Appendix I : Consultation Responses & Advice

Argyll and Bute Council

CONSULTEE RESPONSE OF ARGYLL AND BUTE COUNCIL

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

SCOPING OPINION – IONA HARBOUR REDEVELOPMENT, IONA HARBOUR, SOUND OF IONA, ARGYLL AND BUTE

BACKGROUND

Argyll and Bute Council applied for planning permission in October 2020 for;

1. Application Reference - 20/01500/PP - Construction of rock armour breakwater and steel monopile overnight berthing facility, at Iona Ferry Slip, Isle of Iona

The Argyll and Bute Council also sought a screening opinion in September 2020 relative to;

2. Application Reference – 20/01489/SCREEN - Screening opinion for proposed breakwater and overnight berthing facility, at Iona Ferry Slip, Isle of Iona

Following ongoing communications with the Planning Authority and in response to matters raised by third party representations and Consultees it was confirmed to the Planning Authority on the 15th of December 2020, that the applicant had determined it would undertake a full EIA on their own accord. In response the Planning Authority conformed both applications should therefore be withdrawn and in the case of the application for planning permission, this should be resubmitted with the inclusion of the EIA as a material consideration.

MATTERS OF INTEREST

The proposed development comprises the construction of a rock armour breakwater and steel monopole berthing facility, including walkway, gangway access and associated works at the existing Iona Ferry Slip. The works include dredging, transportation and disposal of sediments, rock armour revetment, piling and mooring systems, access platforms and walkways. The Development is positioned within a noted area of panoramic quality and which contains a number of ecological values. The impacts to landscape and or seascape will be particularly relevant to any decision and are reflected in the comments and observations below.

<u>Main policy considerations / Summary</u>
National Marine Plan:
The proposed is required to take into consideration General Policies (GEN: 1, GEN: 2, GEN: 3, GEN: 4, GEN: 7 and GEN: 8) of the Plan, including the relevant shipping, ports and harbours and ferries policies TRANSPORT 3, 4 and 5.

Local Development Plan:
The adopted and current LDP, in terms of its key spatial settlement policies, does not specifically provide for development of the scale proposed. Nor does it define scales of development for breakwater structures. Therefore in order to justify the development it will be necessary to consider it as both an exceptional case and as essential infrastructure. The proposal is a one-off development which serves a community interest and meets with support

through Policy LDP 4 which recognises that the coast will sensibly accommodate proposals with a locational need, as is clearly the case here. The proposed development, by its very nature, requires a coastal location. Policy LDP 5 recognises that the success of our local economy is fundamental to Argyll and Bute's future prosperity, helping to retain population and attract new people to the area. The proposed facility will serve a varied demographic on the Isle of Mull which will in turn assist in the delivery of sustainable economic growth in accordance with policy LDP 5. This is reinforced through SG LDP CST 1 – Coastal Development and SG LDP TRAN 8 Piers and Harbours.

Local Development Plan 2:
Argyll and Bute proposed Local Development Plan 2 (November 2019) – The unchallenged policies and proposals within pLDP2 may be afforded significant material weighting in the determination of planning applications at this time as the settled and unopposed view of the Council. Elements of the pLDP2 which have been identified as being subject to unresolved objections still require to be subject of Examination by a Scottish Government appointed Reporter and cannot be afforded significant material weighting at this time. The provisions of pLDP2 that may be afforded significant weighting will need to be considered in detail.

A detailed assessment against the relevant settlement strategy and policy context must form part of any detailed assessment provided.

Flooding
It is understood that the proposed breakwater and overnight berth are not for flood protection but rather for protection of the ferries from rough seas. With reference to the drawings previously provided to the Planning Services in the planning application document, the top of the piers will be circa 1m above the 200 year still water level, this is to be in accordance with the Council's Flood Planning Supplementary Guidance Policy SG LDP SERV 7. A flood risk assessment having regard to both direct and indirect impacts should form part of any assessment provided.

Ecological / Biodiversity Impacts
The Sound of Iona is identified as having specific conservation interests and designations including;

1. Forming part of the Inner Hebrides and Minches Special Area of Conservation (SAC), partly designated for harbour porpoise;
2. Forming part of a Marine Consultation Area, whereby other conservation designations overlap and are intended to protect cetaceans, such as Minke Whale and Basking Shark
3. Having distributions of Seagrass Beds, a nationally important Priority Marine Feature.
4. The coastline is noted for Otter (Lutra lutra), being a European Protected Species as well as for ground nesting birds.

Having regard to the above specific species management plans, ecological surveys along with a construction environmental management plan must form part of any wider assessment. For example, a cetacean protection plan that offsets any direct and indirect impacts from construction upon harbour porpoise must be considered. Included within this plan should be full details of piling activities (acoustic levels, timing, duration etc.), bedrock drilling (if required) and other marine acoustic impacts that may lead to disturbance of this species. The document must include mitigation to offset any potential impacts upon harbour porpoise, adhering to Best Practice guidance as required. The same best practise guidance must be applied to consideration of any impacts on other species.

The Sound of Iona is noted to have distributions of Seagrass Bed, a nationally important Priority Marine Feature. Seagrass beds can be smothered by the effect of dredging and siltation. The applicant must undertake a visual survey to establish the extent of seagrass

beds within areas affected by construction, dredging and increased sedimentation associated with current regime change. Any such surveys should consist of video/ photo images from full ROV runs, diver footage or drop down survey. An assessment of the potential direct and indirect impacts of the development upon the PMF resource and details of any mitigation proposed to offset impacts to an acceptable level.

Impacts to Water Quality

The Sound of Iona is classified as a High Quality Coastal Water Body under the Scotland River Basin District. Whilst any dredging siltation impacts may be localised it would be expected that any assessment considered those impacts in more detail and have regard to guidance and best practise produced by the Scottish Environmental Protection Agency.

Landscape and Visual Impacts

The site is located within a regionally significant scenic area and has at least 4 designated Local Nature Conservation sites within proximity to the development. The development is also positioned within a relatively undeveloped coastal environment whereby the development proposed will constitute a substantial structure in landscape and seascape terms. It is absolutely critical that any detailed assessment consider the landscape and visual impacts of the development. In particular full visualisations and photo montages should accompany any assessment undertaken whereby any direct and potential cumulative visual impacts are considered and evaluated. Whilst navigation lights and markings are a matter for the Northern Lighthouse Board to consider any visualisations, including night time impacts, should account for navigational requirements in any assessment.

Concern has been previously raised that the scale of development at this location is excessive for the magnitude of storm event in which the ferry would be operating. In particular the height of the berthing facility would be potentially inappropriate for the village conservation area.

Impacts on Other Users

The Council is required to protect public access rights along the foreshore for non-motorised users. Consideration of any impact to foreshore access both during and post construction should be evaluated and considered.

The Sound of Iona is popular for sea kayaking. Most of these paddlers stay in close to shore as swell and waves can increase in size rapidly as you move further into the sound. The scale of the development proposed will extent further into the sound that the existing pier and ferry infrastructure. This will force paddlers further out into the sound, increasing potential risk depending on sea levels and sea conditions. The geometry of the sound means that large tidal currents can be experienced. The impacts the development may have on localised sea conditions needs to be explored and understood, particular if the design may influence wave refraction, tidal velocity or current directions. In addition the height of the structure may obscure visibility for craft at water level and consideration of navigational issues of this nature should also be explored.

The development also has the potential to impact sail boats and the use of the Sound of Iona for pleasure boating. Consideration and the scoping of any adverse impacts on navigation and or anchorage of recreational vessels should be explored. The creation of shelter in the harbour may provide a better occasional access point for recreational boaters but the ferry movements only permit this for short periods on any given day. The potential release of mooring space elsewhere may be beneficial for recreational boaters.

Noise

Noise impacts and mitigation including during both construction and operating noises should be considered. It is noted some of those impacts are covered in consideration of ecological and or construction environmental effects.

Historical Environment
The development has the potential to impact the setting of Iona Nunnery and St Marys Abbey. Both are recognised as being Scheduled monuments of national Importance and accordingly consideration of the impacts of this structure of these sites is a material consideration for the Planning Authority.

Impacts to existing infrastructure assets
Existing roads infrastructure and potentially Scottish Water assets are located near to the development. Consideration of direct impacts on these assists should be considered.

SUMMARY

In summary; the following matters should be considered within the Environmental Impact Assessment process;

- Landscape and visual amenity impacts
- Impacts on the Historical Environment and Sites of National Importance
- An assessment against the planning policy context
- Flooding impacts
- Ecological and Biodiversity Impacts
- Impacts of water refraction or changes to local sea conditions
- Impacts to water quality
- Impacts on other users
- Noise Impacts
- Impacts on existing infrastructure assets.

Should you have any questions please feel free to contact myself to discuss further.

