

1. Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended), Regulation 22 - EIA Consent Decision

- **1.1 Title:** Martello Quays Marina Development
- **1.2 Regulatory Approval**: Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)
- **1.3 Operators**: Martello Quays Limited
- **1.4 Marine Licence Application No:** CDRML1457
- **1.5 Location**: Pembroke Dock, Pembrokeshire

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3. Purpose

3.1 This document constitutes an EIA consent decision under Regulation 22 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) (MWR), in respect of a Marine Licence application (ref: CDRML1457) submitted by Martello Quays Limited. The application was supported by an Environmental Statement. The Marine Licensing Team has considered the application and information provided in support of the application and is now in a position to make an EIA consent decision to Martello Quays Limited.

3.2 In accordance with Regulation 22 of the MWR, the Natural Resources Wales Marine Licensing Team, as appropriate authority have considered the application, environmental statement (ES), representations of consultation bodies and members of the public and have had regard to the relevant legislation. Following the conclusion of a Transboundary Screening Assessment it was determined that consultation with other EEA states was not necessary.

4. Application

- 4.1 The applicant is Martello Quays Limited who won a procurement bid to deliver the development for a Client Group. The Client Group consists of Pembrokeshire County Council, Milford Haven Port Authority, The Crown Estate and Welsh Government.
- 4.2 The proposal is for a marina development at Pembroke Dock, Pembrokeshire. The site includes a bay consisting of intertidal mud either side of West Llanion Pill.
 - The marina development are will total circa 8.92 ha, of this the majority 8.88 ha will comprise of intertidal mud flats.
- 4.3 The development will include the following major components:
 - 4.3.1 Perimeter breakwater this will form the impounding structure to the marina basin. The majority of the length (283 m) will comprise of a rock mound with a crest level at +5.0 m Above Ordnance Datum (AOD). The remaining 69 m section to the western end will formed of twin walled sheet pile due to the location is in close proximity to the dredged berthing area for Pembroke Port.
 - 4.3.2 Entrance Lock structure This will enable passage of multiple boats to and from the marina to the Milford Haven waterway. The lock structure will be approximately 46.5 m in length and 17 m wide. The lock basin will be approximately 20 m by 8 m with reinforced concrete base and walls with gates at each end. Two sets of stop logs will be required to allow dewatering of the lock for maintenance activities. The lock will be located at the eastern end of the breakwater with a 20 m wide dredged approach channel.
 - 4.3.3 Marina basin The marina basin will have an open water area of 7.1 ha and will be impounded at a level within the range of 2.79 m to 3.29 m AOD.
 - 4.3.4 Front Street dry dock This is a Grade II listed structure dating from the mid-19th Century. The current gate on the lock will need to be removed as it is not functional and is in disrepair. The dry dock will permanently contain water within the marina impoundment. Repair works are needed to prolong the integrity if the structure.

- 4.3.5 Pontoons and berths The marina will provide 314 berth for boats and consist of floating pontoons. Pontoon piling will be undertaken in the dry following construction of the marina breakwater.
- 4.3.6 Front Street waterfront This will include a new hardstanding (land reclamation) on the Front Street boundary with the marina basin, installation of a new gantry walkway connecting to the Martello Tower and existing slipway modifications. The new hardstanding structure will be constructed in the dry and will be infilled with imported granular material and surfaced. The existing quay wall along Front Street will also be retained
- 4.3.7 Dredging of lock approach channel The area to be dredged will be 72 m long by 20 m wide with side slopes at 1 in 4 to a depth of -6 m OD, area of 3,850 m². The quantity to be removed is 13,000 tonnes (9,500m³), a proportion of which will be disposed of at LU169 offshore disposal site and/or reused within the project.
- 4.3.8 Marina basin dredging and re-grading of material Material within the marina will need to be redistributed to ensure a minimum water depth of 2.5 m in the operational marina area. There will be a need to redistribute 3,500 m³ within the marina basin to ensure that one half of the marina basin is maintained between +0.3 m and +0.5 m OD and the remainder is between +0.3 m and 0.0 m OD.
- 4.3.9 Maintenance dredging within the marina basin and lock approach channel. This will either be done through the use of a back hoe dredger, plough or water injection dredging. The expected volume to be dredged annually is 1,000 m³ over a 4,000m² area within the approach channel. It is predicted that there will be a depth loss of 0.25 m per annum within the approach channel. Maintenance dredging of the approach channel would not exceed -6 m OD.
- 4.3.10 Other works will include modification and removal of existing outfalls; construction of new outfalls; removal of jetty at Criterion Way.

