicted.
- 7.3.9 NRW MLT is satisfied that Marine Biodiversity has been adequately assessed, and subject to a BRAMP, CEMP, VMP, MPCP and EMP being implemented, any impacts are not considered significant.

7.5 Chapter 9: Terrestrial Ecology

- 7.5.1 Impacts of the Project on Terrestrial Ecology were assessed and presented within Chapter 9 of the ES. The assessment focused on potential impacts of the works on terrestrial ecology receptors, such as otter and bat species, and ornithological receptors, including wintering and passage birds, and black guillemot. Potential impact pathways assessed included noise and vibration from construction and operational activities including piling and underwater noise, artificial lighting, visual disturbance, and human activity from both construction and operational phases of the Project. Subject to mitigation the assessment concluded that proposal would not lead to any significant effect.
- 7.5.2 NRW A provided guidance surrounding the future success of nest boxes proposed to be installed by the Applicant to improve biodiversity and ecosystem resilience by creating habitat for black guillemots. NRW A noted that 2 adult black guillemots were observed during the single day of surveying, and based on this advised that it would not be possible to rule out black guillemot breeding in the area, and therefore recommended that the precautionary approach should be adopted to assume they were. NRW A however advised that it did not consider this assumption would alter the assessment or conclusions reached.
- 7.5.3 NRW A advised that the successful uptake of the boxes will be dependent on both the design and positioning. It was recommended that prior to installation, the Applicant should consult a relevant expert, who has experience of designing and siting black guillemot nesting boxes, to ensure optimal design and positioning of the nest boxes. NRW A also advised that to assess the uptake and productivity of the nest boxes it will be important to ensure the nest boxes are accessible to allow monitoring; both from a practical and legal perspective. This advice was shared with the Applicant.
- 7.5.4 NRW A confirmed that there remain no concerns relating to European Protected Species, subject to the implementation of species protection measures set out in the ES, section 9.12.1.
- 7.5.5 NRW MLT is satisfied that Terrestrial Ecology has been adequately assessed, and Subject to the implementation of a CEMP, and measures set out in the ES Section 9.12, any impacts are not considered significant.

7.6 Chapter 10: Coastal Processes

- 7.6.1 Impacts of the Project on Coastal Processes were assessed and presented within Chapter 10 of the ES. The assessment focused on potential impacts of the works on key habitats including sandbanks, mudflats and sandflats, and on tidal regime, wave regime, sediment transport and associated sediment transport pathways and the associated potential impacts along adjacent shorelines and physical features. Potential impact pathways assessed included increase in suspended sediments due to construction activities and impacts to coastal processes due to the presence of infrastructure related to the Project within the water column. The assessment concluded that proposal would not lead to any significant effect.

- 7.6.2 NRW A noted that the data concerning non-algal Suspended Particulate Matter (SPM) is eleven years old and may not reflect modern SPM concentrations found within the Coastal Processes Study Area. However, NRW A acknowledged that these figures are unlikely to have changed since 2015 and that regular disturbance of the seabed occurs with vessel traffic into Fishguard Harbour. Due to this, NRW A did not request new SPM data to be presented.
- 7.6.3 Whilst NRW A acknowledged that the figures within the data for SPM are unlikely to have changed since the data used in the assessment was collected, NRW A wished to impress that all datasets considered within the Environmental Statement should be as up to date as possible to reflect current baseline conditions accurately.
- 7.6.4 NRW A agreed that there will be negligible adverse effects on coastal processes, given the short duration of activities resuspending sediments during construction, the already highly disturbed nature of the site from vessel traffic, and the modelled scenarios demonstrating limited changes to tides, waves and sediment transport.
- 7.6.5 NRW A welcomed best practice with regards to minimising unnecessary resuspension of sediment, which included measures such as the use of good environmental practice in accordance with NetRegs Guidelines for Pollution Prevention (GPP), and the submission and adherence to a CEMP. NRW MLT are content that best practice measures can be incorporated into and CEMP which can be secured through a condition in the Marine Licence.
- 7.6.6 NRW MLT is satisfied that Coastal Processes has been adequately assessed, and subject to the implementation of a CEMP, and any impacts are not considered significant.

