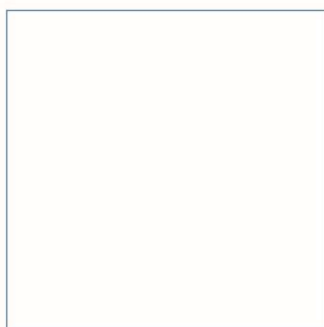
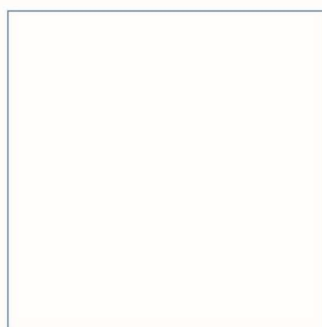


Associated British Ports

Ayr Harbour Maintenance Dredging

Best Practicable Environmental Option Assessment

August 2026



Innovative Thinking - Sustainable Solutions

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Contents

1	Introduction.....	1
1.1	Background	1
1.2	Report scope.....	1
2	Dredge Requirements.....	2
2.1	Current dredge practice	4
3	Policy Review.....	5
3.1	Marine policy statement.....	5
3.2	Waste Policy.....	6
4	Dredge Material Characteristics	9
4.1	Physical.....	9
4.2	Chemicals	11
5	Waste Hierarchy Assessment	14
5.1	Prevention	14
5.2	Re-use, recycling and other recovery.....	14
5.3	Disposal.....	16
6	Conclusion.....	19
7	References.....	20
8	Abbreviations/Acronyms	21

Tables

Table 1.	Previous dredge and disposal quantities at Ayr and Troon from 1990 to 2015.....	3
Table 2.	Previous dredge and disposal quantities at Ayr from 2020.....	3
Table 3.	Stages of the waste hierarchy	7
Table 4.	Particle size analysis for sediment samples taken within the dredge area	9
Table 5.	Concentration of chemical determinands in surface sediment samples collected from within the dredge area.....	12

Figures

Figure 1.	Waste hierarchy	7
Figure 2.	Sediment sampling locations within dredge area	10

1 Introduction

1.1 Background

Associated British Ports (ABP) is the Harbour Authority for the Port of Ayr, situated on the east coast of the Firth of Clyde in South Ayrshire. The Port of Ayr is located at the mouth of the River Ayr and has a significant commercial cargo trade.

To maintain depths at the operational berths and in the approach channel to the Port, and thus allow safe passage to vessels wishing to use the Port, ABP must undertake regular maintenance dredging. As part of the required dredging, the dredged material has to be disposed of. Historically this has involved placement of the dredge arisings in an offshore site in the Firth of Clyde under a licence granted to ABP by the Marine Directorate Licensing Operations Team (MD-LOT) (formerly Marine Scotland Licensing Operations Team (MS-LOT) in accordance with the Marine (Scotland) Act 2010 Part 4. The current licence number is MS-00009935, which is due to expire on 28 April 2026 and requires renewal.

ABP is in the process of applying for a maintenance dredge licence for the Port of Ayr. Part of the application procedure for the licence under Section 27(2) of the Marine (Scotland) Act is an assessment of the Best Practicable Environmental Option (BPEO) for managing the dredge arisings. Such an assessment was previously undertaken in 2022 and examined a wide range of possibilities for managing the dredge arisings. This document provides an updated review to support the application for renewal of the maintenance dredge licence.

1.2 Report scope

This report provides a Waste Hierarchy Assessment (WHA) to determine the BPEO for the use/disposal of the dredged material that is required for a Marine Licence under the Marine (Scotland) Act, 2010.

The report is structured as follows:

- Section 1:** Introduction;
- Section 2:** Sets out the dredge requirement;
- Section 3:** Provides a review of the policy;
- Section 4:** Outlines the dredge material characterisation;
- Section 5:** Waste Hierarchy Assessment;
- Section 6:** Presents the overall WHA and BPEO conclusion.

2 Dredge Requirements

Material dredged from the Port of Ayr mainly originates from the River Ayr, which passes through the harbour. Sediment enters the river as a result of erosion of the land comprising the river's 600 km² catchment and is carried downstream by the river flow, mainly during high discharge conditions. The river upstream of the harbour is generally in a regime state and it is only on reaching the tidal area, with the increased cross-section of the harbour, that the sediment load is deposited. In general, the coarser fraction deposits in the river channel and berths while the finer material either settles in the off-river tidal basin or is carried to the sea.

In addition to these fluvial sediments, sand enters the approach channel from seaward as a result of wave action during storm conditions. This sand originates from the natural shallow water sediments of the Ayrshire Coast.

Because the mechanisms controlling sediment movement at the harbour is primarily weather dependent, the resulting siltation and hence the need for maintenance dredging is not readily predictable, other than on average. The amount and rate of siltation has been found to vary depending upon the severity and frequency of floods and storms, as does the proportion of deposited sediment originating from the landward and seaward sources.

The maximum annual quantity of maintenance dredging at Ayr in recent years has been approximately 23,500 m³ *in situ* (about 32,233 tonnes). Table 1 and Table 2 summarise the volumes for the period from 1990. The volume of material that has to be dredged each year to maintain safe navigable depths and allow the port to function, and the rate of sediment inflow, mean that typically maintenance dredging has been undertaken at Ayr about twice a year.

Table 1. Previous dredge and disposal quantities at Ayr and Troon from 1990 to 2015.

