



HISTORIC
ENVIRONMENT
SCOTLAND

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ALBA

By email to:
MS.MarineLicensing@gov.scot

Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Deirdre.Cameron@hes.scot
T: 0131 668 8896

Our ref: AMA/16/31/53
Our case ID: 300025365
Your ref: 06806 & 06807
06 December 2018

Dear Sir/Madam

Marine (Scotland) Act 2010
06806 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Construction
06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Marina Re-development - Capital Dredging & Deposit of Dredged Spoil

Thank you for your email consultation of 12 November requesting our comments on this Marine License application and Environmental Report.

I can confirm we have no comments to make on the proposal. We noted during Scoping we were content for cultural heritage interests to be scoped out of the EIA process; we therefore have no further comments in regards to the submitted EIA report.

Yours sincerely

Historic Environment Scotland

Royal Yachting Association Scotland

Caledonia House
1 Redheughs Rigg
South Gyle
Edinburgh
EH12 9DQ

T +44 (0)131 317 7388
E admin@ryascotland.org.uk
W www.ryascotland.org.uk

25 October 2019

Naomi Gibson, Marine Scotland – Marine Planning and Policy
Scottish Government, Marine Laboratory,
375 Victoria Road, Aberdeen, AB11 9DB

Dear Ms Gibson,

**06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Harbour Redevelopment –
Capital Dredging and Sea Disposal, Edinburgh CEMP**

I have read the above Environmental Management Plan on behalf of RYA Scotland.

I read closely section 6.5 of the CEMP, which relates to navigation, to ascertain how interactions with recreational boats would be managed. It is unclear whether this section is the Navigational Risk Assessment required by the marine licence (3.1.9.c) or whether one will be written and submitted to Marine Scotland once the dredging contractor is appointed. The key risks have been identified although it should be noted that damage to vessels by the dredger should include the effect of wash from the dredger on small vessels.

The CEMP suggests publicity in [the] local press for recreational users to help avoid damage to vessels by the dredger. However, Condition 3.2.4 of the marine licence requires the licensee to invite listed local stakeholders to contribute to a stakeholder agreement relating to how the licensee will liaise with these harbour users. Once formed, a liaison group like this will be a more effective way of communicating with harbour users than publicity in the press. If the dredging is completed by early April 2020 and the dredger is moored in the West Harbour while the works are taking place, there is unlikely to be any interaction with recreational boaters as most boats are laid up ashore during the winter. Boats are lifted in to the water during April (the Forth Corinthian Yacht Club lift into the West Harbour). From late October till lift-in, only a few recreational boats are active in Granton Harbour although this is the time when maintenance of the East harbour moorings takes place. The work boats used for this would be vulnerable to the wash from the dredger were it to enter the East Harbour to be tied up at the South Slip.

We recognise the importance of this dredging campaign and hope that it can start as soon as possible once the points above have been addressed.

Yours sincerely,
[Redacted]

Northern Lighthouse Board

Your Ref: MSL 06806 & 06807
Our Ref: AL/OPS/ML/PJMS_028_19

84 George Street
Edinburgh EH2 3DA
Switchboard: 0131 473 3100
Fax: 0131 220 2093
Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk



Ms Naomi Gibson
Marine Licensing Casework Officer
Marine Scotland – Marine Planning and Policy
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

30 October 2019

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

06806 – EDINBURGH MARINA GRANTON HARBOUR LTD (PER CAMERON PLANNING) – MARINA RE-DEVELOPMENT – CONSTRUCTION

06807 - EDINBURGH MARINA GRANTON HARBOUR LTD (PER CAMERON PLANNING) - HARBOUR REDEVELOPMENT – CAPITAL DREDGING AND SEA DISPOSAL, EDINBURGH

Thank you for your e-mail correspondence dated 10th October 2019 regarding the application submitted by **EDINBURGH MARINA GRANTON HARBOUR LTD** for consent to carry out construction works and a capital dredging campaign, at Granton Harbour, Firth of Forth.

06806 - Construction

It is noted that the proposal includes the installation of 2 lit navigational buoys and a navigational light on the proposed breakwater extension.

Northern Lighthouse Board has no objections to the proposed construction works and recommend the following:

- The navigational light proposed for the breakwater extension is required to have a minimum nominal range of 2 nautical miles.
- **EDINBURGH MARINA GRANTON HARBOUR LTD** communicate with Northern Lighthouse Board with regard to the required characters for the proposed navigational lights.
- **EDINBURGH MARINA GRANTON HARBOUR LTD** liaise with Forth Ports PLC with regard to the promulgation of Notice to Mariners, and local marine works licences.
- The final “as-laid” positions, upon completion of the project, should be communicated to the UK Hydrographic Office to enable the appropriate updates to be made to navigational charts.

