Argyll and Bute Council
Comhairle Earra Ghàidheal agus Bhóid

Development And Economic Growth
Executive Director: Kirsty Flanagan

Marine and Coastal Development Unit
Municipal Buildings, Albany Street, Oban, Argyll, PA34 4A

www.argyll-bute.gov.uk

Ref: SCOP-0061 - Argyll and Bute Council (per Ramboll Ltd) - Ferry Terminal - Craignure, Isle of Mull

27th January 2025

Chris Pollard
Licensing Casework Officer
Marine Directorate – Licensing Operations Team
Scottish Government
5 Atlantic Quay
Glasgow G2 8LU

Dear Mr. Pollard

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("the MW EIA Regulations")

CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

Thank you for consulting me on the above scoping opinion. Please find below comments from the Marine and Coastal Development Policy Officer.

Yours sincerely

Redacted
Marine and Coastal Development Policy Officer

Development Proposal

The proposed development comprises the installation of a new ferry terminal to the north of the existing ferry terminal.

The proposed development consists of:

- Replacement of the existing terminal infrastructure, parts of which are in poor condition, deteriorating or have limited structural capacity;
- Increase berth capacity at the new ferry terminal;
- Capital dredging to approximately -5m CD to achieve the required under keel clearances for the range of vessels berthing at the site;
- Reclamation of an area of land, to accommodate new landside infrastructure, including a vehicle marshalling yard, car park, bus/coach terminal and ferry terminal building north-east of the A849;
- Construction of a new pier to create two new berths for vessels of approximately 100m overall length, with a linkspan (north berth) and a fixed ramp (south berth) providing vehicle access onto the vessels;
- Potential provision of a slipway and provision of a pontoon facility;
- Re-location and integration of the Passenger Access System (PAS) from the existing ferry terminal to provide step-free access to the design vessels from the new terminal building;
- Demolition and removal of existing ferry terminal infrastructure, including the existing jetty, vehicle linkspan and support structures.

Overall comments

- The Applicant's Environmental Impact Assessment (EIA) Scoping Report is welcomed. It is the Officer's opinion that the proposed development does constitute an Environmental Impact Assessment (EIA) as defined under Schedule 2 of the EIA Regulations. The proposal will also require planning permission for the ferry terminal and any additional slipway/pontoon construction.

- The Applicant is to confirm the replacement ferry terminal dimensions, of which include: the new pier, the new linkspan, the fixed ramp and the revetment/retaining structures. The Applicant is also to confirm the dimensions of the optional slipway and pontoon and the proposed dredge requirements and final volumes of dredged arisings within their Environmental Impact Assessment Report (EIAR).

- Any future proposal must conform to all relevant National Planning Framework 4 (NPF4) policies, Local Development Plan 2 policies, National Marine Plan Policies, and in particular those highlighted below.

- The EIAR is to provide updated site survey information where appropriate; all surveys and ecological data sets must be updated after two years.

- The Applicant/Developer is to submit an outline Construction Environment Management Plan (oCEMP) and Method Statement for all aspects of the proposed development. With respect to the marine and coastal environment, the oCEMP must include a Noise Method Statement for impact piling. The Noise Method Statement must detail the proposed piling works, including duration, type of piling, predicted noise levels and mitigation measures that will be adhered to. Piling should be undertaken in accordance with the relevant sections of the current Joint Nature Conservation Committee (JNCC) guidelines 'Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise'. The JNCC guidance is located under the following web link: https://data.jncc.gov.uk/data/31662b6a-19ed-4918-9fab-8fbcff752046/JNCC-CNCB-Piling-protocol-August2010-Web.pdf. The oCEMP must include full details of the proposed construction programme; duration of the construction and operation phases. The proposal will need to consider any cumulative infrastructure impacts and mitigation techniques during the works, and to ensure continued safe access / egress during this time. I further recommend that a precautionary approach be

undertaken for the duration of works.

- Together with the EIAR, the Applicant is to submit their Intertidal Phase 1 Survey with a walkover fish habitat assessment, a subtidal benthic survey, a sediment dispersion study and sediment sampling analysis.

- The Applicant is to submit a bathymetric survey, including review of geotechnical information.

- In terms of possible introduction and spread of marine Invasive Non-Native Species (INNS), the Applicant is to submit a Biosecurity Management Plan, with their EIAR.

- The Applicant is to submit an outline Site Waste Management Plan (oSWMP) and an outline Operational Waste Management Plan (oOWMP), with appropriate mitigation measures. The oSWMP and oOWMP must detail how waste materials will be dealt with.

- With respect to water quality, drainage and flooding: all water assessments are to be submitted with the EIAR.

- Detailed comments to the Scoping Report's sections relevant to marine and coastal policies are discussed below.

Scoping Report comments

Chapter 5. Coastal Processes, Hydrodynamics and Sediment Regime

- In terms of the impacts discussed in **Table 5-2: Potential Environmental Impacts Relating to the Coastal Processes, Hydrodynamics and Sediment Regime**, it is agreed to scope in as discussed. The proposed assessment, and the EIA approach and methodology are welcomed. The mitigation measures once proposed will need to be reviewed.

Chapter 6. Marine Water and Sediment Quality

- Under Water Quality – Statutory Designations, section 6.2.7, the Applicant needs to include in their EIAR the Loch Sunart to the Sound of Jura MPA(NC) for the protected feature - Flapper skate (*Dipturus intermedius*), located 300m north-east of the proposal.

- In terms of **Table 6-1: Potential Environmental Effects Relating to Marine Water and Sediment Quality**, the proposed assessment (scoping in and out is agreed), and EIA approach and methodology are welcomed. The mitigation measures once proposed will need to be reviewed.

- Under section **6.4.2 EIA Approach and Methodology**, the Scoping Report discusses the baseline water and sediment environment at the site. Given that biological statutory designations are 300m north-east of the proposal, the Applicant is to undertake water and sediment sampling and submit the results within the EIAR.

- Section 6.5.1, change the wording 'These could include' to 'These should include':
  - Development of suitable foundations (to mitigate the risk of creation of vertical pathways), informed by a foundation works risk assessment;
  - Dredge method controls such bucket type, and dredge timings in order to minimise the mobilisation and dispersion of sediments;
  - Construction method recommendations; and
  - Appropriate water and sediment related measures to be included in and implemented through a CEMP.

Chapter 8. Flood Risk

- In terms of the environmental effects discussed in **Table 8-1: Potential**

Environmental Effects Relating to Flood Risk, the proposed assessment, EIA approach and methodology are welcomed.

- Please note that the development of a Flood Risk Assessment (FRA) should consider flooding and land erosion policies as outlined in the Local Development Plan 2 (LDP2) Argyll and Bute LDP2 Written Statement Feb 2024 (argyll-bute.gov.uk). Policy 55 – Flooding and Policy 56 – Land Erosion will need to be taken into account in the Flood Risk Assessment as part of the EIAR.

Chapter 9. Marine Ecology

- In terms of the desk study data sources identified under sections 9.2.3 and 9.2.10, the Applicant is advised to check the following data sources:

    - *Sea Watch Foundation public sightings data, from onshore and offshore points, is freely available online and which covers the Inner and Outer Hebrides (Sea Watch Foundation, 2024).*
    - *Whale and Dolphin Conservation Shorewatch - A report with an updated trend analysis based on the work completed in Gutierrez-Munoz et al. 2021. The report incorporates Shorewatch effort and sightings through 2023 (WDC).*

- On page 44 of the Scoping Report, the website reference is missing from the footnote: *62 NatureScot (2024). NatureScot Research Report 1364 - Hebridean Cetacean Research Programme, 2021-2024. Available at: [Accessed November 2024].* Can the Consultant please provide the website address in their EIAR.

- It is recognised that there is uncertainty in the baseline data for marine mammal distributions foraging within or migrating through west coast waters, and therefore, whilst this assessment considers some currently available data, it is expected that a detailed project level survey will include possible routes and movements of cetaceans and seals before construction commences to establish a robust baseline against which an assessment can be made.