Licence Period (mm/yy)	Amount Dredged (m ³)	Tonnes Dredge Ayr	Tonnes Dredge Troon	Tonnes (Total)
09/92 - 09/93	22,310	-	-	32,784
09/93 - 09/94	31,079	-	-	47,050
10/94 - 10/95	62,908	-	-	82,425
10/95 - 10/96	32,019	-	-	53,151
10/96 - 10/97	10,335	-	-	17,156
11/97 - 11/98	22,757	-	-	37,776
02/99 - 12/99	13,000	-	-	21,580
01/00 - 11/00	23,823	-	-	39,546
01/01 - 01/02	11,418	-	-	18,840
01/03 - 31/03	35,375	-	-	55,892
04/04 - 03/05	39,461	35,465	26,884	62,349
04/05 - 03/06	28,586	-	-	45,165
04/06 - 03/07	32,725	27,237	24,469	51,706
04/07 - 03/08	44,798	-	-	70,780
04/08 - 04/09	32,019	29,106	21,485	50,591
04/09 - 04/10	39,185	39,404	22,508	61,914
04/10 - 04/11	30,449	34,949	13,161	48,110
04/11 - 04/12	61,061	66,592	17,672	84,264
04/12 - 01/13	20,199	27,875	-	27,875
04/13 - 01/14	40,191	51,095	4,369	55,464
06/14 - 06/15	46,250	63,128	697	63,825
Note: The Port of Troon has been included in this table as the two areas were previously licensed (and therefore dredge arisings were grouped) together. However, the maintenance dredge licence applications have now been separated, and therefore this document only considers dredge arisings from Ayr.				

Table 2. Previous dredge and disposal quantities at Ayr from 2020.

Licence Period (mm/yy)	Amount Dredged (m ³)	Tonnes Dredge Ayr
01/20 - 01/21	20,300	28,014
01/21 - 01/22	23,350	32,223
01/22 - 01/23	21,750	30,015
01/23 - 01/24	16,072	22,180
01/24 - 01/25	4,460	6,160
01/25 - 01/26	13,510	18,648

The Marine Licence application currently being prepared is to dredge to a minimum depth of 4.0 m below Chart Datum (CD) in the harbour, approaches and turning circle, and 3.50 m in the Griffin Dock. This requires the dredging and disposal of a maximum of 70,000 tonnes of material (wet weight) or 50,000 m³, per annum. This is consistent with the volume of material that has been dredged in previous years.

2.1 Current dredge practice

Maintenance dredging at Ayr is undertaken by dredgers operating under contract to ABP. The contract dredgers are generally owned by UK Dredging (UKD), part of the ABP group of companies, or by other commercial dredging contractors. Two types of dredger have been employed in recent years. A trailer suction hopper dredger (TSHD) has been used for the dredging of the river channel and approach channel at Ayr, while a self-propelled grab hopper dredger is used within the basins and for work close to quay walls.

Admiral Day, a grab hopper dredger, will be the principal vessel for the proposed maintenance dredge activities operated by Wyre Marine. There may also be a requirement to engage a larger vessel such as UKD Orca (TSHD) during the period of the licence. This would be operated by UKD.

Both types of dredger discharge are designed to deposit the dredge arisings at a licensed disposal site through bottom opening doors.

3 Policy Review

Dredged material is classed as a waste material once removed and is strictly controlled as it enters the waste stream. Beneficial use and disposal of dredged material at sea are controlled Under the London Convention 1972, the 1996 Protocol, the OSPAR Convention 1992 and the revised EU Waste Framework Directive (2008/98/EC). This legislation has been transposed under the Marine (Scotland) Act 2010. Alternatives to disposal of the dredged material are to be explored and documented in the form of a BPEO assessment. Should this assessment identify a practical alternative to disposal of dredged material, this option should be further considered before consent for disposal at sea (or land) is made. Any identified locations for use and/or disposal also need to take account of the UK Government Sustainable Development Strategy and the Marine Policy Statement (see Section 3.1).

3.1 Marine policy statement

The UK Government Sustainable Development Strategy sets out the need for all Government policy to be in line with the principles of sustainable development (HM Government, 2005). These principles are expressed through the five high-level marine objectives which take forward the UK vision for the marine environment of "clean, healthy, safe, productive and biologically diverse oceans and seas". These high-level objectives are: (1) Achieving a sustainable marine economy; (2) Ensuring a strong healthy and just society; (3) Living within environmental limits; (4) Promoting good governance; and (5) Using sound science responsibly.

It is becoming increasingly important that space within the marine environment is utilised effectively to ensure activities can be undertaken in a sustainable manner with minimal conflict between users. The UK Marine Policy Statement (MPS) (HM Government, 2011) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. The MPS indicates that, "The Marine Plan should identify areas of constraint and locations where a range of activities may be accommodated. This will reduce real and potential conflict, maximise compatibility between marine activities and encourage co-existence of multiple uses" (Defra, 2011).

The policy specifically states that dredging "is essential to the functioning of ports and marinas" (Section 3.6.3 of MPS) and the disposal can have "benefit in maintaining sedimentary systems" and suitable material at appropriate locations can have "benefit in providing material for alternative uses, such as construction, beach nourishment or salt marsh restoration" (Section 3.6.4 of MPS).

3.1.1 Scotland's National Marine Plan

Ayr Harbour lies in the Clyde Scottish Marine Region (SMR). Currently there is no specific Marine Plans for this regional area and therefore decisions in the interim must be made in accordance with the National Marine Plan (Scottish Government, 2015). Furthermore, compliance with the principles documented in the UK's Sustainable Development Strategy should be guaranteed for any locations considered for re-use and/or disposal.

The Scotland National Marine Plan notes that marine licence "applications will be considered in accordance with the objectives and policies of the plan" with a presumption in favour of sustainable development and use of the marine environment". The marine licensing process is also used to reach a "balanced view on whether an individual project should be consented" taking careful account of the use of the development and economic benefit in an appropriate and proportionate manner.

