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16 July 2026

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) 2017 REGULATIONS

DECISION NOTICE – MARINE LICENCES FOR CONSTRUCTION AND DREDGING WITH SEA DEPOSIT ASSOCIATED WITH THE EXPANSION AND REDEVELOPMENT OF STRANRAER MARINA.

1. Application and description of the works

- 1.1 On 19 August 2025, Dumfries and Galloway Council ("the Applicant") having its registered office at Cargen Tower, Garroch Business Park, Garroch Loaning, Dumfries, DG2 8PN submitted applications under Part 4 of the Marine (Scotland) Act 2010 ("the 2010 Act") for the expansion and redevelopment of Stranraer Marina, including dredging and sea deposit (hereinafter collectively referred to as "the Works"). The applications were accompanied by an Environmental Impact Assessment Report ("EIAR") in accordance with The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ("the 2017 MW Regulations"). Additional information was submitted by the Applicant to the Scottish Ministers in September 2026, ("Additional Information") and related to benthic ecology.
- 1.2 The Works comprise a comprehensive programme of upgrade, expansion, and redevelopment works at Stranraer Marina to increase capacity and accommodate larger vessels. The works include both terrestrial and marine components.
- 1.3 Key elements of the Works include:
 - Expansion of marina capacity through the reconfiguration of the existing layout and the provision of up to 185 additional berths, increasing total

capacity to approximately 230 berths, including a proportion for commercial use

- Extension of the existing breakwater and construction of a new breakwater, which will also provide berthing for larger vessels
- Capital dredging, followed by maintenance dredging, to facilitate the revised marina layout and required depths
- Installation of a fuel berth and additional marina access infrastructure, including new linkspans
- Replacement and repair of quay walls, including a new sheet-piled wall at Breastworks and improvements to the west quay;
- Upgrading of existing slipway
- Creation of reclaimed land to provide new car parking, public open space, and coastal access improvements, including a revetment and enhanced walkway connections

1.4 The extension of the existing breakwaters, is anticipated to utilise dredge material as infill, with a rock armour to match the existing structures. A new sheet piled wall is to replace an existing structure with significant defects. The new cantilevered sheet piled wall will sit approximately 2 meters to the north of the existing which will be subsumed by the new construction. The slipway upgrade includes moving the location to ensure all tide access, with addition of a floating pontoon to aid access. The area of reclaimed land will be faced with a new revetment faced with rock armour, and a section of stepped concrete.

1.5 The proposal includes both capital and maintenance dredging to achieve required navigational depths. Key parameters include:

- Total dredge volume of approximately 132,616 m³
- Reuse of approximately 48,340 m³ of dredged material within land reclamation works, subject to suitability testing
- Disposal of the remaining material at offshore licensed disposal sites either MA25 (Girvan) or MA10 North Channel
- Target depths generally of -3.0 m Chart Datum (CD), with deeper dredging (-4.5 m CD) in areas intended for larger vessels

1.6 Allowances for vessel movement and sedimentation are incorporated into the design depths. The detailed dredging methodologies and plant will be determined at the construction stage. The Applicant confirms that the Environmental Impact Assessment has applied a worst-case scenario approach, assessing impacts based on upper-bound assumptions regarding dredging methods and sediment release.

- 1.7 The anticipated construction period is up to 24 months, with completion and opening currently forecast for 2028.
- 1.8 During operation, the expanded marina will support increased leisure and commercial marine activity, including accommodation for larger vessels such as superyachts. Existing infrastructure will be reconfigured and integrated with new facilities, with measures included to minimise conflict between commercial and recreational users.
- 1.9 The EIA Report received was also submitted to Dumfries and Galloway Council in relation to terrestrial works including buildings, a substation, green spaces and a car park. This decision notice considers only the information relevant to the marine environment.
- 1.10 This decision notice contains the Scottish Ministers' decision to grant regulatory approval for the Works as described above, in accordance with the 2017 MW Regulations by issuing marine licences under Part 4 of the 2010 Act.

2. Summary of environmental information

- 2.1 The environmental information provided by the Applicant was:

- An EIA Report that provided an assessment of the impact of the Works on a range of receptors.
- Additional information pertaining to Benthic Ecology

- 2.2 A summary of the environmental information provided in the EIAR and Additional Information is given below.