Regards

Jamie Torrance
Planning Officer
Argyll and Bute Council

Historic Environment Scotland

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL 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

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

Our case ID: 300047195

16 September 2021

Dear Marine Scotland

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Iona Harbour Development - Iona Harbour, Sound of Iona - Iona Breakwater Project Scoping Report

Thank you for your consultation which we received on 20 August 2021 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development
I understand that the proposed development comprises the redevelopment of Iona Harbour and will provide facilities for the berthing of larger ferry vessels to improve transport links between Mull to Iona.

An EIA Screening Opinion on Iona Slipway was issued in November 2020 and we noted that there would be a setting impact on St Mary's Abbey (SM12968) and Iona Nunnery (SM90350), and we requested that these be assessed in the EIAR. We also noted that the proposals have the potential to impact unknown heritage assets, particularly in relation to the medieval operation of the Abbey.

Scope of assessment

We recommend that impacts on cultural heritage are scoped into the EIAR. Given the presence of sandy deposits noted in the Scoping Report we consider that there is the potential for the development to impact surviving unrecorded marine archaeology within the construction footprint. We note that a desk-based assessment will be undertaken to inform the development of mitigation measures, and that the latter may entail a watching brief or the establishment of a protocol for archaeological discoveries for the construction phase. We are content with this proposed mitigation regarding direct impacts by the proposed development.

However, we also note the potential for adverse visual impacts upon the setting of several scheduled monuments as a result of the operation of the breakwater, such as St Mary's Abbey (SM12968). As the development site lies between two small bays that played an important role in the way that pilgrims visited the monastic complex from the medieval period onwards, and the height of the breakwater may impede early views of the abbey for travellers landing at the Bay of Martyrs. We therefore advise that visualisations produced in support of the application should include views looking towards St Mary's Abbey from the waters just off Bay of Martyrs. We would welcome further discussion as to how best to mitigate these impacts, such as through redesign, should significant adverse visual impacts be identified.

Further information
Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at http://conservation.historic-scotland.gov.uk/.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Samuel Fox and they can be contacted by phone on [redacted] or by email at samuel.fox@hes.scot.

Yours faithfully

Historic Environment Scotland

Iona Community Council

To Marine Scotland
ms.marinelicensing@gov.scot

6th October 2021

Dear Marine Scotland Marine Licensing,

Iona Breakwater Project Environmental Scoping Report

We are responding to the Environmental Scoping Report for the Iona Breakwater Project. We received this report on 22nd September having pursued requests with Scottish Government to confirm whether such a report exists. We advised immediately on receipt of the report that the one-week time frame for a response was not feasible, and we request again that you confirm who else has been consulted on this report.

Following is our response to the draft scoping report:

Our comments must be read in conjunction with those previously submitted on the scoping report for the Fionnphort Breakwater Project and in particular, the imperative that these two projects must progress in as short a timescale as possible to secure the integrity and improved reliability of the lifeline ferry service to Iona, and limit disruption to other harbour users. The delays in these two combined projects are damaging to the wellbeing and sustainability of our island community.

(As just one example, CalMac informed Argyll & Bute Council in 2018 that "if the [Fionnphort overnight] berthing structure was not put in place then it would inevitably have an impact on our service" (CalMac Managing Director). CalMac changed its operating parameters last autumn, particularly affecting operations when there is a combination of darkness and bad weather. One direct impact of this change to the service is that Iona's High School children, who leave at 6.10am on a Monday for Oban and return 6.15pm on a Friday, lost on average half a day of school each week last winter term solely as a result of the changed operating parameters on Iona's ferry service. Regarding the pace at which the project is progressing, we also note that this report is dated 30th July 2021 but we did not receive it until 22nd September.)

Balanced against the urgency of the above is the strongly expressed view held locally that the whole process followed by the developer has not been conducted in an ongoing consultative framework with the people of the very islands it is to serve. Justification and explanation of the planned designs published to date have not been undertaken and there has been no opportunity or forum where residents could engage in a meaningful and reassuring dialogue about the changes which will significantly affect their lives, and generations to come. Three examples of the lack of information available include

- That it is only now that it has been stated that the context the breakwater is being considered in, is that of a 120year lifespan, this brings into play significant considerations not referred to in the scoping report; one example being rapidly evolving government policies to combat climate change and the effects that global warming is likely to produce.
- That an economic analysis or any reference to the 'Sound of Iona Masterplan' is missing from information or design thinking.
- A failure to produce satisfactory photo montage images which truly illustrate the appearance of proposed design from relevant viewpoints.

While we understand that it is not for Marine Licensing Scotland to consider in their scoping exercise the track record of the developer, there are consequences resulting from lack of consultation, research, and information or detail, with many unresolved areas in the design still to be finalised, which affect a high percentage of the areas considered in the scoping report.

Iona Community Council's is considering next steps to address this lack of consultation and enable questions to be answered, but clearly this will have to take place after the date on which our response to the scoping report needs to be submitted. It is in the forefront of our thinking that we wish to avoid negatively affecting the progress of the project while asking the questions that need to be answered.

Iona is our place, but it is also a place to which many people have a strong connection and it draws enormous numbers of visitors: any change must be positive, while respecting what makes this place special. As an island off an island, our ferry is our lifeline, critical for our children's education, medical services, economy, business and pleasure. We will have to live with the visual impact of this project for a planned lifespan of 120 years: it is critical it fits into the natural and built environments which draw so many people annually, and respond appropriately to this sensitive setting.

Virtually everyone arriving on Iona comes by sea: the two projects on either side of the Sound must be designed *at a minimum* so as to do no harm to this very sensitive environment, and they should in fact enhance it. This requirement is a fundamental responsibility of the client and professional team, and it should not detrimentally affect the timescale for, or cost of, construction. **The Environmental Impact Assessment (EIA) must demonstrably and convincingly include within its scope the minimal requirement to do no harm to this sensitive setting. The report is not sufficiently clear or convincing on how it will robustly assess impacts – particularly from the sea – and how it will effectively mitigate them without affecting the progress of the project.**

In a number of places within the scoping report reference is made to mitigations, but nowhere is there adequate explanation of what these might be in practice. We understand that until issues are identified it will be difficult to determine what might be proposed to improve or ameliorate. Nevertheless, this gives us cause for concern: the financial and other implications of mitigations need to be quantified, any potential impact on the design, look, materials and so on required to construct the breakwater need to be detailed, and then shared through an objective and transparent process ***which involves the local community***, given this development will be such an important part of Iona's built environment for years to come.

Assumptions:

- The initial planning application showed a higher breakwater and in Appendix B, the drawings used appear to have been revised, and show the height reduced to CD+7.71m. We therefore assume that the scoping report and the EIA itself will use the revised lower height.
- There is reference on p.53 to an 'overnight berthing structure', but our understanding is that this is not currently in the scope of the project.
- We assume the assurance given during a Teams meeting on 15th February attended by the Sound of Iona Harbours Committee, Argyll and Bute Design Team and Cal Mac Representatives that piling would be revisited by Cal Mac (utilising Loch Buie skipper input), and by A&B Design Team, **and that NTS and ICC will be consulted**.

- That the detailed comments below may in some cases apply to the EIA itself rather than the EIA scoping document, but that the scoping document should ensure their inclusion.

Section 2.2
P.6 – Dredging Please clarify how the dredging works are to be undertaken: if only overburden dredging is to be used, will the dredger have a CSD cutting head? If not, will rock bosses remain which protrude above CD-3m? If the latter is the case, in terms of vessel navigation our understanding is that hazards currently bathymetrically recorded will remain. We also note that this clarity is also required in terms of assessing the environmental impact.

We would expect proper assessment to be made of the appropriateness of overnight dredging, given the close proximity of residential properties close-by and around the bay.

Outline Method statement
Section 2.3
P.7 The skippers and crews of the *Loch Buie* must be consulted about the proposed steps. If the sequence is dredge; deliver piles, etc. before the rock armour breakwater is built, we foresee operational difficulties for the ferry as it will lack shelter from a southerly quarter swell and wind and will be denied the favoured southerly approach in those conditions.

Also, in pp.7, 48, 52 (3.7.6) and 71(3.14), in scope should include the effects of dust and any debris (in strong winds, for example) in and around houses, parked vehicles, stored fishing gear and boats in the boat park and people movements to, from and around the slipway. Reassurances as how these will be minimised will be required, particularly given the area immediately above the pier is a key interchange point for vehicle and people movements.

Section 3.1
P.9 and p.11 We would emphasise that there is a distinction between the operating company, 'Staffa Tours' and other boat operators which operate *to* the island of Staffa, which include vessels from other companies which use Iona and Fionnphort piers. Currently one other vessel based at Iona operates day trips to destinations other than Staffa. It is important to also note that many other commercial, predominantly passenger vessels, use the pier at Iona, including their tenders, as do smaller cruise vessels. At present, one commercial fishing boat operates from Iona.

Section 3.1.3
P.10 We note the Navigational Risk Assessment (NRA) was already under way before we received any notification of the scoping report so the context of the assessment was known to the consultants but not consultees. We do not know if all pier users were invited to contribute to the assessment.