5. The Environmental Statement (ES)

- 5.1 A marine licence application was originally submitted to the Marine Licensing Team in 2013 with a supporting ES dating from 2007. Further information was requested for the determination to ensure the conclusions of the 2007 were still relevant to the scheme. The application was withdrawn by the applicant.
- 5.2 In 2014 a new application was submitted to the Marine Licensing Team, along with the original 2007 ES and an updated 2014 ES Addendum containing the requested information.
- 5.3 Both the 2007 ES and 2014 ES Addendum have been taken into consideration during the determination this marine licence application (CDRML1457).

5.4 The Environmental Statement and Addendum outlined the possible impacts of the proposed project organised under the topic headings are outlined in Table 1.

Table 1. ES and ES Addendum Chapter Titles

ES Addendum Chapters 2014	ES Chapters 2007	
Introduction and Background	Introduction	
Approach to Environmental Assessment	Scope of Environmental Assessment	
Need for the Scheme	Need for the Scheme and consideration of	
	alternatives	
Scheme description and Alternative	Detailed scheme description	
Considered		
Planning Policy and Context	Planning policy, guidance and appraisal	
Hydrodynamics, sedimentation and wave	Hydrodynamics, sedimentation and wave	
climate	climate	
Air quality	Air quality	
Transportation	Transportation	
Landscape and visual	Landscape and Visual impacts	
Ecological assessment	Ecological Assessment	
Water quality, surface waters and flood risk	Water quality, surface waters and flood	
	risk	
Noise assessment	Noise Assessment	
Cultural heritage assessment	Cultural heritage assessment	
Socio-economic effects	Socio-economic effects	
Summary of effects	Summary of effects	

5.5 The ES together with the ES addendum is considered to satisfy the requirements of Regulation12 (1)(d) and Schedule 3 of the MWR

6. Public Notices – MWR Regulations 16(2)(g)

- 6.1 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.
- 6.2 The public notice and application documents were made available as follows;
 - A translated public notice was placed in the Western Telegraph on the 8th July 2015 and 15th July 2015
 - The application documents were made available to the public at: Pembroke Dock Library, Water Street, Pembroke Dock, Pembrokeshire, SA72 6DW for 49 days following the publication of the first public notice.
- 6.3 Three public representation were received in response to the public notice. One was in support of the development, two raised concerns over access to Milford Haven Waterway from boat

yards that will be enclosed by the development. Details of the representations can be found in 10.16

7. Consultation

- 7.1 The Marine Licence application was consulted upon on 16th July 2015 for a period of 42 days.
- 7.2 The application was sent to the following consultation bodies:
 - Natural Resources Wales Technical Experts (NRW TE),
 - The Centre for Environment, Fisheries and Aquaculture Science (Cefas),
 - Ministry of Defence (MoD),
 - Maritime and Coastguard Agency (MCA),
 - The Crown Estate (TCE),
 - Local Planning Authority Pembrokeshire County Council (LPA PCC),
 - Local Harbour Authorities, Milford Haven Port Authority (MHPA)
 - Local Biodiversity Officers Pembrokeshire County Council (LBO PCC),
 - Royal Yachting Association (RYA),
 - Royal Society for the Protection of Birds (RSPB),
 - Trinity House (TH),
 - Cadw.
 - Dyfed Archaeological Trust
 - Welsh Government Fisheries Branch, Marine Enforcement Officers (MEO)
 - The Royal Commission on the Ancient and Historic Monuments of Wales (RCAHMW)
- 7.3 The following consultation bodies submitted comments: NRW, MCA, The Crown Estate, RCAHMW, Trinity House, Dyfed Archaeological Trust, MHPA, LPA PCC, LBO PCC, and MoD. Consultation bodies who did not provide a response were assumed to have no comment.

