



# **Glensanda Dredging Habitat Regulations Appraisal Screening Supporting Document**



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## 1 Introduction

This Habitats Regulations Appraisal (HRA) Screening Supporting Document has been produced in support of the proposed dredging works at the Port of Glensanda. It provides the information required for the competent authority (Marine Directorate) to carry out a HRA.

## 2 Objectives

The objectives of this HRA Supporting Document are to:

- Outline the details of the proposed works;
- Consider whether there is any potential ecological connectivity between the proposed dredging works and any qualifying interests associated with European Sites;
- Identify whether there are any Likely Significant Effects (LSEs) to any qualifying interests due to proposed dredging works;
- Determine whether there will be any adverse effects to the conservation objectives of any of the European Sites identified, due to potential impacts to qualifying interests; and
- Provide the Marine Directorate with suitable information to carry out an HRA, including an Appropriate Assessment (AA) if deemed necessary.

## 3 Legislative Context

Articles 6(3) and 6(4) of the Habitats Directive (92/43/EEC) are implemented in Scotland through The Conservation (Natural Habitats, &c Regulations 1994 (as amended) (hereafter referred to as the 'Habitats Regulations'). As a result of the United Kingdom (UK) leaving the European Union (EU), the Habitats Regulations were amended in Scotland, in 2019. The Habitats Regulations remain in force, including the provisions for the protection of European Sites.

The above legislation determines that, if a plan or project could affect a European Site (including SACs, designated under the Habitats Directive (1992), and SPAs, designated under the Birds Directive (2009)), there are certain considerations that must be made before the proposal can proceed. In particular, Regulation 48 of the Habitats Regulations dictates that any plan or project, which may result in an LSE on any qualifying interests associated with a European Site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site, shall be subject to an AA. The AA must demonstrate that the proposal will not adversely affect the integrity of the site.

It is the responsibility of the competent authority to carry out the HRA (and AA if deemed necessary) based on robust, scientific information provided by the project developer. It is not the role of the developer to make an assessment on whether the proposal will have an adverse effect on any qualifying interests associated with European Sites. An AA will only be required if there is considered to be an LSE to any qualifying interests, to allow for an assessment of the potential for adverse effects to European Sites.

## 4 Terminology

### 4.1 European Site

In Scotland, European Sites include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), 'candidate' SACs (cSACs) and proposed SPAs (pSPAs) and SACs (pSACs) which have been approved by Scottish Ministers for formal consultation. The parts of SPAs, SACs, cSACs, pSPAs and pSACs which lie below Mean High Water Springs (MHWS) tidal height are also referred to as 'European Marine Sites,' and those in the offshore marine area are also called 'European Offshore Marine Sites' (EOMS).

### 4.2 Ramsar Site

A Ramsar site is a site listed as a wetland of international importance under the provisions of the 'Ramsar Convention.' In Scotland, most Ramsar sites are considered as European Sites and/or Sites of Special Scientific Interest (SSSI), thus, are protected under the relevant statutory regimes. All features of Ramsar sites must be treated as though they are features of European sites for the purposes of land use change decision making as detailed in Scottish Government Policy (2025). This means that plans or projects on or affecting any European site features of a Ramsar site must be subject to a HRA.

### 4.3 Likely Significant Effect

The terminology employed as part of the HRA process is specific, and in some instances the words have a meaning distinct to that in common usage. In particular, there is a distinction between the usage of 'LSE' and 'adverse effects' on-site integrity.

In this HRA Screening Supporting Document, the use of 'LSE' refers to the potential for adverse effects on the integrity of a European site in the absence of mitigation.

A project component is identified to result in an LSE if there is potential ecological connectivity between a qualifying interest associated with a European Site and the proposed works area, and the proposed works are anticipated to have an impact upon the conservation objectives of the European Site in the absence of mitigation. As such, the conservation objectives of the site provide the framework for considering the potential for LSEs. Where an LSE "cannot be excluded, on the basis of objective information" (European Court of Justice, 2004), or without the use of mitigation, an AA is required.

## 5 Proposed Activity

Dredging is required across four areas in the Port of Glensanda harbour limits where there has been a build-up of natural material within berthing areas. The four areas are:

- Main berth – Maintain to -12.3 meters below Chart Datum (mCD);
- Armour berth – Maintain to -5 mCD;
- Small boat harbour – Maintain to -2 mCD; and
- Service jetty – Maintain to -1 mCD.

Dredging is required to maintain safe operations and navigational access. Plough dredging of the four berths will be conducted to redistribute accumulated material to elsewhere within the berth areas. Due to the proximity of the accumulated material to quay walls, dredging will be primarily conducted with a backhoe to drag seabed material where it is technically unfeasible

to use a plough attachment. A plough attachment may then be utilised to further level off material on the seabed if required. Material will not be removed from the seabed. This method was identified as being the most appropriate for the site in the Best Practicable Environmental Option (BPEO) Report (Affric, 2025a).

Expected quantities to be moved in each of the dredge areas per year are shown in Table 5.1.1. The amount to be moved throughout the 3-year maintenance dredge period approximately totals a volume of 18,300m<sup>3</sup> with the highest volume of 6,100m<sup>3</sup> to be moved during the first year of the dredge plan.

**Table 5.1: Expected dredge quantities in cubic metres per year**

Berth	Operational Depth (mCD)	Volume to Dredge Year 1 (m <sup>3</sup> )	Volume to Dredge Year 2 (m <sup>3</sup> )	Volume to Dredge Year 3 (m <sup>3</sup> )	Total Dredge Volume per Berth (m <sup>3</sup> )
Main Berth	-12.3	4000	4000	4000	12000
Armour Berth	-5	100	100	100	300
Small Boat Harbour	-2	1500	1500	1500	4500
Service Jetty	-1	500	500	500	1500
<b>Total Dredge Volumes per Year (m<sup>3</sup>)</b>		6100	6100	6100	18300

For further detail on the proposed activity including location drawings, please refer to the Environmental Supporting Document (Affric, 2025b).

## 6 Consideration of Ecological Connectivity

The proposed dredging works will be undertaken within the marine environment; hence no terrestrial qualifying interests were considered, with the exception of otter and bird species which may utilise the marine environment.

The designated sites and their qualifying interests within 20km of the development (irrespective of qualifying interest) are shown in Table 6.1. Sites designated for mobile, marine species which are within the typical home ranges of the designated species were also included.

The sites, or species within the sites, are scoped in or out depending on whether there is ecological connectivity to the proposed works. A reduced list of designated sites and features is then taken forward for further consideration.

