

**Invercoe Holiday Park, Glencoe, Argyll
Proposed Coastal Reclamation
Marine Scotland EIA Screening Request**

Prepared on behalf of Invercoe Holiday Park

By Craignish Design

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Summary

Invercoe Holiday Park (the Applicant) wish to carry out a small area of coastal infill and rock armour shore protection at their holiday park at Invercoe, Argyll. The works involve an area of <1000ms of infill below MHWS. The proposed works will a) provide enhanced protection to an artificial shoreline, made up of historic ad-hoc erosion control and: b) provide additional touring caravan pitches.

A full Marine Licence application was submitted to Marine Scotland in April 2022. Marine Scotland: Marine Licencing (MS) indicated that under the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (“the EIA Regulations”) an EIA Screening Request was required. This document is that Screening Request.

Our conclusion is that while the works fall under schedule 2 -1(e) Reclamation of Land from Sea and therefor meets the criteria for EIA screening, there will be no impacts or effects on the environment that would be considered significant. Therefore, due to the small scale, the nature of the works and the location, we are of the opinion that an EIA is not required.

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496 ML 01 rev A	Location
496 ML 02 rev A	Proposed Layout (for ML)
20/066.100C	Site Plan

Introduction

Background

1. Craignish Design was commissioned in April 2022 to make a Marine Licence (ML) application for coastal reclamation works designed by architects Kelly Design Ltd at Invercoe Holiday Park. Subsequent to consultation with Marine Scotland (MS) we were asked to compile this **EIA Screening Request**.

Background

Applicant

2. Applicant is: Iain Brown, Invercoe Holiday Park, Glencoe, Argyll PH49 4HP
tel 01855 811210 email: holidays@invercoe.co.uk

Location

3. Invercoe Holiday Park, Glencoe, Argyll PH49 4HP.
Coordinates: 56°41.214N 005°06.455W : Site centre: OSGB 209767,759336

Existing site

Description of the existing site

4. Invercoe Holiday Park is located on an alluvial delta on the north side of the River Coe as it enters the sea within Loch Leven. The site lies between the B863 public road to the east, Loch Leven to the west and River Coe to the south. The ground is level here and generally amenity grass within the holiday park. The shore here is a mixture of relatively recent rock rip-rap to the north and older mixed rock protection to the south. An extensive intertidal beach of alluvial gravels, crossed by a meandering channel of the River Coe, extends westwards. The foreshore directly affected by the proposed works consists of intertidal beach of river/marine gravels below MHWS.

Proposed Development

Proposed development

5. The applicant proposes to protect a section of foreshore with rock armour rip-rap backfilled with aggregate. The purpose is to protect the shoreline, improve its condition and appearance and to create a small number of additional camp-site pitches. A low wave-wall will be formed to protect from wave damage if the rip-rap is over-topped in storm conditions. This is not a flood protection wall. The infill will raise the ground to above predicted flood levels. It is intended to make use of clean rock aggregate that will become available from the removal of temporary works at the re-construction of the adjacent road bridge.

Purpose

6. The project is a commercial development as part of sustaining the successful holiday business that has operated here for many years, catering primarily for touring caravans, motorhomes and tents with a number of chalets. The area of proposed infill will be used for additional touring pitches.

Proposed works

7. Operations below MHWS:
 - a. Formation of temporary access;
 - b. Excavation of beach material to toe for rock armour, excavations used for infill;
 - c. Import of natural rip-rap rock and clean aggregate for infill;

- d. Formation of rock toe and rip-rap foreshore and aggregate infill;

Scale of development

8. Below MHWS, approximate areas:
 - a. Site area: 995ms:
 - b. Rip-rap & toe: 719ms x approx. 81m length
 - c. Aggregate infill: 276msVolumes will be calculated for the ML application.

Duration of the works

9. The work will be completed over 6-months between November and April.

Design development

10. The project went through various design iterations to gain Planning Approval, primarily in raising infill to mitigate flood risk. Subsequently the proposed development has also been reduced in area, re-designed by the architect. It is the reduced scheme that would progress to a Marine Licence.

Ownership

11. The proposed development is part of Invercoe Holiday Park, a private business, owned by the Applicant. Below MHWS the ground is owned by The Crown Estate.

Consents in place

Consents in place

12. The works have planning approval ref: Highland Council 20/03483

Adjacent works

Previous coastal works

13. A larger scheme for coastal reclamation has been undertaken by the applicant immediately to the north in around 2001/2. This was consented by HC under planning consent 00/0237/FULLO. These works obtained a Marine Licence at that time. The proposed development will be a southward extension of the existing coastal reclamation and protection.