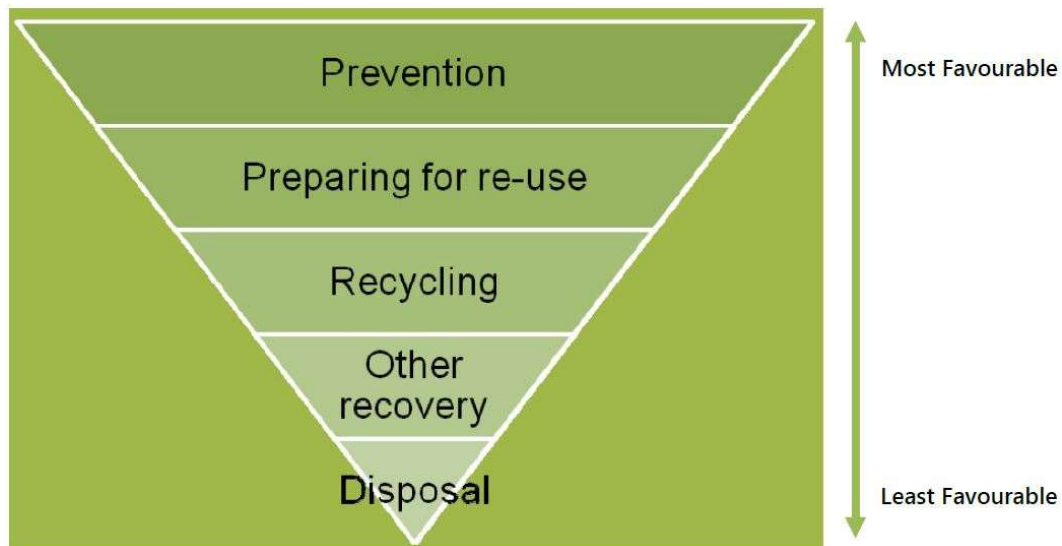
Scotland's National Marine Plan (Scottish Government, 2015) highlights that safeguarding the viability of routes used by shipping, ensuring safety of navigation and encouraging development of Scottish ports and harbours are essential for the continuation and growth of economic prosperity provided by ports and harbours and the variety of sectors they support. As part of these considerations, dredging is recognised as an essential activity to maintain existing shipping channels, establish safe approaches to new ports or open up routes to old ports. Dredged material may be disposed of at licensed marine disposal sites or used for alternative purposes such as land reclamation or coastal nourishment, if suitable, to minimise seabed disposal. Licensed disposal areas may change, typically as a result of disuse, monitoring information or the need for sites in additional locations. The consideration of both dredged navigation channels and disposal sites in marine planning and decision making is important to support safe access to ports and the disposal of dredged material in appropriate locations (Scottish Government, 2015).

While Scotland's National Marine Plan highlights the requirements for dredging and disposal to support port development and navigational safety, it also highlights a number of key issues. Dredging to maintain navigation channels can cause loss or damage to habitats and species and exposure of buried archaeological remains. Dredging requirements may increase if ship size increases and deeper and wider navigation channels are required. Dredging, and the disposal of dredged material, may impact on other sea users on a temporary basis, and dredged areas and disposal sites may not be compatible with other specific uses. Dredging is a licensable activity and, therefore, the potential environmental impacts are assessed through licensing procedures (Scottish Government, 2015).

3.2 Waste Policy

The Waste Framework Directive (75/442/EEC) was originally adopted in 1975, followed by substantial amendment in 1991 (91/156/EEC) and a codified version in 2006 (2006/12/EC). The revised Waste Framework Directive (2008/98/EC) repealed earlier versions, providing a general framework of waste management requirements and sets the basic waste management definitions. It lays down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use. It defines 'waste' as any substance or object which the holder discards or intends or is required to discard.

Article 4 of the revised Waste Framework Directive sets out five steps for dealing with waste, ranked according to environmental impact, commonly referred to as the 'waste hierarchy' (see Figure 1 and Table 3). The WHA (and therefore the determination of the BPEO) are strongly governed by the waste hierarchy.



Source: Adapted from Defra (2011)

Figure 1. Waste hierarchy

Table 3. Stages of the waste hierarchy

Stage	Name (Article 4)	Definition (Article 3)
1	Prevention	Measures taken before a substance, material or product has become waste, that reduce: (a) The quantity of waste, including through the re-use of products or the extension of the life span of products; (b) The adverse impacts of the generated waste on the environment and human health; or (c) The content of harmful substances in materials and products.
2	Preparing for re-use	Any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.
3	Recycling	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.
4	Other recovery (e.g. energy recovery)	Any operation, the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II sets out a non-exhaustive list of recovery operations.
5	Disposal	Any operation which is not recovery even where the operation has as a secondary consequence the reclamation of substances or energy. Annex I sets out a non-exhaustive list of disposal operations.

Prevention, which offers the best outcomes for the environment, is at the top of the priority order, followed by preparing for re-use, recycling, other recovery and disposal, in descending order of environmental preference.

The waste hierarchy places emphasis on waste prevention or minimisation of waste, followed where possible by re-use of the material. For any dredging project, the *in situ* characteristics of the material (physical and chemical), the method and frequency of dredging (and any subsequent processing), determines its characteristics for consent through the waste hierarchy (Section 5). This understanding is central for consideration of management options and determination of the BPEO for dealing with the management of dredged material. An applicant must take account of the waste hierarchy and consider alternative means of disposal of dredged material before applying for a licence to dispose of dredged material at sea (HM Government, 2011).

Where prevention of the dredging is not possible, then the volume to be dredged should be minimised, then options for re-use of the material, recycling and other methods of recovery must be considered in the first instance. In the context of dredge material this could include, for example:

- Engineering uses, such as:
 - Aggregate for the construction industry;
 - Land creation and improvement;
 - Beach nourishment;
 - Construction of offshore berms;
 - Capping material; and
 - Temporary disposal at sea (e.g. in an aggregate site) for future re-use.
- Agriculture and product use:
 - Aquaculture; and
 - Construction material.
- Environmental enhancement:
 - Intertidal feeding/creation, e.g. islands for birds, mudflat and saltmarsh creation, fisheries habitat and wetland restoration.
- Post treatment of the dredge material to change its character prior to determining a potential use, for example:
 - Dewatering to create consolidated sediments;
 - Separation basins; to separate sediments into different size classes for different uses;
 - Soil manufacturing; and
 - Physio-chemical treatments of contaminated sediments.