2.3 Coastal Processes

The assessment examined suspended sediment concentration, bathymetric changes, tidal regime, wave climate and sediment transport regimes. Numerical modelling informed the assessment. No significant effects in EIA terms were identified for suspended sediment and deposition during construction or operation. The provision of infrastructure is designed to alter the wave climate within the harbour to facilitate berthing; impacts beyond the intended changes were assessed as not significant. The assessment concluded there will be no significant cumulative effects.

2.4 Navigation and Safety

A Navigational Risk Assessment identified initial slight risks during construction and operation (recreational vessels breaking moorings and potential collisions between recreational vessels). Additional safety measures including improved communication, navigation aids, staffing and vessel traffic management will reduce these to negligible levels. With these measures implemented, no significant environmental effects are considered to result from the proposed development. No significant cumulative effects were identified.

2.5 Major Accidents and Disasters

A systematic risk assessment identified potential risks, pathways and controls. These included a phase of screening risk events with assessed mitigation and management measures. Perceived risks include accidents at adjacent establishments subject to the Control of Major Accident Hazard Regulations 2015 (“COMAH”), collapse and damage to structures, release of pollutants, interaction with existing electrical transmission infrastructure, watermain strikes, navigation/vessel collision, and flood risks. Through iterative design and implementation of suitable mitigation measures, the EIAR considers that potentially significant adverse effects have been minimised. The assessment concluded there will be no likely significant environmental effects from vulnerability of the development to major accidents or disasters. No significant cumulative impacts were identified.

2.6 Flood Risk

The site experiences significant coastal flood risk (1 in 200 year plus climate change event results in complete inundation). The design incorporates extension to existing breakwater and new floating breakwater, designed following wave modelling to reduce wave heights within the marina. Good practice surface water drainage strategies are incorporated. Assessment indicates no significant adverse impacts on flood risk, with some betterment identified for coastal flood risk. For cumulative effects, the assessment concluded effects will remain negligible for the operational phase.

2.7 Water Quality

Loch Ryan is currently assigned 'Good' Water Framework Directive status and is designated as a Shellfish Water Protected Area. Potential impacts include accidental spillage, sediment mobilisation and physical modification. Good practice construction runoff and material storage measures, dredging methodologies, embedded mitigation (bundling, non-return valves, flood resilience), and enhanced disposal services are considered to minimise effects. Computational modelling indicates tidal regime, wave climate and sediment transport are predicted to remain substantially unchanged. No significant effects on water quality or hydro-morphology have been identified. Cumulative effects, are considered to remain negligible for water quality and slight/moderate for hydro-morphology during operation.

2.8 Benthic Ecology

Field surveys (May 2025) comprising intertidal survey, drop-down video assessment and benthic grab sampling identified nine intertidal biotopes and thirteen subtidal biotopes. Native oyster, a Priority Marine Feature ("PMF") were recorded within the marina basin at low abundance; large seagrass beds were documented east of Stranraer but lie outside the zone of influence. Habitats within affected areas assessed as low sensitivity; native oysters and seagrass assessed as high sensitivity.

The Benthic Ecology Addendum to Chapter 12.0 (document reference 61378-FRH-ZZ-00-RP-000508) details the potential impacts from permanent habitat loss (slight adverse on subtidal habitats, slight adverse on native oysters), temporary habitat loss (negligible on subtidal habitats, slight on native oysters), suspended sediment changes (negligible on all habitats), contaminant mobilisation (negligible), dissolved oxygen changes (negligible) have been identified. An invasive non-native species ("INNS") risk was identified as moderate adverse prior to mitigation; with implementation of a CEMP and Biosecurity Plan, residual effects reduce to negligible for habitats and slight for native oysters. Artificial habitat creation from breakwater extension and new pontoons are identified as slight beneficial effect. No significant cumulative impacts were identified.