Previous EIA Screening

Previous EIA Screening

14. Under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, the works are Schedule 2. Highland Council determined this did not require EIA screening and no EIA has been undertaken as part of the Planning Consent.

Sensitivities / Designations

Natural heritage designations

15. The site is within the Ben Nevis and Glen Coe National Scenic Area (NSA). This is considered below. The site has been screened for the following additional natural heritage designations. None are directly affected:
 - Marine Protection Area (MPA):
 - Site of Special Scientific Interest (SSSI):
 - Geological Conservation Review (GCR):
 - Special Area of Conservation (SAC):

- Candidate SAC: Special Protection Area (SPA):
- Ramsar:
- Local Nature Reserves (LNR):
- National Nature Reserve (NNR):

Ecological Survey

16. An ecological survey was carried out in July 2022, see appendix. Habitats affected are of local importance.

Salmon River

17. River Coe is a Cat 3 Salmon River with specific sensitivity to up-stream migration period (Oct-Nov) and downstream movement of smolts (late spring). The river is > 100m wide at its mouth and the works are out-with the river itself, being on the loch shore.

National Scenic Area (NSA)

18. The proposed works lie fully within the Ben Nevis and Glen Coe National Scenic Area (NSA). Highland Council carried out an assessment of visual impacts as part of the Planning Application process. This implies an assessment of impacts on the NSA designation and NSA Special Qualities. The Highland Council assessed impacts to be non-significant, being a minor change to the existing and established land-use on the site. In addition, no adverse comments were raised by NatureScotland in respect to the NSA during the planning application consultation.

Cultural Heritage

19. The site has been screened for the following cultural heritage designations: None are directly affected:
 - Listed buildings;
 - Canmore;
 - Canmore Maritime;
 - Scheduled Monuments;
 - Historic Environmental Record sites;
 - Gardens and Designed Landscapes;
 - Conservation Areas;
 - Battlefield;
 - World Heritage Sites;
 - Historic Marine Protection Areas;
 - Protected Military Remains, Wrecks.

Flood risk

20. The proposal is potentially susceptible to marine flooding. A proposed finished ground level of 5.30m AOD will be achieved in the proposed infill. This is above the 1:1000 marine flood incidence, plus allowance for climate change and threshold. This has been approved by SEPA. The site is adjacent to the flood plain of the River Coe, but SEPA consultation concurs the proposal would not affect the flood plain.

Public access

21. The site is private with no public access. There is freedom of public access along the beach and an established informal path on the north bank of the river.

Consultation to-date

Marine Licencing Pre-Application Consultation

22. The current proposal for works below MHWS are below the threshold (1000ms) requiring formal pre-application consultation.

Planning Consent Consultation

23. The following consultation has been undertaken as part of the planning consent process:
- Highland Council (HC) Planning: planning consent granted;
 - SEPA: initial objection on flood risk withdrawn following design changes;
 - NatureScotland (South): no comment;
 - HC Flood Risk Management Team (FRMT): initial objection withdrawn;
 - Marine Scotland: Environmental Protection Group: no comment;
 - HC Env. Health Officer: no objection;
 - Scottish Water: no objection;
 - Glencoe Glen Etive Com Council: no comment;
 - HC Transport Planning Team: no objection;
 - HC Access Officer: no objection;
 - Lochaber Fisheries: no response.

Public consultation

24. The planning application was advertised in the local press and on the HC Planning Portal.

Potential Environmental Impacts

Identification of potential impacts

25. Potential environmental impacts that could result from the proposed works below MHWS include:
- Dispersed silt pollution into the sea/loch environment;
 - Dispersed oil/fuel spillage;
 - Loss of inter-tidal marine habitat;
 - Disturbance to migratory salmon;
 - Disruption of marine deposition / erosion and river morphology
 - Construction nuisance including traffic and noise;
 - Disruption of public access.

Analysis of Potential Adverse Environmental Impacts

Introduction

26. Potential impacts have been assessed as follows.

Dispersed silt pollution

27. There is risk of silts/fine material entering the sea as a result of excavation into the aggregate beach for the base for rock armour toe and import and placement of rock and aggregate. This will be mitigated by Construction Method Statement (CMS) including:
- No machines within the water;
 - Containment of plant access to within the area of infill only;
 - Avoidance of placement of material into the sea by working between tides;
 - Avoidance of open excavations for prolonged periods, susceptible to marine erosion;
 - Avoidance of excavation and placement during extreme weather;
 - Quality control to regulate type of material imported;

- Avoidance of contaminated materials and high silt content;
 - Use of primarily clean aggregate from adjacent bridge works;
 - Use of large aggregate and rock armour, minimalizing silt content;
 - In de-watering the works, silt containment at discharge;
 - Compound/storage areas >10m from HW and have silt/pollution containment;
 - No waste should be allowed to accumulate on-site;
 - Operative training in avoidance of pollution.
28. Once complete, the works will prevent future erosion of the foreshore.