- In terms of section **9.2.22 – Marine Non Native Species**, NatureScot are best placed to further advise on more recent data records for Invasive Non Native Species. Marine biosecurity planning guidance can be found on the NatureScot Marine non-native species webpage: https://www.nature.scot/professional-advice/land-and-sea-management/managing-coasts-and-seas/marine-non-native-species.

- In terms of the environmental effects discussed in **Table 9-6: Potential Environmental Effects Relating to Marine Ecology**, the proposed scoping assessment is welcomed. However, under Potential Effect - Introduction and or spread of NNS, it will be important for the Applicant to also develop a separate Biosecurity Management Plan (BMP) (Demolition and Construction Stage, and Operation Stage) for the introduction and potential spread of marine Invasive Non-Native Species (INNS). All marine construction and shipping activities have a high potential to introduce Invasive Non-Native Species (INNS) into the waters and coastline of Argyll. The BMP should detail good practice methods to avoid and limit the introduction and spread of marine INNS that relate to the construction and shipping activities in particular.

- Under section **9.4. EIA Approach and Methodology**, the EIA approach and methodology are welcomed. It is important to note that the construction and operational phases may have Likely Significant Effects (LSEs) to the benthic habitats and Priority Marine Features (PMFs) in the vicinity of the proposal. It is therefore advised that the Applicant undertake an Intertidal Phase 1 Survey with a walkover fish habitat assessment, a subtidal benthic survey, a sediment dispersion study and sediment sampling analysis, as partially discussed under section 9.4.4 – Methodology of the Scoping Report. The Applicant is further advised to consult with NatureScot to confirm appropriate survey methodologies.

- In terms of the **Underwater Noise Assessment Methodology**, I would advise that

the following literature and guidance be reviewed and included where appropriate within the proposed assessment methodology:

  - Kastelein, R. A., Gransier, R., Marijt, M. A. T., and Hoek, L. (2015). “Hearing frequency thresholds of harbor porpoises (Phocoena phocoena) temporarily affected by played back offshore pile driving sounds,” J. Acoust. Soc. Am. 137, 556–564.

  - Kastelein, R. A., Helder-Hoek, L., Covi, J., and Gransier, R. (2016). “Pile driving playback sounds and temporary threshold shift in harbor porpoises (Phocoena phocoena): Effect of exposure duration,” J. Acoust. Soc. Am. 139, 2842–2851.

  - Marine mammal noise exposure criteria (Southall et al., 2019; National Marine Fisheries Service (NMFS), 2018; 2024);

  - The Protection of Marine European Protected Species from Injury and Disturbance - Guidance for Scottish Inshore Waters (July 2020), document on the following web link: https://www.gov.scot/publications/marine-european-protected-species-protection-from-injury-and-disturbance/

  - Statutory Nature Conservation Agency Protocol for Minimising the Risk of Injury to Marine Mammals from Piling Noise (JNCC, 2010b);

  - Guidelines for Minimising the Risk of Injury to Marine Mammals from Geophysical Surveys (Seismic Survey Guidelines) (JNCC, 2017);

  - Scottish Marine Wildlife Watching Code (Scottish Natural Heritage) (SNH), 2017).

- As piling is required, the Applicant would need apply for a European Protected Species (EPS) licence under the Conservation (Natural Habitats, &c.) Regulations 1994 for the potential injury and disturbance to marine mammals, including Harbour porpoise (*Phocoena phocoena*). A licence would be required before works commence.

- It will be important for the Applicant to demonstrate that any generated underwater noise will be minimal and mitigated against during site construction.

- In terms of section **9.5 - Preliminary Discussion of Mitigation and Enhancement Measures**, it is agreed that the good practice measures as outlined are to be included in the Construction Environment Management Plan (CEMP), and that an independent Ecological/Environmental Clerk of Works (ECoW) is employed to audit and report on adherence to the CEMP as well as any other relevant planning consents, environmental permits, legislation and mitigation.

- It is also agreed that a Marine Mammal Risk Assessment (MMRA) and subsequent Marine Mammal Protection Plan (MMPP) will be produced as an Appendix to the EIAR. Further agree that a qualified Marine Mammal Observer (MMO) be in place during the construction stage of the development.

- Agree that it will be important to establish a Vessel Management Plan (VMP) as discussed in section 9.5.2.

- I am not aware of any ongoing projects that are part of the Local Biodiversity Action Plan, but this is something that should be confirmed with the Local Biodiversity Officer. However, there has been a recent Marine Licence application for proposed modifications to the existing Fishnish ferry terminal (*SCR-0092 - CMAL (per Royal HaskoningDHV) - Construction of an Aligning Structure - Fishnish*). There may be cumulative effects if both developments commence concurrently.

Chapter 10. Commercial and Recreational Fisheries

- Under section **10.2.14 – Aquaculture,** regarding the inactive shellfish site (Sgeir Mhic Chomheinn) that is 1.9km from Craignure harbour, it is advisable to check with the lease holder, Mr. Douglas Wilson from Inverlussa Marine Services whether this site is being used for mussel seeding and not on-growing.

- In terms of the effects discussed in **Table 10-3: Potential Environmental Effects Relating to commercial and recreational fisheries**, the proposed assessment, and EIA approach and methodology are welcomed.

- In agreement with the data sources identified in section 10.4.7, 10.4.8 and the Key Consultees and Stakeholders identified in section 10.4.10.

- In agreement with the preliminary discussion of mitigation and enhancement measures identified in section 10.5.

Chapter 20. Materials and Waste

- In terms of the effects discussed in **Table 20-4: Potential Environmental Effects Relating to Materials and Waste**, the proposed assessment, and EIA approach methodology are welcomed.

- Under section **20.4.1 – Assessment Guidance**, agree to scope out materials and waste from the EIAR. Agree that the outline Construction Environmental Management Plan (oCEMP), the outline Site Waste Management Plan (oSWMP); and the outline Operational Waste Management Plan (oOWMP) be submitted at the time of planning.

National Planning Framework 4 (NPF4) overarching policies

Policy 1: Tackling the climate and nature crises

- The development will need to demonstrate reduced emissions as far as practically possible and adapt to current and future risks of climate change by promoting nature recovery and restoration in the area. In this respect, the applicant must aim to conserve and recycle assets where possible.

Policy 3: Biodiversity

a) The development proposal will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.

b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria:

    i. the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;
    ii. wherever feasible, nature-based solutions have been integrated and made best use of;
    iii. an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;

POSITIVE ABOUT DISABLED PEOPLE

iv. significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and

v. local community benefits of the biodiversity and/or nature networks have been considered.

c) Proposals for local development will include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development.

d) Any potential adverse impacts, including cumulative impacts, of the development proposal on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.

Policy 4: Natural places

b) The development proposal that is likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an “appropriate assessment” of the implications for the conservation objectives.

e) The precautionary principle will be applied in accordance with relevant legislation and Scottish Government guidance.

f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.

Policy 10: Coastal Development

a) Development proposals in developed coastal areas will only be supported where the proposal:

i. does not result in the need for further coastal protection measures taking into account future sea level change; or increase the risk to people of coastal flooding or coastal erosion, including through the loss of natural coastal defences including dune systems;

ii. is anticipated to be supportable in the long-term, taking into account projected climate change.

b) Development proposals in undeveloped coastal areas will only be supported where they:

i. are necessary to support the blue economy, net zero emissions or to contribute to the economy or wellbeing of communities whose livelihood depend on marine or coastal activities, or is for essential infrastructure, where there is a specific locational need and no other suitable site;

ii. do not result in the need for further coastal protection measures taking into account future sea level change; or increase the risk to people of coastal flooding or coastal erosion, including through the loss of natural coastal defences including dune systems; and

iii. are anticipated to be supportable in the long-term, taking into account projected climate change; or

iv. are designed to have a very short lifespan.

d) Where a design statement is submitted with any planning application that may impact on the coast it will take into account, as appropriate, long-term coastal vulnerability and resilience.