2.9 Fish and Shellfish Ecology

Loch Ryan supports multiple commercial and migratory fish species and the largest extant native oyster bed in Scotland. Fish and shellfish populations are assessed as high sensitivity. Short-term increases in turbidity from dredging is assessed as slight adverse to fish populations; contaminant disturbance is assessed as negligible; underwater noise impacts are assessed as low significance for fish and negligible for shellfish. Soft start procedures during piling and timing of piling operations to avoid February-June peak spawning will reduce impacts. Residual impact assessed as low significance for all fish

groups and negligible for shellfish. No significant cumulative impacts were identified.

2.10 Marine Mammals

Potential effects include injury or disturbance from piling operations, construction disturbance, pollution, operational disturbance, vessel collision and operational pollution. Key mitigation includes soft start to impact piling, marine mammal observer during impact piling, and CEMP to minimise construction pollution. Following mitigation, no significant effects on marine mammals were identified. No significant cumulative impacts were identified.

2.11 Terrestrial Biodiversity and Ornithology

Field surveys undertaken October 2023 – August 2024. Potential effects include disturbance to breeding and non-breeding birds from piling and visual disturbance, habitat loss and construction pollution. Key mitigation includes soft start to piling, avoidance of sensitive seasons and tidal states, Ecological Clerk of Works, and CEMP. Following mitigation, no significant effects identified. No significant cumulative impacts assessed.

2.12 Transportation

The construction phase will result in significant short-term traffic impacts from movement of materials, equipment and workforce. Mitigation through Construction Traffic Management Plan will address potential congestion and infrastructure issues. Operational phase will see ongoing impacts from increased visitors, managed through parking provision on reclaimed land and sustainable travel measures. Overall assessment concludes short-term moderate adverse impacts during construction, minimal long-term impacts with potential positive effects on sustainable travel options. No significant cumulative impacts were identified.

2.13 Air Quality and Dust

Construction phase dust is assessed as a main concern; mitigation measures are anticipated to reduce the risk to negligible. Pollutant concentrations at facades of existing receptors are not expected to exceed air quality strategy objectives. The overall effect is assessed as 'not significant' for both construction and operational phases. No significant cumulative impacts were identified.

2.14 Climate Change

The climate change risk assessment identified key hazards (flooding, extreme weather, temperatures) but with embedded mitigation (flood resilience design, all-electric heating, mechanical ventilation with heat recovery, low energy

lighting, solar PV on new buildings) no significant impacts have been identified. Construction phase emissions (28,469 tonnes of carbon dioxide equivalent ("tCO₂e")) is assessed as moderate adverse prior to mitigation; with additional mitigation measures (lower carbon materials, on-site reuse of dredged material, efficient practices) this is reduced to minor adverse (not significant in EIA terms). Operational emissions (336 tCO₂e additional to 9 tCO₂e baseline) are assessed as minor adverse (not significant). Decommissioning emissions are assessed as minor adverse (not significant).

2.15 Noise and Vibration

Quantitative assessment has identified potential for significant adverse effects at nearby sensitive receptors during construction. Mitigation through Best Practicable Means and monitoring throughout works are required. Operational noise is controlled through limits at sensitive receptors to avoid adverse impacts. Cumulative effects assessment identified no significant adverse effects.

2.16 Underwater Noise

Modelling established effect ranges for various activities. Impact piling with soft start (30 minutes quieter piling) allows sensitive animals to clear the nearby area (<500m); temporary hearing impairment is possible to 1500m for harbour porpoise. Sheet piling/vibratory piling risk ranges <200m. The dredging and operational noise from vessels indicated a temporary hearing impairment risk within 30m. Behavioural disturbance thresholds may exceed at ranges >4km but animals near high vessel traffic areas are expected to have higher tolerance.

2.17 Soils, Geology and Contamination

The content in this chapter is a terrestrial matter and has been covered by the council during its planning process.

2.18 Cultural Heritage

There is one designated heritage asset is within the site boundary – the Harbour Office with weighbridge (Category C Listed Building). The site also lies partially within the Stranraer Conservation Area with 65 listed buildings in wider study area. All site land was reclaimed in latter 19th century onwards. No significant construction phase impacts on known heritage assets have been identified. There is low potential for isolated artefacts during dredging, these are to be addressed through archaeological discovery protocol. During the operational phase a new sheet piled wall will obscure a remaining 19th century harbour element (slight adverse), a substation and compound may detract from Conservation Area (mitigated through sensitive design) and

larger vessels may affect views (slight effect on Conservation Area). An historic building recording programme will offset loss. Overall, the EIAR considers that there is no significant effects in EIA terms.