**Table 6.1: Designated Sites Relevant to the Proposal**

Site	Distance and Direction from Construction Site	Qualifying Feature(s) and Latest Assessed Condition	Included in Further Assessment? (IN/OUT)
<b>Special Areas of Conservation</b>			
Eileanan agus Sgeiran Lios mor	3.4km SE	Harbour seal ( <i>Phoca vitulina</i> )	IN – There is potential for dredging activities to impact on the qualifying features of the SAC due

Site	Distance and Direction from Construction Site	Qualifying Feature(s) and Latest Assessed Condition	Included in Further Assessment? (IN/OUT)
		<b>Favourable maintained</b>	to the proximity of the dredging site to the SAC and the mobile nature of the designated feature.
Morvern Woods	5km SW	Mixed woodland on base-rich soils associated with rocky slopes <b>Unfavourable declining</b> Western acidic oak woodland <b>Unfavourable declining</b>	Out - Dredging works has no linkage to the terrestrial qualifying habitats within the SAC due to the marine nature of the works.
		Otter ( <i>Lutra lutra</i> ) <b>Favourable maintained</b>	IN – There is potential for activities to impact otter due to connectivity provided by Loch Linnhe, and being within the home range of up otter.
Lismore Lochs	5.1km SE	Calcium-rich nutrient-poor lakes, lochs and pools <b>Favourable maintained</b>	OUT – Dredging works will not affect this habitat due to the distance of the dredging site to the SAC and the lack of hydrological connectivity from Loch Linnhe to the qualifying feature.
Inner Hebrides & The Minches	6.3km SW	Harbour porpoise ( <i>Phocoena phocoena</i> ) <b>Favourable maintained</b>	IN – There is the potential for dredging activities to impact on the qualifying features of the SAC due to the proximity of the dredging site to the SAC and the mobile nature of the qualifying feature.
Loch Creran	7.7km SE	Reefs <b>Unfavourable declining</b>	OUT – Despite hydrological connectivity through Loch Linnhe, reefs within the SAC will not be affected by dredging works due to the localised and small-scale nature of the works.
Sunart	13.2km NNW and 19km NW	Otter <b>Favourable maintained</b>	IN – Due to connectivity provided by the Sound of Mull, there is potential for activities to impact otter due to the mobility of the qualifying feature.

Site	Distance and Direction from Construction Site	Qualifying Feature(s) and Latest Assessed Condition	Included in Further Assessment? (IN/OUT)
		Dry heaths <b>Unfavourable no change</b> Mixed woodland on base-rich soils associated with rocky slopes <b>Unfavourable declining</b> Reefs <b>Favourable Maintained</b> Western acidic oak woodland <b>Unfavourable no change</b> Wet heathland with cross-leaved heath <b>Unfavourable no change</b>	OUT - Dredging works will not affect the terrestrial qualifying habitats in the SAC due to the marine nature of the works.  Despite hydrological connectivity through the sound of Mull, reefs within the SAC will not be affected by dredging works due to the localised and small-scale nature of the works.
Glen Creran Woods	14.5km ESE	Otter <b>Favourable maintained</b>  Mixed woodland on base-rich soils associated with rocky slopes <b>Unfavourable declining</b> Western acidic oak woodland <b>Unfavourable declining</b>	IN – Due to the connectivity provided by Loch Creran, there is potential for activities to impact otter due to the mobility of the qualifying feature.  OUT - Dredging works has no linkage to the terrestrial qualifying habitats within the SAC due to the marine nature of the works.
Beinn Iadain and Beinn na h' Uamha	15km WNW	Base-rich scree <b>Favourable maintained</b> High-altitude plant communities associated with areas of water seepage <b>Favourable maintained</b>	OUT - Dredging works has no linkage to the terrestrial qualifying habitats within the SAC due to the marine nature of the works.

Site	Distance and Direction from Construction Site	Qualifying Feature(s) and Latest Assessed Condition	Included in Further Assessment? (IN/OUT)
		Plants in crevices on base-rich rocks <b>Favourable maintained</b> Species-rich grassland with mat-grass in upland areas <b>Unfavourable declining</b> Tall herb communities <b>Favourable maintained</b>	
Loch Etive Woods	17.4km SE and 18.5km ESE	Otter <b>Favourable maintained</b>	IN – Due to connectivity provided by Loch Etive and Loch Linnhe, there is potential for activities to impact otter due to the mobility of the qualifying feature.
		Alder woodland on floodplains <b>Unfavourable recovering</b> Mixed woodland on base-rich soils associated with rocky slopes <b>Favourable declining</b> Western acidic oak woodland <b>Unfavourable recovering</b>	OUT - Dredging works has no linkage to the terrestrial qualifying habitats within the SAC due to the marine nature of the works.
Mull Oakwoods	18km SSW	Otter <b>Favourable maintained</b>	IN – Due to connectivity provided by the Sound of Mull, there is potential for activities to impact otter due to the mobility of the qualifying feature.
		Western acidic oak woodland <b>Unfavourable declining</b>	OUT - Dredging works has no linkage to the terrestrial qualifying habitats within the SAC due to the marine nature of the works.
Treshnish Isles	50.9km W	Grey seal ( <i>Halichoerus grypus</i> ), <b>Favourable maintained</b>	IN – Mobile feature which can range up to 100km.
		Reefs <b>Favourable maintained</b>	OUT - Despite hydrological connectivity through the waters surrounding Mull, reefs within the

Site	Distance and Direction from Construction Site	Qualifying Feature(s) and Latest Assessed Condition	Included in Further Assessment? (IN/OUT)
			SAC will not be affected by dredging works due to the localised and small-scale nature of the works.
<b>Special Protection Areas</b>			
Moidart and Ardgour	10.7km NNE	Golden Eagle ( <i>Aquila chrysaetos</i> ), breeding <b>Favourable maintained</b>	OUT – Due to the qualifying feature’s unlikely use of the marine environment, and the sufficient distance between the proposed dredging works and the SAC. Dredging work has no linkages to the qualifying features.
Glas Eileanan	13.6km SW	Common tern ( <i>Sterna hirundo</i> ), breeding <b>Unfavourable declining</b>	IN - Due to a possible breeding foraging range of up to 27km for common tern, there is potential for works to impact this feature as they forage in the marine environment.
Glen Etive and Glen Fyne	15.4km NE and 17km ENE	Golden Eagle, breeding <b>Favourable maintained</b>	OUT – Due to the qualifying feature’s unlikely use of the marine environment, and the sufficient distance between the proposed dredging works and the SAC. Dredging work has no linkages to the qualifying features. .
Cnuic agus Cladach Mhuile	17.2km SSW	Golden Eagle, breeding <b>Favourable maintained</b>	OUT – Due to the qualifying feature’s unlikely use of the marine environment, and the sufficient distance between the proposed dredging works and the SAC. Dredging work has no linkages to the qualifying features.