7.7 Chapter 11: Water Quality

- 7.7.1 Impacts of the Project on Water Quality were assessed and presented within Chapter 11 of the ES. Potential impact pathways assessed included increase in suspended sediments due to construction, removal, dredge and piling activities, pollution from cement and concrete, and pollution from accidental spillage of oils, fuels and chemicals. Subject to mitigation the assessment concluded that proposal would not lead to any significant effect.
- 7.7.2 Advice was sought from ABPmer on the sediment sample analysis results presented with the Application, and whether the material can be deemed suitable for plough dredging. ABPmer advised that in relation to polybrominated diphenyl ethers (PBDEs) concentrations, most were below the Limit of Detection (LOD), however one type of PBDE (BDE209) was above the recommended Lower Assessment Criteria. Although these results could have indicated a degree of risk to the marine environment from BDE209, ABPmer did not consider that the concentrations are so elevated to preclude plough dredging of the material. The risk is also reduced further as all remaining results in this category are low in concentration (mostly below the LOD).

- 7.7.3 Overall, ABPmer advised that the material proposed to be dredged as part of the Stena Line Linkspan Replacement in Abergwaun (Fishguard) is suitable for plough dredging on the basis of the analysis provided. ABPmer recommended that material from the proposed dredge area is re-analysed at least every 3 years (if either dredging has not taken place within 3 years of sediment sampling, or maintenance dredging is required).
- 7.7.4 Since the Licence duration will not exceed 3 years from the date samples were collected (18 March 2025), NRW MLT consider no licence conditions or further action is required in relation to sediment sampling.
- 7.7.5 NRW A welcomed the detail provided within the CEMP, and management of concrete and cement to prevent any pollution of the water. NRW A welcomed the spillage emergency procedures and are satisfied with the information included in the documents.
- 7.7.6 NRW A agreed with the conclusions of the HRA in relation to water quality, that there will be no adverse effect on the integrity of a European site.
- 7.7.7 NRW A agreed with the screening and scoping assessment of the WFD to include risk of chemicals, water clarity, oxygen levels and Dissolved Inorganic Nitrogen (DIN). NRW A agreed with the mitigation measures outlined, including the submission and adherence to a CEMP among other measures stated, such as a Construction Surface Water Drainage Management Plan, toolbox talks, refuelling guidance in accordance with GPP8, Emergency spill kit and oil spill equipment, and planning and guidance to support the Port Authority's Oil Spill Contingency Plan. NRW A agreed that the requirement for the submission and approval of a CEMP should be secured through a Marine Licence condition. NRW MLT consider it appropriate to secure production and adherence to a CEMP and a Marine Pollution Contingency Plan (MPCP) through Marine Licence conditions.
- 7.7.8 NRW MLT is satisfied that Water Quality has been adequately assessed, and subject to the implementation of a CEMP, BRAMP and MPCP and any impacts are not considered significant.

7.8 Chapter 16: Cultural Heritage

- 7.8.1 Impacts of the Project on Cultural Heritage were assessed and presented within Chapter 16 of the ES. The assessment focused on potential impacts of the works relating to historic assets, including archaeology and built heritage. Potential impact pathways assessed included physical removal of a heritage asset, change in the setting of the asset and disturbance or damage to archaeological remains on or within the seabed. Subject to mitigation the assessment concluded that proposal would not lead to any significant effect.
- 7.8.2 Cadw noted that Port facilities are an established feature in the area of the proposed development and a number of designated historic assets will have views of the proposed development. However, it was noted that whilst the proposed development will cause changes to the views from these designated historic assets, they will not alter the way that they are experienced, understood and appreciated. Consequently,

Cadw stated that the proposed development will not have an unacceptably damaging effect upon the setting of any designated historic assets.