Policy 12: Zero waste

a) The development proposal will seek to reduce, reuse, or recycle materials in line with the waste hierarchy.

b) The development proposal will be supported where they:
   i. reuse existing buildings and infrastructure;
   ii. minimise demolition and salvage materials for reuse;
   iii. **minimise waste, reduce pressure on virgin resources and enable building materials, components and products to be disassembled, and reused at the end of their useful life**;
   iv. **use materials with the lowest forms of embodied emissions, such as recycled and natural construction materials**;
   v. **use materials that are suitable for reuse with minimal reprocessing**.

c) The development proposal that is likely to generate waste when operational, including residential, commercial, and industrial properties, will set out how much waste the proposal is expected to generate and how it will be managed including:
   i. provision to maximise waste reduction and waste separation at source, and
   ii. measures to minimise the cross-contamination of materials, through appropriate segregation and storage of waste; convenient access for the collection of waste; and recycling and localised waste management facilities.

Policy 29: Rural development

a) The development proposal that contributes to the viability, sustainability and diversity of rural communities and local rural economy will be supported, including:

   i. farms, crofts, woodland crofts or other land use businesses, where use of good quality land for development is minimised and business viability is not adversely affected;
   ii. diversification of existing businesses;
   iii. production and processing facilities for local produce and materials, for example sawmills, or local food production;
   iv. **essential community services**;
   v. **essential infrastructure**;
   vi. reuse of a redundant or unused building;
   vii. appropriate use of a historic environment asset or is appropriate enabling development to secure the future of historic environment assets;
   viii. reuse of brownfield land where a return to a natural state has not or will not happen without intervention;
   ix. small scale developments that support new ways of working such as remote working, homeworking and community hubs; or
   x. **improvement or restoration of the natural environment**.

b) The development proposal in a rural area should be suitably scaled, sited and designed to be in keeping with the character of the area. The applicant should also consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location.

c) The development proposal is in a remote rural area, where new development can often help to sustain fragile communities, will be supported where the proposal:

   i. **will support local employment**;
   ii. **supports and sustains existing communities**, for example through provision of digital infrastructure; and
   iii. **is suitable in terms of location, access, siting, design and**

environmental impact.

Local Development Plan 2 (LDP2)

- The proposed development must conform to all relevant and general proposed policies of the LDP2 Written Statement Argyll and Bute LDP2 Written Statement Feb 2024 (argyll-bute.gov.uk) In particular:

1. Policy 02 – Outwith Settlement Areas;
2. Policy 04 – Sustainable Development;
3. Policy 05 – Design and Placemaking;
4. Policy 14 – Bad Neighbour Development;
5. Policy 22 – Economic Development;
6. **Policy 28 – Supporting Sustainable Aquatic and Coastal Development**;
7. **Policy 42 – Safeguarding Piers, Ports and Harbours**;
8. **Policy 55 – Flooding**;
9. **Policy 56 – Land Erosion**;
10. **Policy 57 – Risk Appraisals**;
11. **Policy 59 – Water Quality and the Environment**;
12. Policy 62 – Drainage Impact Assessments;
13. **Policy 63 – Waste Related Development and Waste Management**;
14. **Policy 73 – Development Impact on Habitats, Species and Biodiversity**;
15. **Policy 74 – Development Impact on sites of international importance.**

Marine Planning Policy

- The proposed development extends into the marine environment and therefore the Council as a public body is required to take authorisation decisions in accordance with the National Marine Plan (NMP), unless relevant considerations indicate otherwise.

- The proposal must be consistent with General Policies of the NMP, that include:
  GEN 1 General planning principle,
  GEN 2 Economic benefit,
  GEN 3 Social benefit,
  GEN 5 Climate change,
  GEN 7 Landscape/seascape,
  GEN 8 Coastal process and flooding,
  GEN 9 Natural heritage,
  GEN 10 Invasive non-native species,
  GEN 11 Marine litter,
  GEN 12 Water quality and resource,
  GEN 13 Noise,
  GEN 14 Air quality,
  GEN 21 Cumulative impacts.

In addition, the proposal must be consistent with TRANSPORT 1, TRANSPORT 3, TRANSPORT 4, and TRANSPORT 5.

Monday, 03 February 2025

Marine Licensing
375 Victoria Road

Aberdeen

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk

Follow Us

Dear Customer,

Craignure Ferry Terminal, Craignure, Isle of Mull, Argyll and Bute, PA65 6AY
Planning Ref: SCOP-0061
Our Ref: DSCAS-0125957-ML5
Proposal: Scoping Request - Craignure Ferry Terminal - Craignure, Isle of Mull

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-

Developers/Connecting-to-Our-Network which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps:

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Redacted
Development Services Analyst
PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
    - Site Investigation Services (UK) Ltd
    - Tel: 0333 123 1223
    - Email: sw@sisplan.co.uk
    - www.sisplan.co.uk

- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for

checking the water pressure in the area, then they should write to the Development Operations department at the above address.

- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.

- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.

- Please find information on how to submit application to Scottish Water at our Customer Portal.

By email: MD.MarineLicensing@gov.scot

Marine Directorate
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300032761
Your ref: SCOP-0061
4 February 2025

Dear Marine Directorate

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Argyll and Bute Council (per Ramboll Ltd) - Ferry Terminal - Craignure, Isle of Mull
Comments on scope of proposed Environmental Impact Assessment

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 27 January 2025. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by our advice-giving role, and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Proposed development

We understand that the proposed development comprises the construction of a new ferry terminal and the demolition of the existing terminal.

Scope of assessment

We recommend that the applicant refers to the EIA Handbook for best practice advice on assessing cultural heritage impacts.

We have identified likely significant effects on our historic environment interests. Our advice on the nature of these impacts, and any potential mitigation measures, are included in an annex to this covering letter. This also includes our requirements for information to be included in the EIA Report.

We would be happy to provide advice on draft assessments and visualisations of impacts on the historic environment, if the applicants wish to consult us directly.

From 1 January 2025 we no longer provide advice on undesignated underwater cultural heritage. This includes the preparation of documents for post-consent activities including Written Schemes of Investigation or Protocols for Archaeological Discoveries. For EIA projects, the relevant competent authority must ensure that they have access to sufficient expertise to examine the EIA Report in accordance with the relevant regulations.

Further information

Decisions that affect the historic environment should take the Historic Environment Policy for Scotland (HEPS) into account as a material consideration. HEPS is supported by our Managing Change guidance series.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Mary MacLeod Rivett at mary.macleod@hes.scot.

Yours sincerely

Historic Environment Scotland

ANNEX

Scoping Report

We are content with the proposed scope of assessment for our interests.

Scheduled Monuments, Inventory Battlefields, World Heritage Sites

The proposed development would not have an impact on any of these categories of historic environment assets and we are content for them to be scoped out of further assessment.

A-Listed Buildings, Inventory Gardens & Designed Landscapes

We would wish to have a better understanding of how the new infrastructure of the ferry terminal would potentially impact the following assets and, where appropriate, to see wirelines illustrating potential impacts:

- Torosay Castle (Duart House) GDL00376 - 520m south east of the site
- Torosay Castle LB17975 – 2.2 kms south east of the site
- Duart Castle LB17974 – 3.5 kms east of the site

It is unclear to us at present if the new ferry terminal would be visible from these assets, and we welcome their inclusion in the assessment. Where there is potential for significant impacts, wirelines illustrating impacts on views from the assets and on views of or towards the assets would be helpful. If screening provided by current woodland is included as a consideration in the assessment (for example within the designed landscape) plans for the long-term management of this should be reviewed and the results included in the assessment, so that it can be understood whether such screening would be retained in the future.

Historic Environment Scotland
4 February 2025

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: SCOP-0061
Our Ref: KD/ML/A5_01_246

Chris Pollard
Marine Licensing Casework Officer
Licensing Operations Team - Marine Directorate
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

17 February 2025

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("THE MW EIA REGULATIONS") & CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

SCOP-0061 – Argyll & Bute Council (Per Ramboll Ltd) – Ferry Terminal, Craignure, Isle of Mull – SCOP-0061

Thank you for your e-mail correspondence dated 27th January 2025 regarding the scoping report submitted by **Argyll & Bute Council (Per Ramboll Ltd)** relating to the proposed construction and dredging works at the ferry terminal at Craignure, Isle of Mull.

We note that this confirms that any Navigational Risk Assessment is to be scoped out at this stage, to be covered later as part of the submission of a full marine licence application.

Northern Lighthouse Board are content with the proposed EIA scoping report.