8. European Protected Sites

- 8.1 The scheme is not located within a European Protected Site.
- 8.2 However, due to close proximity, the effects of the proposal on the following European Sites, their features and conservation objectives have been considered by NRW during the licence determination:
 - Pembrokeshire Marine SAC
 - West Wales Marine pSAC
- 8.3 A test of likely significant effect (TLSE) was undertaken and potential significant effects on features of Pembrokeshire Marine SAC could not be ruled out. An Appropriate Assessment was therefore carried out

- 8.4 The Appropriate Assessment concluded, taking into account advice received from relevant protected site advisors, the project would not cause adverse effect the integrity of any European Protected Site, providing the conditions, restrictions and mitigation measure of the marine licence, either alone or in-combination with other plans and projects.
- 8.5 Further details are described within the Habitats Regulations Assessment.

9. Water Framework Directive Assessment

- 9.1 A Water Framework Directive (WFD) assessment was undertaken to determine if the project was likely to cause a deterioration to the status of listed waterbodies.
- 9.2 The six waterbodies that were screened into the WFD assessment were
 - Milford Haven Inner (Transitional) GB531006114100
 - Milford Haven Outer (Coastal) GB641008220000
 - Pembrokeshire South (Coastal) GB611008590003
 - Pembroke Headwaters to tidal limit (River) GB110061025050
 - Westfield Pill Headwaters to tidal limit (River) GB110061031260
 - Pembrokeshire Carboniferous Limestone (Groundwater) GB41002G206000
- 9.3 Milford Haven Inner (Transitional) and Westfield Pill Headwaters to tidal limit (River) were taken forward for a more detailed WFD Assessment. However, it was concluded that the development was not likely to cause deterioration to the waterbodies identified in 9.2
- 9.4 Further details are described within the WFD assessment.

10. Issues arising for consideration of the Environmental Statement, Marine Licence Application and representatives received

- 10.1 In taking a Regulation 22 EIA consent decision, we have considered the issues that have been identified following consideration of the ES, representations from consultation bodies, and any resultant supplementary information provided in response by the applicant.
- 10.2 The 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.
- 10.4 A summary of the issues raised during the technical consultation was sent to the applicant on the 21st October 2015. A response addressing the concerns was received from the applicant on the 1st December 2015.
 - A meeting was held between the applicant, the agent, the MLT and NRW TE on 5th January 2016 to discuss the range of issues within the summary document.

10.5 Coastal Processes

- 10.5.1 Cefas raised concerns over the choice of model that the applicant had used for coastal modelling.
- The applicant responded stating the comments related to the original Jacobs Babtie model within the 2007 ES were superseded by the Black & Veatch model within the 2014 ES Addendum (appendix 6-1).
- Following clarification with Cefas, they were satisfied with the conclusions of the Black & Veatch model. It should also be noted that NRW were content with the updated modelling report.
- 10.5.4 MLT consider that the issue has been addressed and no condition is required.

10.6 Re-grading of Material

- 10.6.1 Cefas and NRW sought clarification on methods that would be used to re-grade material within the marina.
- 10.6.2 The applicant responded stating that the re-grading would be done within a confined environment behind the constructed lock and breakwater. There are two possibilities for the works, either plough dredging or with earthmoving plant to the necessary bed depths. If works are done in the wet option, the water not be exchanged in to the estuary through the lock prior to the sediment settling within the marina, to reduce the risk of pollution/increased sedimentation.
- 10.6.3 NRW were satisfied with the response at the meeting held on the 5th January 2016.
- MLT are satisfied with the response and consider it appropriate to condition the licence for the requirement of a Construction Environment Management Plan (CEMP) detailing the proposals for chosen method for re-grading material. The CEMP must be submitted to the MLT for approval prior to the commencement of works.

10.7 Seagrass

- The development will result in the loss of approximately 1.84 ha of intertidal seagrass.
- The loss of seagrass was raised as an issue by NRW, Cefas and LPA PCC.
- 10.7.3 The applicant responded stating that as part of the planning permission for the development, a section 106 agreement is being formalised between Pembrokeshire County Council and Martello Quays Limited. The agreement will include translocation of seagrass and a financial contribution towards ongoing monitoring surveys within the Milford Haven waterway.