- 7.8.3 The ES also identified that the proposed development will have a direct impact on the 1930s lifeboat station platform and slipway, which have been fully recorded by the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) and this record is publicly accessible. As these historic assets are “preserved by record” Cadw stated that they have no objection to their removal. The RCAHMW also stated that they consider that the slipway is subject to preservation by record, lodged within the National Archive that forms part of the National Monuments Record of Wales.
- 7.8.4 The RCAHMW stated that there is potential for previously unknown marine archaeological material to be located within the scheme area, and to be discovered during the proposed activities, including dredging. However, this could be mitigated through the production and adherence to a Protocol for Archaeological Discoveries (PAD) and a Written Scheme of Investigation (WSI), which the Applicant has committed to. NRW MLT consider it appropriate to secure production and adherence to a PAD and WSI through appropriate licence conditions.
- 7.8.5 Cadw additionally noted that the ES identified a number of recorded historic wrecks in the proposed dredging area and that the locations of these wrecks cannot be precisely identified and therefore proposed that a PAD should be agreed with the maritime archaeological advisor at the RCAHMW prior to the commencement of any proposed activities.
- 7.8.6 The Welsh Archaeology Trust stated that they defer to Cadw and RCAHMW regarding impacts on the lifeboat station and shipwrecks within the area, also highlighting that the ES recommends a PAD to be agreed with the maritime archaeological advisor at the RCAHMW prior to construction.
- 7.8.7 NRW MLT is satisfied that Cultural Heritage has been adequately assessed, and subject to a PAD and WSI being implemented, any impacts are not considered significant.

7.10 Chapter 24: Shipping and Navigation

- 7.10.1 Impacts of the Project on Shipping and Navigation were assessed and presented within Chapter 24 of the ES. The assessment focused on potential significant effects arising from the risk of physical impacts on existing navigation and shipping vessels from collision and allision, and the effect of the ferry shutdown. Subject to mitigation the assessment concluded that proposal would not lead to any significant effect.
- 7.10.2 The MCA advised appropriate local warnings should be issued to alert those navigating in the vicinity to the presence of the works, as deemed necessary. The requirement to issue a Notice to Mariners prior to commencement of activities can be captured as a Marine Licence condition. Trinity House requested to be copied in on issued Notice to Mariners. This advice has been shared with the Applicant.

- 7.10.3 The MCA also provided advice for the Applicant to consider regarding adopting the Ports & Marine Facilities Safety Code (PMSC). This has been shared with the Applicant.
- 7.10.4 Trinity House advised that consent is required from Trinity House for the establishment of the two buoys proposed as part of the development. This information has been shared with the Applicant.
- 7.10.5 Trinity House also advised that the UKHO should be informed when Aids to Navigation (AtoN) are established. NRW MLT consider this can be secured through a Marine Licence condition.
- 7.10.6 NRW MLT is satisfied that Shipping and Navigation has been adequately assessed and any impacts are not considered significant. NRW MLT also recognise that as a Statutory Harbour Authority, Stena Line Limited has responsibility to ensure the safety of navigation within their jurisdiction.

7.11 All other chapters

7.11.1 No concerns were raised regarding the following chapters:

- Chapter 12 Flood Risk
- Chapter 13 Noise & Vibrations
- Chapter 14 Underwater Noise
- Chapter 15 Air Quality
- Chapter 17 Soils, Geology & Contaminated Land
- Chapter 18 Land Use & Material Assets
- Chapter 19 Traffic & Transport
- Chapter 20 Seascape, Landscape & Visual
- Chapter 21 Waste Management
- Chapter 22 Climate Change
- Chapter 23 Risk of Major Accidents & Disasters
- Chapter 25 Interactions

7.11.2 The assessment of impacts has been considered for all of the above chapters, and no significant impacts have been identified. NRW MLT therefore consider that subject to the mitigation measures identified within the ES, any impacts are not considered significant.

7.11.3 NRW MLT is therefore satisfied that the chapters listed above have been adequately assessed and any impacts are not considered significant.

8. Mitigation or monitoring measures to be taken

8.1 Features or measures to avoid, prevent, reduce or offset likely significant effects

8.1.1 In reaching the Conclusion about Environmental Impact (Regulation 21A of the Regulations), NRW MLT must give consideration of any features of the project, or

proposed measures, to avoid, prevent, reduce or offset any likely significant adverse environmental effects (regulation 21A (1)(f)).