- The Statutory Sanction of the Commissioners of Northern Lighthouses will be required for the establishment of the proposed Aids to Navigation. This form can be downloaded from the NLB website, or sent on request.

06807 – Dredging

It is noted that the campaign has identified the FO038, FO041 and FO044 spoil grounds within the Firth of Forth as disposal sites.

Northern Lighthouse Board has no objections to this proposal and recommends the following:

- **EDINBURGH MARINA GRANTON HARBOUR LTD** liaise with Forth Ports PLC with regard to the promulgation of Notice to Mariners.
- The final depths should be should be communicated to the UK Hydrographic Office to enable the appropriate updates to be made to navigational charts.

Yours sincerely
[Redacted]

Peter Douglas
Navigation Manager

Privacy Statement

NLB take seriously the protection of your privacy and confidentiality, and understand that you are entitled to know that your personal data will not be used for any purpose unintended by you. In line with our document retention schedules, copies of this correspondence will be retained on our live internal system in line with our legislative requirements and obligations, before being archived as required for conformance with our data Protection Policy and the associated Data Retention Schedules. Archived copies may be retained indefinitely in the public interest. Our Privacy Notice can be accessed via the following link: <https://www.nlb.org.uk/legal-notices/>

Gibson N (Naomi)

From: DIO-Safeguarding-Offshore (MULTIUSER) <DIO-Safeguarding-Offshore@mod.gov.uk>
Sent: 15 October 2019 14:49
To: MS Marine Licensing
Subject: RE: 06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Harbour Redevelopment – Capital Dredging and Sea Disposal, Edinburgh. - CEMP Consultation - Response by 05 November 2019

Good Afternoon,

DIO Ref-10043072-Rev 2

Further to your email below, after reviewing the details of the Environmental Management Plan (“EMP”) (Dredging) submitted as condition 3.1.9 of licence 60709/19/0 provided. I can confirm the MOD has no safeguarding objections to this proposal.

Please disregard email sent earlier as this was sent in response to your first email which had the incorrect case details noted on it.

Kind Regards

Kalie Jagpal | Assistant Safeguarding Manager | Safeguarding |
Defence Infrastructure Organisation | Kingston Road |
Sutton Coldfield | West Midlands | B75 7RL |

Mob: 07970 171174

Email: kalie.jagpal326@mod.gov.uk



Website: www.gov.uk/dio/

Twitter: @mod_dio

Read DIO's blog <http://insidedio.blog.gov.uk/>

From: MS.MarineLicensing@gov.scot <MS.MarineLicensing@gov.scot>

Sent: 10 October 2019 10:39

To: MS.MarineLicensing@gov.scot; forth@nature.scot; planning.se@sepa.org.uk; hmconsultations@hes.scot; planning@edinburgh.gov.uk; navigationsafety@mcga.gov.uk; clerk@forthdsfb.org; RMerrylees@ukchamberofshipping.com; RCarington@ukchamberofshipping.com; marine@crownestatescotland.com; DIO-Safeguarding-Offshore (MULTIUSER) <DIO-Safeguarding-Offshore@mod.gov.uk>; secretary@marinesafetyforum.org; pauline@ryascotland.org.uk; planning.scotland@rspb.org.uk; renewables@sff.co.uk; info@scottishfishermen.co.uk; scollin@scottishwildlifetrust.org.uk; Fred.Abercrombie@transport.gov.scot; Chris.Wilcock@transport.gov.scot; Val.Ferguson@transport.gov.scot; sarah.dolman@wdcs.org; Phil.Gilmour@gov.scot; Douglas.Keith@visitscotland.com; planningconsultations@scottishwater.co.uk; brian@asfb.org.uk; planningconsultations@scottishwater.co.uk; ailies@btinternet.com

Subject: 06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Harbour Redevelopment – Capital Dredging and Sea Disposal, Edinburgh. - CEMP Consultation - Response by 05 November 2019

Gibson N (Naomi)

From: navigation safety <navigationsafety@mcga.gov.uk>
Sent: 15 October 2019 15:06
To: MS Marine Licensing
Cc: navigation safety
Subject: RE: 06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Harbour Redevelopment – Capital Dredging and Sea Disposal, Edinburgh. - CEMP Consultation - Response by 05 November 2019

Good Afternoon Naomi,

Thank you for your email, well noted that licence 06709 (Port of Cromarty Firth) is **not** being re-consulted.

On the understanding that we are being asked to consider the submitted Environmental Management Plan (EMP) as an addendum to the existing licence to 06807 (Edinburgh Marina), then MCA confirm we have no objections on the understanding that agreement has also been reached between the licence holder and the Statutory Harbour Authority (Forth Ports, Edinburgh), as per our advisory to the original licence consultation. Notices to Mariners should also be updated as appropriate.

Should you have any questions please feel free to contact us.