Dispersed pollution

29. There is risk of oil spillage as a result of plant working on the beach. Risk will be mitigated by Construction Method Statement (CMS) including:
- No machines within the water;
 - Plant maintenance to avoid leakage;
 - Designated fueling location >10m from watercourse and sea;
 - Spill kits and pollution socks on-site at all-times;
 - Operative training in avoidance of pollution;
 - Machines parked over-night >10m from HW with spillage mats beneath.
30. Once complete, the works will not have pollution risk.

Loss of intertidal beach habitats

31. There will be permanent loss of around 995ms of beach. The ecological survey confirms sensitivity is low. Impacts can be mitigated by CMS as above, though loss will be permanent. Extent of impact will be contained by limiting plant access to the beach other than to the working area.

Disturbance to migratory Atlantic Salmon and Sea Trout

32. The works are on the marine foreshore, not the river. No work is proposed within the river. The channel is >100m wide. At low-tide the current river channel is remote from and not affected by the works. Seasonal constraints will be applied to avoid fish/smolt migration periods.

Disruption of marine deposition / erosion of beach and river morphology

33. Risk is considered to be low for the following reasons:
- Works are small in scale with a limited intrusion below MHWS;
 - Works are out-with the river with minimal affect on river flow;
 - Works do not directly affect the present river channel, this being >50m to the south;
 - Foreshore above MHWS is not natural showing historic reinforcement and protection.
34. Ordnance Survey maps suggest the works would potentially affect a river channel across the beach. On-site at low-tide this can be observed to be a former channel and is not connected to the main river.

Construction nuisance

35. Plant involved will likely be limited to one 360-degree tracked excavator and dumper. The CMS will control the works. There will be no on-site breaking of rock and /or use of pecker or explosives. Construction work will be timed to minimize disturbance, working M-F 9am to 5pm. There will be night-time illumination and no works after dark. Once complete the works will not have any noise implication over and above that of the existing caravan site.

Disruption of public access

36. There will be a minor loss of public access along the beach during construction and specifically at high-tide. At low-tide there is a wide area of beach unaffected. Once

complete access to the intertidal beach will be slightly reduced at high-tide. At low tide there will be no effect on access to the wider beach.

Cumulative Schemes

37. The replacement of the B863 road bridge has been subject of a Marine Licence application. The construction works, if concurrent, would have some combined impacts on character of the setting, but no material impacts on habitat or cultural heritage. Once complete there would be no combined impacts.

Conclusions

EIA Criteria

38. The proposed works include the construction of rock armour and infill below MHWS to protect and reclaim foreshore from the intertidal area. The works to fall under paragraph 10(m) of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) (“the 2017 MW Regulations”). The threshold for sea defence works, as described in column 2 of schedule 2 of the 2017 MW Regulations, is “all works” thus the proposed works exceed this threshold. When making a determination as to whether schedule 2 works are an EIA project account is taken of the selection criteria set out in schedule 3 of the 2017 MW Regulations (Appendix II) as are relevant to the works. In this regard, we consider the follow apply here:

Characteristics of the works

39. Based on the information above, the works are unlikely to have significant effects on the environment for the following reasons:
 - The works are considered small in scale (<0.1ha) hectares below MHWS;
 - Highland Council has audited the proposal in respect to marine flooding and concluded the that the proposal has been adequately designed to ensure the protection and safety of users from flooding and wave action;
 - The proposed construction methods are restricted to land-based operations, working within tides. No piling or dredging is proposed;
 - Waste materials produced during construction will be appropriately disposed of. Operational waste generated will not affect the marine environment. It will either be appropriately disposed of.

Location of the works

40. Based on the information above, the works are unlikely to have significant effects on the environment for the following reasons:
 - Apart from the NSA, the location of the proposed works do not affect European sites or other areas classified or protected under national legislation. The ecological survey concurs that impacts would be non-significant;
 - In respect to migratory fish within the River Coe, the works are not directly within the river, being on the shore of Loch Leven and, in addition, the CMS will mitigate impacts through avoidance of migration periods;
 - There are no mapped/ designated cultural heritage sites affected;
 - In respect to the NSA, the HC has assessed visual impacts to be non-significant;

Characteristics of the potential impact

41. In view of the findings above we suggest the proposed works are unlikely to significantly affect the environment and that potential impacts can be effectively addressed and mitigated by the marine licence application and determination process. We are therefore

of the opinion that the proposed works are not an EIA project under the 2017 MW Regulations and EIA is not required to be carried out.

END