

# **Draft Report**

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Comhairle Nan Eilean Siar Council Offices Sandwick Road Stornoway



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## **Revision history**

<b>Revision Ref/Date</b>	Amendments	Issued to
P01 / December 2023	Draft Addendum	Colin Maciver (Comhairle Nan Eilean Siar)

## Contract

This addendum report describes work commissioned by Colin Maciver on behalf of Comhairle Nan Eilean Siar, by email dated 20 November 2023. Eloise Eggleston and Harriet Thomlinson, JBA Consulting carried out this work.

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### Purpose

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## Acronyms

- EIA Environmental Impact Assessment
- SSR Screening and Scoping Report

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# 1 Introduction

#### 1.1 Background

- 1.1.1 The council of Comhairle Nan Eilean Siar ('the Applicant') requested an Environmental Impact Assessment (EIA) screening and scoping opinion from the Comhairle nan Eilean Siar council and Marine Scotland for the proposed South Ford Flood Risk Management Scheme ('the Proposed Development'). The request was submitted in August 2023 and was accompanied by a combined Screening and Scoping Report ('SSR') (herein referred to as 'the submitted SSR') prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (SI 2017/567), and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (SI 2007/1518) (as amended 2011, 2015, 2017).
- 1.1.2 The scoping opinion is currently being determined by the Comhairle nan Eilean Siar council and Marine Scotland. During the determination period, a request for additional information from Marine Scotland has been received.
- 1.1.3 The SSR Addendum (the 'SSR Addendum') has been prepared to provide Marine Scotland with additional information. Updates to the proposed development design information have been made at two locations in response to these comments, with additional work designs included.
- 1.1.4 The SSR Addendum should be read in conjunction with the submitted SRR.

#### Purpose of the Screening and Scoping Addendum

- 1.1.5 The purpose of this SSR Addendum is to provide consultees with further information on points they have raised to support them in developing an informed view of the potential environmental impacts of the Proposed Development.
- 1.1.6 The Applicant has taken into consideration comments received through this consultation and has reviewed opportunities to amend the description of the Proposed Development at two sites accordingly.
- 1.1.7 This SSR Addendum only considers changes in legislation, baseline conditions or potential effects since the submitted SSR was prepared; if no change is listed then conditions and potential effects are the same as those presented in the submitted SSR.

#### **1.2** Structure of this SSR Addendum

- 1.2.1 This SSR Addendum comprises of one document.
  - SSR Addendum describes the changes to the Proposed Development, any additional information available, and whether these have affected the submitted SSR technical chapters.

## 2 Description of Proposed Development Changes

#### 2.1 Introduction

- 2.1.1 This chapter of the SSR Addendum presents a description of the Proposed Development changes since submission of the SRR in August 2023.
- 2.1.2 Since the submission of the SRR, two changes have been identified following consultee comments and further discussions with the Applicant. The consultee comments and how these have been addressed within the SSR addendum are provided in Table 2-1 below.

#### Table 2-1 Consultee Comments and SSR changes

Consultee	Date	Торіс	Comment	Where/how addressed in SSR addendum.
Marine Scotland	October 2023	Preferred option	Provide further detail on the proposed Liniclate Flood Protection Bund works.	Section 3.2.5- 3.2.9 Additional description of the works and supporting designs (Appendix A*)
Marine Scotland	October 2023	Preferred option	Provide further detail on the proposed Dune Management Scheme works.	Section 3.2.10- 3.2.12 Additional description of the works and supporting designs (Appendix A*)

\* Due to the size of the documents, designs have also been provided within an Appendix A.

2.1.3 With the exception of the changes outlined above, all other details of proposed development designs included in the Submitted SSR submitted in August 2023 remain valid.

#### 2.2 Scope and methodology of the SSR Addendum

#### <u>Overview</u>

- 2.2.1 This section outlines the scope and methodology used in this SSR Addendum. This SSR Addendum should be read in conjunction with the submitted SSR.
- 2.2.2 The introductory sections, general EIA screening and scoping methodology, topicspecific methodologies, relevant legislation, policy and guidance and key assumptions and limitations set out in submitted SSR remain unchanged, unless specifically stated in this SRR Addendum.
- 2.2.3 A preliminary assessment of whether there would be any new or materially different likely potential impacts on the environment arising as a result of the additional information has been undertaken with reference to the previous assessments presented within the submitted NRR.
- 2.2.4 The outcome of this scoping exercise was that changes are required to the Proposed Development design description outlined within Chapters 1-3 of the submitted SSR. It is not anticipated that there will be any alterations to the potential impacts of the Proposed Development reported in Chapters 4-13 as a result of the additional design information.