Best Regards,

Tom

Thomas Bulpit, Marine Licencing Lead

Navigation Safety Branch, DMSS
Maritime & Coastguard Agency
Spring Place, 105 Commercial Road, Southampton, SO15 1EG
Direct: 020381 72418 | Mobile: 07825 792138
Email: Thomas.bulpit@mcga.gov.uk



Safer Lives, Safer Ships, Cleaner Seas



From: MS.MarineLicensing@gov.scot <MS.MarineLicensing@gov.scot>
Sent: 10 October 2019 10:39
To: MS.MarineLicensing@gov.scot; forth@nature.scot; planning.se@sepa.org.uk; hmconsultations@hes.scot; planning@edinburgh.gov.uk; navigation safety <navigationsafety@mcga.gov.uk>; clerk@forthdsfb.org; RMerrylees@ukchamberofshipping.com; RCarrington@ukchamberofshipping.com; marine@crownestatescotland.com; DIO-safeguarding-offshore@mod.gov.uk; secretary@marinesafetyforum.org; pauline@ryascotland.org.uk; planning.scotland@rspb.org.uk; renewables@sff.co.uk; info@scottishfishermen.co.uk; scollin@scottishwildlifetrust.org.uk; Fred.Abercrombie@transport.gov.scot; Chris.Wilcock@transport.gov.scot; Val.Ferguson@transport.gov.scot; sarah.dolman@wdcs.org; Phil.Gilmour@gov.scot; Douglas.Keith@visitscotland.com; planningconsultations@scottishwater.co.uk; brian@asfb.org.uk; planningconsultations@scottishwater.co.uk; ailies@btinternet.com

17th October 2019

Marine Scotland
Scottish Government 375 Victoria Road
Aberdeen
AB11 9DB



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

Dear Naomi Gibson

EH5 Edinburgh Granton Harbour Edinburgh Marina
PLANNING APPLICATION NUMBER: 06807/19/0
OUR REFERENCE: 783750
PROPOSAL: Capital Dredging and Sea Disposal, Edinburgh.

Please quote our reference in all future correspondence

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Infrastructure within boundary

According to our records, the development proposals impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly at service.relocation@scottishwater.co.uk.

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

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."

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 taking account of various factors including legal, physical, and technical challenges. However it may still be deemed that a combined connection will not be accepted. Greenfield sites will not be considered and a connection to the combined network will be refused.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is proposed, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- **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

If the applicant requires any further assistance or information, please contact our Development Operations Central Support Team on 0800 389 0379 or at planningconsultations@scottishwater.co.uk

Yours sincerely

Angela Allison

Angela.Allison@scottishwater.co.uk

Gibson N (Naomi)

From: Malcolm Fraser <Malcolm.Fraser@nature.scot>
Sent: 22 October 2019 09:33
To: MS Marine Licensing
Subject: RE: 06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Harbour Redevelopment – Capital Dredging and Sea Disposal, Edinburgh. - CEMP Consultation - Response by 05 November 2019

FAO: Naomi Gibson

Thank you for consulting us on the CEMP for the above project.

We confirm that, in our view, this CEMP meets the requirements of Condition 3.1.9 of marine licence 06807/19/0 – as far as they relate to SNH's remit. We have no comments to offer on those aspects of the CEMP that do not relate to our remit (e.g. navigational risk).

We note the applicant's position (see CEMP section 3.5) that the most practical time to carry out dredging is during lower tidal states, but that this works against Condition 3.3.10. At times of lower tidal states, larger amounts of intertidal habitat are available for birds to use for foraging etc, particularly in the eastern harbour. We therefore support the applicant's statement that there is sufficient alternative habitat available for SPA birds to use during the dredging campaign.

I hope these comments are useful, please contact me if you would like to discuss them further.

--

Malcolm Fraser | Operations Officer - Forth

Scottish Natural Heritage | Silvan House | 3rd Floor East | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: 0131 316 2629
Dualchas Nàdair na h-Alba | Taigh Silvan | 3mh Làr an Ear | 231 Rathad Chros Thoirphin | Dùn Èideann | EH12 7AT
nature.scot – Connecting People and Nature in Scotland – [@nature_scot](https://twitter.com/nature_scot)

From: Naomi.Gibson@gov.scot <Naomi.Gibson@gov.scot>
Sent: 16 October 2019 10:22
To: Malcolm Fraser <Malcolm.Fraser@nature.scot>
Subject: RE: 06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Harbour Redevelopment – Capital Dredging and Sea Disposal, Edinburgh. - CEMP Consultation - Response by 05 November 2019

Good morning Malcolm,

Yes, we are solely consulting on the content of the CEMP, as it relates to Condition 1.1.10 of the Decision notice – which is the same condition as Condition 3.1.9 of licence 06807/19/0.