- In addition a Water Framework Directive (WFD) Assessment covering the development was submitted to support the MLTs WFD Assessment as well as the application.
- 10.7.5 Seagrass has been screened in as a critical habitat within the Milford Haven Inner (Transitional) waterbody that will be affected as part of the development.
- 10.7.6 In this instance, NRW undertook further investigation of the likely impact of the permanent loss of seagrass to the waterbody through supplementing the information that has been included within the Martello Quays Water Framework Directive Compliance Assessment in Support of Marine Licence February 2016.
- 10.7.7 Using the UKTAG Intertidal Seagrass Tool, calculations were undertaken to determine the proportion of the seagrass that would be permanently lost from the waterbody as a result of the development and whether the loss would cause a deterioration to the waterbody. This showed that the development would result in a loss of approximately 2% of the Milford Haven Inner (Transitional) waterbody seagrass.
- 10.7.8 It was concluded that this loss would not be likely to affect the Ecological Quality Ratio (EQR) for seagrass or the overall classification of the waterbody.
- The MLT consider the assessments of the potential impacts sea grass to be satisfactory. The MLT consider it appropriate to condition the marine licence that a seagrass mitigation and monitoring plan, including any translocation activities, be submitted for written agreement prior to the commencement of the works.

10.8 Sediment Sampling/Contamination

- 10.8.1 The application included dredging of the approach channel to the marina and potential dredging within the marina bund itself. Much of the material will be utilised within the project. However there is likely to be an element of disposal of dredged material to sea. The application is for the disposal of all 9,500 m³ to LU169 in case reuse of the approach channel dredge material is not suitable. As such, sediment sampling and analysis was conducted on the material to be dredged to ensure its suitability for disposal at sea.
- Surface samples were analysed by Cefas in April 2015. It was deemed that the surface material was suitable for disposal at sea at LU169.
- 10.8.3 However, as the application was to dredge to -6 m OD, further depth samples were taken and analysed in August 2016. Whilst some determinants showed slight levels slightly above Cefas Action Level 1, it is considered that the elevation was not to be cause for concern and was likely to be due to localised hotspots. Cefas advised therefore, it is considered acceptable for 9,500 m³ of dredge material to be disposed of at sea to LU169 Milford Haven Three.

MLT consider that it is appropriate to attached conditions to the licence detailing dredge quantities specifying the location of disposal, LU169 Milford Haven Three. The MLT understand there is a requirement under OSPAR for sediment sampling of dredge material to ensure suitability for disposal at sea every 3 to 7 years. As such, the licence conditions that sediment sampling and analysis is undertaken every three years of the licence duration.

10.9 Underwater Noise

10.9.1 NRW raised concerns about underwater noise levels from piling activities on fish and marine mammals as detailed in the following sections. These issues were addressed through correspondence with the applicant and discussed during the meeting on the 5th January 2015.

10.9.2 Fish

- 10.9.2.1 NRW advised that in order to mitigate herring spawning and migratory fish, particularly shad, movements, piling should only occur between July and November.
- Information was provided by the applicant in the form of an updated WFD assessment and report to inform an HRA; these included details of mitigation that could be implemented to reduce the impact to fish, particularly for migratory fish (shad) and herring spawning. The WFD assessment conducted by the MLT concluded that project would not cause deterioration to the status of the fish element of either the Milford Haven Inner (Transitional) and Westfield Pill headwaters to tidal limit (River) waterbodies. Mitigation measures to reach this conclusions included use of a soft-start procedure for piling or considering avoiding piling timing in conjunction with other projects in the vicinity (see 10.9.2.3)
- The HRA completed by the MLT could not rule out likely significant to shad, a feature of the Pembrokeshire Marine SAC. As such, an appropriate assessment was undertaken and mitigation suggested. The mitigation to avoid an adverse effect on site integrity for shad is soft-start procedure or considering avoiding timing of piling with other noisy projects in the vicinity, such as Waterston (Egnedol Jetty) and Milford Dock or that piling was not undertaken between March and June. At a minimum, at least one of this mitigation measures must be detailed in an approved Construction Environment Management Plan and implemented throughout the works.
- MLT are satisfied with the response and consider it appropriate to condition the licence for the requirement of a Construction Environment Management Plan (CEMP) detailing piling timing to be submitted for approval prior to the commencement of the works.