3.1.5.1 Construction Phase *" A consultation plan to keep Argyll and Bute Council (Marine Operational Team) and CalMac Ferries Ltd (as the ferry operator) updated on scheme timings will be developed."* **This plan should include ICC and NTS**

Section, 3.2 Terrestrial biodiversity
P.12 **The scoping report must not be concluded prior to consulting with the National Trust for Scotland, *and* with its Ross of Mull (Iona, Staff and the Burg) Ranger** (see our repeated question in the first para for confirmation of who else has been consulted on this report). We regard the

mitigation measures currently scoped out to be generic but will defer to the ranger's expertise and local knowledge.

3.2.1

pp.14 -15 The project is misnamed and we need assurances that designated sites on Iona have been checked, not Fionnphort.

p.23 From empirical observation, bottlenose dolphins are more frequently sighted in the Sound of Iona, rather than Minke Whale, Orca or Basking Shark. In p. 24, dolphins are omitted from both construction and operational phases and at p. 26, most types of dolphins (assuming harbour porpoise is a dolphin sub-species) are missing from the Summary of Scoping Exercise.

Obvious sources not mentioned as being utilised for guidance of scoping opinion include the Hebridean Whale and Dolphin Trust based in Tobermory which has considerable data gathered over many years, and The Scottish Association for Marine Science in Oban.

Section 3.4.1.1, Land
P.27 There is inconsistent reference to car parking at the pier (see for example, pp.2, 6, 31, 58). P.15 suggests a car park included in the project. This needs clarified, both in terms of what is actually in scope of the project and then in scope of the environmental assessment.

At present, there is a well-used car parking area between the head of the pier and the public toilets: the use of this area during construction and/or operational phases needs to be properly assessed and mitigation measures proposed.

In addition, the need for, location and practical implications of a security gate (p.32)should be consulted upon and should not result in any reduction of the already pressured parking capacity in this location.

Section 3.9.5 Coastal Processes – preliminary mitigation measures
P.57 There is no clarity as to what these are and we cannot comment given the lack of detail. The statement, 'the scheme will be designed to take full cognisance of environmental constraints and provide mitigation through engineering design and by way of prescribed mitigation measures' explains nothing.

Section 3.10 Material assets
P.58 We note the typo in 3.10.1.

The scope must also explicitly include the arrival (and departure) experience and the tourism ambience. As previously noted, arrival to Iona is by sea and we expect any new infrastructure will not detract from, but should actually enhance the arrival experience.

Related to improvements to the ferry service and broadening economic opportunities (p.59),we do not follow the logic of listing what might be included within Material Assets nor this section's summary 3.10.6. An integral part of many visitors experience is the heritage and built environment, including the Scheduled Nunnery and St Ronan's chapel much of which is within a short distance of the pier.

We would clarify that the resident population is approximately 170.

Section 3.11 Material Assets – Traffic and Transportation
P.60 The impact on the Iona ferry is not included and needs to be included within scope on the EIA.

Section 3.12.2.2 – Cultural heritage
See also our comments below on Landscape and Visual – the same concerns apply to this section about need for much more clarity on methodology and mitigation.

P.62 We do not understand how an EIA can properly consider this until the design and appearance has been presented. The project has the potential to significantly affect Iona's cultural heritage which include the village conservation area, and the listed and scheduled assets. We recognise that assessments have to be made as to the impact which changes may potentially have on sightlines, views, settings and so on, but the scope of the EIA, as proposed, while using sensitivity and magnitude as measures, suggests that 'professional judgement' will determine which is the most appropriate where there is more than one significant option (p.63). What the matrix does not appear to include, though, is the impact within its local setting: in other words, the value and importance of the cultural heritage to the local community, as residents and also businesses etc. The failure to include local input and take these into consideration should be redressed and be integral to what is one of the most important assets to Iona itself.

p.64 There needs to be much more clarity on what mitigation measures might be considered and how they will be assessed in partnership with the local community.

Section 3.13 Landscape and visual
P.67 onwards. We are unclear as to exactly what is being assessed in this section and this needs to be clarified. Again, a meaningful EIA depends on clarity of the design, colour and texture of materials, scale, shape, extent, and 'street furniture' (lighting, gates, etc.). There needs to be more clarity on what mitigations might be possible; design enhancement might be better achieved by studying natural landmasses and coastal features and aiming at an attractive structure which integrates with the coast rather than the cheapest utilitarian model. For other developments, materials that were appropriate for the specific setting have been used, and we see no reason why, within limits, appropriate mitigating factors cannot be considered in this development. The recently-completed Village Hall is one example how this can be achieved through good design.

We are concerned about the chosen illustrated viewpoints.

Figures 3.12 and 13 captions have been transposed and the one purporting to be from 'Ballymore' is actually from within the curtilage of 'Oran Cottage'. The images selected are dated and would need updated to show, for example, the new Village Hall were they to be used in future.

Viewpoints must include several from the Sound and Fionnphort.

We should be involved in the choice of representative viewpoints, which will be constructive and helpful to those carrying out the EIA.

Section 3.13.4 Methodology

Page 70 We note the documents listed for consideration within the assessment. We would add that it is crucial that those used reflect the current situation on Iona: examples include planning applications usually requiring archaeological watching briefs, which will include updated information on land use and settings; South West Mull and Iona Development's development plan 'Sound of Iona Masterplan' resulted from much consultation in 2013 and was signed off by the community and also the Argyll and Bute Council Oban, Lorne and the Isles Area Committee, and National Trust for Scotland's local planning documents.

Again, the criteria must centrally include assessment of the impact of the breakwater on travellers arriving at Fionnphort, and crossing the Sound, approaching Iona. This report needs to specify much more clearly, using examples, *how would the receptor-based methodology work, particularly from this perspective* in order to demonstrate that it will assess robustly and convincingly whether there are impacts that are significant and require mitigation. What is the meaning of 'cumulative effects' (p.71) on landscape and properties and what might be the mitigations?

This visual impact is crucial and if compromised, has the potential to quickly feature on social and in other media, with for example detrimental consequences to attracting future potential visitors. Having a 120 year lifespan, residents will have to live with this development: will the benefits of improved connectivity be detrimentally affected by an inappropriately designed construction? This scoping report needs to convince everyone that this serious risk will be assessed and, if necessary, mitigated promptly and effectively without further delays to the project.

Section 3.14 Population and Health

P.72 'The closest residential receptor is located approximately 130 m from the proposed works, along Baile Mor.' We disagree – there are residential properties significantly closer, for example, 'Dunara' immediately opposite the pier head.

Very importantly, the statement that the 'proposed development would support an increase in tourism' is based on the assumption that the final (unseen) design and realisation of the project being sensitive to the setting and place. Insensitive development entails a significant risk of damage to the island's crucially important visitor economy. Any impact during the construction phase will likely have ongoing consequences. In any event, there could be harmful impacts on income and employment (3.14.2.1) and on ensuring compliance with a key element of Scottish Government policy to support and sustain island life. (noting again that timely completion of this project is also essential to this Scottish Government policy commitment).

3.14.2.2 Operation Phase

P.72 From Section 3.14.2.1 'Socio-economic determinants of health (such as income and employment) have a potentially wider distribution than environmental determinants. However, due to the rural location of the proposed development, potential population and health effects associated with socio-economic factors are likely to remain limited to Mull, Iona, Coll & Tiree intermediate zone and the wider Argyll & Bute council area.'

The construction of the breakwater will create a new sheltered area which has the potential to become re-purposed to community benefit. The potential to create berthing for boats is of value and

should be included within the EIA: please confirm how best to protect the ability to progress the development of options and their subsequent realisation.

Finally, we are not convinced by, and request change of, the current statement that 'no preliminary mitigation measures relevant to population and health are anticipated during the operation phase' (p.74); this should calibrated for *inclusion* within the EIA so that any impacts on income and employment are identified.

Appendix C Marine Scotland Science Marine Scotland Science Letter
Tidal scouring and data collection on the Iona side of the Sound – further data collection needs to be undertaken and shared.

We consider that sediment deposition and resulting loss of depth in mooring and berthing areas adjacent to the pier is a key risk on both sides of the sound of Iona once the operational phase of the project is under way, to date no robust proof has been evidenced to indicate this very serious negative outcome (or suitable mitigations which avoid it), will not ensue.

We stress again the following points that were made on the Fionnphort breakwater environmental scoping report, which also apply very strongly to this draft report. Please ensure that a more holistic approach is included in both reports:

Lack of economic analysis
From Fionnphort Breakwater scoping report response previously submitted: **The scoping reports focus solely on provision of the Overnight Berth at Fionnphort and the Breakwater at Iona. There is no holistic assessment of considerations to maximise the extensive harbour opportunities and benefits which accrue from their construction, as referred to in the section on Land above. While we do not expect Argyll and Bute Council would or could develop all the possible opportunities, the undertaking of an EIA would enable a wider assessment to be made which ensures that other projects are enabled rather than handicapped.**
One of the objectives of the EIA is to "define other projects and plans that may need to be considered as part of an assessment of cumulative impacts". We are concerned that transport, pier facilities, pier surroundings and marine tourism are not within current scope. This is the most appropriate and first opportunity to maximise the investment of time, consultation and planning which resulted in a 'Sound of Iona Masterplan' (2013), endorsed by both the local community and also the Argyll and Bute Council Oban, Lorne and the Isles Area Committee.