- 8.1.2 NRW MLT considers that the following features of the project, or measures included within the project proposal, as described in the application form, Environmental Statement and other supporting information, would avoid, prevent, reduce or offset any likely significant adverse environmental effects:
- 8.1.2.1 Production of and adherence to a Marine Pollution Contingency Plan (MPCP) to ensure appropriate mitigation measures are implemented to minimise impacts from potential marine pollution incidents to a number of receptors.
 - 8.1.2.2 Production of and adherence to an Environmental Management Plan (EMP) to include detail regarding appropriate measures and their implementation to avoid, minimise and mitigate potential environmental effects across a number of receptors during construction and operation activities.
 - 8.1.2.3 Production of and adherence to a Construction Environmental Management Plan (CEMP) to ensure a range of measures are implemented to reduce impacts across a number of receptors during construction activities.
 - 8.1.2.4 Fencing, signage, adherence to road safety guidelines, and other best practice measures will be detailed within the CEMP, and adhered to, to reduce impacts to Public Health.
 - 8.1.2.5 Communications will be maintained with local residents, local emergency services and businesses throughout the construction phase to notify them of any road closures, construction noise and other disruptions in advance.
 - 8.1.2.6 A 20-minute soft start period for percussive piling activities to reduce underwater sound impacts to marine mammals and fish.
 - 8.1.2.7 Adoption of JNCC (2010) guidelines for minimising the risk of injury to marine mammals from piling noise, involving a 30-minute pre-piling visual watch for absence of marine mammals with a mitigation zone (minimum 500m) by a qualified marine mammal observer, to reduce underwater noise impacts to marine mammals and fish.
 - 8.1.2.8 Production of and adherence to a Vessel Management Plan (VMP) to detail appropriate measures to reduce impacts to a number of receptors, including marine mammals, and shipping and navigation.
 - 8.1.2.9 Production of and adherence to a Navigation Safety Plan (NSP) to detail appropriate measures to reduce impacts to a number of receptors, including marine mammals, and shipping and navigation.

- 8.1.2.10 Environmental best practice will be implemented such as pollution prevention, dust minimisation, precautionary working methods to prevent the potential for injury and/mortality to protected and/notable terrestrial species, and precautionary working methods to prevent accidental damage to habitats, as set out within the CEMP.
- 8.1.2.11 Pre-start checks will be carried out for bird nests and otter resting places in the quay wall suspended concrete approach structure, and harbourside working area, prior to commencement of construction activities, to reduce impacts to these species.
- 8.1.2.12 Sensitive construction lighting will be used in the northern temporary compound to avoid light spill onto coastal heath beyond the western boundary, to reduce disturbance impacts to light-sensitive species.
- 8.1.2.13 There will be avoidance of the need for any additional temporary lighting where the southern temporary compound adjoins broadleaved woodland. Where lighting is required, it will comply with the guidance published by the Institute of lighting Professionals (ILP, 2023) to ensure there is no light spill onto the off-site trees within the adjacent woodland. This will help minimise impacts to light-sensitive species, and other receptors.
- 8.1.2.14 Standard noise mitigation will be applied, including the use of noise reduced equipment and ensuring that plant is not left idling when not in active use, to reduce noise impacts to a range of receptors. This is also applicable for reduction in air quality impacts for a range of receptors, in addition to avoiding the use of diesel- or petrol-powered generators and use of mains electricity or battery powered equipment where practicable.
- 8.1.2.15 The Applicant has proposed to install a number of bat boxes and bird nest boxes, which include boxes for black guillemot within the landholding. These measures will help to provide biodiversity improvement and ecosystem resilience.
- 8.1.2.16 A surface water drainage management plan will be implemented, setting out the methods for managing surface water runoff and groundwater, to protect the local environment and sensitive receptors, as part of the CEMP.
- 8.1.2.17 A documented Accident Prevention Procedure and Emergency Response Procedure will be put in place prior to commencement to outline measures in place in the event of major accidents, to limit impacts to a range of receptors.
- 8.1.2.18 A protocol for regular communication between the appointed contractor, the engineer's representatives, statutory agencies, such as Natural Resources Wales and Fishguard & Goodwick Town Council, and other third parties shall be established to mitigate for impacts to water quality during construction.