Following such treatments, the material may be able to be used for example, as top soil or bricks etc. Should no practical and cost-effective solutions be identified, final options for the disposal of the dredged material are considered. These include:

- Marine disposal in licenced deposit sites; and
- Land based disposal in terrestrial landfill (possibly after treatment such as incineration).

Each of the stages in the waste hierarchy have been considered in turn, where practical, for the management of the dredge arisings within this assessment. This has also taken into account the respective policies as outlined above.

4 Dredge Material Characteristics

A specific sediment sample plan was provided by MD-LOT in the context of the proposed dredging activities. As specified in this plan, six surface sediment samples were collected on the 25 February 2026 within the dredge area. The location of these samples and the dredge area is shown in Figure 2.

The results of the physical and chemical analyses undertaken on the samples are presented below in Section 4.1 and 4.2 respectively.

4.1 Physical

Particle size analysis (PSA) has been undertaken on the sediments to be dredged. This grading is shown in Table 4.

The material to be dredged comprises predominantly fine sand, with a small proportion (*circa* 0.3- 1.9%) of gravel. The relative mix varies both with location along the channel and harbour and with time. Larger proportions of finer sediments are associated with periods of heavy rainfall and snowmelt, particularly on spring tides, whereas the proportion of sand/gravel is likely to be higher following storm events. Organic material is also present, associated with riverine inputs of debris assumed to be mainly comprising leaves, twigs and small pieces of wood.

The average *in situ* density of the sediment at Ayr, based on regular sampling, is 1.38 tonnes/m³.

Table 4. Particle size analysis for sediment samples taken within the dredge area

Sample	Grain size (%)		
	Gravel (>2 mm)	Sand (63-2000 µm)	Silt/clay (<63 µm)
Location A	0.67	99.33	0.00
Location B	0.34	99.66	0.00
Location C	1.89	98.11	0.00
Location D	0.88	99.12	0.00
Location E	0.48	99.52	0.00
Location F	0.29	99.71	0.00

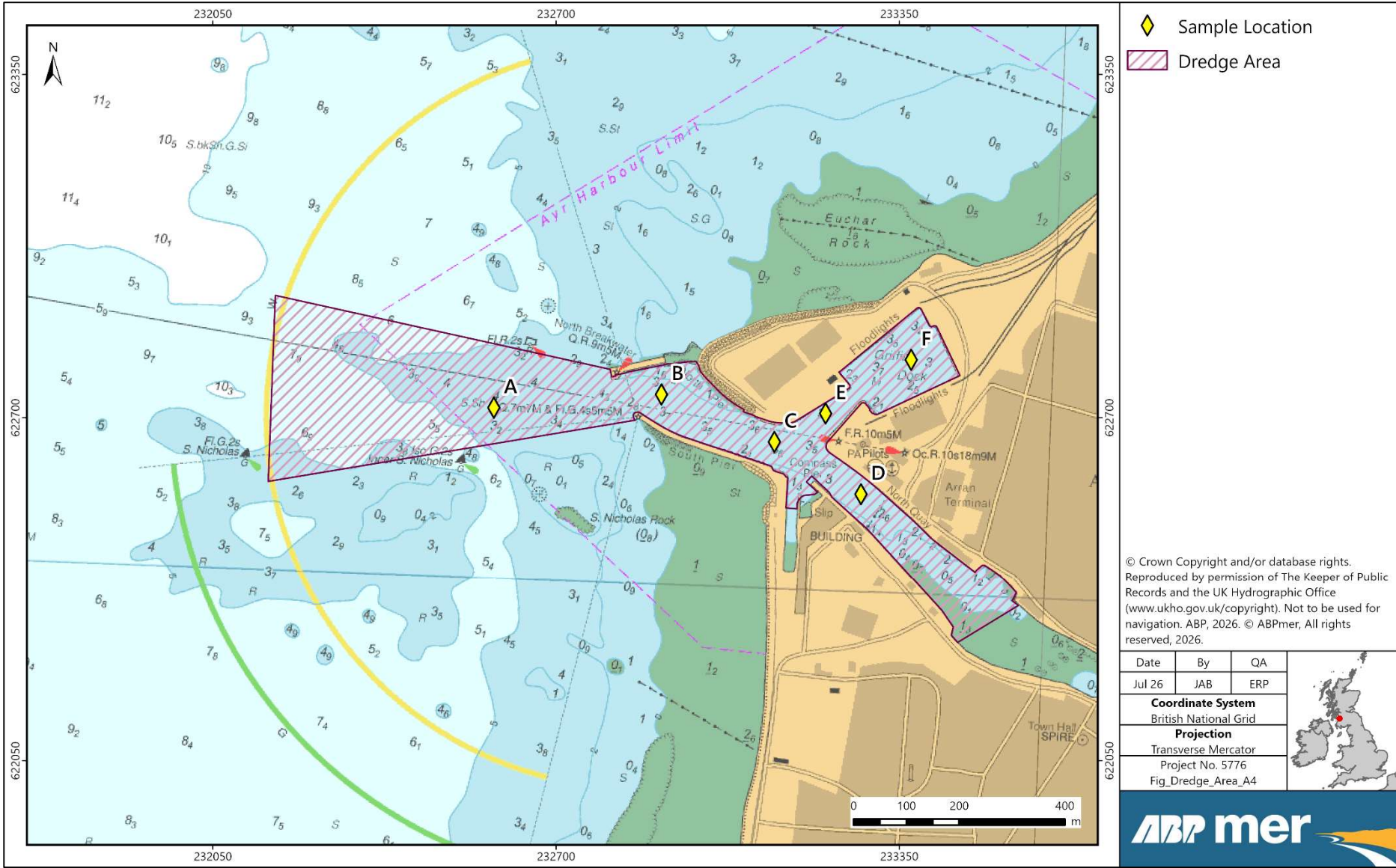


Figure 2. Sediment sampling locations within dredge area

4.2 Chemicals

4.2.1 Present contamination

Chemical analysis of samples obtained during the survey was undertaken by SOCOTEC and the results are presented in Table 5. The samples were analysed for concentrations of the following chemical determinands (dry weight):