## 7 Consideration of Likely Significant Effects

### 7.1 Eileanan agus Sgeiran Lios mór SAC

The Eileanan agus Sgeiran Lios mór SAC is designated for the conservation of harbour seal under the European Habitats Directive. The main purpose of the SAC is to contribute to the favourable conservation status of harbour seal in the UK. In terms of conservation benefits, the SAC is estimated to support over 1% of the UK population of harbour seals (NatureScot, 2024a). The seals have several preferred locations which are used as haul-outs. These are on the skerries around the Creag Isles and Eilean Dubh to the South of Lismore, around Eilean Nam Meann and Dubh Sgeir to the northwest of Lismore, and around Sgeir an Teampuill, on the northwest coast of Lismore. These locations are believed to have been used by harbour seal for several decades (NatureScot, 2024a).

The conservation objectives for the Eileanan agus Sgeiran Lios mór SAC are shown in Table 7.1.1.

**Table 7.1.1: Eileanan agus Sgeiran Lios mór SAC Conservation Objectives**

Conservation Objective of the Designated Site for Harbour Seal
<ol style="list-style-type: none"> <li>1. To ensure that harbour seals at Eileanan agus Sgeiran Lios mór SAC are in favourable condition and make an appropriate contribution to achieving Favourable Conservation Status.</li> <li>2. To ensure that the integrity of Eileanan agus Sgeiran Lios mór SAC is maintained in the context of environmental changes by meeting objectives 2a, 2b and 2c:               <ol style="list-style-type: none"> <li>a. The population of harbour seal is a viable component of the site.</li> <li>b. The distribution of harbour seal throughout the site is maintained by avoiding significant disturbance of harbour seal.</li> <li>c. The supporting habitats relevant to harbour seal are maintained.</li> </ol> </li> </ol>

Connectivity has been identified between the Eileanan agus Sgeiran Lios mór SAC and the proposed dredging site due to their close proximity, and the mobile nature of the site’s qualifying feature, harbour seal. The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, underwater noise, vessel interactions and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.1.2. The summary concludes that there is unlikely to be a significant effect on the viability of the harbour seal population within the SAC, the distribution of harbour seal throughout the site, and the maintenance of harbour seal supporting habitats. It is therefore unlikely that an AA will be required.

Mitigation associated with underwater noise, vessel interactions and water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to individual mammals in the marine environment including harbour seals.

**Table 7.1.2: Eileanan agus Sgeiran Lios mór SAC Summary of Assessment**

Qualifying Feature	Summary of Assessment
Harbour seal	<p>The proposed dredge works are outwith the Eileanan agus Sgeiran Lios mór SAC, though the connectivity provided by Loch Linnhe means harbour seal may use the area for foraging. Changes may occur to these foraging areas through the temporary disturbance of benthic habitat, as studies show harbour seal to largely forage on species strongly associated with the seabed (Tollit <i>et al.</i>, 1998). However, this change in foraging habitat is expected to be minimal due to the small size of the dredging areas, and the availability of surrounding possible foraging habitat within close proximity to the SAC. Therefore, it is not anticipated that there will be a significant effect on the supporting foraging habitats of harbour seal associated with the SAC.</p> <p>Dredging works may cause a temporary increase in surrounding water turbidity as a result of solids in the water column. The proposed plough dredge technique doesn’t raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Harbour seal use both visual and vibrissal systems (whisker sensitivity) to detect and catch prey (Weiffen <i>et al.</i>, 2006; Milne <i>et al.</i>, 2020). Therefore, as vision is not solely relied upon as a hunting method, a short-term localised increase in turbidity is unlikely to have a substantial effect on harbour seal (Todd <i>et al.</i>, 2015).</p>

Qualifying Feature	Summary of Assessment
	<p>As floating plant in the marine environment will be utilised, there is potential for disturbance to harbour seal within the SAC to occur through temporary changes to the harbour seal haul-out behaviour such as flushing from haul-outs into the water, increased alertness, and head raising (Erbe <i>et al.</i>, 2019). Vessel movements also pose a risk of injury through ship strikes. Furthermore, it is possible that vessel noise could act as a stressor through an increase in underwater ambient noise levels within the hearing spectrum of harbour seals (Nachtsheim <i>et al.</i>, 2023). These disturbances may increase energy expenditure, resulting in a decrease in overall fitness (Andersen <i>et al.</i>, 2014; Suryan and Harvey, 1999). Despite this, the harbour seals are already exposed to a moderate amount of vessel activity and noise as Glensanda is a working quarry. A ferry is in operation from Oban to Lismore, and a number of active fish farms are in close proximity to the SAC (Scotland’s Aquaculture, 2025). Therefore, as vessel movements and their associated noise will not increase significantly beyond those already operable adjacent to the SAC, such impacts are unlikely to affect the distribution of harbour seal within the SAC.</p> <p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on harbour seal, including fatality. In the unlikely event of a pollution event however, the scale is likely to be too small to affect harbour seal supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p> <p>Without mitigation, LSEs on the conservation objective of the SAC are not predicted.</p>

## 7.2 Morvern Woods SAC

Morvern Woods SAC is designated for the conservation of otter under the European Habitats Directive. Otter require a close continued proximity to open water that is unpolluted with a plentiful food supply. They are wide ranging and often occur at a low density (NatureScot, 2005a).

The conservation objectives for the Morvern Woods SAC are shown in Table 7.2.1

**Table 7.2.1: Conservation Objectives of Morvern Woods SAC**

Conservation Objectives of the Designated Site for Otter
<ol style="list-style-type: none"> <li>1. To ensure that the qualifying features of Morvern Woods SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.</li> <li>2. To ensure that the integrity of Morvern Woods SAC is restored by meeting objectives 2a, 2b and 2c for the qualifying feature:               <ol style="list-style-type: none"> <li>a. Maintain the population of otter as a viable component of the site.</li> <li>b. Maintain the distribution of otter throughout the site.</li> <li>c. Maintain the habitats supporting otter within the site and availability of food.</li> </ol> </li> </ol>

Connectivity has been identified between the Morvern Woods SAC and the proposed dredging site due to their close proximity, and the mobile nature of the site’s qualifying feature, otter.

The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, vessel interactions, underwater noise, and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.2.2. The summary concludes that there is unlikely to be a significant effect on the viability of the otter population within the SAC, the distribution of otter throughout the site, the maintenance of otter supporting habitats, and availability of food. It is therefore unlikely that an AA will be required.

Mitigation associated with underwater noise, vessel interactions and water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to individual mammals in the marine environment including otter.