Yours sincerelv
[Redacted]

Redacted
Navigation Manager

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Development Management and Strategic Road Safety
Roads Directorate

George House 36 North Hanover St Glasgow G1 2AD
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TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Chris Pollard
Marine Directorate
5 Atlantic Quay
Glasgow
G2 8LU

MD.MarineLicensing@gov.scot

Your ref:
SCOP-0061

Our ref:
GB01T19K05

Date:
24/02/2025

Dear Sirs,

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

CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

SCOPING REQUEST - CRAIGNURE FERRY TERMINAL - CRAIGNURE, ISLE OF MULL

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Ramboll in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

Proposed Development

The proposed development comprises the installation of a new ferry terminal to the north of the existing ferry terminal at Craignure on the Isle of Mull. This will include the following activities:

- Capital dredging to approximately -5 m CD:
- Reclamation of an area of land to accommodate new landside infrastructure, including a vehicle marshalling yard, car park, bus/coach terminal and ferry terminal building;
- Construction of a new pier to create two new berths for vessels;
- Potential provision of a slipway and provision of a pontoon facility;
- Re-location and integration of the PAS from the existing ferry terminal to provide step-free access to the design vessels from the new terminal building; and
- Demolition and removal of existing ferry terminal infrastructure.

The SR states that the number of sailings on the Oban-Craignure route in the summer is anticipated to remain largely similar to the existing summer timetable, i.e. 11 daily sailings, albeit with greater capacity provided by using larger vessels.

The nearest trunk road to the site is the A85(T) at Oban, approximately 16.5km to the southeast.

Assessment of Environmental Impacts

Chapter 17 of the SR presents the proposed methodology for the assessment of the potential environmental impacts associated with Transport. This states that the assessment will be carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines entitled Environmental Assessment of Traffic and Movement (July 2023). These specify that road links should be taken forward for further assessment where the following two rules are breached:

Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)

Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more.

The SR states that the assessment for the demolition and construction stage will be limited to the roads immediately adjacent to the site and any roads further afield where Rule 1 is breached. It is anticipated that the road to be assessed will be the A849, with no mention of any proposed assessment at Oban.

It is not clear how the construction materials will arrive on site, and we note that options for the management and disposal of dredge material are yet to be explored and confirmed. In addition, excavation/ dredging of soft material (such as silt and soft clay) is considered to be required in order to facilitate the land reclamation, and it is anticipated that these arisings would be unsuitable for reuse elsewhere on site.

If materials are to be shipped in to/ out of Oban, Transport Scotland would ask that consideration is given to the increased traffic levels and associated environmental effects of both the demolition of the existing infrastructure and construction of the proposed development on the A85(T) at Oban. A threshold assessment against the IEMA rules would be a suitable first step to see if any further detailed assessment is required. In addition, we would request that consideration is given to the potential uplift in vehicle numbers associated with the potential capacity increase associated with the larger ferries that will be accommodated. Base traffic should be factored to the peak construction year using National Road Traffic Forecasts (NRTF) low growth factors.

Abnormal Loads Assessment

No mention is made within the SR for the need for deliveries using Abnormal Indivisible Loads (AIL). In the event these are required and that they will route from the Mainland, Transport Scotland will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

A full Abnormal Loads Assessment report should be provided which identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office can assist on 0141 343 9636.

Yours faithfully

Redacted

Redacted

Transport Scotland
Roads Directorate

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From:	Planning.North
To:	MD Marine Licensing
Subject:	PCS-20004392 SEPA Response to SCOP-0061
Date:	25 February 2025 13:04:38
Attachments:	image.png

To Whom It May Concern,

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
SCOP-0061
Craignure Ferry Terminal
Craignure, Isle of Mull

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our website. In addition, please also refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available here.

If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,

Redacted
Planning Officer

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac

a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.

Helen Duncan
Maritime and Coastguard Agency
Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Your Ref: SCOP-0061

Date: 26th February 2025

Via email: md.marinelicensing@gov.scot

Dear Chris,

Argyll and Bute Council (per Ramboll Ltd), Ferry Terminal, Craignure, Isle of Mull

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("the MW EIA Regulations")

CONSULTATION UNDER PART 4, REGULATION 14(4) OF THE MW EIA REGULATIONS

Thank you for your email dated 27th January 2025 inviting comments on the Scoping Report for the proposed Argyll and Bute Council (per Ramboll Ltd), Ferry Terminal, Craignure, Isle of Mull development. The Scoping Report has been considered by representatives of UK Technical Services Navigation, and the MCA would like to respond as follows:

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations.

We note that the project includes (but is not limited to) the proposed development of a replacement ferry terminal and demolition of the existing terminal, jetty, vehicle linkspan and support structures:

- Capital dredging to approximately -5 m CD to achieve the required underkeel clearances for the range of vessels berthing;
- Construction of a new pier to create two new berths for vessels of 100m overall length, with a linkspan (north berth) and a fixed ramp (south berth) providing vehicle access onto the vessels;
- Provision of a slipway and of a pontoon facility; re-location and integration of the Passenger Access System (PAS) from the existing ferry terminal to provide step-free access to the design vessels from the new terminal building; and

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- Demolition and removal of existing ferry terminal infrastructure, including the existing jetty, vehicle linkspan and support structures.

The MCA would expect any works in the marine environment to be subject to the appropriate consents under the Marine (Scotland) Act 2010 before carrying out any marine licensable works.

On this occasion, the works will take place within the boundaries of a Statutory Harbour Authority (SHA) - Craignure (Argyll and Bute Council) and therefore they are responsible for the safety of navigation within their waters. Although we note that in Section 16.4.1 of the Scoping Report that Navigation will be scoped out of the Environmental Impact Assessment, we recognise that the *"potential hazards and risks for navigation and marine operations identified will be assessed in a standalone NRA* ". We would be content therefore that shipping and navigation will form part of the standalone Navigation Risk Assessment along with further stakeholder consultation. The MCA also notes, in Section 16.2.5, the applicant's commitment to carry out the NRA in accordance with the Port Marine Safety Code (PMSC) and its Guide to Good Practice (GTGP), including the use of risk analysis and risk controls, which we welcome. We also welcome in Section 16.4.15, the intention to conduct a Hazard Identification Workshop which will include relevant stakeholders and be used to inform the NRA.

In consideration of emergency response arrangements, we note in the Scoping Report that the RNLI and the local HM Coastguard station are stakeholders and would therefore be consulted as part of this project on the potential impacts to search and rescue (SAR) functions. We have contacted our HM Coastguard Coastal Rescue team in Mull and they have the following comments on the Scoping Report:

- HM Coastguard maintains a Coastguard Rescue Team (CRT) base within the An Roth Community Enterprise Centre, owned by Mull & Iona Community Trust (MICT) at Craignure, just south of the construction site.
- As a Declared Facility of HM Coastguard, Craignure CRT may be called up 24/7 to respond to emergencies on the coast, including threat to life and missing persons. They also provide flank support to our two other Mull CRTs in Tobermory and Fionnphort (Ross of Mull) for coastal searches and technical rescues including water and rope rescue. As a relatively remote island location, our teams are also frequently called upon to support partner emergency services on the island during incidents.
- Access and egress to Craignure CRT's station is via a private access road to the back of the MICT building, joining the A849 main road to respond to locations in either direction.
- Any works which may impact on our ability to respond to emergencies e.g. road closures, will require advance notice to our Maritime Rescue Co-Ordination Centre in Stornoway, and the usual mitigations put in place to enable emergency vehicles to pass through any closed section.
- HM Coastguard also supports NHS and Scottish Ambulance Service (SAS) in patient transfer services via CalMac ferry and RNLI lifeboat (when out of hours). Again, these operations may take place 24/7 and depend on access to the Craignure ferry linkspan. This comment is made with the assumption that NHS and SAS are already consultees in your scoping process.

As well as emailing our Navigation safety team with any further Craignure Ferry project consultations, please can you also direct any future correspondence to John Newing (john.newing@mcga.gov.uk) who will deal with the Coastguard Rescue response if required.

Finally, to address the ongoing safe operation of the marine interface for this project, the MCA would like to point the applicant in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice.