- Heavy metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc);
- Tributyltin (TBT) and Dibutyltin (DBT);
- Polychlorinated biphenyls (PCBs) (including ICES 7 congeners: 28, 52, 101, 118, 153, 138, 180);
- Polycyclic aromatic hydrocarbons (PAHs) (including United States Environmental Protection Agency (USEPA) suite of 16: Naphthalene, Acenaphthylene, Acenaphthene, Fluorene, Phenanthrene, Anthracene, Fluoranthene, Pyrene, Benz(a)anthracene, Chrysene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Benzo(a)pyrene, Indeno(123-cd)pyrene, Dibenzo(ah)anthracene, Benzo(ghi)perylene); and
- Organochlorine pesticides (OPs).

Unlike water quality, there are no formal quantitative environmental quality standards (EQS) in the UK for the concentration of chemicals in sediments, although the Water Framework Directive (2000/60/EC) has introduced optional standards for a small number of priority and priority hazardous substances. Marine Scotland (2017) provides a series of Action Levels to assist in the assessment of dredged material (and its suitability for disposal to sea, assuming this is considered appropriate under the waste hierarchy). In general, concentrations of chemicals in dredged material below Action Level 1 (AL1) are likely to be acceptable for disposal at sea, although it may require monitoring conditions if the dredge is large in scale or in a sensitive area. In contrast, dredged material with concentrations above Action Level 2 (AL2) is generally considered unsuitable for disposal at sea. Dredged material with concentrations between AL1 and AL2 requires further consideration before a decision can be made. This could potentially include a restriction on sea disposal of certain areas of dredge spoil, monitoring of the dredge material and disposal site and specific treatment or mitigation measures (Marine Scotland, 2017).

Results show that all samples were below Action Level 1 (Marine Scotland, 2017) for arsenic, cadmium, copper, mercury, lead, zinc, dibutyltin and tributyltin. Nickel concentrations marginally exceeded Action Level 1 across all locations, and chromium concentrations marginally exceeded Action Level 1 at Locations B, D and F.

Polycyclic Aromatic Hydrocarbons (PAHs), total hydrocarbon content (THC), and all Polychlorinated Biphenyls (PCBs), were found to be below Action Level 1 at all locations. Organochlorine pesticides were below the limit of detection (LoD); there are no action levels for these contaminants in Scottish guidance, but concentrations were below Cefas Action Level 1 used in England and Wales.

Overall, the latest chemical sampling suggests that, on the basis of sediment contamination, there is no reason to prevent disposal of sediment in the marine environment, should this remain the BPEO. As required by MD-LOT, the full set of results will also be provided with the marine licence application in the pre-disposal sampling results form.

Table 5. Concentration of chemical determinands in surface sediment samples collected from within the dredge area.

Parameter	Unit	Action Level		Sediment Concentrations					
		AL1	AL2	Location A	Location B	Location C	Location D	Location E	Location F
Trace Metals and Organotins (dry weight)									
Arsenic	mg/kg	20	70	6.8	6.8	6.1	6.1	5.9	6.3
Cadmium	mg/kg	0.4	4	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04
Chromium	mg/kg	50	370	48.5	52.6	49.1	50.6	45.6	52.2
Copper	mg/kg	30	300	3.7	3.2	3.3	3.9	2.8	3.5
Mercury	mg/kg	0.25	1.5	0.02	0.02	0.05	0.03	0.02	0.03
Nickel	mg/kg	30	150	59.7	63.7	61.7	61.7	56.8	61.6
Lead	mg/kg	50	400	6.3	5.5	5.4	5.4	4.8	5.3
Zinc	mg/kg	130	600	31.5	32.6	32.2	30.7	31.2	31.2
Tributyltin	mg/kg	0.1	0.5	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
Dibutyltin	mg/kg	0.1	0.5	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
PAHs (dry weight)									
Acenaphthene	µg/kg	100	-	<1	<1	<1	<1	<1	<1
Acenaphthylene	µg/kg			<1	<1	<1	<1	<1	<1
Anthracene	µg/kg			<1	<1	<1	<1	<1	<1
Benzo[a]anthracene	µg/kg			<1	5.07	<1	2.04	<1	1.65
Benzo[a]pyrene	µg/kg			1.38	6.90	<1	2.35	<1	2.21
Benzo[b]fluoranthene	µg/kg			<1	6.20	<1	2.18	<1	2.21
Benzo[e]pyrene	µg/kg			<1	4.41	<1	1.50	<1	1.51
Benzo[ghi]perylene	µg/kg			<1	4.31	<1	1.44	<1	1.49
Benzo[k]fluoranthene	µg/kg			1.52	6.04	<1	2.58	<1	2.33
C1-naphthalenes	µg/kg			<1	<1	<1	2.12	<1	2.03
C1-phenanthrene	µg/kg			<1	2.72	<1	1.34	<1	1.73
C2-naphthalenes	µg/kg			<1	<1	<1	1.66	<1	1.67
C3-naphthalenes	µg/kg			<1	<1	<1	1.35	<1	<1
Chrysene	µg/kg			1.61	8.21	<1	2.42	<1	2.45
Dibenzo[ah]anthracene	µg/kg	10	-	<1	<1	<1	<1	<1	
Fluoranthene	µg/kg	100	-	2.66	16.1	1.59	4.91	<1	5.16
Fluorene	µg/kg			<1	<1	<1	<1	<1	<1
Indeno[1,2,3-cd]pyrene	µg/kg			<1	4.81	<1	1.69	<1	1.70
Naphthalene	µg/kg			<1	<1	<1	<1	<1	<1
Perylene	µg/kg			<1	2.17	<1	<1	<1	<1
Phenanthrene	µg/kg			1.33	4.45	<1	1.93	<1	3.10
Pyrene	µg/kg			2.22	13.2	1.49	4.05	<1	4.16
Total Hydrocarbon Content	mg/kg	100	-	1.220	1.550	0.767	0.941	1.150	1.550