2.19 Landscape and Visual

The construction phase indicates significant adverse visual effect on users of Stranraer Waterfront/Core Path STRA/544/1 due to the proximity and dominance of the construction works, but the EIAR indicates no other significant adverse effects on landscape character/views. In respect of the operational phase, the site is not in protected landscape area and changes are reported to fit well with the existing character. The visual effects from footpaths, parks, homes and roads is assessed as minor and not significant. The reclaimed land area and car park improvements are noted as bringing positive benefits. Considered cumulatively with other projects results in a slight increase in visible urban development but the effects are considered as remaining minor and not significantly harmful.

2.20 Socio-Economics

The construction phase is predicted to moderately boost local economic activity through job creation (estimated 30 net additional permanent jobs post-operation), reduce unemployment, provide skills development opportunities, and support the local economy through worker accommodation demand. Moderate beneficial effects have been identified. Minor adverse effects on crime/safety and access to open spaces is possible with negligible effects on tourism. The operational phase is predicted to significantly boost tourism and leisure, improve access to open spaces, enhance community uses, and increase demand for local shops and services. Overall long-term benefits are expected to outweigh construction phase adverse effects. No significant cumulative effects identified.

3. Consultation

- 3.1 In accordance with the 2017 MW Regulations a notice publicising the application and EIA Report must be published in the Edinburgh Gazette, in a newspaper circulating in the locality in which the Works to which the EIA Report relates are situated (or, in relation to proposed works in, on, over or under the sea, in such newspapers as are likely to come to the attention of those likely to be affected by the proposed works) and on the application website.
- 3.2 As such, the Applicant, in agreement with the Scottish Ministers, published the application, together with the EIA Report and any subsequent additional information.

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- 3.2 As such, the Applicant, in agreement with the Scottish Ministers, published the application, together with the EIA Report and any subsequent additional information.

- 8.6 In respect of the representations made by NatureScot, it can be ascertained that the Works are not likely to have a significant effect on any European sites, however in its advice NatureScot identified potential risks to benthic ecology, marine mammals and terrestrial biodiversity and ornithology, but determine that in respect of Benthic Ecology a detailed Construction Environmental Management Plan must be submitted and approved prior to works commencing to include a comprehensive biosecurity plan to be prepared and implemented. In respect of marine mammals NatureScot advise that piling must be undertaken using a maximum hammer energy of 500 kJ, with a 30-minute soft start and a 1 km pre-piling search area to mitigate impacts on marine mammals. In respect of Terrestrial Biodiversity and Ornithology, NatureScot advise that piling activities must not take place between April and August inclusive to protect breeding black guillemot.
- 8.7 In respect of the representations made by Transport Scotland, it is determined that whilst it is satisfied that the development will not have a material impact on the trunk road network, to mitigate any effect of increased construction traffic prior to the commencement of development, a Construction Traffic Management Plan must be submitted to, and approved in writing by the Planning Authority in consultation with Transport Scotland. Thereafter, all construction traffic associated with the development must be managed in accordance with the approved Plan.
- 8.8 In respect of the above risk identified at consultation Scottish Ministers are satisfied that subject to the implementation of the above mitigations no significant determining issues remain.

9. The Scottish Ministers' Determination and Reasoned Conclusion

- 9.1 The Scottish Ministers are satisfied that an EIA has been carried out, and that the applicable procedures regarding publicity and consultation in respect of the applications have been followed.
- 9.2 The Scottish Ministers have weighed the impacts of the Works, and the degree to which these can be mitigated. The Ministers have undertaken this exercise in the context of national and local policies.
- 9.3 The Scottish Ministers have considered the extent to which the Works accord with and are supported by Scottish Government policy and the terms of the NMP, and the environmental impacts of the Works.
- 9.4 The Scottish Ministers are satisfied that the environmental issues associated with the Works have been appropriately addressed by way of the design of the Works and mitigation measures.