- 8.1.2.19 A contingency plan for the construction works shall be prepared by the appointed contractor, in accordance with GPP 21 Pollution Incident Response Planning (Netregs, 2021) to be included in the CEMP, to ensure appropriate measures are in place to minimise impacts to water quality.
- 8.1.2.20 Management and auditing procedures, including toolbox talks to personnel, shall be put in place to ensure that any works which have the potential to impact on the aquatic environment are being conducted in accordance with required licences, certificates and planning permissions, to ensure appropriate measures are in place to minimise impacts to water quality, included within the CEMP.
- 8.1.2.21 Pollution prevention measures, including appropriate fuel, oil and chemical storage, adherence to appropriate guidance, adherence to the Port Authority Oil Spill Contingency Plan, safe operation of refuelling activities, appropriate emergency spill kit and oil spill containment equipment storage and use, will be adhered to and detailed within the CEMP, to mitigate impacts to water quality.
- 8.1.2.22 Mitigation and control measures, such as adherence to appropriate guidance, to address the impact of concrete and cement will be adhered to and detailed within the CEMP, to mitigate impacts on water quality.
- 8.1.2.23 Development and implementation of a Dust Management Plan (DMP) to reduce impacts to a range of receptors, such as air quality, as part of the CEMP.
- 8.1.2.24 Adherence to the mitigation listed in the 2024 Institute of Air Quality Management (IAQM) dust guidance to mitigate impacts to air quality.
- 8.1.2.25 Implementation of a Traffic Management Plan if required for specific busy periods, in order to mitigate impacts to a range of receptors.
- 8.1.2.26 To limit impacts to Shipping and Navigation, advance warning to mariners will be issued by the Harbour Master to keep clear of the area during construction.
- 8.1.2.27 An Ecological Clerk of Works (ECoW) will be employed to provide advice both pre-construction and during construction in relation to relevant legislation relating to proposed works to provide advice on the timing of works and the implementation of mitigation and enhancement measures; to monitor identified works; and to produce site inspection reports. This will mitigate for impacts to a range of receptors. This is to be included within the CEMP.
- 8.1.2.28 A Code of Construction Practice (CoCP) will be implemented as part of the CEMP, to mitigate against impacts to a range of receptors during construction.
- 8.1.2.29 A Site Waste Management Plan (SWMP) will be implemented as part of the CEMP, outlining procedures for the management of waste and related pollution control measures.

8.2 Mitigation or monitoring required to be attached to the consent (Regulation 22 (c)-(e))

- 8.2.1 In reaching the EIA Consent Decision required under Regulation 22, NRW MLT must make consideration of the requirement for any mitigation measures or monitoring required to be attached to the consent.
- 8.2.2 Section 7 outlines where NRW MLT considers that there is a requirement for mitigation and/or monitoring, and sets out the measures we consider necessary to address potential impacts identified through the EIA process. These are summarised below:
- 8.2.2.1 Licence conditions will be required stating that the Licence Holder must ensure that notification is sent to the UK Hydrographic Office prior to commencement of the works, which includes details of any marking arrangements.
- 8.2.2.2 Licence conditions will be required stating that the following plans should be submitted to NRW MLT as the Licensing Authority for approval prior to commencement of activities:
- Written Scheme of Investigation (WSI)
 - Protocol for Archaeological Discovery (PAD)
 - Construction Environmental Management Plan (CEMP)
 - Environment Management Plan (EMP)
 - Marine Pollution Contingency Plan (MPCP)
 - Marine Mammal Mitigation Plan (MMMP)
 - Biosecurity Risk Assessment and Management Plan (BRAMP)
 - Vessel Management Plan (VMP)
 - Navigation Safety Plan (NSP)
- 8.2.2.3 Licence conditions will be required surrounding mitigating impacts from piling activities. These include the use of soft-start procedures where percussive piling is used, to ensure incremental increase in pile power over a set time period until full operational power is achieved. It should be dictated that the soft-start duration should be a period of no less than 20 minutes, and that should piling cease for a period greater than 10 minutes, then the soft start procedure must be repeated.
- 8.2.2.4 Licence conditions will be required stating that all precautionary recommendations outlined in the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise August 2010 are implemented.
- 8.2.2.5 Licence conditions will be required to ensure an entry into the UK Marine Noise Registry is completed, detailing the proposed dates and locations and nature of the piling activities prior to commencement, and every 6 months following the commencement of piling activities until the completion of piling activities, with the final entry to be completed within 8 weeks of completion of piling activities.