We understand your request that respondents point to any data sources, proposed methodologies or the requirement for specific studies: we would direct you to the following:

- The National Trust for Scotland;
- South West Mull and Iona Development;
- The Sound of Iona Masterplan;
- Caledonian MacBrayne can provide passenger numbers, which well-illustrate the number of travellers, predominantly visitors who come to Iona to experience its natural and built environment, history, heritage, peace and for a myriad of other reasons;
- CMal and CalMac in respect of plans for a future replacement ferry, to ensure these projects take fully into account its size, manoeuvrability, fuel and other factors;

- The skippers and crews of the current ferry have day-to-day knowledge of tidal conditions, the operability of their ship, future technological developments and potential implications of both breakwaters on nearby waters – for example for Iona, the moorings in Martyr's Bay, and St Ronan's Bay with potential implications for existing tour operators and other pier and mooring users.

Finally, we are unaware that the developer (Argyll and Bute Council) has contextualised the projects within its own wider policies and strategies, which major on sustaining island communities, economic regeneration, promotion of incoming investment, including tourism, amongst other key foci, or the Sound of Iona Masterplan.

We regard the necessary investment in our lifeline ferry service, as an island off an island, as clearly demonstrative of all these important policies and plans; logically then the developer should also ensure the appropriateness in design, and limit any negative impact of the breakwater.

We are available to provide further information as needed, and request your response to each of these issues that we have raised.

Please contact us through: iona-community-council@googlegroups.com

Maritime and Coastguard Agency

Maritime and Coastguard Agency
Spring Place, 105 Commercial Road
Southampton, SO15 1EG

www.gov.uk/mca
16 September 2021

Hamish Wright
Marine Licensing Officer
Marine Scotland - Marine Planning & Policy
Scottish Government, Marine Laboratory
375 Victoria Road, Aberdeen, AB11 9DB

Dear Hamish

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the EIA Regulations")

Argyll and Bute Counci (Per RPS)l – Iona Harbour Development – Iona Harbour, Sound of Iona

Thank you for your email dated 20 August 2021 inviting the Maritime and Coastguard Agency (MCA) to comment on the Environmental Scoping Report from RPS Group Plc on behalf of Argyll and Bute Council.

The report has been considered by representatives of UK Technical Services Navigation. We note that the regeneration scheme includes a new 177m long breakwater extending into the Sound of Iona and 70m south of the existing slipway, new berthing piles at the existing slipway and capital dredging for new navigation channels. The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to marine facilities and any impact on our search and rescue obligations. We would therefore like to comment as follows on the report:

The MCA would expect any works in the marine environment to be subject to an appropriate Navigation Risk Assessment (NRA) to assess the likely impacts to fishing, recreational and commercial traffic within the study area and the likely associated risks to shipping and navigation. We note the applicant's commitment in paragraph 3.1.3 to carry out a NRA, which will be used to support the EIA Report. It is noted that AIS data will be used to inform the traffic analysis and the data should capture seasonal variations. It is understood from the HAZID workshop that 2019 data will be used which is accepted. The NRA should address both the construction phase and the

ongoing safe operation of the site and what is required with regards to risk mitigation. The MCA would expect no effects to be scoped out of the assessment with regards to shipping and navigation, pending the outcome of the Navigation Risk Assessment and further stakeholder consultation.

We note that the site does not falls within the jurisdiction of a Statutory Harbour Authority (SHA). The new facilities should be treated as Marine Facilities as per Port Marine Safety Code (PMSC - the Code is applicable both to statutory harbour authorities and to other marine facilities which may not have statutory powers and duties), however we note under paragraph 3.1.3 it states: "*The overall objective is to maintain risk levels within a limit that is deemed 'as low as reasonably practicable' (ALARP) following the requirements of the Port Marine Safety Code (DfT, 2016)".* We would be interested to understand if Argyll and Bute Council have any intentions of applying for Statutory Harbour Authority status through a Harbour Empowerment Order. The MCA advises that further discussion on this takes place.

To address the ongoing safe operation of the marine interface for this project, we would like to point the applicant in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice. They will need to liaise and consult with the relevant operators and develop a robust Safety Management System (SMS) for the project under this code. From the Guide to Good Practice, section 7 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port. The harbour authority also has a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 7.8 Regulating harbour works covers this in more detail and have copied the extract below from the Guide to Good Practice.

> *7.8 Regulating harbour works*
>
> *7.8.1 Some harbour authorities have the powers to license works where they extend below the high watermark, and are thus liable to have an effect on navigation. Such powers do not, however, usually extend to developments on the foreshore.*
>
> *7.8.2 Some harbour authorities are statutory consultees for planning applications, as a function of owning the seabed, and thus being the adjacent landowner. Where this is not the case, harbour authorities should be alert to developments on shore that could adversely affect the safety of navigation. In any case harbour authorities should ensure that the MMO or appropriate licensing authority consults them with regard to any applications for works or developments in or adjacent to the harbour area. Where necessary, consideration should be given to requiring the planning applicants to conduct a risk assessment in order to establish that the safety of navigation is not about to be put at risk. Examples of where navigation could be so affected include:*

- *high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation;*

- *high constructions, which potentially affect wind patterns; and*

- *lighting of a shore development in such a manner that the night vision of mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous.*

There is a British Standards Institution publication on Road Lighting, BS5489. Part 8 relates to a code of practice for lighting which may affect the safe use of aerodromes, railways, harbours and navigable Inland waterways.

A preliminary assessment on the potential impacts to Search and Rescue and emergency response in the area will need to be included to ensure there are no impacts on SAR operations.

I hope you find this information useful at this scoping stage. We would welcome further discussions with the applicant and/or their consultants on any of the above.

Yours sincerely

Nick Salter
Offshore Renewables Lead
UK Technical Services Navigation

Marine Scotland - Marine Analytical Unit

marinescotland

Iona Breakwater Project - Scoping Report

The Iona Breakwater Project Scoping Report includes descriptions of a range of potential impacts. This response focuses only on the assessment of social and economic impacts.

Overall, the assessment of potential social and economic impacts in the scoping report is quite narrow. We would expect a broader range of social and economic impacts to be considered and for this to be done through a Socio-economic Impact Assessment. As the development is relatively small, we recognise that the detail included in the SEIA should be proportionate. Nonetheless, there is room for a more thorough assessment of the socio-economic impacts than currently presented in the scoping report.

While we recognise that individual scoping reports have been carried out for the Iona Breakwater Project and the Fionnphort Breakwater and Overnight Berth project, we recommend that the SEIAs for both projects are done in tandem, so as not to duplicate effort.

Stakeholder engagement

There is very little, if any, mention of plans to engage with stakeholders. Engaging with stakeholders, checking assumptions and asking them whether they anticipate impacts from the development, is crucial for impact assessment.

The introduction includes a list of people who currently use the pier currently:

- The Iona ferry
- Crab fishing vessels
- Leisure boat operators
- Private boat owners

These people should be contacted as part of stakeholder engagement for this project.

The introduction also mentions that the following services are currently impacted by weather related disruption of the Iona ferry:

- Medical
- Educational
- refuse collection
- business delivery etc.

Local people in Iona who may have experienced these impacts should also be included as part of stakeholder engagement for this project.

We would also recommend that people living in the general area (i.e. the local community/residents) should also be included whether it is expected that they will be impacted or not, to be able to share their views on the development.

Context and Baseline

The scoping report gives very little context about the communities in Iona or Fionnphort who may be affected by this project. The report should provide details of the following:

- the population in Iona and Fionnphort – demographics

- businesses in each area but Iona especially, whether and how they rely on the ferry
- the schools and school children who rely on the ferry
- other useful contextual information

The report does not provide much baseline information and so it is hard to determine how big the impacts might be. The report suggests that the main changes brought about by the development will be:

- Reduced disruption to the ferry service due to bad weather
- Protection from waves propagating from a southerly direction
- Provide protection for future longer ferries
- Reduce the risks to ferry operators and passengers and vehicles boarding and disembarking the ferry

There is no information given about the **current level** of disruption, caused by bad weather, to the ferry service or other users of the pier. As there don't seem to be plans to expand the ferry service, the main impact would stem from a reduction in disruption.
Baseline information should be included on the following:

- The level of disruption currently experienced i.e. number of ferry trips cancelled
- Implications of disruption i.e. number of school days missed, business supplies undelivered
- Knock on effects i.e. business closure due to missed deliveries?
- Less tangible effects i.e. potential anxiety related to uncertain medical supplies?
- Engaging with the community will be essential for identifying important baseline information to collect

The economic baseline may also include:

- Employment and unemployment levels
- Structure of working age population/skills/qualifications
- GVA

Impacts

Overall, the scoping report focuses on a much too narrow range of impacts. Given the rationale for the project described in the introduction, it is a surprise that the potential positive impacts of the project are not mentioned or explored.