- 9.5 The Scottish Ministers consider that the licensing tests in respect of an EPS disturbance application for cetaceans will likely be met and an EPS licence will likely be granted.
- 9.6 In their consideration of the environmental impacts of the Works, the Scottish Ministers have identified conditions to be attached to the marine licences to reduce environmental impacts. These include development of, and adherence to the mitigation measures outlined within the Schedule of Mitigation in the Applicant's EIAR and an updated CEMP, and a Construction Traffic Management Plan.
- 9.7 The Scottish Ministers are satisfied, having regard to current knowledge and methods of assessment, that this reasoned conclusion, as required under the 2017 MW Regulations, is valid.
- 9.8 The Scottish Ministers are satisfied that regard has been given to protecting the environment, protecting human health, and preventing interference with legitimate uses of the sea, as well as other factors considered to be relevant, as required by section 27 of the 2010 Act.
- 9.9 The Scottish Ministers **grant marine licences subject to conditions** under the 2010 Act for the dredging and sea deposit and construction associated with the Stranraer Marina Redevelopment, Dumfries and Galloway. The marine licences are attached at Appendix 1.
- 9.10 The embedded mitigation and any additional mitigation identified in the EIA Report has been incorporated into the conditions of the marine licences.
- 9.11 In accordance with the 2017 MW Regulations, the Applicant must publicise notice of the Scottish Ministers' regulatory decision by ensuring that a copy of this decision letter is published on the application website, and within the same publications listed at paragraph 3.2 of this decision letter, namely the Edinburgh Gazette and Stranraer Free Press. The Applicant must provide copies of the public notices to the Scottish Ministers.
- 9.12 Copies of this decision notice have been sent to the bodies consulted on the applications including the local planning authority, NatureScot, SEPA and HES. This decision notice has also been published on the Scottish Ministers' external facing website: Marine Scotland Information.
- 9.13 The Scottish Ministers' decision is final, subject to the right of any aggrieved person to apply to the Court of Session for judicial review. Judicial review is the mechanism by which the Court of Session supervises the exercise of administrative functions, including how the Scottish Ministers exercise their statutory function to determine applications for consent. The rules relating to the judicial review process can be found on the website of the Scottish Courts

– <http://www.scotcourts.gov.uk/rules-and-practice/rules-of-court/court-of-session-rules>. Your local Citizens' Advice Bureau or your solicitor will be able to advise you about the applicable procedures.

Yours sincerely,

Peter Sparrow

Marine Licensing Group Leader, Marine Directorate - Licensing Operations Team

A member of the staff of the Scottish Ministers

16 July 2026

- (a) In the Stranraer Free Press on 19 February 2026, .
 - (b) In the Edinburgh Gazette on 20 February 2026 and
 - (c) On the Applicant's website at <https://www.fairhurst.co.uk/stranraer-marina-expansion-marine-licences-application/>
- 3.3 The Scottish Ministers made the application publicly available on their external facing website: <https://marine.gov.scot/?q=node/27312>
- 3.4 In addition, a consultation exercise on the application and EIA Report was undertaken in accordance with the 2017 MW Regulations for a period from 23 February 2026 to 25 March 2025. The regulatory requirements regarding consultation and public engagement have been met and the representations received taken into consideration. Where matters have not been fully resolved, conditions have been included to ensure appropriate action is taken.
- 3.5 A summary of the representations is set out at sections 4, 5, 6 and 7. The representations are available to view in full, using the following link: <https://marine.gov.scot/?q=node/27312>.