- 8.2.2.6 Licence conditions will be required stating that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment, and suitable concrete cure times are used.
- 8.2.2.7 Licence conditions will be required to ensure that silt laden run off from activities is kept to a minimum.
- 8.2.2.8 Licence conditions will be required to ensure that best practise is used to minimise re-suspension of sediment.
- 8.2.2.10 Licence conditions will be required to ensure the implementation of suitable pollution control measures when servicing pumping vessels, with spill kits available onshore and offshore and all personnel involved in dredging operations are aware of the location of the kits and trained to use them.
- 8.2.3 The onshore elements of the works fall outside the jurisdiction of the Marine Licence; however, NRW MLT are content that a HRO Harbour Revision Order (HRO) under the Harbours Act 1964 (as amended) is currently being determined by another consenting authority, PEDW, for the Project, and know of no reason why onshore mitigation measures proposed by the Applicant and discussed in section 8.1 could not be secured.
- 8.2.4 In considering the mitigation and monitoring requirements outlined above we do not consider that these requirements can be met by existing mitigation and monitoring arrangements.

9. Regulation 21A Conclusion about Environmental Impact

- 9.0.1 In reaching a Conclusion about Environmental Impact, as required by Regulation 21A, NRW MLT has considered the following (Regulation 21A(1)):
- The application for a Marine Licence
 - The Environmental Statement submitted
 - Further information provided, as outlined in section 3.3
 - The responses to public consultation outlined in sections 4 and 7
 - The responses to the technical consultation outlined in sections 6 and 7
 - Any comments received from another EEA state, as outlined in section 5 and 7
 - Any features of the project, or proposed measures, to avoid, prevent, reduce or offset any likely significant adverse environmental effects as outlined in section 8
- 9.0.2 NRW MLT, as appropriate authority, has considered the likely significant effects of the project, and reached a conclusion of the likely significant effects of the project with regard to the following (Regulation 21A(2)):
- Population and human health (9.1)
 - Biodiversity (9.2)

- Land, soil, water, air and climate (9.3)
- Material assets, cultural heritage and landscape (9.4)
- Risk of major accidents and disasters relevant to the project (9.5)
- Cumulative impacts and in-combination impacts (9.6)

9.1 Population and human health

- 9.1.1 NRW MLT has considered the potential effects of the Project on population and human health, including those arising from noise, air quality, traffic, and socio-economics.
- 9.1.2 During construction, there is the potential for temporary minor disturbance to local populations resulting from the temporary shutdown of ferry operations, noise and vibration, dust and air pollutants from construction activities and plant/vehicle emissions, changes to road traffic, change to active or public transport, access, and impacts to water quality from potential pollution.
- 9.1.3 However, the level of change from construction activities due to the Project is considered temporary, small in scale and can be appropriately mitigated by standard good practice measures that minimise disruption and disturbance through the implementation of a CEMP.
- 9.1.4 During operation, the project will improve the safety of the Fishguard berth, providing long-term safe berthing for the Stena Line ferry service linking Abergwaun (Fishguard) to Rosslare, Ireland. Improved access to and from Abergwaun (Fishguard) harbour may also result in indirect socio-economic benefits to local communities; and provide safe and effective transport for users of the ferry services, particularly those travelling for work and those with access needs.
- 9.1.5 NRW MLT concludes that, subject to the mitigation detailed within the ES and section 8 above, the Project will not give rise to significant adverse effects on population and human health.

9.2 Biodiversity

- 9.2.1 NRW MLT has considered the potential effects of the Project on biodiversity, including marine and terrestrial biodiversity and ecology, designated sites, protected species, coastal processes and ecological processes.
- 9.2.2 Potential impacts during construction include temporary habitat loss and disturbance, long-term habitat loss and disturbance, increased suspended sediment concentrations (SSCs) and associated deposition, changes in water quality, increased risk of introduction and spread of INNS, accidental pollution, disturbance from noise and vibration, disturbance from lighting, and impacts from underwater noise from piling and other noise sources, such as dredging and demolition activities. Impacts however are mostly expected to have a local spatial extent, short-term duration, to be intermittent and have high reversibility.