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From the Guide to Good Practice, section 7 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port. The harbour authority also has a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 7.8 Regulating harbour works covers this in more detail.

The MCA is satisfied with the Scoping Report at this stage as the basis for an Environmental Impact Assessment and an Environmental Statement from the shipping and navigation perspective on the understanding that the navigation receptors for the project will be fully assessed in the standalone NRA.

I hope you find this information useful at Scoping Stage.

Yours sincerely,

Redacted

Redacted

Redacted Project Lead
UK Technical Services Navigation

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Scottish Government
Riaghaltas na h-Alba

Craignure Ferry Terminal

Marine Analytical Unit ("MAU") Response
Marine Directorate

The scoping report for the Craignure Ferry Terminal development includes a description of a range of potential impacts. This response focuses only on the assessment of social and economic impacts. Social and economic impacts are covered in two chapters of the scoping report (chapter 22. Socio-Economics, and chapter 23. Population and Human Health).

Data sources

The range of data sources presented in the Socio-Economic, and Population and Human Health chapters of the scoping report appear to be appropriate. However, there are inconsistencies. The Socio-Economic chapter uses data from 2021 and Population and Human Health data from 2022. Consequently, demographic data is inconsistent across chapters. Please use the most up-to-date data. Please see Annex 1 for the suggestions on data sources.

Scoping of impacts

It is proposed in the scoping report that socio-economic, and population and human health effects are scoped out of the final assessment. We advise that these chapters should be scoped in for the final assessment. Please see Annex 1 for general advice on socio-economic impact assessments ("SEIA") and the assessment of social impacts. We note that this is a relatively small development. The assessment should be proportionate to the size of the development and consider the proposed mitigation measures.

Economic impacts

In terms of economic impacts, the final assessment should analyse the gross value added ("GVA") and employment impacts of the proposed development, including the direct, indirect and induced impacts and take account of deadweight, leakage, displacement and substitution. The assessment of the employment impacts should focus on the years of employment and type of jobs.

Social impacts

We note that the current ferry service operations will be maintained during the construction period, and the new ferry terminal is likely to improve access to the Isle of Mull. It was not clear from the assessment how many workers will be employed for the development during the duration of the project (18 months), and whether these workers will stay on the Isle of Mull. If workers are going to stay on the island, this might put pressures on local housing stock and thus might negatively affect tourism.

We advise that the interplay between jobs, a potential increase in population (due to the temporary labour force), housing, and tourism is considered in the assessment. We note that this is a relatively small development.

Engagement with local communities

It is not clear whether any engagement has been conducted with local communities that might be affected by the development. The assessment of potential socio-economic impacts could benefit from the engagement with local communities.

Conclusions

It is proposed that socio-economic, and population and human health are scoped into the final assessment, with particular focus on the interplay between jobs, a potential increase in population (due to the temporary labour force), housing, and tourism. We note that this is a relatively small development. The assessment should be proportionate to the size of the development and consider the proposed mitigation measures.

Annex 1: General Advice for Socio-Economic Impact Assessment
Marine Analytical Unit (MAU)
Marine Directorate
March 2024

This document sets out some suggestions for delivering socio-economic impact assessment drawing on the professional expertise of the Marine Analytical Unit (MAU), Marine Directorate.

Section 1. Some general best practice tips

- Take a proportionate approach to SEIA in line with the size of the development
- Consider offshore and onshore components of the development in the same assessment.
- Employ experts to design and carry out the assessment. The relevant expertise would include:
    - Social research and economist training, qualifications and experience
    - Familiarity and experience with appropriate methods for each discipline (including economic appraisal, social research methods such as surveys, sampling, interviews, focus groups and participatory methods)
- Consider potential secondary socio-economic impacts of any changes that affect the other relevant receptor groups covered in the wider EIA e.g. commercial fisheries, cultural heritage and archaeology and visual impacts.
- Include consideration of the cumulative impact of multiple offshore developments.
- Outline the rationale for scoping out impacts that are deemed to be minimal, including any evidence or analysis that has been used. If this is not provided it can be difficult for MAU to understand why impacts have been scoped out and we may suggest scoping them back in.

Section 2. Key components of a Socio-economic Impact Assessment

We set out below what we consider to be the key steps to an assessment. We recommend a combined approach so that social and economic impacts are covered together in the assessment, whilst acknowledging that different methodologies for social and economic impacts assessment are needed at certain stages, and that the two disciplines are distinct.

We wish to highlight the importance of stakeholder engagement throughout the assessment, and the use of social research methods (see Methods Toolkit referenced at the end of this Annex) to gather primary data and first hand perspectives from particular groups and communities that are affected. These are helpful in order to better understand the nature and degree of impacts that might be caused by changes that are expected occur. A change in itself may or may not bring about tangible impact, impacts may vary for different people or be perceived in different ways, are affected by individual values and attitudes, and conditioned by the context.

Stakeholder engagement and data collection can occur at a number of stages in the SEIA process and may involve similar methodologies but there are important differences to note. The primary aims of stakeholder engagement are to inform, consult or involve key stakeholders, and to communicate information and gather feedback. Data collection, in contrast is a more rigorous analytical process involving:

- Setting out a planned methodology in advance with clear objectives of what you wish to achieve through data collection
- Sampling strategies that take account of the demographic variations in the population and the need to include difficult to reach groups
- Robust methods to collect information from people in a neutral and unbiased way
- Awareness of how data will be analysed and reported on to obtain and disseminate robust conclusions
- Taking account of research ethics including informed consent, and data protection requirements under GDPR

The stages below are divided into the activities that we suggest are **before** the developer submits a request for a scoping opinion and those that are done **after** the scoping phase. We recommend an iterative approach which means that steps inform each other, information is built up over time, and some steps may be repeated or done in a different order.

The key steps should include:

Pre-scoping activities

1) **Getting started:** Employ economist and social research experts and work with them to develop a plan for the SEIA that sets out data requirements, and the proposed social and economic data collection and impact assessment methodologies, timescales, any data protection considerations, risk assessment and ethical issues that might arise from the work.

2) Develop a **detailed description** of the planned development and consider the project phases where socio-economic impacts might be experienced (covering development, construction, operation and maintenance and decommissioning phases). Start to map out potential socio-economic impacts and initial consideration of areas of impact on land that will need to be covered.

3) **Initial scoping of impacts:** develop a broad list of potential impacts informed by experts (including social researcher, economist, local representatives from key groups, community stakeholders and others).

4) **Define potential impact areas on land** taking into account locations and connections between activities. Different types of impacts may be experienced at different geographic levels, some in the area nearest the landfall or the nearest coastline to the development at sea, and others much further away (at Scotland level, UK level and internationally). The geographical scale at which social impacts are experienced may be different for social impacts compared with economic impacts. There may be multiple epicentres from which impacts radiate

including the site of the development, land-based areas such as landfall and grid connections, construction bases and places from which the development is visible. Activities that take place in the sea are also relevant for defining the impact area on land, for example the location of fishing activity and ports where fish are landed. The definition of the impact area will inform which communities and which sectors are included in the assessment and vice versa, so this exercise needs to be done iteratively with step 3, the initial scoping of impacts.

5) **Stakeholder mapping** is required to identify all the people, groups and stakeholders who may be affected by the development and is a first step in order to conduct effective stakeholder engagement. This exercise is informed by the definition of the impact area. A broad approach is recommended. Stakeholders are likely to include local communities, businesses, workers, other users of the sea, interest groups, community councils and so on.

   Steps 4 and 5 may lead to a change in the list of potential impacts so this will need refined/checked.

6) **Stakeholder engagement (with those affected by the development, sea users, communities etc)** is a key requirement of SEIA that is done at different stages of the process. We recommend doing some initial stakeholder engagement before submitting the scoping report. Stakeholder engagement will fulfil a number of requirements:

   - **Provide information about the development** so that those who might be affected are able to make an informed judgement about potential impacts
   - **Present and refine list of potential impacts based on feedback** - identify impacts that are most relevant and add any additional ones that are identified
   - **Collect initial data/ insights from stakeholders** on what potential socio-economic impacts (to be developed later)
   - **Build relationships** with the community and key groups affected for later stages of the SEIA process so that they can understand the decisions making process and how they can influence it.