4. Summary of representations from statutory consultees

- 4.1 Dumfries and Galloway Council - Harbours. responded on 23 February 2026 confirming no objection.
- 4.2 The Scottish Environment Protection Agency ("SEPA") responded on 24 February 2026. In its response, SEPA confirmed there is no site-specific advice, and referred Dumfries and Galloway Council (Per Fairhurst) to its standing advice.
- 4.3 Historic Environment Scotland ("HES") responded on 3 March 2026 but had no comments or concerns in respect of the proposals.
- 4.4 NatureScot responded on 18 June 2026 in respect of the Capital Dredging and Sea Deposit application (MD-00011392), and on 23 June 2026 in respect of the Construction application (MD-00011391).
- 4.5 NatureScot advised that the dredging and sea deposit works are unlikely to have significant effects on European sites and therefore do not require an Appropriate Assessment. However, it highlighted that dredging must not take place during the black guillemot breeding season (April–August) due to disturbance risks, and recommended this be secured by licence condition. NatureScot also considered the submitted Construction Environmental Management Plan (CEMP) insufficiently detailed and requires a revised

version setting out all mitigation measures and seasonal environmental sensitivities

- 4.6 NatureScot advised that a detailed biosecurity plan must be submitted to manage the risk of marine invasive non-native species and disease. The plan should address identified invasive species, relevant fish, mollusc and crustacean diseases, and pathogens that threaten Loch Ryan's native oyster population, including *Bonamia ostreae* and *Marteilia refringens*. It should also consider disease vectors and follow recognised marine biosecurity best practice
- 4.7 In its assessment of dredging proposals, NatureScot requested further clarification and documentation for the dredging proposals, including confirmation of dredging frequency, timing, volumes and any supporting modelling. Concerns over the accuracy and clarity of dredge area plans were subsequently resolved following verification of the coordinates by the Scottish Government. NatureScot also supported the overall ornithological assessment but reiterated that the black guillemot breeding season restriction (April–August) should be secured by condition. In addition, pre-construction otter surveys must be undertaken within three months of works commencing, with this requirement incorporated into the CEMP

In conclusion NatureScot require the following to be secured through conditions of any Marine Licence for dredging and sea disposal:

- Dredging activities must not take place between April and August inclusive to avoid disturbance to breeding black guillemot;
 - The applicant must clarify and confirm dredge areas, volumes, and dredging frequency;
 - A detailed and revised Construction Environmental Management Plan must be submitted, incorporating all required mitigation measures and seasonal considerations;
 - A detailed biosecurity plan must be prepared and submitted, addressing marine invasive non-native species and relevant disease risks.
- 4.8 In respect of the Construction application (reference 00011391) NatureScot identified Loch Ryan as a Marine Consultation Area supporting PMF's, namely native oysters and seagrass beds. However, NatureScot concluded that the works are unlikely to have significant effects on European sites and therefore do not require an Appropriate Assessment. It advised that any changes to the project design or construction methods from those assessed in the EIAR must be identified and addressed through a detailed and comprehensive CEMP, to include a detailed biosecurity plan addressing invasive species, disease risks, and protection of Loch Ryan's native oyster population. NatureScot supported

the marine mammal and ornithological assessments but recommended a 30-minute piling soft-start, a 1 km pre-piling marine mammal search area, and a restriction on piling during the black guillemot breeding season (April–August). It also requires pre-construction otter surveys within three months of works commencing,

In conclusion NatureScot require the following to be secured through conditions of any Marine Licence for construction:

- Piling activities must not take place between April and August inclusive to protect breeding black guillemot.
- Piling must be undertaken using a maximum hammer energy of 500 kJ, with a 30-minute soft start and a 1 km pre-piling search area to mitigate impacts on marine mammals.
- A detailed Construction Environmental Management Plan must be submitted and approved prior to works commencing.
- A comprehensive biosecurity plan must be prepared and implemented.

5. Summary of representations from other consultees

- 5.1 The Northern Lighthouse Board (“NLB”) responded on 25 February. In its response the NLB has confirmed it has no objection to the proposed development or associated capital dredging works, but states that before each dredging campaign appropriate marine safety notices must be issued. Following completion of the works, updated survey data must be provided to the UK Hydrographic Office in order that nautical charts can be revised to reflect the new water depths. Notices to Mariners must be issued throughout the construction project to keep stakeholders informed of the works. The applicant must also work with the NLB on any navigation aids required during and after construction, including any relocations. Concerns about the visibility of existing navigation aids may be addressed through agreed mitigation measures. The NLB’s approval is required before any navigation aid is installed, altered, or removed. The NLB recommended a number of standard conditions be included in the associated licences.
- 5.2 Royal Yachting Association Scotland (“RYA Scotland”) responded on 13 March 2026, with no concern and in support of the applications.
- 5.3 The Maritime and Coastguard Agency (“MCA”) responded on 19 March 2026 and raised no objection to the proposed works, noting that navigational safety within the area is the responsibility of the Statutory Harbour Authority. It advised that all relevant maritime safety requirements should be followed, including measures to prevent pollution from fuels, oils and chemicals, obtaining approval from the Harbour Authority, and issuing navigational