- 9.2.3 Operational impacts include the increased risk of introduction and spread of INNS, long term habitat loss and disturbance, and disturbance from operational noise and lighting.
- 9.2.4 The Applicant has embedded a range of mitigation measures into the project design, and has committed to mitigation, including but not limited to:
- A 20-minute soft-start period for percussive piling activities with a 12 dB reduction in source level.
 - Adoption of JNCC (2010) guidelines for minimising the risk of injury to marine mammals from piling noise, involving a 30-minute pre-piling visual watch for absence of marine mammals with a mitigation zone (minimum 500m) by a qualified Marine Mammal Observer.
 - Development of and adherence to a Vessel Management Plan (VMP) and Navigation Safety Plan (NSP).
 - Development of and adherence to a Construction Environmental Management Plan (CEMP), which will have environmental best practice embedded, including pollution prevention, dust minimisation, and precautionary working methods to prevent damage to habitats and injury to species.
 - Development of, and adherence to a Construction Method Statement (CMS) along with a Code of Construction Practice (CoCP), both embedded within the CEMP.
 - Development of and adherence to an Environmental Management Plan (EMP).
 - Development of and adherence to a Marine Pollution Contingency Plan (MPCP).
 - Development of and adherence to a Marine Mammal Mitigation Plan (MMMP).
 - Development of and adherence to a Biosecurity Risk Assessment and Management Plan (BRAMP).
- 9.2.5 An HRA has been completed and concluded that, subject to measures detailed above, the Project will not adversely affect the integrity of any European site, either alone or in-combination.
- 9.2.6 NRW MLT is satisfied that subject to appropriate mitigation, impacts on biodiversity are not significant.

9.3 Land, soil, water, air and climate

- 9.3.1 NRW MLT has considered the effects of the Project on land, soil resources, geology, hydrogeology, surface water, groundwater, marine water and sediment quality, air quality and climate.
- 9.3.2 Construction activities have the potential to have impacts from dust generation, emissions from machinery, accidental pollution, construction traffic and use of construction materials. However, these effects can be managed through appropriate mitigation measures such as those outlined within the CEMP.
- 9.3.3 Once the replacement Linkspan is constructed and operational, the vessel numbers and vessel size are not expected to increase above existing levels, nor are the related number of generated vehicle movements expected to increase above

existing levels. Therefore, increased impacts to land, soil water, air and climate are not expected for Operational activities.

- 9.3.4 A WFD assessment has been completed and concluded that the Project will not cause deterioration in status of any WFD water body nor prevent achievement of good status, subject to adherence to appropriate mitigation measures.
- 9.3.5 NRW MLT concludes that, subject to the implementation of appropriate mitigation the Project will not result in significant adverse effects on land, soil, water, air or climate.

9.4 Material assets, cultural heritage and landscape

- 9.4.1 NRW MLT has considered effects on material assets, cultural heritage and both terrestrial and seascape landscape character.
- 9.4.2 Potential impacts during construction include shutdown of the ferry service during construction, physical removal of a heritage asset or as a result of change in the setting of the asset, construction traffic and noise, as well as landscape and visual effects. There is the potential for the Project to have impacts on historic post-medieval maritime shipwrecks present within the site. These Marine archaeology impacts are mitigated through implementation of a Written Scheme of Investigation (WSI) and a Protocol for Archaeological Discoveries (PAD), which can be secured through the Marine Licence. Other impacts are considered to be temporary and reversible in nature.
- 9.4.3 The proposed linkspan is less visually obtrusive than the current infrastructure it will replace, and will represent a slight improvement to the view of the ferry port in terms of landscape and visual effects at an operational level. Impacts on material assets, cultural heritage and landscape during operation are therefore predicted to either be negligibly positive, or to be unchanged from current infrastructure.
- 9.4.4 Impacts on material assets, including commercial fisheries and shipping, have been assessed and are mitigated through implementation of a Navigation Safety Plan (NSP), Vessel Management Plan (VMP) and issue of notice to mariners prior to commencement of activities.
- 9.4.5 NRW MLT concludes that, subject to the implementation of appropriate mitigation the Project will not result in significant adverse effects on material assets, cultural heritage or landscape.

9.5 Risk of major accidents and disasters relevant to the project

- 9.5.1 NRW MLT has considered the vulnerability of the Project to major accidents and disasters, including those arising from extreme weather events, pollution incidents, and accidental damage.
- 9.5.2 The ES includes an assessment of major accidents and disasters and identifies that, with appropriate design and mitigation measures in place, the likelihood of such events is low.

9.5.3 The Applicant has committed to a range of mitigation measures and management plans which will be secured through the Marine Licence, including:

- Marine Pollution Contingency Plan (MPCP)
- Construction Environmental Management Plan (CEMP)
- Vessel Management Plan (VMP)
- Navigation Safety Plan (NSP)
- Traffic Management Plan

9.5.4 The Applicant has also committed to the adherence to relevant safety and navigational requirements and a documented Accident Prevention Procedure, and Emergency Response Procedure, will be put in place prior to commencement.