   There are many **participatory methodologies** that can be used for effective stakeholder engagement that provide a deliberative space for community discussions.

   This stage may also require the setting up of governance structures and a community liaison officer. **Early engagement** with those who might be affected is very important, as is meaningful and inclusive engagement where people feel that they are being listened to and that their feedback will be acted upon. It is important to set out clearly how stakeholder engagement is being done for the SEIA specifically.

7) **Gather contextual information** to develop a social and economic profile of the area prior to the development that will help with setting the baseline and impact

prediction, identifying potential industries and communities that might be affected and sources of data that can be used in the assessment. This might include primary data collection using social research methods (such as surveys, interviews, focus groups) as well as desk based analysis (of existing data sets such as fishing data, population data).

Primary data collection may occur alongside participatory activities (e.g. engagement events) but must be done in a rigorous and systematic fashion and the findings should be robustly analysed and incorporated into the SEIA. Impacts that are identified for the other receptors in the wider EIA may also have socio-economic consequences and so it may be important to include these in the SEIA.

8) **Produce list of anticipated impacts to be covered in the scoping report** setting out the range of potential impacts that could occur, building on what has already been done using data and insights that have been collected from various activities described above. Details of the methods that have been used should be included to enable Marine Directorate to determine if the analysis is based on a robust and appropriate approach. Justification should be provided for any impacts that are scoped in or out. This could be based on suggestions made by stakeholders and the public during stakeholder engagement or an assessment based on the analysis of primary and secondary data.

   It is helpful if the scoping report includes details on the approach to be used for the SEIA including methods for data collection, planned stakeholder engagement activities and data-sets to be used.

Post scoping activities for the SEIA

The scoping opinion will advise on the final list of socio-economic impacts to be assessed in the SEIA. This may require additional data collection/ social research to enable a more rigorous assessment of a narrower set of anticipated impacts. It may also require further stakeholder engagement in order to check the significance of impacts with different groups, and the acceptability of mitigation options.

The data and information that has been collected throughout the scoping phase will be used to conduct steps 9, 10 and 11 below.

9) **Conduct baseline analysis** to assess the situation in the absence of the development, to provide a point of comparison against which to predict and monitor change. Appropriate social and economic measures should be used for the baseline and cover relevant issues (see section 4 for suggested data sources). Key stakeholders and other interested parties including affected communities and sectors may be aware of baseline data to be included, and this can be explored in the participatory approaches described above. The findings from social research can also be included in the baseline. Note that baseline data can be presented in the scoping report but is also the first stage of the SEIA and so should be included in the SEIA report.

10) Predict impacts and assess their significance (otherwise known as impact appraisal or options appraisal)

Through analysis, estimate the social and economic changes and their expected impacts, considering any alternative development options and how significant the impacts might be. This is the core part of the assessment and forms the main part of the assessment report. Different methodologies and both primary and secondary data inform this part of the exercise.

Different phases of the development should be covered (development, construction, operation and maintenance) and also transitions between phases (if relevant).

The knock on socio-economic consequences of impacts in other parts of the EIA assessment should be assessed here, such as the impact on commercial fisheries, and impacts on related industries such as tourism could also be included.

It is important to consider distribution of impacts among different social groups (covering protected quality characteristics, socio-economic groups and geographic area where relevant to do so).

Economic impact appraisal should include consideration of:

- Direct, indirect and induced impacts;
- Leakage, displacement and substitution effects;
- Deadweight loss;
- Cumulative impacts;
- Sensitivity analysis to account for risk, uncertainty and optimism bias.

There are a range of methodologies for calculating direct, indirect and induced impacts. These include the appropriate use of multipliers, a local content methodology, stakeholder involvement and expert opinion.

Modelling approaches should be realistic, based on robust data, and avoid over promising the economic impacts.

All prices should be presented in real terms (excluding inflation) and should state which year the prices represent.

11) Development enhancement, mitigation strategy and complete SEIA report.

There may be an opportunity for adaptation or other approaches to mitigate potentially adverse impacts and to maximise positive opportunities. This may include engagement with the community to develop a strategy for enhancing benefits and mitigating against impacts; or development of a Community Benefit Agreement (CBA). Again these activities should be done collaboratively with stakeholders where relevant and appropriate.

The SEIA report should clearly set out the methods used in the assessment, justification for decision made such as scoping certain impacts in or out of the

assessment, and the approach to analysis. The report should cover the baseline analysis and results of the impact prediction or appraisal, and distributional impacts . Social and economic impacts can be set out separately (where this makes sense) and together where they overlap.

It is good practice for the report to be reviewed by the people (i.e. the wider group of stakeholders and communities) who were involved in providing data for its production.

Section 3. Examples of different types of socio-economic impacts

In the literature social and economic impacts are defined in many different ways. Sometimes social and economic impacts are covered separately, whilst other sources refer to socio-economic impacts.

The following table sets out some commonly identified socio-economic impacts.

Examples of Socio-economic Impacts from Glasson 2017[1]

1. Direct economic:

- GVA
- employment, including employment generation and safeguarding of existing employment;
- characteristics of employment (e.g. skill group);
- labour supply and training; and
- other labour market effects, including wage levels and commuting patterns.

2. Indirect/induced/wider economic/expenditure:

- employees' retail expenditure (induced);
- linked supply chain to main development (indirect);
- labour market pressures;
- wider multiplier effects;
- effects on existing commercial activities (e.g. tourism; fisheries);
- effects on development potential of area; and

3. Demographic:

- changes in population size; temporary and permanent;
- changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
- settlement patterns

4. Housing:

- various housing tenure types;

[1] Glasson J (2017a) "Socio-economic impacts 2: Overview and economic impacts" in Therivel R and Wood G (eds.), Methods of Environmental and Social Impact Assessment, Abingdon: Routledge

- public and private;
- house prices and rent / accommodation costs;
- homelessness and other housing problems; and
- personal and property rights, displacement and resettlement

5. Other local services:

- public and private sector;
- educational services;
- health services; social support;
- others (e.g. police, fire, recreation, transport); and
- local authority finances

6. Socio-cultural:

- lifestyles/quality of life;
- gender issues; family structure;
- social problems (e.g. crime, ill-health, deprivation);
- human rights;
- community stress and conflict; integration, cohesion and alienation; and
- community character or image

7. Distributional effects:

Distributional analysis is a term used to describe the assessment of the impact of interventions on different groups in society. Interventions may have different effects on individuals according to their characteristics such as income level or geographical location, effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice.

Section 4: Useful Data Sources for Socio-Economic Impact Assessments

Name	Summary	Link to Source
Statistics.gov.scot	Contains a wide range of data by local authority and other geographic breakdowns. Has a search by subject and area option.	statistics.gov.scot
Marine Economic Statistics	Annual economic statistics publication including GVA and employment data for marine economy sectors.	Marine economic statistics - gov.scot (www.gov.scot)

Scottish Sea Fisheries Statistics	Provides data on the tonnage and value of all landings of sea fish and shellfish by Scottish vessels, all landings into Scotland, the rest of the UK and abroad, and the size and structure of the Scottish fishing fleet and employment on Scottish vessels.	Sea fisheries statistics - gov.scot (www.gov.scot)
Scottish Shellfish Farm Production Survey 2022	Statistics on employment, production and value of shellfish from Scottish shellfish farms.	Scottish Shellfish Farm Production Survey 2022 - gov.scot (www.gov.scot)
Scottish Annual Business Statistics 2020	Scottish Annual Business Statistics (SABS) presents estimates of employment, turnover, purchases, Gross Value Added and labour costs. Data are provided for businesses that operate in Scotland. Data are classified according to the industry sector, location and ownership of the business.	Scottish Annual Business Statistics 2020 - gov.scot (www.gov.scot)
Sub-Scotland Economic Statistics Database	The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.	Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)
Nomis Official Labour Market Statistics	Labour market statistics including data on employment, unemployment, qualifications, earnings etc.	Nomis - Official Labour Market Statistics (nomisweb.co.uk)
Economics of the UK Fishing Fleet 2020	Economic estimates at UK, home nation and fleet segment level for the UK fishing fleet. The estimates are calculated based on samples of fishing costs and earnings gathered by Seafish as part of the 2020 Annual Fleet Economic Survey.	Economics of the UK Fishing Fleet 2020 — Seafish
Scotland's Census, National Records of Scotland	Census data that provides information about the characteristics of people and households in the country.	Scotland's Census | National Records of Scotland (nrscotland.gov.uk)