10.9.3 Marine Mammals

- 10.9.3.1 NRW welcomed the mitigation measures outlined in the application to reduce the noise impact of piling on marine mammals. However, highlighted that if night working (piling) was proposed, use of a marine mammal observer would not be suitable and other mitigations would be required.
- 10.9.3.2 The applicant responded stating that it was not expected that night time piling would be required. However, if night works were required during the project such measures would be detailed within the CEMP.
- The MLT are satisfied with the response and consider it appropriate to condition the licence for the requirement of a Construction Environment Management Plan (CEMP) detailing marine mammal mitigation to be submitted for written approval.

10.10 Water Quality

- 10.10.1 NRW raised concerns regarding the potential effects the development could have on water quality. This included affecting biological oxygen demand (BOD), pumping water to maintaining water levels in the marina, stratification and ongoing monitoring. NRW advised that full water quality modelling, as stated in the ES addendum, should be undertaken prior to the commencement of the works. This is to ensure the water quality of the Milford Haven estuary is not adversely affected.
- 10.10.2 The applicant responded stating that a water quality study, including modelling, and agreed monitoring programme would address concerns regarding water quality impact. Any surface water discharge concerns would be dealt with via the relevant discharge consent, should one be required. NRW agreed that this would be satisfactory.
- 10.10.3 The MLT are satisfied with the response and consider it appropriate to condition a Water Quality Study and monitoring programme to be submitted for written approval, in consultation with NRW and MHPA prior to the commencement of the works, as well as ongoing monitoring.

10.11 Dredging and Disposal Quantities

- 10.11.1 Clarification was sought by the MLT, NRW Technical Experts and Cefas on the likely quantities of material be dredged and disposed, and the quantity to be used as fill in the project.
- The applicant confirmed the dredge, disposal and fill quantities are detailed in Table 2 and section 10.8:

Table 2. Capital Dredge, Infill and Disposal Quantities

Location	Cut/Dredge (m³)	Fill (m³)	Disposal at Sea (m³)
Approach Channel	9,500	N/a	N/a
Lock	6,100	9,400	N/a
Breakwater (twin walled section)	N/a	1,400	N/a
Totals	15,600	10,800	4,800

- 10.11.3 The total likely amount of material that will be disposed of at sea is estimated to be 4,800 m³. This calculated from the expected dredge quantities subtracting the expected volume that can be utilised as fill material in the scheme.
- There will be a need to conduct maintenance dredging, the expected volume being 1,000 m³ annually over a 4,000m² area within the approach channel
- 10.11.5 MLT are satisfied with this response and consider it appropriate to condition the licence with these quantities accordingly and condition sediment sampling to be undertaken every 3 years and consider this to be assessed in the Environmental Statement.

10.12 Marine Invasive Non-Native Species

- 10.12.1 NRW advised an Environmental Management Plan (EMP) for construction and operation includes monitoring and mitigation for marine invasive non-native species, particularly focused on vessel movement, exchange of water over the tidal cycle and dredging activities.
- 10.12.2 It was highlighted that dredging has the potential to release and spread *Crepidula fornicata* (slipper limpet). This is a species listed on Schedule 9 of the Wildlife and Countryside Act 1981. It is an offence to release Schedule 9 species in to the wild. This can be addressed through a biosecurity risk assessment detailing mitigation measures. A template biosecurity risk assessment was provided with the response.
- 10.12.3 MLT consider it appropriate to condition an Environmental Management Plan, containing a biosecurity risk assessment and detailed mitigation measures, is submitted for approval prior to the commencement of works.

10.13 Environmental Health

10.13.1 The LPA raised concerns regarding noise from the development stating that the mitigation measures outlined in the ES should implemented, including restricting the

timings of all works and ancillary operations that are audial at the site boundary to between 07:30 and 19:00 Monday to Friday, 08:00 and 13:00 on Saturdays and no time on Sundays or Bank Holidays.

- The LPA also stated that dust emissions from plant, vehicle and vessel movement could be managed through a Dust Control Plan.
- 10.13.3 MLT consider it appropriate to condition the licence for the requirement of a Construction Environment Management Plan (CEMP) detailing noise mitigation measure and dust control plan to be submitted for written approval prior to the commencement of the works.

10.14 Archaeology

- 10.14.1 Dyfed Archaeological Trust (DAT) stated there are heritage assets within the proposed development; the East Martello Tower and the Northeast Martello Tower, and in close proximity to other heritage assets. DAT advise that the development is unlikely to have a direct impact on these. However, there is a potential that the development could have an adverse visual impact on the setting of nearby assets, particularly the Martello Towers. These can be addressed through a desk-based assessment via a Written Scheme of Investigation.
- 10.14.2 The MLT consider is appropriate that a Written Scheme of Investigation (WSI) is submitted for approval prior to the commencement of works via condition on the marine licence.