Parameter	Unit	Action Level		Sediment Concentrations					
		AL1	AL2	Location A	Location B	Location C	Location D	Location E	Location F
PCBs									
PCB 18	µg/kg	20	180	<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 105	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 110	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 128	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 141	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 149	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 151	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 156	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 158	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 170	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 183	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 187	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 194	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 31	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 44	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 47	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 49	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 66	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 28	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 52	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 101	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 118	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 138	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 153	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
PCB 180	µg/kg			<0.08	<0.08	<0.08	<0.08	<0.08	<0.08
Organochlorine pesticides									
alpha-Hexachlorcyclohexane	µg/kg	-	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
beta-Hexachlorcyclohexane	µg/kg	-	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
gamma-Hexachlorcyclohexane	µg/kg	-	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Dieldrin	µg/kg	5*	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Hexachlorobenzene	µg/kg	-	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
p,p'-Dichlorodiphenyldichloroethane	µg/kg	-	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
p,p'-Dichlorodiphenyldichloroethylene	µg/kg	-	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
p,p'-Dichlorodiphenyltrichloroethane	µg/kg	1*	-	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Key	Below AL1								
	Above AL1, below AL2 (if applicable)								
* Derived from the Cefas provided Action Levels, as these values are not provided for the above chemicals in the Scottish guidance									

5 Waste Hierarchy Assessment

As described in Section 3.2 the waste hierarchy ranks waste management options according to the best environmental practice. The following section discusses the options, with respect to the management of the sand and silt arising from maintenance dredging of the Port of Ayr.

5.1 Prevention

There are two main alternatives for the prevention of generating waste material, including:

- 1) Do Nothing (i.e. do not undertake maintenance dredging);
- 2) Reduce the dredging requirement and hence the volume of dredge arisings.

The main approach to avoiding the generation of waste would be to not undertake the proposed maintenance dredging. To cease all maintenance dredging would, however, ultimately restrict the maximum size of vessel that could safely navigate to the Port of Ayr and therefore limit the competitiveness of the Port, eliminating existing trades which provide 'just in time' goods to a wider hinterland. Maintenance dredging is therefore seen as essential for the ongoing operations of the Port of Ayr Harbour which supports the employment of people directly on the port estate and jobs (hauliers, suppliers etc.) in the Ayr area and further into west Scotland.

The maintenance dredging requirement has been optimised/minimised to facilitate safe and efficient navigation of vessels and is consistent with marine plan policies. This means a minimum depth required in the channel of 4.0 m below CD. The depth on vessel's echo sounders is monitored when piloting vessels and where necessary spot surveys are carried out to confirm depths if there is uncertainty. Channel depths are also monitored by pre-and post-dredge surveys. These methods inform the decision 'to call' for a dredge campaign.

These methods of monitoring mean the dredger is only called when necessary; in recent years this has typically been twice a year. Additionally, the monitoring method along with the pre-and post-dredge surveys allow specific areas of the harbour to be 'targeted' to maximise efficiency and minimise the dredge volume (hence disposal quantity) required. This is typically at the entrance to the harbour.

The use of water injection dredging (WID) is an alternative method to minimise the need for a separate waste disposal activity. However, the coarse sediments to be removed are not conducive for use of the method and the sediment is likely to settle in areas which would create an increased supply of sediment to return to the channel. This would effectively increase the future maintenance requirement. The method is therefore not considered viable.

In summary, all measures to prevent and/or reduce the volume of waste generated by the project have been fully considered and the present dredge management provides the minimum dredge requirement for the existing trade through the Port.

5.2 Re-use, recycling and other recovery

Potential options have been identified for uses of the dredge arisings from the Port of Ayr. These include, for example, habitat creation, engineering projects (e.g., land reclamation), agricultural land improvement, beach replenishment and other forms of recovery, such as for aggregates or building materials (following treatment). These options are reviewed below with respect to the maintenance dredge arisings.

5.2.1 Re-use

Soil improvement

The dredge material comprises predominantly sand with smaller quantities of gravel. Its organic content is assumed to be in the form of coarse vegetation, mainly leaves and twigs. The material would also have a high water and saline content. Therefore, the expected dredge spoil is not suitable for soil conditioning or spreading on agricultural land without extensive treatment. As such the materials would not improve the growing capability of soil to any significant extent and in general it would be detrimental to growth. The only possible agricultural or landscaping benefit would be localised improvements in drainage if the material was used to raise depressions or otherwise increase soil permeability. However, any local demand for soil is also easily satisfied from normal sources, and the logistics of moving the material to any site would be like that described for sacrificial land disposal, in Section 5.3.1, below.

Land reclamation

The material is potentially suitable for use in creating new land, either on the coast or inland. Its size and texture give it good drainage and loadbearing characteristics. Appropriate potential uses include general raising of ground levels, road embankment construction and any situation where bulk infill might be required. Should any reclamation project on the Ayrshire Coast require fill, ABP would be prepared to offer material dredged from Ayr. In the absence of any known project, however, the option is not considered the BPEO at this stage.

Construction product use

The dredged material has a possible use in the manufacture of concrete, asphalt, glass and other materials made from silica. Sands used in these industries are required to be of a specified quality, to have a consistent quality and to be free from organic material and salts. The material dredged from Ayr has been examined for possible use in concrete production and glass manufacture and has been found to be unacceptable because of the organic content, and no demand has resulted for the material landed at Ayr. The option is therefore not considered the BPEO.