**Table 7.2.2: Morvern Woods SAC Summary of Assessment**

Qualifying Feature	Summary of Assessment
Otter	<p>The proposed dredge works are situated within the average home range of otter, a qualifying feature of the designated site. As such, changes may occur to foraging areas through the temporary disturbance of benthic habitat. However, this change in foraging habitat is expected to be minimal due to the small size of the dredging areas, and the availability of surrounding possible foraging habitat within close proximity to the SAC. Therefore, it is not anticipated that there will be a significant effect on the supporting foraging habitats of otter associated with the SAC, or the availability of food.</p> <p>As floating plant in the marine environment will be utilised, these movements pose a risk of injury to otter through the movement of machinery through the water column. Despite this, otter are predominantly nocturnal with peaks in activity at dawn and dusk. Studies also show that in areas of heightened diurnal human presence, otter are more likely to display nocturnal behaviour (Penteriani <i>et al.</i>, 2025). Therefore, as otter are unlikely to be in the area during works, and vessel movements will be slow and not increase significantly beyond those already operable adjacent to the SAC, such impacts are unlikely to have a significant effect on otter population.</p> <p>Otter may be affected by anthropogenic underwater noise, though studies have focused primarily on high frequency sounds such as those emitted from acoustic harassment devices (AHDs) (Stepien <i>et al.</i>, 2024). The dredging vessels will be a source of low frequency and continuous noise which is not anticipated to increase above the ambient underwater noise levels of the port. Therefore, underwater noise from the dredging works is not anticipated to cause significant disturbance or injury to otter associated with the SAC, nor affect their distribution or population.</p> <p>Dredging works may cause a temporary increase turbidity as a result of solids in the water column. The proposed plough dredge technique doesn't raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Otter often hunt at night or in low light levels, suggesting that eyesight is not solely relied upon for foraging (Bouroş <i>et al.</i>, 2019). Furthermore, the dredging activities will likely be short-lived, and during the day. Therefore, as vision is not solely relied upon as a hunting method, and dredging works are to take place during daylight hours, a short-term increase in local turbidity is unlikely to have a substantial effect on otter.</p>

Qualifying Feature	Summary of Assessment
	<p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on otter, including fatality. In the unlikely event of a pollution event however, the scale of the event is likely to be too small to affect otter supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p> <p>Without mitigation, significant effects on otter associated with the SAC in terms are unlikely.</p>

### 7.3 Inner Hebrides & The Minches SAC

The Inner Hebrides & the Minches SAC is designated for the conservation of harbour porpoise, under the European Habitats Directive. The area is of key importance to the UK as part of the harbour porpoise management unit (Inter-Agency Marine Mammal Working Group (IAMMWG), 2023). The Inner Hebrides & the Minches SAC is estimated to support approximately 5,438 individuals for at least part of the year, equating to approximately 32% of the management unit. It is suggested that these areas, relative to the rest of the continental shelf, include the best habitat for harbour porpoises, and have been used consistently by the species over the last two decades (NatureScot, 2024b). The Inner Sound, west of Mull, the Sea of the Hebrides and the Sound of Sleat were identified by Embling *et al.* (2010) as areas with the highest predicted density of harbour porpoises in the seas around western Scotland. In addition, Marubini *et al.* (2009) found that the marine areas around the Small Isles, in the Inner Sound and north of Skye as have the highest modelled density of harbour porpoises.

The conservation objectives for the Inner Hebrides & The Minches SAC are shown in Table 7.3.1.

**Table 7.3.1 Inner Hebrides & The Minches SAC Conservation Objectives**

Conservation Objective of the Designated Site for Harbour Porpoise
<ol style="list-style-type: none"> <li>1. To ensure that the Inner Hebrides and the Minches SAC continues to make an appropriate contribution to harbour porpoise remaining at favourable conservation status.</li> <li>2. To ensure for harbour porpoise within the context of environmental changes, that the integrity of the Inner Hebrides and the Minches SAC is maintained through 2a, 2b and 2c.               <ol style="list-style-type: none"> <li>a. Harbour porpoise within the Inner Hebrides and the Minches are not at significant risk from injury or killing.</li> <li>b. The distribution of harbour porpoise throughout the site is maintained by avoiding significant disturbance.</li> <li>c. The condition of supporting habitats and the availability of prey for harbour porpoise are maintained</li> </ol> </li> </ol>

Connectivity has been identified between the Inner Hebrides & The Minches SAC and the proposed dredging site due to their close proximity, and the mobile nature of the site's qualifying feature, harbour porpoise. The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, underwater noise, vessel interactions and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.3.2. The summary concludes that due to works taking place outwith the SAC, there is

a negligible risk of injury and killing of harbour porpoise within the SAC. Furthermore, the distribution of harbour porpoise within the SAC will not be affected and the condition of supporting habitats will be maintained. Therefore, it is highly unlikely that an AA will be required.

Mitigation associated with vessel interactions, underwater noise, and water quality are proposed within Section 6 of the Environmental Supporting Document (Affric, 2025b) to further minimise risks to individual mammals in the marine environment including harbour porpoise.

**Table 7.3.2 Inner Hebrides & The Minches SAC Summary of Assessment**

Qualifying Feature	Summary of Assessment
Harbour porpoise	<p>The proposed dredge works are outwith the Inner Hebrides &amp; The Minches SAC, though the connectivity provided by Loch Linnhe means harbour porpoise may use the area for foraging. Dredging may cause a temporary increase in turbidity as a result of solids in the water column. The proposed plough dredge technique doesn't raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Thus, a temporary change in turbidity is unlikely to have a substantial effect on fish and the subsequent structure and function of harbour porpoise foraging habitats. Harbour porpoise use echolocation to find, track and intercept individual prey items (Miller &amp; Wahlberg, 2013) and it is therefore unlikely that increased sedimentation will impair their foraging abilities.</p> <p>As floating plant in the marine environment will be utilised, there is a risk of injury to harbour porpoise through the movement of machinery through the water column and vessel movement to and from the site. As vessel movements during dredging works will not increase significantly beyond those already operable adjacent to the SAC, and dredge vessel movements will be slow, such impacts are unlikely to have detrimental effects on harbour porpoise.</p> <p>Harbour porpoise may be impacted by anthropogenic underwater noise emissions resulting in impacts on hearing such as temporary threshold shifts (TTS) and permanent threshold shifts (PTS). In extreme cases, masking and/or habitat avoidance relating to foraging (Wisniewska et al., 2016) and injury to, or death of individuals, may occur. This is usually associated with high intensity and high frequency sounds such as those associated with pile driving and military sonar (Tougaard <i>et al.</i>, 2022). The dredging vessels will be a source of low frequency and continuous noise which is not anticipated to increase above the ambient underwater noise levels of the port. Therefore, underwater noise from the dredging works is not anticipated to cause significant disturbance or injury to harbour porpoise associated with the SAC.</p> <p>There is also risk of pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on harbour porpoise, including fatality. In the unlikely event of a pollution event however, the scale is likely to be too small to affect harbour porpoise supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p>

Qualifying Feature	Summary of Assessment
	Without mitigation, any significant effects on harbour porpoise associated with the SAC in terms of foraging are unlikely.