Scottish Index of Multiple Deprivation	Collection of documents relating to the Scottish Index of Multiple Deprivation - a tool for identifying areas with relatively high levels of deprivation.	Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)
The Green Book	HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.	The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk)
The Magenta Book	HM Treasury guidance on evaluation. Chapter 4 provides specific guidance on data collection, data access and data linking.	The Magenta Book - GOV.UK (www.gov.uk)
Enabling a Natural Capital Approach (ENCA)	Supplementary guidance to The Green Book. ENCA resources include data, guidance and tools to help understand natural capital and know how to take it into account.	Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk)

Section 5: Further sources of guidance:

HM Treasury guidance on how to appraise and evaluate policies, projects and programmes: The Green Book: appraisal and evaluation in central government

Best practice in Social Impact Assessment according to the International Association for Impact Assessment: Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects

The project A two way Conversation with the People of Scotland on the Social Impacts of Offshore Renewables (CORR/5536) has developed elements of a conceptual framework on social values that can be used to support and inform existing processes for assessing the potential social impacts of offshore renewables plans: Offshore renewables - social impact: two way conversation with the people of Scotland

Best practice guidance for assessing the socio-economic impacts of OWF developments: Guidance on assessing the socio-economic impacts of offshore wind farms (OWFs)

A toolkit of methods available to assist developers, consultants, and researchers carrying out socio-economic impact assessments: Methods Toolkit for Participatory Engagement and Social Research - gov.scot (www.gov.scot)

Our Ref: FH-Arv-WFDA/25-0001

Your Ref: SCOP-0061 - Argyll and Bute Council (per Ramboll Ltd) - Ferry Terminal - Craignure, Isle of Mull - Scoping

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05 March 2025

Dear Chris Pollard/MD-LOT

SFF Response to Ferry Terminal - Craignure, Isle of Mull EIA Scoping Report Consultation

This response to the above scoping request is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association.

Comments

Dredging materials

The SFF note from section 3.3 Dredging (p12) of the Scoping Report (SR) that some dredge material will not be suitable for reuse and will require disposal. Options for the management and disposal of dredge material, for example at an approved marine disposal site, would be explored and confirmed following further Ground Investigation (GI) and sediment testing.

From a fishing perspective, we would need more information regarding the deposit of dredged material location and the effects of sediment in water column etc. We would propose that the marine deposit site should be selected outwith fish spawning and nursery and fishing grounds.

Noise impact on fish spawning

The SFF note from para '9.2.19' of the Marine Ecology section, Fish sub-section that the proposed development is within the distribution for other notable species such as Atlantic herring, sandeel, anglerfish, mackerel, cod, and more. As herring and other fish are sensitive to noise, we would propose that the demolition work to be undertaken outwith sensitive fish species spawning period to avoid damage to their eggs, larvae and juveniles.

We also note from Table 10:3 that the “Potential indirect impacts on stocks of target finfish and shellfish species” have been scoped out under section ‘10. Commercial and Recreational Fisheries’ as they will be assessed in the marine ecology and underwater noise chapter of the EIAR. Given the importance of the topic, we would like to see the EIA findings on this in the final EIAR.

In conclusion, SFF stresses that our primary concern is protecting the rights of fishermen to safely undertake their trade, and this is the cornerstone of our response. Our position is that fishing activities should continue unaffected and unharmed post-development. With this said, we will look forward to the EIA report to come out for our comments.

Best regards

Redacted
Offshore Energy Policy Manager
Scottish Fishermen’s Federation

31 March 2025
Your ref: SCOP-0061
Our ref: **CLC178823**

Sent by email to:[Redacted] and MD.MarineLicensing@gov.scot

Dear Mr Pollard,

SCOP-0061 - Argyll and Bute Council (per Ramboll Ltd) - Ferry Terminal - Craignure

Thank you for consulting us on the above Scoping consultation dated the 27th of January 2025.

1. Summary

The following Scoping Opinion is based on details in the Scoping Report and builds on previous advice given by NatureScot in our response to a licence for Ground Investigation works, dated the 1st March 2024.

2. Scoping Opinion

2.1 Designated sites

2.1.1 Loch Sunart to the Sound of Jura Nature Conservation (NC) Marine Protected Area (MPA)

The proposal is close (approx. 300m NE) to Loch Sunart to the Sound of Jura NC MPA, selected for its flapper skate (*Dipturus intermedius*) and its Quaternary of Scotland geology and geomorphology. (https://sitelink.nature.scot/site/10418). We are content with the approach and methodology for this site.

2.1.2 Zone of Influence

The Zone of Influence (ZOI) identified for designated sites where marine mammal species are a qualifying interest is 15 km within the Scoping Report: it is unclear why a 15 km ZOI has been chosen, and we do not agree with this distance for all designated sites.

Special Areas of Conservation are designated based on the qualifying feature and their protection is not limited to within the SAC boundary. For wide-ranging species such as marine mammals the connectivity of the qualifying interest to the development needs to be considered in addition to the pressure pathway.

Designated sites currently screened in include Inner Hebrides and the Minches SAC (harbour porpoise) and Eileanan agus Sgeiran Lios mor SAC (harbour seal). At a minimum the Sea of the Hebrides MPA (minke whale and basking shark) and Treshnish Islands SAC (grey seals) should be included in the list of designated sites in the vicinity of the development.

- Inner Hebrides and the Minches SAC, protected for harbour porpoise (https://sitelink.nature.scot/site/10508)
- Eileanan agus Sgeiran Lios mor SAC designated for harbour seals. (https://sitelink.nature.scot/site/8251)
- Sea of the Hebrides MPA protected for minke whale and basking shark (https://sitelink.nature.scot/site/10474)
- Treshnish Islands SAC designated for grey seals (https://sitelink.nature.scot/site/8398)

2.1.3 Zone of Influence - Species connected by Underwater Noise (UWN) propagation

We suggest that this ZoI of 15 km is updated once the site-specific UWN modelling has been completed for auditory injury and disturbance impact ranges from noise emitting construction/demolition activities.

2.1.4 Habitats Regulations Assessment screening

We have provided advice on our recommendations for carrying out an HRA screening report, noting that one has not yet been submitted for consultation. NatureScot advise for harbour seals screening in SACs for assessment if the project site/impact radius is within 50 km of the SAC. Ranges further than this should also be considered if there is other information (e.g. tagging data, photo-ID data) to suggest that SAC animals travel to the project area.

For grey seals, we advise screening in SACs for assessment if the project site/impact radius is within 20 km of the SAC. Although grey seals can and do forage considerable distances, the Conservation Objectives for grey seal SACs are related to the protection of the breeding colony. During this sensitive time, grey seals (especially females) do not travel further than about 20 km.

- **Desk based study**

The baseline study identifies the key marine mammal species in the area, and we assume the species identified will be scoped into the EIA. The sources used to inform the desk-based study are limited and we would expect an appropriately detailed review of available data sources in the EIA. NatureScot are happy to advise further, if required.

- **Designated seal haul out sites**

We agree that the designated seal haul out site 'East End Sound of Mull' is in close proximity to the development area and will likely be within the impact ranges from development activities. It is unclear why no other designated seal-haul out site within the ZOI identified within the scoping report has been screened in for further consideration.

In addition, the vessel transit routes for construction activities have not been outlined and it is unclear where the dredging disposal site will be located, therefore we cannot rule out disturbance at other designated seal haul out sites in the vicinity of the project.

Once there is further detail on construction activities, the screening in of designated sites may need to be revisited.

- **Potential Impacts and Likely Effects**

Overall, we agree with the impacts scoped in and out of the EIA.

It is stated that local disposal sites have been identified for dredging disposal, based on the limited information provided we expect that this impact is fully assessed within the EIAR for the disposal site and vessel transit routes.

We advise that impacts on the East End Sound of Mull designated seal haul out site, or any additional designated seal haul out sites which may be identified as having the potential to be impacted, are assessed as its own impact due to the close proximity to the construction activities.