5.2.2 Recycling

Beach nourishment/replenishment

The dredged material may be suitable for beach nourishment either to counteract erosion or to improve amenity when the beach is used for public recreation. The dredged material is either derived from or would contribute to the natural coastal processes, and if the Port of Ayr did not exist, it is likely that it would form part of the natural sediment circulatory system of the Ayrshire Coast.

The beaches to the north of Ayr, extending as far as the River Irvine, are all experiencing erosion. This is particularly noticeable to the south and north of Troon where wave erosion of the backing dunes had to be countered by hard protection. There would thus be considerable benefit to the Ayrshire beaches in terms of both erosion reduction, and amenity upgrading as the beaches are widely used for recreation.

A study undertaken by the University of Strathclyde in 1995 (Allan, 1995) has examined the potential for nourishing the beaches using material dredged from Ayr (and Troon). It identified a problem relating to the transport and placement of material on the beaches. Because of the relatively flat slopes of the beaches, bottom dumping from grab or trailer dredgers even at high tide would leave the material at some distance from the upper beach. The trailer dredger could pump the material ashore using a floating pipeline, but this would require to be installed and maintained through the surf zone.

Therefore, the best practical option for placement on the beaches was identified as the use of Irvine Harbour for berthing the dredgers with material then being conveyed south by pipeline or by dump trucks. Dump trucks would seem the most practicable but would introduce significant environmental and safety issues with the increase of lorry journeys (1,500 loads, based on 30,000 tonne dry weight of material, and a 20-tonne lorry capacity) on the roads. Both options would therefore involve considerable additional environmental costs, in addition to significant financial implications, compared with sea disposal.

Responsibilities for beach management, and hence any beach nourishment activities, lie with the local authorities, in this case South Ayrshire and North Ayrshire councils. These councils would require taking the initiative in developing a beach management plan based on intermittent nourishment. The involvement of other agencies such as The Crown Estate, NatureScot and the Marine Directorate would also be required.

Furthermore, for beach replenishment to be considered the BPEO for management of the maintenance dredge material the following consents, and assessment would be required:

- Consent of the Marine Directorate is required for works in tidal waters under Marine (Scotland) Act 2010;
- Consent to dispose of material to the foreshore or seabed from both the Marine Directorate and The Crown Estate. The Crown Estate, generally, may be happy to issue consent, providing all other statutory consents are in place and subject to negotiation of a disposal fee;
- Consultation with the local councils;
- Local acceptability of the use of the dredged material as beach replenishment; and
- Assessment of the environmental implications of a beach recharge at the identified location and the potential effects of any dispersion (which may include statutory requirements such as Environmental Impact Assessment, or Water Framework Directive assessment).

The results of the Strathclyde study demonstrate that use of the material dredged from Ayr for nourishing the Ayrshire beaches is a potential environmental option, and preferable to at-sea disposal. However, the study also identified major practical and organisational difficulties, environmental and safety issues, as well as the significantly increased costs, which would need to be addressed by all interested parties. ABP would be willing to participate in discussions in the future should projects be identified. However, there are currently no known beach nourishment schemes being progressed by South Ayrshire or North Ayrshire councils.

At this time, given that no ongoing projects have been identified, and ABP is unaware of potential projects being taken forwards by the local councils, beach nourishment is not considered as a practical disposal option to be progressed within the timescales of the present licence application. Should projects be identified in the future a full assessment would be required to determine the overall feasibility and balance of environmental costs and potential benefits of a beach nourishment scheme.

5.3 Disposal

5.3.1 Sacrificial landfill

The dredged material is largely inert, and the concentration of contaminants is predominantly below that considered as requiring special care of controlled disposal in a licensed landfill. Therefore, placement of the dredge material at a licensed landfill site would be unnecessary.

Furthermore, the nature of the dredged material (a mixture of sand, with some gravel) is unsuitable for sacrificial landfill without involving an extensive transport and treatment process. Disposal to landfill would involve a complicated material handling operation involving sea to land transfer, de-watering, loading to trucks and transport to site. In addition, there would need to be a change in dredger type, for example from a TSHD designed for maintenance dredging to one designed for aggregate recovery or a change to a mechanical form of dredger, unless a settling lagoon could be constructed. These considerations would all add considerably to the complexity of managing the dredge arisings both from a practicality and cost perspective.

South Ayrshire, East Ayrshire and North Ayrshire councils, the three authorities local to the harbours, do not have sites able to accept the quantities of material dredged from Ayr. Commercial operators of licensed landfill sites might accept the material but only at a charge which would compensate for the significant loss of volume. There is considerable difficulty in obtaining suitable landfill sites for domestic and commercial waste throughout Ayrshire, and there would be no environmental benefit in placing relatively clean sand and gravel in existing or new sites. Owners and operators of sites are reluctant to sacrifice space for inert material thus shortening the life of their site and reducing capacity for industrial and domestic controlled wastes. This would place increased pressure to open further sites in the locality, which is unlikely to be favoured by either local authorities or the public.

In view of the reasons noted above, it is concluded that the transfer of the dredged material to landfill is not a practical option and therefore can be discounted as the BPEO.

5.3.2 Incineration

The sediment dredged from Ayr comprises approximately 99% sand with some gravel. Placing the material in an incinerator would only result in removal of the organic fraction. The organic material is natural in origin, being mainly vegetation, and there is no need for it to be burned either to render it harmless or to reduce its volume. If the Port of Ayr did not exist, the vegetation would pass naturally to the sea, as it does from other rivers on the Ayrshire Coast, and there continue the natural process of decay. Incineration of the material from Ayr is not a practical option; it would result in a very substantial inert residual volume and produce no environmental benefit. This option is thus not considered appropriate as the BPEO.