Potential social and economic impacts will likely stem from the construction work of the project, the impacts of an improved ferry service and any additional economic activity that the project may facilitate (e.g. crab fishing vessels). Annex 1 and 2 give examples of social and economic impacts to consider, some of which might be relevant here.

The scoping report does not go into detail on how the specific social and economic impacts that may arise as a result of the proposal will be assessed. A description of the methods to be used would be beneficial.

Construction

The construction is estimated to take 52 weeks. The report does not mention what impact construction might have on the ferry service between Fionnphort and Iona. The section on 'Traffic and Transportation' only discusses traffic and so does not mention ferries.

The weather-related ferry disruption is reported to have impacts on essential services such as medical supplies, education, business deliveries and refuse collection. The report should, therefore, detail how these might be affected by disruption during the construction phase, and how these impacts will be mitigated. Any potential disruption to economic activity during the construction phase should be described and assessed. It should also be noted that potential disruption to the provision of medical supplies, especially over a 52 week period, may constitute a health and safety risk.

There is no discussion of employment related to the project. Information about employment associated with the construction phase should be detailed, including:

- The number and type of jobs
- Who will fill these positions and where are they coming from – locally, regionally?

Operation

There is potential for a number of positive impacts during the operation phase of the project, which are not mentioned in the report.

- Reduced weather-related disruption to the ferry service, with potential benefits for services such as medical, educational, business delivery etc.
- Reduced health and safety risk to ferry boat operators

These impacts should be described and assessed. There may impacts which would emerge through engagement with relevant stakeholders.

The report mentions further economic opportunities which are not adequately explained:

- The scoping report suggests there will be an increase in tourism as a result of the proposal. As the proposal does not involve the introduction of a new ferry service, will the increase in tourism only relate to avoided ferry disruption? What will be the resulting economic impacts of this increase?
- It is mentioned in the scoping report that the proposals will facilitate wider economic development. What will be the expected increase in economic activity associated with this?

Monitoring

There is no mention of monitoring the socio-economic impacts of the project. While we recognise that the project is small and with fairly little potential for negative impacts, some monitoring after the completion of the project is recommended.

Annex 1

Key components of an economic impact assessment

1. Establishing the life and stages of the Project. In this case these would be construction and operation.

2. Establishing and developing the baseline:
    - This is the starting point for the economic assessment and the benchmark against which to measure impacts.
    - Start with a study of the local and regional area:
        - Industrial structure i.e. existing businesses in the area
        - Socio-economic conditions i.e. levels of employment, income etc.
        - Related industries i.e. fishing/crab vessel operators, leisure boat operators etc.
        - Local planning policies, where relevant
    - Select a range of indicators, e.g.:
        - Employment and unemployment levels
        - Structure of working age population/skills/qualifications
        - GVA

3. Identifying and scoping the economic factors:
    - Economic impacts ideally clearly stated in:
        - Life and stages of project i.e. construction, operation
        - Direct, indirect, induced
    - Economic Factors
        - Impacts related to GVA
        - Impacts related to employment, skills and training
        - Impacts on related industries – tourism, fishing, etc.

4. Distributional Impacts:
    - Distribution of impacts across different individuals, groups or businesses.
    - Screening – identification of likely impacts
    - Assessment – confirmation of area impacted and analysing the characteristics of the groups in the area which will be impacted

- Appraisal – Core analysis of the impacts

Annex 2

*Table **Error! No text of specified style in document.** Types of socio-economic impact (taken from Glasson 2017[1])*

1. **Direct economic:**
   - employment, including employment cohort and safeguarding of existing employment;
   - unemployment and underemployment
   - characteristics of employment (e.g. skill group);
   - labour supply and training; and
   - other labour market effects, including wage levels and commuting patterns
2. **Indirect/induced/wider economic/expenditure:**
   - employees' retail expenditure (induced);
   - linked supply chain to main development (indirect);
   - labour market pressures;
   - wider multiplier effects;
   - effects on existing commercial activities (eg tourism; fisheries);
   - effects on development potential of area; and
   - GVA and GNP.
3. **Demographic:**
   - changes in population size; temporary and permanent;
   - changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
   - settlement patterns
4. **Housing:**
   - various housing tenure types;
   - public and private;
   - house prices and rent / accommodation costs;
   - homelessness and other housing problems; and
   - personal and property rights, displacement and resettlement
5. **Other local services:**
   - public and private sector;
   - educational services;
   - health services; social support;
   - others (e.g. police, fire, recreation, transport); and
   - local authority finances
6. **Socio-cultural:**
   - lifestyles/quality of life;
   - gender issues; family structure;
   - social problems (e.g. crime, ill-health, deprivation);
   - human rights;
   - community stress and conflict; integration, cohesion and alienation; and
   - community character or image
7. **Distributional effects:**
   - effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice

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

Ministry of Defence

Horrill J (Judith)

From: DIO-Safeguarding-Offshore (MULTIUSER) <DIO-Safeguarding-Offshore@mod.gov.uk>
Sent: 08 September 2021 11:09
To: MS Marine Licensing
Subject: RE: Argyll and Bute Council (Per RPS) – Iona Harbour Development – Iona Harbour, Sound of Iona - Scoping Opinion - Consultation - Response required by 19 September 2021

FAO Hamish Wright

Thank you or your email request.
After further investigation I can confirm the MoD has no objection to the proposed scoping opinion at the location specified.

Kind regards

Debi Parker | Safeguarding Officer| Estates - Safeguarding|
Defence Infrastructure Organisation Head Office |
St George's House | DMS Whittington | Lichfield | Staffordshire, WS14 9PY

| Tel No: [redacted] |
Email: [redacted]

Due to COVID-19 I am working from home until further notice.

In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network. Therefore I will only check emails and Skype periodically which will mean that I might not respond as promptly as usual.

Defence Infrastructure Organisation

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: 20 August 2021 16:54
Subject: Argyll and Bute Council (Per RPS) – Iona Harbour Development – Iona Harbour, Sound of Iona - Scoping Opinion - Consultation - Response required by 19 September 2021

Deadline-19/09/2021

Dear Sir/Madam,

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the EIA Regulations")

Argyll and Bute Counci (Per RPS)l – Iona Harbour Development – Iona Harbour, Sound of Iona

Marine Scotland Science

T: +44 (0)131 244 2500
E: MSS_Advice@gov.scot

Judith Horrill
Marine Scotland Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

29 September 2021

IONA HARBOUR DEVELOPMENT – REQUEST FOR ADVICE

Marine Scotland Science (MSS) have reviewed the relevant documentation and has provided the following comments.

General comment
MSS recommend splitting the Marine Biodiversity chapter into sections for each receptor/species group, each with their own identified potentially significant effects and mitigation measures.

Marine Ornithology
With respect to marine ornithology the Scoping Report is presented at a high level thus lacks detail on more specific aspects. Marine ornithology has been included in the 'Terrestrial Biodiversity' section; inclusion in the Marine Biodiversity section or for the EIA in a receptor specific section would be more appropriate.

There is general consideration of species likely to be of interest (page 15), however this does not appear to be an exhaustive list. The EIA will need to give more detailed consideration of key species and where these species have potential connectivity to Special Protection Area (SPA) sites. MSS advise that a long-list approach is taken with SPAs with potential connectivity first identified, then where no Likely Significant Effect can be concluded, sites can then be screened out. It is stated that SPAs within 30 km of the site boundary will be considered (page 16); however given the long foraging ranges of some species (Woodward et al. 2019) MSS note that foraging ranges exceed this distance for several seabird species. MSS therefore advise that careful justification is given for selection of screening distances and that for some species a greater distance will be appropriate, leading to inclusion of more SPAs than have been initially identified (Table 3-2). For many marine bird species it is likely that the area is most important in terms of commuting and passage movements rather than for foraging, given its location with the potential for birds to be funnelled when moving north or south to passing between the Isle of Mull and Iona. MSS note that there is potential for connectivity between the development and Rum SPA (Manx shearwater) and also to the Irish Sea Front SPA, known to be used by birds from Rum (Dean et al. 2015). As such this species should be scoped in for initial assessment.

It is stated that monthly Through the Tide Counts will be used (running from April – August 2021) to record waterbird species present within 500 m of the project footprint. It is noted that this will be an adapted version of a standard methodology (see page 16 for details). It is not clear from this

description if this survey is restricted to the traditional species included in Wetland Bird Surveys (WeBS) or includes all marine bird species present during observations. If other marine bird species are excluded from these counts then it may be appropriate to also include some targeted vantage point surveys to record other species passing through. MSS also recommend that during construction works a small number of breeding bird surveys are performed where construction activities could cause disturbance during the breeding period, with construction activity that could disturb breeding birds only progressing during the breeding period if suitable mitigation is identified and implemented. MSS would expect this to be considered when drafting the outline Construction Environmental Management Plan (oCEMP) (see section 3.2.5.1 of the Scoping Report).