9.5.5 NRW MLT is satisfied that the Project incorporates appropriate design, mitigation and management measures to minimise risks, and that any residual risks are not significant.

9.6 Cumulative impacts and in-combination impacts

9.6.1 NRW MLT has considered the potential for cumulative and in-combination effects arising from the Project in conjunction with existing, consented and reasonably foreseeable development.

9.6.2 The ES includes a comprehensive assessment of cumulative effects across all environmental topics, including marine ecology, terrestrial ecology, landscape, shipping, fisheries and socio-economics.

9.6.3 The Cumulative Effect Assessment (CEA) within the ES takes into account the impact associated with the Proposed Development together with other projects and plans. However, of those projects outlined within the CEA, none share a spatial proximity to Abergwaun (Fishguard) Harbour that could cause a potential cumulative effect with the Proposed Development, with the nearest identified project situated 26 km to the southwest. There were no cumulative projects identified which could result in a cumulative effect on human health and population in the study area. Additionally, there were no projects on the CEA long list screened into the CEA for any of the marine biodiversity receptor groups. The two developments being considered in the Cumulative Impact Assessment have no shoreline or terrestrial connectivity with the proposed development at Abergwaun (Fishguard) Harbour. Given both the distance of relevant external developments and the magnitude of impact, sensitivity of receptors, significance of effects can be considered to be in line with those assessed for the Proposed Development alone, as presented in the ES.

9.6.4 The HRA also considered in-combination effects on European sites and concluded no adverse effect on integrity of the feature of any European site.

9.6.5 NRW MLT is satisfied that cumulative and in-combination effects have been appropriately assessed and that no significant adverse cumulative impacts will arise.

Produced By: Emma Lowe

Signed: 

Date: 03 September 2026

Approved by: Emmer Litt



Signed:

Date: 03 September 2026

10. Regulation 22 EIA Consent Decision

10.0.1 The Marine Licensing Team has considered the application CML2612 and information provided in support of the application and is now in a position to make an EIA consent decision to Stena Line Limited.

10.0.2 In accordance with Regulation 22 of the Regulations, NRW MLT, as appropriate authority, have considered:

- The application for a Marine Licence.
- The Environmental Statement submitted.
- Further information provided, as outlined in section 3.3.
- The Conclusion about Environmental Impact (under Regulation 21A(2)) in section 9 (dated 03 September 2026), which we consider to be up to date.
- The responses to public consultation outlined in sections 4 and 7.
- The responses to the technical consultation outlined in sections 6 and 7.
- Any comments received from another EEA state, as outlined in section 5 and 7.
- Whether monitoring of the significant adverse environmental effects of the Project is appropriate (as outlined in section 8), including whether:
 - Existing monitoring can be relied upon,
 - Conditions should be attached to the regulatory approval,
 - Whether conditions to make provision for potential remedial action are required, as outlined in section 8, and
 - Whether any other conditions need to be attached to the regulatory approval, with respect to the likely significant environmental effects of the Project, as outlined in section 8.

10.0.3 After conducting a full and comprehensive review of the Project and applying appropriate additional external expertise, we conclude that the environmental impacts of the Project have been adequately identified, described and assessed. Accordingly, we conclude a favourable determination and that EIA consent for the project should be given.

- 10.0.4 We consider the works have been appropriately assessed and adequate mitigation strategies have been incorporated to remove or reduce the potential for impacts of significant effect associated with the development.
- 10.0.5 We consider that the monitoring and mitigation conditions outlined in section 8 should be considered in the regulatory decision.
- 10.1 This Written Confirmation of the EIA Consent Decision will be sent to the following, in accordance with Regulation 23 of the Regulations:
- Stena Line Limited.
 - Any person from whom NRW received representation arising from the consultation described in section 4.
 - Any EEA states consulted (see section 5).
 - All consultation bodies listed in section 6.
- 10.2 This Written Confirmation of the EIA Consent Decision is available on the NRW online public register at [<https://publicregister.naturalresources.wales/>].

Produced By: Emma Lowe

Signed: 

Date: 03 September 2026

Approved by: Emmer Litt

Signed: 

Date: 03 September 2026