5.3.3 Sea

The dredged material is suitable for disposal in the sea at an appropriate site. It is in part derived from the sea bed, and in part would eventually form the sea bed. As such, the material could be disposed of in a near shore site, where it is likely to continue to be part of the natural circulatory system.

Material dredged from Ayr and Troon has historically been relocated in an offshore disposal ground (Ayr Bay – MA050). This option allows both the grab dredgers and trailer dredgers to work efficiently. Sea disposal has not been demonstrated to have caused significant adverse impact on the marine environment at and around the disposal site. No complaints have been received from fishing or other marine interests and there is no evidence that the use of the site licensed in 1987 has resulted in turbidity, discolouration, foaming, odour or floating substances either at the site or on the shore. No objections have been received on amenity grounds and ABP is unaware of the disposal of dredge arisings causing any interference with other legitimate uses of the sea.

It is thus considered that this shallow water dispersive site to the north of Ayr is the most practical option for at-sea disposal. Here, sediment of similar characteristics to that dredged occurs on the sea bed and allows the sediment to be retained within the natural circulation system, as it would if the harbours did not exist.

The traditional objections to shallow water disposal of dredged material are on navigational and fishing grounds. ABP is the only port authority within the area proposed and the only authority with dredged areas or harbours which could be affected by the movement of the relocated sediment. It is considered that with the use of a dispersive site and considering the total quantity of material to be relocated annually, the frequency of dredging and the size of the dredgers used, the change in water depth resulting from the relocation will be insignificant.

With regard to fishing and the marine environment, the shallow water to the north of Ayr is not fished on a regular basis and is not one regarded by local fisheries officers or fishermen as a fish breeding ground. The shallow depth means that the seabed is one subject to considerable natural disturbance during storms, and marine life existing in such a high energy environment is unlikely to be affected detrimentally by the controlled release over a wide area of material of similar characteristics to that existing on that sea bed. Organic material would be released by the disposal, but this would either fall to the seabed or be moved by surface or sub-surface currents. Some discolouration of the water might also result. Both these effects would be within the natural variation occurring at the mouth of any river during a flood.

ABP thus considers that relocation of the material dredged from Ayr in the designated disposal area to be the BPEO. It continues to allow flexibility in the dredging operation, it will help to contain dredging costs, it will retain sediment within the coastal circulation zone, and it is unlikely to have significant adverse navigation or environmental impacts.

6 Conclusion

This review of the options available for the prevention, re-use and recycling of the material dredged from the Port of Ayr has developed from earlier BPEO studies in the light of experience gained in actively seeking alternatives to at-sea disposal.

The material dredged by ABP from the Port of Ayr consists of predominantly sand, with organic material, which is derived from the coastal circulation system or from the River Ayr. Dredging is required to ensure vessels are able to safely navigate to the Port of Ayr and deliver goods to the wider hinterland. As such, preventing the production of waste is not possible in this case.

Options for the re-use and recycling of the material have been examined. The sediment contains organic material, but this is not in a form of ready benefit to vegetation. The high sand and salt content of the sediment also means that it is of little use as a growing medium or as a soil conditioner. Its use in construction products is also not considered appropriate. Whilst it is theoretically possible for the sediment to be used in creating new land, the absence of any current known projects in the local area discounts its use at this stage.

The material may be suitable for beach nourishment and there is a potential need for Ayrshire beaches to be supplied with sediment for coastal protection and amenity enhancement. However, a study carried out into the feasibility of using the dredged material for local beach nourishment identified major practical problems, environmental and safety issues, increased disposal costs and no established enabling organisation. ABP has no responsibility for coastal protection and no powers to undertake such work on Ayrshire beaches. Therefore, at this time, it is considered that beach nourishment is not a practical option.

Nevertheless, ABP is willing to make material available for beach nourishment assuming there were no significant practical, environmental or cost implications for its marine dredging operations. ABP would be pleased to participate in discussions with local authorities and other interested organisations, in order to overcome the practical, economic and legislative difficulties in using dredged sediment for beach nourishment opportunities. However, it is considered unlikely that this would be practicable in the timescales required for this marine dredge licence application.

The prevention, re-use or recycling of the dredge material is not considered possible and options for disposal have been assessed. The material does not contain contaminants at concentrations considered to be unacceptable for at-sea disposal. There is accordingly no need for and no environmental benefit to be gained by incineration of the material or its placement in a licensed landfill.

The dredged material is considered suitable for sea disposal, and disposal at the present licensed disposal site at Ayr Bay (MA050) has not (to the knowledge of ABP) resulted in adverse environmental impacts or been a cause of complaint. Therefore, it is concluded that the BPEO for the placement of maintenance dredge arisings from the Port of Ayr is near shore disposal in a dispersive site to the north of Ayr (present disposal site).

7 References

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8 Abbreviations/Acronyms

ABP	Associated British Ports
AL	Action Level
BPEO	Best Practicable Environmental Option
CD	Chart Datum
EC	European Commission
EEC	European Economic Community
EQS	Environmental Quality Standard
EU	European Union
HM	His (Her) Majesty's
ICES	International Council for the Exploration of the Sea
MD-LOT	Marine Directorate Licensing Operations Team
MPS	Marine Policy Statement
MS	Marine Scotland
OPs	Organochlorine Pesticides
OSPAR	Oslo-Paris Convention
PAH	Polycyclic Aromatic Hydrocarbons
PCB	Poly-chlorinated biphenyls
PD	Project Director
PM	Project Manager
PSA	Particle Size Analysis
QM	Quality Manager
SI	International System of Units
SMR	Scottish Marine Region
TBT	Tributyltin
THC	Total Hydrocarbon Content
TSHD	Trailer Suction Hopper Dredger
UK	United Kingdom
UKD	UK Dredging
USEPA	United States Environmental Protection Agency
WHA	Waste Hierarchy Assessment
WID	Water Injection Dredging

Cardinal points/directions are used unless otherwise stated.

SI units are used unless otherwise stated.

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