### 7.4 Sunart SAC

The Sunart SAC is a 10,230.22 hectare site designated for the conservation of otter under the European Habitats Directive. The Sunart SAC supports a relatively high density of otter and is shown to have historically supported consistently strong populations, an indication that the area is highly suitable for the species. Over 1400 otter holts have also been recorded within the SAC, highlighting the importance of the landscape for this qualifying feature (Joint Nature Conservation Committee (JNCC), 2025).

The conservation objectives for the Sunart SAC are shown in Table 7.4.1.

**Table 7.4.1 Sunart SAC Conservation Objectives**

Conservation Objectives of the Designated Site for Otter
<ol style="list-style-type: none"> <li>1. To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained;</li> <li>2. The site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and</li> <li>3. To ensure for the qualifying species that the following are maintained in the long term:               <ol style="list-style-type: none"> <li>a. Population of the species as a viable component of the site</li> <li>b. Distribution of the species within site</li> <li>c. Distribution and extent of habitats supporting the species</li> <li>d. Structure, function and supporting processes of habitats supporting the species</li> <li>e. No significant disturbance of the species</li> </ol> </li> </ol>

Connectivity has been identified between the Sunart SAC and the proposed dredging site through the Sound of Mull, and the mobile nature of the site’s qualifying feature, otter. The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, vessel interactions, underwater noise, and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.4.2. The summary concludes that there is unlikely to be a significant effect on the viability of the otter population within the SAC, the distribution of otter throughout the site, the maintenance of otter supporting habitats, and availability of food. It is therefore unlikely that an AA will be required.

Mitigation associated with underwater noise, vessel interactions and water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to individual mammals in the marine environment including otter.

**Table 7.4.2: Sunart SAC Summary of Assessment**

Qualifying Feature	Summary of Assessment
Otter	<p>The proposed dredge works are situated within the average home range of otter, a qualifying feature of the designated site. As such, changes may occur to foraging areas through the temporary disturbance of benthic habitat. However, this change in foraging habitat is expected to be minimal due to the small size of the dredging areas, and the availability of surrounding possible foraging habitat within close proximity to the SAC. Therefore, it is not anticipated that there will be a significant effect on the supporting foraging habitats of otter associated with the SAC, or the availability of food.</p> <p>As floating plant in the marine environment will be utilised, these movements pose a risk of injury to otter through the movement of machinery through the water column. Despite this, otter are predominantly nocturnal with peaks in activity at dawn and dusk. Studies also show that in areas of heightened diurnal human presence, otter are more likely to display nocturnal behaviour (Penteriani <i>et al.</i>, 2025). Therefore, as otter are unlikely to be in the area during works, and vessel movements will be slow and not increase significantly beyond those already operable adjacent to the SAC, such impacts are unlikely to have a significant effect on otter population.</p> <p>Otter may be affected by anthropogenic underwater noise, though studies have focused primarily on high frequency sounds such as those emitted from AHDs (Stepien <i>et al.</i>, 2024). The dredging vessels will be a source of low frequency and continuous noise which is not anticipated to increase above the ambient underwater noise levels of the port. Therefore, underwater noise from the dredging works is not anticipated to cause significant disturbance or injury to otter associated with the SAC nor affect their distribution or population.</p> <p>Dredging works may cause a temporary increase turbidity as a result of solids in the water column. The proposed plough dredge technique doesn't raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Otter often hunt at night or in low light levels, suggesting that eyesight is not solely relied upon for foraging (Bouroş <i>et al.</i>, 2019). Furthermore, the dredging activities will likely be short-lived, and during the day. Therefore, as vision is not solely relied upon as a hunting method, and dredging works are to take place during daylight hours, a short-term increase in local turbidity is unlikely to have a substantial effect on otter distribution, habitat or population.</p> <p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on otter, including fatality. In the unlikely event of a pollution event however, the scale is likely to be too small to affect otter supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p> <p>Without mitigation, significant effects on otter associated with the SAC are unlikely.</p>

## 7.5 Glen Creran Woods SAC

The Glen Creran Woods SAC is designated for the conservation of otter under the European Habitats Directive (NatureScot, 2005b).

The conservation objectives for the Glen Creran Woods SAC are shown in Table 7.5.1.

**Table 7.5.1: Glen Creran Woods SAC Conservation Objectives**

Conservation Objectives of the Designated Site for Otter	
1.	To ensure that the qualifying features of Glen Creran Woods SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.
2.	To ensure that the integrity of Glen Creran Woods SAC is restored by meeting objectives 2a, 2b and 2c for the qualifying feature: <ol style="list-style-type: none"> <li>a. Maintain the population of otter as a viable component of the site.</li> <li>b. Maintain the distribution of otter throughout the site.</li> <li>c. Maintain the habitats supporting otter within the site and availability of food.</li> </ol>

Connectivity has been identified between the Glen Creran Woods SAC and the proposed dredging site through Loch Linnhe, and the mobile nature of the site’s qualifying feature, otter. The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, vessel interactions, underwater noise, and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.5.2. The summary concludes that there is unlikely to be a significant effect on the viability of the otter population within the SAC, the distribution of otter throughout the site, the maintenance of otter supporting habitats, and availability of food. It is therefore unlikely that an AA will be required.

Mitigation associated with underwater noise, vessel interactions and water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to individual mammals in the marine environment including otter.

**Table 7.5.2: Glen Creran Woods Sac Summary of Assessment**

Qualifying Feature	Summary of Assessment
Otter	<p>The proposed dredge works are situated within the average home range of otter, a qualifying feature of the designated site. As such, changes may occur to foraging areas through the temporary disturbance of benthic habitat. However, this change in foraging habitat is expected to be minimal due to the small size of the dredging areas, and the availability of surrounding possible foraging habitat within close proximity to the SAC. Therefore, it is not anticipated that there will be a significant effect on the supporting foraging habitats of otter associated with the SAC, or the availability of food.</p> <p>As floating plant in the marine environment will be utilised, these movements pose a risk of injury to otter through the movement of machinery through the water column. Despite this, otter are predominantly nocturnal with peaks in activity at dawn and dusk. Studies also show that in areas of heightened diurnal human presence, otter are more likely to display nocturnal behaviour (Penteriani <i>et al.</i>, 2025). Therefore, as otter are unlikely to be in the area during works, and vessel movements will be slow and not increase</p>