Potentially significant effects for 'Terrestrial Biodiversity', in which birds are included, are summarised in section 3.2.2. of the Scoping Report by project phase. This is generally appropriate but does not specifically identify vessel activity (other than vessel noise) during construction, which should be considered. The potential for disturbance to breeding birds should also be considered during construction (see point above regarding breeding bird surveys).

Section 3.2.5 outlines approach to mitigation measures, and at this point this has no specific details on mitigation measures during project phases. MSS would welcome opportunity to comment on proposed mitigation measures once these are developed.

Marine Mammals

MSS note that for marine mammals, this is a high-level scoping report that does not explicitly state the sources to be used for defining the baseline conditions, nor an exhaustive list of the marine mammal species that are to be scoped in to the assessment. Once the applicant has undertaken a desk-based review of baseline conditions at the site, MSS would welcome the opportunity to comment on the species that are intended to be scoped in to the assessment. MSS note that the applicant has acknowledged that the area of works lies within the Inner Hebrides and Minches SAC, for which harbour porpoise is a qualifying feature, and the Sea of Hebrides MPA, designated for the protection of minke whale.

3.3.1 Baseline Conditions

MSS recommend Hague et al. (2020) is included in the desk-based review of the baseline conditions for marine mammals. This report incorporates data from the Hebridean Whale and Dolphin Trust, which will likely provide one of the best sources of local information to inform the assessment.

3.3.2 Potentially Significant Effects

MSS agree with the applicant that:

- disturbance from the physical presence of vessels, including increased risk of collision, should be scoped in for the construction and operational phases.
- effects of underwater noise as a result of activities during the construction phase (e.g. dredging, vessel noise and piling) should be scoped in.

MSS recommend that impacts to marine mammals through changes in prey distribution and abundance should be scoped in for the construction and operational phases. MSS expects that the majority of the assessment for this impact pathway would come from the assessment of other relevant receptors (e.g. benthic ecology, fish and shellfish).

MSS advise that dredging/disposal activities and the placement of rock armour could have a potential impact to marine mammals through pathways other than underwater noise. Therefore, MSS recommend that other impacts to marine mammals as a result of these activities during the construction phase are scoped in to the assessment.

MSS advise that for the the assessment of underwater noise impacts in the EIA, a suitable site specific, range dependent, underwater noise propagation model should be used. MSS would expect a detailed methodology and the assumptions used in the underwater noise modelling to be provided for transparency, in order to ascertain that the method used is appropriate to assess potential impacts. MSS are content to provide further advice on suitable underwater noise propagation modelling during the EIA stage of the project.

3.3.5 Preliminary Mitigation Measures

MSS note that no preliminary mitigation measures have been provided for marine mammals in this section. In due course, MSS would welcome the opportunity to comment on marine mammal mitigation.

MSS have reviewed the advice provided by NatureScot in relation to marine mammals. We broadly agree with the statements in the NatureScot advice, but would consider it likely that there would be Likely Signficant Effect, requiring an Appropriate Assessment, for the Inner Hebrides and the Minches SAC. We also understand that marine mammal specialists within NatureScot may not have been consulted on this scoping report and would recommend that MS-LOT engages with these individuals.

Marine fish ecology

MSS are content that all potentially significant effects in the Marine Biodiversity section are being scoped in for further assessment and inclusion the EIAR.

MSS note that the several species have spawning and nursery areas that overlap with the Marine Biodiversity Study Area. In particular the area overlaps with spawning areas for sandeel, sprat, *Nephrops* and plaice. The benthic environment survey and sediment composition analysis will aid the classification of sediments and also help to determine the suitability of the area for spawning for the different species listed.

MSS recommend highlighting any fish species which are designated as Priority Marine Features. In addition to this, MSS recommends providing information on fish spawning and nursery periods such as those listed in Coull *et al*. 1998 and Ellis *et al*. 2012 which are key sensitive periods for fish species and considering this in line with the construction programme timeline.

In terms of assessing the effects of increased suspended sediment concentrations and sediment deposition of marine fish and shellfish, MSS also recommend considering fish and shellfish eggs and larvae.

With regards to the effects of underwater noise arising from construction activities (dredging, vessel noise and piling) and in line with marine mammal advice, MSS recommend marine fish species are considered within the underwater noise propagation modelling, with consideration of the timing of these activities relative to marine fish spawning periods. MSS recommend that this is considered in line with sound exposure guidelines for marine fish for pile driving as detailed in Popper et al. 2014.

Commercial Fisheries
MSS understand that the harbour area is used by mostly shellfish fishing vessels and that the project team intend to consult representatives of local fishing boat operators. However there is a lack of detailed information presented on the local fishing industry in terms of number of vessels and fishing effort in the area. There is also a lack of consideration of the potential impacts of development on fishing activity, in particular any activities which may cause displacement of fishing activity or restrictions on access to the harbour. MSS also recommend consideration of potential cumulative impacts on commercial fishing in the local area as the Fionnphort Harbour Breakwater Project is being developed in parallel with this development.

MSS understand that the works aim to improve facilities that may benefit fishing vessels however MSS recommend early and effective engagement with the fishing industry and consideration of any activities which may cause displacement of fishing activity.

Benthic ecology
MSS agree with the impacts that are scoped in but would also include,

- Impact of introduction of non-native species: a new harbour wall or structure provides an empty niche for colonisation by species with a preference for hard substratum, some of which may be non-natives. An increase in movement of vessels in the vicinity may increase risk of introduction of non-native species.

- Change in hydrological conditions (current, water flow, wave height and strength) and the effect on surrounding benthic and intertidal communities.

Note that impacts should be assessed on the intertidal features as well as sub-tidal.

Page 25: MSS advise that in addition to Annex I features, the survey should identify whether any Priority Marine Features and OSPAR Threatened and Declining species or habitats exist within the impacted area.

MSS are content with the proposed sampling points for benthic fauna. MSS welcome the survey proposed for seagrass beds. Note that hydrological modelling may be required to determine direction and extent of impact of increased sediment load or smothering on sensitive species or habitats, such as reef features or seagrass. Seagrass, for example, has a high sensitivity to changes in siltation and water clarity (FEAST).

MSS are in agreement with the comments made by NS.

Diadromous Fish
The scoping report lacks detail with respect to diadromous fish. MSS agree that Atlantic salmon, sea trout and European eel are likely to occur close to the development site, and that the potential impact mechanisms have been identified and scoped in.

Salmon, sea trout and eel are all of high conservation interest. Scotland is a stronghold for salmon and sea trout but stocks are currently at a low level and the populations of many rivers are no longer resilient to losses. Numbers of eels have also declined greatly in recent decades.

The marine feeding areas for salmon are to the north of Scotland, but largely outwith Scottish waters. Salmon migrate to them as young fish (smolts), or as post-spawning adults, and return from them to

spawn in their natal river or stream. The smolts, which mainly leave the rivers in April and May, may be particularly vulnerable to the potential impact mechanisms as, due to their small size, they are less able to take avoiding action.

Sea trout have a similar life history to salmon, but generally appear to use coastal areas, estuaries and sea lochs near the river mouths as their sea feeding areas prior to their return to spawn in their natal river or stream.

The spawning areas of eel are in the Sargasso Sea in the western North Atlantic Ocean and the young fish migrate from there to rivers across Europe. Eels do not home to particular river systems, and the population appears to be entirely mixed across Europe.

There is uncertainty about the numbers of salmon and sea trout which occur in the development area, and there are no major rivers in the immediate vicinity. There are various on-going tracking programmes for acoustically tagged salmon smolts, but none to date have had receivers in the vicinity of the development area. In 2016 and 2017, tagged smolts were tracked using fixed receivers as they emigrated from the rivers Lochy and Awe, two important salmon rivers on the Scottish mainland, but there were no receivers in the vicinity of the Sound of Iona.

The Mull District Salmon Fishery Board, if there is one at present, should be consulted.

NatureScot did not provide comments with respect to diadromous fish.

Physical Processes

As previously stated in the response to the screening request, MSS recommend that aspects of natural tidal scouring and changes in tidal stream velocities (and therefore turbulence) should be explored in more detail as part of an EIA.

In the screening report it was also suggested that should further modelling be required, collection of hydrodynamic and sediment transport conditions should be considered to support calibration validation. This would include waves in the sound, tidal currents in the sound and suspended sediment transport. This would be desirable at several locations and MSS would agree that further data collection would be useful to validate the models and gain confidence in the results.

The scoping report suggests simulations will be carried out in the context of extreme storm events, including typical winter/summer periods. MSS support the inclusion of these simulations to evaluate different events, including a 1:100 year storm event as a worst case scenario.

Cumulative effects with works on the Fionnphort side also need to be considered. Model outputs with the proposed scenario will vary depending on the proposed works at Fionnphort so a combined modelling study would be useful.