10.15 Lighting Requirements

- 10.15.1 Trinity House raised concerns that the lighting requirements for the development could not be determined without detailed drawings.
- 10.15.2 The MLT consider it appropriate to condition the licence that detailed plans of the marina development are submitted for approval to determine the lighting requirements prior to the commencement of works therefore, the development could not proceed without appropriate lighting

10.16 Public Representations

- 10.16.1 Three public representations were received in response to the public notice that was advertised in the Western Telegraph on the 8th July 2015 and 15th July 2015.
- One representation stated support for the development. This could not be handled under Schedule 5 of the MWR. However, the MLT have had regard to the support when making the EIA consent decision.
- 10.16.3 The two remaining representations raised similar concerns regarding public rights of way and the lease agreement of an affected Yacht Club. Details of the representation are documented in the following sections:

10.16.4 Public Rights of Way

- 10.16.4.1 Two representations stated the development would encompass three slipways, restricting free movement and access to the Milford Haven Waterway. The MLT consider that the representation to be relevant to the EIA consent decision under Schedule 5 of the MWR.
- 10.16.4.2 Following the Schedule 5 procedure, the applicant was given the opportunity to respond. The applicant stated that following a comprehensive search by the developers' legal advisors with relevant statutory bodies, no public rights of way would be affected by the development. This was confirmed by MMO who are responsible for the determination of a Harbour Revision Order for the development.
- 10.16.4.3 The MLT are satisfied that no public rights of way will affected by the proposal. Therefore, Schedule 5 is no longer applicable and no condition required on the marine licence to address this point.

10.16.5 Yacht Club Lease Agreement

- 10.16.5.1 Two representations were received stating that, whilst in principle they welcome the development, they wished to highlight it would directly effect and enclose the boat storage facility of Pembroke Haven Yacht Club.
- 10.16.5.2 The applicant provided the MLT with a letter from the Client Group dated 30th August 2016 regarding the Development Agreement for the project and status of the Yacht Club storage facilities.
- 10.16.5.3 The Yacht Club has a business tenancy agreement with Pembrokeshire County Council which is subject to the provisions of Part II of the Landlord and Tenant Act 1954 ("the 1954 Act"). Under the 1954 Act, a business tenancy may be terminated by the landlord on grounds including redevelopment of the land or provision of a suitable alternative accommodation. The letter from the Applicant confirms that Pembrokeshire County Council will serve the appropriate notice at such time as it is sufficiently assured that the development will actually proceed.
- 10.16.5.4 The MLT consider that Schedule 5 is applicable and that an arrangement may be made between the developer, the Client Group and the Yacht Club. It is recognised that vacant possession of the site will be necessary for the development to be completed and that it would not be productive for a meeting to be arranged between the parties given the timescales of the project. The Landlord and Tenant Act 1954 provides a robust and comprehensive statutory scheme; it would not be appropriate for the MLT to seek to interfere with these statutory processes by making alternative arrangements pursuant to Schedule 5. The MLT consider it is likely that under the 1954 Act an "arrangement" will be made prior to the commencement of the marine works to terminate the tenancy agreement of the Yacht Club. Therefore, at the commencement of the development there will not be interference with the Yacht Club as the site will be vacant for redevelopment.

11. Regulatory Evaluation and EIA consent decision

- 11.1 In considering the application for the development of the Martello Quays marina and associated dredging at Pembroke Dock, Pembrokeshire the following has been considered:
 - The ES and ES Addendum, including the mitigation measures proposed;
 - The relevant provisions of Marine and Coastal Access Act 2009 and
 - The representations received.
- 11.2 The Marine Licensing Team has determined that the environmental impacts of the marine development have been adequately identified, described and assessed and that mitigation can be secured which would be sufficient to allow the application, CDRML1547, to be approved.

12. Sign off

Produced by: Katherine Route-Stephens – Marine Licensing Team

Signed:

Date: 16 February 2017

Approved by: Eleanor Smart – Senior Team Leader, Marine Licensing

Signed: EAA

Date: 14 March 2017