Kind regards,

Naomi Gibson

Naomi Gibson
Marine Licensing Casework Officer
Marine Scotland - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Direct Line: +44 (0)131 244 3996

Our Ref: PCS/168116
Your Ref: 06807

If telephoning ask for:
Paul Lewis

Naomi Gibson
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

14 November 2019

By email only to: MS.MarineLicensing@gov.scot

Dear Ms Gibson

Marine (Scotland) Act 2010, Part 4 Marine Licensing

06807 - Edinburgh Marina Granton Harbour Ltd (per Cameron Planning) - Harbour Redevelopment – Capital Dredging and Sea Disposal, Edinburgh.

Thank you for your consultation email which SEPA received on 10 October 2019. I apologise for the delay in response.

Advice for Marine Scotland

- 1.1 The current application seeks to discharge 3.1.9 of licence 06807/19/0 capital dredging and sea disposal.
- 1.2 The Dredging Environmental Management Plan (EMP) states the dredged spoil will be disposed of at sea in licensed disposal sites, as set out in the approved Marine Licence where this is possible. The acceptability of the proposal for disposal at sea is for Marine Scotland to determine and we have no comments to make on this element of the EMP
- 1.3 As outlined in the BPEO and the Works Licence application documents, the remainder of the dredging will be brought to land and either utilised within the development i.e. use as backfill if deemed appropriate or disposed of off-site. Where possible the strategy will focus on the beneficial reuse of material as far as possible. All of this seems reasonable and appropriate, however, as Marine Scotland and the applicant's agent have been advised in previous correspondence, dredging materials may only be used when they meet certain standards or, if they do not, they must go to appropriately licensed waste sites. The applicant was also advised to make contact with SEPA's local office to discuss the nature of the wastes to be brought ashore and any appropriate waste sites which have been identified.
- 1.4 We do not advise against the discharge of the condition. It is at the applicants' own risk if they have not made proper provision for dredged materials brought to shore.

continued.....

- 1.5 We reiterate that our remit with regards to the EMP applies to activities above MHWST. While the EMP indicates awareness of and adherence to SEPA guidance contained within GPP the applicant is reminded that the use of reclaimed materials is covered by Waste Management licensing and the relevant exemption would be required to be in place prior to the use of dredging spoil on land.
- 1.6 While SEPA encourages the reuse of such materials the fact that those brought ashore are more than likely deemed unsuitable for offshore disposal raises questions regarding their suitability for use in harbour infill. As a result, SEPA would require information on the type and level of pollutants present and their potential for release back into the water column: of particular concern would be Copper and Zinc. Additionally SEPA would ask if any analysis been carried out on the particular sediments for Tributyltin (TBT) and its breakdown products di- and mono- butyltin (DBT and MBT).
- 1.7 Furthermore the use of dredging spoil under exemption should meet the relevant objectives under Waste Management Licensing. SEPA would ask that training be given to relevant staff in filling out both Waste Transfer Notes and Special Waste Consignment Notes: this is particularly relevant as SEPA is currently running a campaign to improve the information provided by producers carriers and disposers on SWCN this campaign is backed by Fixed Monetary Penalties The operator is advised to read the guidance at https://www.sepa.org.uk/media/36660/consigning_special_waste_guidance.pdf
- 1.8 The applicant is advised that any accident or incident above MHWST that is liable to cause significant pollution either to land or water should be reported to SEPA forthwith either via the local SEPA office or via the 24hr SEPA Pollution Hotline on 0800 80 70 60 These details should be added to Table 7.1
- 1.9 The concerns relating to re-use and disposal on land are given above. SEPA would look for storage and reuse to be undertaken in such a way as to prevent re-suspension of particulates in the water environment and for appropriate analysis to be undertaken to prevent material being used which have the potential for leachate.
- 1.10 Storage of dredging spoil requires to be carried out in a manner which prevents pollution of land or the water environment.
- 1.11 Should crushing grading or screening of spoil be required the applicant is advised to contact SEPA prior to activities commencing.
- 1.12 As a brownfield site, a SEPA GIS Map search was undertaken for contaminated land and Radioactively contaminated land. While no contaminated land is identified in the area of Granton Harbour any wastes dredged from the entire harbour and its environs would require consultation with SEPA's Radioactive Substances Unit before any licence, consent or authorisation could be given by us.

continued.....

Regulatory advice for the applicant

Regulatory requirements

Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in the local SEPA office at:

Silvan House, SEPA 3rd Floor, 231 Corstorphine Road, Edinburgh EH12 7AT.

Tel: 0131 449 7296

If you have any queries relating to this letter, please contact me by telephone on 0131 273 7334 or e-mail at planning.se@sepa.org.uk

Yours sincerely

Paul Lewis
Senior Planning Officer
Planning Service

ECopy to:

naomi.gibson@gov.scot

steven@cameronplanning.com

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).