Qualifying Feature	Summary of Assessment
	<p>significantly beyond those already operable adjacent to the SAC, such impacts are unlikely to have a significant effect on otter population.</p> <p>Otter may be affected by anthropogenic underwater noise, though studies have focused primarily on high frequency sounds such as those emitted from AHDs (Stepien <i>et al.</i>, 2024). The dredging vessels will be a source of low frequency and continuous noise which is not anticipated to increase above the ambient underwater noise levels of the port. Therefore, underwater noise from the dredging works is not anticipated to cause significant disturbance or injury to otter associated with the SAC, nor affect their distribution or population.</p> <p>Dredging works may cause a temporary increase turbidity as a result of solids in the water column. The proposed plough dredge technique doesn't raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Otter often hunt at night or in low light levels, suggesting that eyesight is not solely relied upon for foraging (Bouroş <i>et al.</i>, 2019). Furthermore, the dredging activities will likely be short-lived, and during the day. Therefore, as vision is not solely relied upon as a hunting method, and dredging works are to take place during daylight hours, a short-term increase in local turbidity is unlikely to have a substantial effect on otter.</p> <p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on otter, including fatality. In the unlikely event of a pollution event however, the scale is likely to be too small to affect otter supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p> <p>Without mitigation, significant effects on otter associated with the SAC are unlikely.</p>

## 7.6 Loch Etive Woods SAC

The Loch Etive Woods SAC is designated for the conservation of otter under the European Habitats Directive (NatureScot, 2005c).

The conservation objectives for Loch Etive Woods SAC are shown in Table 7.6.1.

**Table 7.6.1: Loch Etive Woods SAC Conservation Objectives**

Conservation Objectives of the Designated Site for Otter
<ol style="list-style-type: none"> <li>1. To ensure that the qualifying features of Loch Etive Woods SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.</li> <li>2. To ensure that the integrity of Loch Etive Woods SAC is restored by meeting objectives 2a, 2b and 2c for the qualifying feature:               <ol style="list-style-type: none"> <li>a. Maintain the population of otter as a viable component of the site.</li> <li>b. Maintain the distribution of otter throughout the site.</li> <li>c. Maintain the habitats supporting otter within the site and availability of food.</li> </ol> </li> </ol>

Connectivity has been identified between the Loch Etive Woods SAC and the proposed dredging site through Loch Linnhe, and the mobile nature of the site’s qualifying feature, otter. The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, vessel interactions, underwater noise, and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.6.2. The summary concludes that there is unlikely to be a significant effect on the viability of the otter population within the SAC, the distribution of otter throughout the site, the maintenance of otter supporting habitats, and availability of food. It is therefore unlikely that an AA will be required.

Mitigation associated with underwater noise, vessel interactions and water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to individual mammals in the marine environment including otter.

**Table 7.6.2: Loch Etive Woods SAC Summary of Assessment**

Qualifying Feature	Summary of Assessment
Otter	<p>The proposed dredge works are situated within the average home range of otter, a qualifying feature of the designated site. As such, changes may occur to foraging areas through the temporary disturbance of benthic habitat. However, this change in foraging habitat is expected to be minimal due to the small size of the dredging areas, and the availability of surrounding possible foraging habitat within close proximity to the SAC. Therefore, it is not anticipated that there will be a significant effect on the supporting foraging habitats of otter associated with the SAC, or the availability of food.</p> <p>As floating plant in the marine environment will be utilised, these movements pose a risk of injury to otter through the movement of machinery through the water column. Despite this, otter are predominantly nocturnal with peaks in activity at dawn and dusk. Studies also show that in areas of heightened diurnal human presence, otter are more likely to display nocturnal behaviour (Penteriani <i>et al.</i>, 2025). Therefore, as otter are unlikely to be in the area during works, and vessel movements will be slow and not increase significantly beyond those already operable adjacent to the SAC, such impacts are unlikely to have a significant effect on otter population.</p> <p>Otter may be affected by anthropogenic underwater noise, though studies have focused primarily on high frequency sounds such as those emitted from AHDs (Stepien <i>et al.</i>, 2024). The dredging vessels will be a source of low frequency and continuous noise which is not anticipated to increase above the ambient underwater noise levels of the port. Therefore, underwater noise from the dredging works is not anticipated to cause significant disturbance or injury to otter associated with the SAC, nor affect their distribution or population.</p> <p>Dredging works may cause a temporary increase turbidity as a result of solids in the water column. The proposed plough dredge technique doesn’t raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Otter often hunt at night or in low light levels, suggesting that eyesight is not solely relied upon for foraging (Bouroş <i>et al.</i>, 2019). Furthermore, the dredging activities will likely be short-lived, and during the day. Therefore, as vision is not solely relied upon as a hunting method, and dredging works are to take place during daylight hours,</p>

Qualifying Feature	Summary of Assessment
	<p>a short-term increase in local turbidity is unlikely to have a substantial effect on otter.</p> <p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on otter, including fatality. In the unlikely event of a pollution event however, the scale of the event is likely to be too small to affect otter supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p> <p>Without mitigation, significant effects on otter associated with the SAC in terms are unlikely.</p>

### 7.7 Mull Oakwoods SAC

The Mull Oakwoods SAC is designated for the conservation of otter under the European Habitats Directive (NatureScot, 2005d).

The conservation objectives for Mull Oakwoods SAC are shown in Table 7.7.1.

**Table 7.7.1: Mull Oakwoods SAC Conservation Objectives**

Conservation Objectives of the Designated Site for Otter
<ol style="list-style-type: none"> <li>1. To ensure that the qualifying feature of Mull Oakwoods SAC is in favourable condition and makes an appropriate contribution to achieving favourable conservation status.</li> <li>2. To ensure that the integrity of Mull Oakwoods SAC is restored by meeting objectives 2a, 2b and 2c for the qualifying feature:               <ol style="list-style-type: none"> <li>a. Maintain the population of otter as a viable component of the site.</li> <li>b. Maintain the distribution of otter throughout the site.</li> <li>c. Maintain the habitats supporting otter within the site and availability of food.</li> </ol> </li> </ol>

Connectivity has been identified between the Mull Oakwoods SAC and the proposed dredging site through the Sound of Mull, and the mobile nature of the site’s qualifying feature, otter. The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, vessel interactions, underwater noise, and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.7.2. The summary concludes that there is unlikely to be a significant effect on the viability of the otter population within the SAC, the distribution of otter throughout the site, the maintenance of otter supporting habitats, and availability of food. It is therefore unlikely that an AA will be required.

Mitigation associated with underwater noise, vessel interactions and water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to individual mammals in the marine environment including otter.