To summarise, MSS agree that coastal processes need to be scoped into the EIA and that hydrodynamic modelling (including waves, sediments, cumulative effects) should be undertaken.

References

Coull, K.A., Johnstone, R. and Rogers, S.I. (1998) Fisheries Sensitivity Maps in British Waters. Published and distributed by UKOOA Ltd.

Dean, B., Kirk, H., Fayet, A., Shoji, A., Freeman, R., Leonard, K., Perrins, C.M. and Guilford, T. (2015). Simultaneous multi-colony tracking of a pelagic seabird reveals cross-colony utilization of a shared foraging area. Marine Ecology Progress Series, 538, pp.239-248.

Ellis, J.R., Milligan, S.P., Readdy, L., Taylor, N. and Brown, M.J. (2012) Spawning and nursery grounds of selected fish species in UK waters. Science series Technical Report., Cefas Lowestoft, no. 147: 56 pp.

Hague, E. L., R.R. Sinclair, and C.E. Sparling. (2020). Regional baselines for marine mammal knowledge across the North Sea and Atlantic areas of Scottish waters. Scottish Marine and Freshwater Science Vol 11 No 12, https://data.marine.gov.scot/dataset/regional-baselines-marine-mammal-knowledge-across-north-sea-and-atlantic-areas-scottish

Popper, A. N., Hawkins, A. D., Fay, R. R., Mann, D. A., Bartol, S., Carlson, T. J., Coombs, S., Ellison, W. T., Gentry, R. L., Halvorsen, M. B., Løkkeborg, S., Rogers, P H., Southall, B. L., Zeddies, D. G. and Tavolga, W. N. (2014) Sound exposure guidelines for fishes and sea turtles. A technical report prepared by ansi-accredited standards committee. Springer Link.

Woodward, I., Thaxter, C.B., Owen, E., Cook, A.S.C.P. (2019). Desk-based revision of seabird foraging ranges used for HRA screening. BTO Research Report No. 724.

Hopefully these comments are helpful to you. If you wish to discuss any matters further then please contact the REEA Advice inbox at MSS_Advice@gov.scot

Yours sincerely,

Renewable Energy Environmental Advice group
Marine Scotland Science

Northern Lighthouse Board

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

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

Your Ref: Iona Harbour Development – Scoping Opinion
Our Ref: AL/OPS/ML/A5_01_231

Mr Hamish Wright
Marine Licensing Casework Officer
Marine Scotland – Marine Planning and Policy
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

23 August 2021

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the EIA Regulations")

Argyll and Bute Council (Per RPS) – Iona Harbour Development – Iona Harbour, Sound of Iona

Thank you for your e-mail correspondence dated 20th August 2021 relating to the Scoping Report submitted by **Argyll & Bute Council** for the development of Iona Harbour, Argyll & Bute.

Northern Lighthouse Board are satisfied with the content of the Scoping Report, and welcome the applicant's proposal to engage with NLB and MCA for a Hazard Identification exercise.

NLB have already responded to the Town & Country Planning Act Application submitted by **Argyll & Bute Council**, in which navigational Lighting and Marking recommendations have been made.

Northern Lighthouse Board will re-state these recommendation in any future Marine Licence application.

Yours sincerely

Peter Douglas
Navigation Manager

NatureScot

Horrill J (Judith)

From: Colin MacFarlane [redacted]
Sent: 17 September 2021 16:33
To: MS Marine Licensing
Subject: RE: Argyll and Bute Council (Per RPS) – Iona Harbour Development – Iona Harbour, Sound of Iona - Scoping Opinion - Consultation - Response required by 19 September 2021

Dear Sir/ Madam

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the EIA Regulations")
Argyll and Bute Counci (Per RPS)l – Iona Harbour Development – Iona Harbour, Sound of Iona

Thank you for consulting NatureScot regarding this scoping opinion. I note you have requested advice on the following:

"*To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (EIA) Report to be submitted by the applicant with their proposed marine licence applications, please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed works. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies*."

I can confirm we have reviewed the scoping document and are content with those matters to be scoped into the EIA process. Regarding our interests, these include: Terrestrial Biodiversity (principally otters), Marine Biodiversity (all interests), Water Quality, Terrestrial Noise and Vibration, Coastal Process and Landscape and Visual Impact Assessment. The scoping report details those surveys and assessments that we require to provide you with advice on the application and we look forward to reviewing these in due course. We have been contacted by the applicants consultants with regards to methodologies, species/ habitat locations and most recently landscape and visual impact assessment. Regarding the latter, we have suggested two additional viewpoints to be included in the LVIA; one view point from Port nam Mairtir (Martyrs Bay) and one from the approach to the Island from the ferry (or other suitable craft).

Given the proposals location within the Inner Hebrides and Minches Special Area of Conservation, there is a possibility, depending on impacts that the development could have a likely significant effect upon the Harbour Porpoise qualifying interest, and thus the application could be subject to a Habitat Regulations Appraisal. In addition, the scoping report also confirms that there are likely to be species or habitats of interests in the application area, hence we provide the following web links that will help with EIA assessments and, where appropriate, consideration of mitigation/ licence applications etc:

Habitats Regulation Appraisal - https://www.nature.scot/professional-advice/protected-areas-and-species/protected-areas
Priority Marine Features - https://www.nature.scot/professional-advice/protected-areas-and-species/priority-marine-features-scotlands-seas
Species Protection Plan - https://www.nature.scot/professional-advice/protected-areas-and-species/licensing/species-protection-plan
Landscape Assessment - https://www.nature.scot/professional-advice/landscape

General - https://www.nature.scot/professional-advice

I hope the above is useful. Please don't hesitate to contact me if you require any further information.

Kind regards

Colin MacFarlane | Operations Manager and Argyll Islands Area Officer

NatureScot | The Enterprise Centre | Kilmory Industrial Estate | Lochgilphead | Argyll | PA31 8SH| Tel: [redacted] |

nature.scot | @nature_scot | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

From: MS.MarineLicensing@gov.scot <MS.MarineLicensing@gov.scot>
Sent: 20 August 2021 16:54
Subject: Argyll and Bute Council (Per RPS) – Iona Harbour Development – Iona Harbour, Sound of Iona - Scoping Opinion - Consultation - Response required by 19 September 2021

Dear Sir/Madam,

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the EIA Regulations")

Argyll and Bute Counci (Per RPS)l – Iona Harbour Development – Iona Harbour, Sound of Iona

In respect of the proposed marine licence applications for the above works under the Marine (Scotland) Act 2010, Argyll and Bute Council has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under regulation 14(1) of the EIA Regulations.

The scoping report submitted by the applicant can be found at:
Marine Licence - Iona Harbour Redevelopment - Iona Harbour, Sound of Iona | Marine Scotland Information

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (EIA) Report to be submitted by the applicant with their proposed marine licence applications, please review the scoping report and advise on **what you consider should be included within or excluded from the scope of the EIA for the proposed works**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to ms.marinelicensing@gov.scot by 19 September 2021. If you are unable to meet this deadline, please contact us as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Kind regards,

Hamish

Hamish Wright
Marine Licensing Officer
Marine Scotland - Marine Planning & Policy

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

Direct Line: +44 (0)131 244 3541

National Trust for Scotland

Horrill J (Judith)

From: Will Boyd-Wallis [redacted]
Sent: 07 October 2021 17:37
To: Horrill J (Judith)
Cc: Emily Wilkins; Alan Barrow; Diarmid Hearns; Clea Warner
Subject: Scoping Opinion - Iona Harbour Redevelopment - Iona Harbour, Sound of Iona - NTS response

Dear Judith,

I have recently started working as Operations Manager in the North West for the National Trust for Scotland. Emily, I and other colleagues in NTS have collated our comments below on the Iona Harbour redevelopment Scoping Document. Thank you for extending the deadline for us.

Our comments are framed within the context that Iona is regarded internationally as one of the most iconic and sacred locations in Scotland. For visitors and the working local community alike, arrival at Iona by boat is both a practical necessity and an emotional experience that must be extremely carefully managed. The National Trust for Scotland is a conservation charity and the main landowner of Iona. Our responsibility is to protect Iona's special cultural and natural heritage alongside the aspirations and needs of the community and visitors. We recognise the importance of the breakwater to enabling access to the island in inclement sea conditions and our wish is to ensure that the way in which this is developed is of maximum benefit to the island and the community with minimal impact on the heritage.

Our comments are organised against the same 6 points which appeared in our comment on the original planning application, with additional points below:

1. Visual impact - we are happy that this is to be scoped in to the EIAR and it is good to see that a detailed landscape character assessment is to be prepared. We hope this will cover the whole island which would be most useful for assessing the cumulative impact of any future developments in addition to the breakwater. However, there is some confusion on page 4 of the report as to whether Option 1A or Option 1B is being assessed, given that they differ significantly in the proposed length of the breakwater, there could be significant difference in visual as well as other impacts from the structure, so clarity is needed here. It should also be noted that figures 3-12 and 3-13 have incorrect captions, the photos should be switched to match the captions. In addition there is mention of a security gate and we would like to see this included in the assessment of visual impact.