There is limited information on how demolition of the existing ferry terminal will be undertaken. Depending on the methods required for this work there may be potential for increased noise emitted into the marine environment during this phase and additional information and potential impacts associated with this work needs to be included and assessed accordingly within the EIA.

- **Underwater noise modelling**

Pile driving, dredging and vessel movements will be modelled to better understand the risk from increased underwater noise risk during the construction and operational phases of the project. It is not clear at this stage what piling (percussive or vibro-piling) methodology will be modelled, but we advise the worst-case scenario is considered.

As outlined in the Underwater Noise Assessment Methodology section of the scoping report we welcome a detailed modelling report that will include the input parameters and associated assumptions inputted into the model. We agree that both instantaneous and cumulative auditory injury is modelled for each noise source, where appropriate. Should concurrent pile driving occur, we strongly advise that this is included within the modelled scenarios. However, we welcome cumulative modelling on a range of noise sources as suggested in this section.

In regard to the proposed use of the NOAA User Spreadsheet Tool, it is important that the pile driving noise is modelled as line source, not point source, to accurately capture its propagation in the harbour environment. We have reviewed the NOAA tool guidance and there is no obvious

evidence that the tool uses line source modelling; instead it appears to rely on a simple spreading model which may not suffice for the complexity of piling activities. While the assessment methodology is detailed and well considered, the NOAA tool may not adequately address the harbours specific acoustic challenges, especially in regard to pile driving. We would request further clarification on the type of source model used.

We note the consideration of noise abatement systems such as bubble curtains, but we advise that the worst-case impact ranges without noise abatement are shown within EIA alongside the modelled scenarios with noise abatement systems.

It is unclear what behavioural thresholds are being considered within the UWN modelling methodology and therefore we cannot comment on this until further information has been provided.

It should be noted that grey seals on the west coast of Scotland do not pup in late spring to summer as outlined in this section and this should be updated and assessed accordingly.

- **Mitigation and Enhancement Measures**

Due to the limited information available on construction methodology at this stage it is not possible to comment on the effectiveness of proposed mitigation measures for marine mammal species.

- **Cumulative Effects (Scoping Report section 4.7)**

As it has yet to be confirmed when construction activities are proposed to start and the size of the impact ranges from underwater noise modelling, we can't confirm that there is no potential for cumulative impacts for other developments. We advise in addition to the criteria outlined in this section including a year on either side of development to ensure an appropriate temporal scale. We do not agree that only projects in which planning permission or a marine licence has been granted should be included within the cumulative impacts assessment. We advise including projects where information on project plans is in the public domain.

In relation to screening in developments within the zone of influence, we do not agree with this approach as impact ranges from other developments may overlap with the zone of influence from this development and should be considered.

2.2 Otter

We welcome the inclusion of potential impacts on otter species, noting that otters can utilise the marine environment and any impact pathways such as indirect impacts via prey, auditory injury and disturbance should be fully assessed for this species. It is noted that otters are an EPS and under Conservation of Habitats and Species Regulations 2017 it is an offence to "to damage or destroy a resting place (whether deliberately or recklessly)" however, other offences under this convention

which are relevant to the marine impact pathways may include deliberately killing, injuring or disturbing and need to be assessed accordingly[1].

Under the Wildlife and Countryside Act 1981 it is an offence to intentionally or recklessly:

- *disturb otters while they occupy a structure or place used for shelter or protection*
- *obstruct access to a place of shelter or protection*

We agree with the inclusion of the Movern Woods SAC (https://sitelink.nature.scot/site/8331) and Mull Oakwoods SAC (https://sitelink.nature.scot/site/8335) for otters.

2.3 Benthic habitats and species

We agree with the benthic/ water quality aspects scoped in and the proposed investigations. The proposed assessments include:

- Development and implementation of a construction environmental management plan (CEMP)
- A biosecurity plan would be produced and implemented throughout works (see notes below on Biosecurity)
- Assessment of the potential for particulate and chemical contamination of water as a result of the proposed dredging and construction works will be central to the assessment.
- Desk based review of the proposed development and surrounding coastal environment to establish baseline conditions.
- Benthic surveys to establish the benthic habitats and species present at the development location, with particular focus on identifying and PMFs will be conducted.
- Sediment dispersion modelling (to include suspended sediment and sedimentation rates) will be undertaken to determine the potential extent and magnitude of impacts on species and habitats present, particularly in relation to dredging.
- Hydrodynamic Modelling Study
- Sampling, screening and reporting on sediment samples against the Waste Acceptance Criteria (WAC) limits.

In addition, the following surveys should be performed:

- A Best Practicable Environmental Option (BPEO) for the dredged material should be undertaken and submitted with the EIA. If a dredge spoil site is planned to be used then this will also need to be assessed if there is connectivity with designated sites or protected species and habitats.
- The benthic surveys should include both the development site and the zone of influence of the site e.g. the dredge plumes, areas predicted changes to hydrodynamics. These should

[1] https://www.gov.uk/guidance/otters-advice-for-making-planning-decisions

also include identifying Non-Native Species (NNS). Section 9.4.4. states "*Consultation with NatureScot should be considered to establish an appropriate survey methodology*". We are happy to provide comment on the survey plan.

2.4 Biosecurity and Invasive Non Native Species (INNS)

Table 9.6 provides an overview of the potential environmental effects relating to marine ecology and the scoping determination for inclusion in an EIA. The Introduction and/or spread of INNS has been scoped out of the EIA, with the statement that site operations will be adequately managed through the implementation of the CEMP. Additionally, Chapter 9.5 states that a biosecurity plan would be produced and implemented throughout works.

INNS have been noted in the scoping report acknowledging the Argyll region as an 'area of high concern'. We recommend that INNS are scoped in within the EIA and a separate site-based biosecurity plan should be developed in line with best practice Marine Biosecurity Planning guidance.

- Marine Biosecurity Planning Guidance for producing site and operation-based plans for preventing the introduction of non-native species
- Marine biosecurity planning – Identification of best practice: A review: NatureScot Commissioned Report No. 748

Hull fouling and ballast water exchange are identified as a key pathways associated with ports and harbours that can result in the spread of INNS. For this reason key considerations should be given to the known distributions of INNS in the vicinity of the proposed development and risks associated with introducing and spreading INNS during construction and operation.

2.5 Priority Marine Features.

Priority Marine Features (PMFs) and ANNEX I features have been identified by the desk-based study within a 5km range of the development. Our review agreed with the PMFs listed within the Scoping Report, and identified 2 PMFs within a 5km range, that were not identified:

- **Flame shell beds – not identified in report. Located at Latitude: 56.496496 Longitude: -5.682766. 3km from development.**
- **Ocean quahog- Latitude: 56.497137, longitude -5.688335. 3km from development.**

Descriptions of these PMF species and habitats can be found in the following report - SNH Commissioned Report 406: Descriptions of Scottish Priority Marine Features.

The EIA report should scope in likely effects on all PMFs and ANNEX I features which will be affected by the development. To date, no benthic surveys have been undertaken to inform the proposed development. As stated in the scoping report, the composition and characteristics of the habitats in the proposed development's footprint (which will include ZOI) is unknown. Robust benthic surveying and modelling will inform the risk to features.

Please get back in touch if you have any queries regarding the above or require further input.

Yours sincerely,

Redacted

Operations Officer - Operations West

Redacted

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E: MD-SEDD-RE_Advice@gov.scot

Chris Pollard
Licensing Casework Officer
Marine Directorate – Licencing and Operations Team
Scottish Government

RE: Craignure Ferry Terminal

Advisors from the SEDD Marine Renewables & Ecology Team have reviewed the above request and provide the following advice.

MD-SEDD advise that the potential indirect impacts on stocks of target finfish and shellfish species is scoped in within the commercial fisheries chapter. Although any impacts to fish and shellfish will be assessed within the marine fish ecology chapter, MD-SEDD advise that the results from that chapter should be used within the commercial fisheries chapter to inform and assess potential impacts to commercially important species within a commercial fisheries context.

Yours sincerely,

Renewables and Ecology Team
Marine Directorate – Science, Evidence, Data and Digital