**Table 7.7.2: Mull Oakwoods SAC Summary of Assessment**

Qualifying Feature	Summary of Assessment
Otter	<p>The proposed dredge works are situated within the average home range of otter, a qualifying feature of the designated site. As such, changes may occur to foraging areas through the temporary disturbance of benthic habitat. However, this change in foraging habitat is expected to be minimal due to the small size of the dredging areas, and the availability of surrounding possible foraging habitat within close proximity to the SAC. Therefore, it is not anticipated that there will be a significant effect on the supporting foraging habitats of otter associated with the SAC, or the availability of food.</p> <p>As floating plant in the marine environment will be utilised, these movements pose a risk of injury to otter through the movement of machinery through the water column. Despite this, otter are predominantly nocturnal with peaks in activity at dawn and dusk. Studies also show that in areas of heightened diurnal human presence, otter are more likely to display nocturnal behaviour (Penteriani <i>et al.</i>, 2025). Therefore, as otter are unlikely to be in the area during works, and vessel movements will be slow and not increase significantly beyond those already operable adjacent to the SAC, such impacts are unlikely to have a significant effect on otter population.</p> <p>Otter may be affected by anthropogenic underwater noise, though studies have focused primarily on high frequency sounds such as those emitted from AHDs (Stepien <i>et al.</i>, 2024). The dredging vessels will be a source of low frequency and continuous noise which is not anticipated to increase above the ambient underwater noise levels of the port. Therefore, underwater noise from the dredging works is not anticipated to cause significant disturbance or injury to otter associated with the SAC, nor affect their distribution or population.</p> <p>Dredging works may cause a temporary increase turbidity as a result of solids in the water column. The proposed plough dredge technique doesn't raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Otter often hunt at night or in low light levels, suggesting that eyesight is not solely relied upon for foraging (Bouroş <i>et al.</i>, 2019). Furthermore, the dredging activities will likely be short-lived, and during the day. Therefore, as vision is not solely relied upon as a hunting method, and dredging works are to take place during daylight hours, a short-term increase in local turbidity is unlikely to have a substantial effect on otter.</p> <p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on otter, including fatality. In the unlikely event of a pollution event however, the scale of the event is likely to be too small to affect otter supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p>

## 7.8 Treshnish Isles SAC

The Treshnish Isles SAC is designated for the conservation of grey seal under the European Habitats Directive. The Treshnish Isles SAC is estimated to contribute to around 25% of grey seal pup production of the Western Scotland Seal Management Unit (SMU). Grey seal are highly mobile species, and the maintenance of the species within the SAC is linked to habitat and prey resource access in areas outwith the SAC. Following tracking of grey seal from within the SAC, they have been found to forage within 100km of the SAC, with some individuals travelling several hundred kilometres to feed (NatureScot, 2024c).

The conservation objectives for the Treshnish Isles SAC are shown in Table 7.8.1.

**Table 7.8.1: Treshnish Isles SAC Conservation Objectives**

Conservation Objectives of the Designated Site for Grey Seal	
1.	To ensure that the qualifying feature the Treshnish Isles SAC is in favourable condition and makes an appropriate contribution to achieving favourable conservation status.
2.	To ensure that the integrity of the Treshnish Isles SAC is maintained in the context of environmental changes by meeting objectives 2a, 2b and 2c for the qualifying feature: <ol style="list-style-type: none"> <li>Maintain the population of grey seal as a viable component of the site.</li> <li>Maintain the distribution of grey seal throughout the site.</li> <li>Maintain the habitats and processes supporting grey seal within the site.</li> </ol>

Connectivity has been identified between the Treshnish Isles SAC and the proposed dredging site through Sound of Mull and Loch Linnhe, and the mobile nature of the site's qualifying feature, grey seal. The connectivity of the proposed dredge site and the qualifying feature of the SAC is associated with foraging, vessel interactions, underwater noise, and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.8.2. The summary concludes that there is unlikely to be a significant effect on the viability of the grey seal population within the SAC, the distribution of grey seal throughout the site, and the maintenance of grey seal supporting habitats. It is therefore unlikely that an AA will be required.

Mitigation associated with underwater noise, vessel interactions, and water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to individual mammals in the marine environment including grey seal.

**Table 7.8.2: Treshnish Isles SAC Summary of Assessment**

Qualifying Feature	Summary of Assessment
Grey seal	<p>The proposed dredge works are situated within the average foraging range of grey seal, a qualifying feature of the designated site. As such, changes may occur to foraging areas through the temporary disturbance of benthic habitat, as grey seal are known to feed on species strongly associated with the seabed (Nilssen <i>et al.</i>, 2019). However, this change in foraging habitat is expected to be minimal due to the small size of the dredging areas, and the availability of surrounding possible foraging habitat within close proximity to the SAC. Therefore, it is not anticipated that there will be a significant effect on the viability of the population of grey seal associated with the SAC.</p> <p>Dredging works may cause a temporary increase in turbidity as a result of solids in the water column. The proposed plough dredge technique doesn't raise material through the water column, hence minimising turbidity impacts</p>

Qualifying Feature	Summary of Assessment
	<p>and keeping any increases local to the dredge. Grey seal may use both visual and vibrissal systems (whisker sensitivity) to detect and catch prey (Zheng <i>et al.</i>, 2025). Therefore, as vision may not solely be relied upon as a hunting method, a short-term localised increase in turbidity is unlikely to have a substantial effect on grey seal.</p> <p>The Treshnish Isles SAC is not considered a key haul-out site for grey seal, contributing only 5% of the SMU numbers as of 2019 (NatureScot, 2024c). Furthermore, the SAC will be separated from the dredging works by the Isle of Mull. As a result, the use of floating plant in the marine environment will unlikely impact upon the distribution of grey seal within the SAC.</p> <p>For grey seal that may be foraging within the proximity of the dredging site, vessel movements pose a risk of injury through ship strikes. Furthermore, it is possible that vessel noise could act as a stressor through an increase in underwater ambient noise levels within the hearing spectrum of grey seals (Ruser <i>et al.</i>, 2025). Despite this, as vessel movements and their associated noise will not increase significantly beyond those already operable adjacent to the SAC, such impacts are unlikely to affect the viability of the population of grey seal associated with the SAC.</p> <p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on grey seal, including fatality. In the unlikely event of a pollution event however, the scale is likely to be too small to affect grey seal supporting habitats within and adjacent to the designated site and indeed its qualifying features.</p> <p>Without mitigation, any significant effects on grey seal associated with the SAC are unlikely.</p>

### 7.9 Glas Eileanan SPA

The Glas Eileanan SPA is designated for the conservation of breeding common tern under the Article 4.1 of the Birds Directive. Glas Eileanan SPA lies 2 km north of Craignure on Mull, consisting of a group of 3 small islets in the Sound of Mull. It regularly supports one of the largest colonies of common tern in Great Britain, hosting approximately 4% of the total breeding population (NatureScot, 1998).