## 3 Changes to the Submitted Screening and Scoping Report.

#### 3.1 Introduction

3.1.1 This chapter of the SSR Addendum describes the changes to the chapters 1-3 of the submitted SSR, which result from the Proposed Development changes or are in response to consultee comments.

#### 3.2 Changes to Chapters 1- 3 of the submitted SSR

#### Chapter 1- Introduction

- 3.2.1 There are no changes to sections 1.1 1.5 of chapter 1.
- 3.2.2 Section 1.6 of Chapter 1 details the preferred options for the South Ford Flood Risk Management Scheme. Section 1.6.6. outlines the construction details for the Liniclate flood protection bund and Dune Management. In response to comments received from Marine Scotland further details for this proposed option have been provided.

#### Change 1 – Additional information on Liniclate flood protection bund and Dune Management

- 3.2.3 The proposed flood bund and dune management at Liniclate is to supplement the protection afforded by an extensive beach and dune system, defending the Dark Island Hotel, Liniclate school, a sports centre, and a wind turbine. In recent years, inundation from South Ford has become an issue with water outflanking the dunes and inundating through tidal channels. In the short to medium term, this represents a risk of flooding of these properties and facilities. The flood bund is proposed to mitigate this inundation.
- 3.2.4 Figure 3-1 shows additional design details for the Liniclate Flood Protection Bund and Dune Management general arrangement.



Figure 3-1 General arrangement Liniclate Flood Protection Bund and Dune Management

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#### **Liniclate Flood Protection Bund**

- 3.2.5 The bund itself would be constructed from a mix of imported rockfill and sand with the top vegetated machair layer within the footprint of the bund stripped and used to dress the surface of the bund (with additional seeding and planting as necessary). The detailed arrangement of the rock core, impermeable membranes, pipes, and flap valves has yet to be decided.
- 3.2.6 Figure 3-2 shows additional design for the Liniclate Flood Protection Bund cross section.



#### Figure 3-2 Liniclate Flood Protection Bund cross section

- 3.2.7 Figure 3-3 shows additional design for the Liniclate Flood Protection Bund long section. Due to the size of the designs, please refer to Appendix A for the full details.
- 3.2.8 Figure 3-4 shows a key extract Liniclate Flood Protection Bund long section demonstrating the proposed crest level compared to the existing ground profile at the approximate midpoint of the bund.



#### Figure 3-3 Liniclate Flood Protection Bund long section



#### Figure 3-4 Liniclate Flood Protection Bund long section extract.

3.2.9 Figure 3-5 shows additional design for the Liniclate Flood Protection Bund general arrangement.



Figure 3-5 General arrangement Liniclate Flood Protection Bund

IMP-JBAU-XX-XX-RP-EN-0002-S3-P01-Screening\_Scoping\_Addendum

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3.2.10 Figure 3-6 shows the 2D design model of the sites existing ground levels and the general arrangement for the Liniclate Flood Protection Bund.



# Figure 3-6 Liniclate Flood Protection Bund 2D design model

## **Dune Management Scheme**

- 3.2.11 Dune management measures would include sand fencing to trap sand at the base of the fence and assist in the formation of a new foredune and the use of strandline<sup>1</sup> seaweed deposits at the seaward face of the dune to reduce sediment loss at the toe of the dune face. Ongoing monitoring and maintenance will be required as the dunes will be influenced by wave action.
- 3.2.12 Fencing on the landward side will be implemented to manage impacts of pedestrian and livestock activities on the dune system. Localised measures including sand fencing and planting will be implemented to encourage accretion at vulnerable points of the dune (dune blowouts etc).
- 3.2.13 Figure 3-7 shows additional design for the Dune Management general arrangement.

<sup>&</sup>lt;sup>1</sup> Strandline- the start of the dune system on the beach, were seaweed or other debris provide a medium for dune flora to establish. Nature Scotland. 2023. Sand Dunes [Online]. Available at Sand dunes | NatureScot [Accessed December 2023]



Figure 3-7 Dune Management general arrangement

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3.2.14 Section 1.7 of Chapter 1 detailed the Legislation, Policy, and Guidance for the proposed development. There are no changes to this section.

Chapter 2 – Screening and Scoping Methodology

- 3.2.15 There are no changes to Chapter 2: Screening and Scoping Methodology of the SSR. Chapter 3- EIA Scoping
- 3.2.16 There are no changes to Chapter 3: EIA Scoping of the SSR.



# A Liniclate Flood Protection Bund designs

Appendix A (IMP-JBAU-XX-XX-SM-Z-0005-DesignDetails\_Bund) includes the following designs.

- General arrangement Liniclate Flood Protection Bund and Dune Management
- Liniclate Flood Protection Bund cross section
- Liniclate Flood Protection Bund long section
- General arrangement Liniclate Flood Protection Bund
- Liniclate Flood Protection Bund 2D design model



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