warnings where necessary. The applicant is also encouraged to follow the Ports and Marine Facilities Safety Code and associated [Guide to Good Practice](#) to ensure safe management of the works.

- 5.4 The Ministry of Defence (“MOD”) responded on 24 March 2026 confirming no objection to the applications.
- 5.5 The Scottish Fisherman's Federation (“SFF”) responded on 25 March 2026, and again on 3 June 2026 subsequent to clarification of deposit site location confirming that provided the proposed activities do not disrupt fishing activity it holds no objection to the applications.

6. Summary of internal advice

- 6.1 Transport Scotland (“TS”) responded on 23 March 2026, identifying that the site is located approximately 800 metres west of the A75(T) and A77(T) trunk roads at the Cairnryan Road/Stair Drive priority junction. In its response Transport Scotland raised no objection to the development. It confirmed that the project's impact on nearby trunk road junctions would be minimal, with traffic increases well below assessment thresholds. Construction traffic is expected to generate around 200 two-way vehicle movements (approximately 3.4% above baseline levels), which is not considered significant. No abnormal loads are anticipated, and Transport Scotland is satisfied that the development will not have a material impact on the trunk road network. However, to mitigate the potential impact of construction traffic on the safe and efficient operation of the trunk road network. Transport Scotland recommends that the following condition be attached to any consent granted:

- Prior to the commencement of development, a Construction Traffic Management Plan must be submitted to, and approved in writing by, the Planning Authority in consultation with Transport Scotland. Thereafter, all construction traffic associated with the development shall be managed in accordance with the approved Plan.

- 6.2 The Marine Analytical Unit (“MAU”) responded on 23 March 2026 and after subsequent clarification updated its advice on 27 May 2026. The Marine Analytical Unit (MAU) acknowledged that the EIAR appropriately assesses socio-economic impacts and identifies several potential benefits, including positive effects on economic output, employment, tourism, recreation and local services. However, it highlighted weaknesses in the assessment, including inconsistencies in the methodology, limited consideration of some issues (such as public services and wider community safety impacts), insufficient supporting evidence, and apparent errors in economic calculations. As a result, while the MAU recognises the potential for significant

socio-economic benefits, it considers the assessment insufficiently robust to draw firm conclusions on the scale and significance of these effects.

7. Summary of representations from other organisations and members of the public

- 7.1 The Scottish Ministers received no relevant representations from other organisations or members of the public.

8. The Scottish Ministers' Regulatory Approval and Main Determinative Issues

8.1 Determination of Marine Licence Applications

- 8.1.1 In determining the applications for marine licences (including the terms on which they are granted and what conditions, if any, are to be attached to them) the Scottish Ministers have had regard to:

- the need to protect the environment, protect human health, prevent interference with legitimate uses of the sea and such other matters as the Scottish Ministers consider relevant;
- the effects of any use intended to be made of the Works when constructed; and
- representations received from persons with an interest in the outcome of the applications.

8.2 Main Determinative Issues

- 8.2.1 The Scottish Ministers, having taken account of all relevant information and regulatory requirements, consider that the main determining issues are:

- the extent to which the Works accord with and are supported by Scottish Government policy and the terms of the Scotland's National Marine Plan ("NMP"); and
- the main effects of the Works on protecting the environment and human health and preventing interference with the legitimate use of the sea which are in summary, impacts on:

- Benthic Ecology
- Marine Mammals

8.3 Policy Context

- 8.3.1 The proposed works are to be undertaken within the Scottish marine area, as such they fall within the scope of the 2010 Act. The Act requires that decisions be taken in accordance with the National Marine Plan ("NMP"), unless relevant considerations indicate otherwise.