The conservation objectives for the Glas Eileanan SPA are shown in Table 7.9.1.

**Table 7.9.1: Glas Eilean SPA Conservation Objectives**

Conservation Objectives of the Designated Site for Common Tern	
1.	To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and
2.	To ensure for the qualifying species that the following are maintained in the long term: <ol style="list-style-type: none"> <li>a. Population of the species as a viable component of the site;</li> <li>b. Distribution of the species within the site;</li> <li>c. Distribution and extent of habitats supporting the species;</li> <li>d. Structure, function and supporting processes of habitats supporting the species; and</li> <li>e. No significant disturbance of the species.</li> </ol>

Connectivity has been identified between the Glas Eileanan SPA and the proposed dredging site through Sound of Mull and Loch Linnhe, and the mobile nature of the site’s qualifying feature, common tern. The connectivity of the proposed dredge site and the qualifying feature of the SPA is associated with foraging, vessel movements, and water quality. A summary of the LSE considerations without mitigation are provided in Table 7.9.2. The summary concludes that there is unlikely to be a significant effect of dredging works on the conservation objectives of the SPA. It is therefore unlikely that an AA will be required.

Mitigation associated with water quality are proposed within Section 6 of the Environmental Supporting Document to further minimise risks to ecology including common tern.

**Table 7.9.2: Glas Eilean SPA Summary of Assessment**

Qualifying Feature	Summary of Assessment
Common Tern	<p>The proposed dredge works are situated 13.6km southwest of the Glas Eilean SAC. This is within the average foraging range of common tern which can be up to 27km from their breeding grounds (Woodward <i>et al.</i>, 2019). Common terns prefer small fish, foraging in open waters, shallow coastal waters, bays, inlets, among other marine and freshwater sites (Becker and Ludwigs, 2004). Dredging works may cause a temporary increase in turbidity as a result of solids in the water column. The proposed plough dredge technique doesn’t raise material through the water column, hence minimising turbidity impacts and keeping any increases local to the dredge. Thus, any short-term increase in turbidity, is unlikely to have a substantial effect on fish and the subsequent structure and function of common tern foraging habitats.</p> <p>Pollutants released into the water as a result of the release of hydraulic oils or fluids from dredge vessels and the spillage of onboard fluids and/or chemicals could have negative, direct or indirect, implications on common tern, including fatality. In the unlikely event of a pollution event however, the scale is likely to be too small to affect common tern supporting habitats within and adjacent to the designated site, and indeed its qualifying features.</p> <p>The distance of the SAC from the proposed dredging works is large enough to confirm that no disturbance of breeding common tern within the SAC will occur due to vessel movements, and there will be no change to the distribution of common tern within the designated site.</p> <p>Without mitigation, any significant effects on common tern associated with the SAC in terms of with foraging and vessel movements are unlikely.</p>

Qualifying Feature	Summary of Assessment

## 8 Cumulative Impacts

The Marine Scotland website (2025) was searched for licence applications to MD-LOT in the local area. The search term ‘Loch Linnhe’ returned relevant applications in the vicinity; those projects with active licences are summarised in Table 8.1 and evaluated for their potential to create cumulative impacts with the proposed dredging. The proposed dredging works were not identified to have any LSE with any designated sites or their qualifying features. There are no other projects in the area that would change this, and no cumulative effects requiring consideration.

**Table 8.1: Licenced Marine Works and Activities in Loch Linnhe**

Project Title	Applicant	Description	Status	Expiration	Considerations
Corran Narrows Subsea Cable Removals	Scottish Hydro Electric Power Distribution Plc	Marine Licence and European Protected Species Licence required for cable removal	Licensed, works in progress	Licences expire 31/10/2026 and 31/12/2026	Works will not overlap- No consideration necessary
Corran Narrows Ferry Terminal Construction	The Highland Council	Capital dredge and sea disposal, Land Reclamation, and Terminal Construction	Licensed	Licences expire 10/10/2028	Distance from site and localised nature of works means no consideration necessary
Marine Farm - Port na Moralachd	Scottish Sea Farms Ltd	Fish (including shellfish) farm	Licensed	Licence expires 24/05/2027	Ongoing operations- No cumulative effects with dredging operations.
Marine Farm - Dubh Sgeir, Lismore North,	Scottish Sea Farms Ltd	Fish (including shellfish) farm	Licensed	Licence expires 16/06/2048	
Marine Farm - Shuna Island	Scottish Sea Farms Ltd	Fish (including shellfish) farm	Licensed	Licence expires 01/12/2027	

Project Title	Applicant	Description	Status	Expiration	Considerations
Marine Farm - Dunstaffnage,	Scottish Sea Farms Ltd	Fish (including shellfish) farm	Licensed	Licence expires 24/03/2048	
Marine Farm - Lismore East	Scottish Sea Farms Ltd	Fish (including shellfish) farm	Licensed	Licence expires 16/05/2048	
Marine Farm - Lismore West	Scottish Sea Farms Ltd	Fish (including shellfish) farm	Licensed	Licence expires 02/06/2048	
Moorings - Loch a Choire	Kingairloch Estate Ltd	Mooring	Licensed	Licence expires 06/06/2049	
Mooring - Kerrera Sound	Inverlussa Shellfish Co Ltd	Mooring	Licensed	Licence expires 30/10/2050	
Marine Farm and Moorings - Camas a Chuilinn	Fassfern Mussels Limited	Fish (including shellfish) farm	Licensed	Licence expires 05/02/2048	
Moorings - Loch a Choire	Kingairloch Estate Ltd	Mooring	Licensed	Licence expires 06/06/2049	
Mooring - Kerrera Sound	Inverlussa Shellfish Co Ltd	Mooring	Licensed	Licence expires 30/10/2050	

## 9 Summary

After consideration of the proposed works and the anticipated risks to qualifying interests associated with European Sites, no LSEs were identified. Therefore, we anticipate that no AA for the dredging works will need to be completed by the competent authority.

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## 11 Glossary

Acronym	Definition
AA	Appropriate Assessment
AHD	Acoustic Harassment Device
BPEO	Best Practicable Environmental Option
CD	Chart Datum
cSAC	Candidate Special Area of Conservation
EOMS	European Offshore Marine Site
EU	European Union
HRA	Habitats Regulations Appraisal
IAMMWG	Inter-Agency Marine Mammal Working Group
JNCC	Joint Nature Conservation Committee
km	kilometres
LSE	Likely Significant Effect
m	metres
MHWS	Mean High Water Springs
pSAC	Proposed Special Area of Conservation
pSPA	Proposed Special Protection Area
PTS	Permanent Threshold Shift
SAC	Special Area of Conservation
SMU	Seal Management Unit
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TTS	Temporary Threshold Shift
UK	United Kingdom