2. Sedimentation - we are happy that this is to be scoped in to the EIAR with further modelling work to be carried out and that dredgings are to be disposed of to a registered site away from the immediate area. In section 3.9.1 should the final word in the following sentence read 'Fionnphort' rather than 'Iona'? *The tidal currents are similar on both sides of the sound, however more sediment action (both erosion and deposition) is present to west of the sound at Iona compared to that on the east at Iona.*

3. Lack of detail - the Outline Method Statement in this scoping report adds to the detail provided in the original planning application. It is interesting to note that the rock is to be sourced from Glensanda quarry and that most operations will be based from a crane barge. Colour and positioning of the boulders remains an important issue to be clarified.

4. Lack of consultation - we will continue to engage with the applicant, Argyll and Bute council, over their lack of engagement with NTS as landowner of the foreshore, and other local stakeholders. However, in terms of the EIA fieldwork itself, it would have been useful to consult with local experts for each topic.

5. Temporary stock pile arrangements - it is reassuring to see the very small size of the on-island compound and that most operations will be conducted from a barge.

6. Missed opportunity – Mention of a security gate seems to show that value-added uses such as seating, sea life interpretation, viewing etc are not to be considered. We appreciate that the structure of the breakwater as planned may not lend itself to easy access, but we believe this should remain a consideration. Given Iona's status as a key location on the Hebridean Whale Trail, we still consider this to be a missed opportunity.

- A further concern is that EIA fieldwork has been ongoing concurrently with the production of the scoping report, leaving no time for additional fieldwork in response to any comments received. For example, in the Terrestrial Biodiversity section, no mention is made of consulting the National Biodiversity Network Atlas. NTS collects wildlife sightings from visitors to our Shelter building and uploads data to NBN. Had this been done then existing records of otter sightings on and around the pier area itself would have been found, so hopefully this will be borne out by fieldwork, as we have known other instances nearby where fieldwork for a planning application has failed to find any signs of otter yet local expert knowledge and sightings (from Mull Otter Group studies) proves they are using the area in question. Similarly, the Marine Biodiversity section makes no mention of consulting sightings collated by the Hebridean Whale and Dolphin Trust, which would show that bottlenose dolphins are regularly using the Sound of Iona close to both Fionnphort and Iona piers.

- Lastly, the grid reference for the site location on page 2 is incorrect (pointing to a landlocked area in the centre of the island), we suggest it should be NM286240. There are some typos: on page 14 Staffa is 11.5km north, on page 30 there are 2 mentions of Ardalanish Bay SSSI when one should read Ardmeanach SSSI and the other should read South Mull Coast SSSI, on page 58 'Ioan' should be 'Iona'.

We hope you find the above comments helpful. If anything is not clear or you would like to explore further with NTS, please let me or Emily know.

Yours sincerely

Will

Will Boyd-Wallis

Operations Manager for the North West

(Torridon, Kintail, West Affric, Balmacara, Iona, Staffa, Burg, St Kilda, Mingulay, Pabbay, Berneray, Ben Lawers, Moirlanich Longhouse, Strome Castle)

The National Trust for Scotland

Balnain House, 40 Huntly Street, Inverness. IV3 5HR
Mob: [redacted]

wboydwallis@nts.org.uk

Scottish Water

Tuesday, 24 August 2021

Marine Licensing
375 Victoria Road

Aberdeen

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

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

Dear Customer,

Iona Harbour, Sound of Iona
Planning Ref: Scoping
Our Ref: DSCAS-0047087-ZFF
Proposal: Iona Harbour Redevelopment

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this 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:

Drinking Water Protected Areas

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

Surface Water

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

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

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should 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

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

Yours sincerely,

Angela Allison
Development Operations Analyst
Tel: 0800 389 0379
developmentoperations@scottishwater.co.uk

Scottish Water Disclaimer:

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

Scottish Environment Protection Agency

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

Our ref: !!SREF!!
Your ref: !!CPREF!!

If telephoning ask for:
!!OFFICER!!

INSERT DATE

!!CPNAME!!
!!CPORGNAME!!
!!CPADD!!
!!CPADD2!!
!!CPADD3!!
!!CPADD4!!
!!CPPCODE!!

By email only to: !!CPEMAIL!!

Dear !!CPNAME!!

!!LEGISLATION!!!!SUMMARY!!
!!SITE!!

Thank you for consulting SEPA on the screening / scoping opinion for the above development proposal by way of your letter of dd month yyyy, which we received on !!DATED!!. We would welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter.

Delete next paragraph if only providing scoping advice

We consider that, with respect to our interests, Environmental Impact Assessment is / is not required for the above proposal. Whether or not Environmental Impact Assessment is required, to **avoid delay and potential objection** the following key issues must be addressed and information submitted in support of the application.

Delete next paragraph if only providing screening advice

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection** the following information must be submitted in support of the application.

List key site specific issues identified or remove this section

While all of the issues below should be addressed in the Environmental Statement (ES), there may be opportunities for several of these to be scoped out of detailed consideration. The justification for this approach in relation to specific issues should be set out within the ES. We would welcome the opportunity to comment on the draft ES. Please note that we can process files only of a maximum size of 25MB and therefore, when the ES is submitted, it should be divided into appropriately sized and named sections.

1. Scope of the ES for marine developments <Delete this section if only offshore development proposed>

1.1 From the information submitted we understand the development will include both onshore and offshore components. As such, the development will be subject to a range of different consenting regimes. We encourage you to consider producing a single ES, which covers all aspects of the proposed development. This will enable a full assessment of the potential effects of the development as a whole, rather than assessing certain details of the development individually.

2. Water Framework Directive and River Basin Management Planning

2.1 The Water Framework Directive (2000/60/EC) was implemented in Scotland through the Water Environment and Water Services (Scotland) Act 2003 (WEWS). This legislation requires SEPA to lead and co-ordinate in the Scotland and Solway Tweed river basin districts to protect and improve Scotland's water environment. Further information is available from the River Basin Management Planning section of our website. The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR) provide controls over activities affecting the water environment.

2.2 Engineering works in transitional (estuaries) and coastal waters are not regulated by SEPA under CAR. Such works below the Mean High Water Springs mark or in any tidal river up to the tidal influence will require a marine licence from Marine Scotland Licensing Operations Team, designated a Responsible Authority under The Water Environment (Relevant Enactments and Designation of Responsible Authorities and Functions) (Scotland) Order 2011 made under Section 2(8) of WEWS. By this designation Marine Scotland is required to ensure that marine licensing assists in the delivery of River Basin Management Planning objectives. Similarly, planning authorities are designated Responsible Authorities by the Water Environment and Water Services (Designation of Responsible Authorities and Functions) Order 2006. In order to meet the requirements of the Water Framework Directive Responsible Authorities must carry out their statutory functions in a manner that secures compliance with the objectives of the Water Framework Directive (i) preventing deterioration and (ii) promoting improvements in the water environment in order that all water bodies achieve "good" ecological status by 2015.

2.3 River basins comprise all surface waters, including transitional (estuaries) and coastal waters extending to 3 nautical miles seaward from the territorial baseline. Within the River Basin Management context, the ES should identify if the impacts of the proposal are likely to lead to deterioration of the marine environment or present opportunities for improving the marine environment. Marine Scotland and, where applicable, the planning authority, must take this into account in considering the application due to their designation as Responsible Authorities.

2.4 The Water Framework Directive (WFD) requires considerations of Scotland's water bodies in terms of their chemical, biological and hydromorphological parameters and combines these parameters to score each water body in terms of it's status, ranging from bad, through poor, moderate, good to high. A system of River Basin Planning has been put in place to ensure delivery of the WFD and manages the current targets set for each water body in support of Directive targets.

2.5 Water body data collated in support of the WFD is available on the Scottish Environment website and should be used in assessing any development proposal. The website provides data on the overall status of all Scotland's water bodies, with the options of filtering by local

authority, catchment or water body name or alternatively just panning across the map. A summary table of the 'overall status' and an indication of whether there has been 'change' or 'no change' in status in the last year is provided for each water body in the search results, below the spotfire map. This table can be exported if required. Classification results are updated annually (following any necessary verification requiring to be completed post-publication). If you require further information for a water body which has undergone a change in status in the last year you can request verification of the change by emailing the RBMP Unit (rbmp@sepa.org.uk.) entitling your email "Urgent request for data verification". Detailed information on the pressures affecting an individual water body and the measures (actions) set against it to address the pressures are available by accessing the individual water body datasheet via the relevant hyperlink. This data should form part of the baseline characterisation in the ES.

2.6 In order to meet the objectives of the Water Framework Directive, coastal development should be designed wherever possible to avoid engineering activities in the marine environment.

2.7 We recommend that it be demonstrated in the ES that every effort has been made to leave the marine environment in its natural state. There is a need to protect the remaining areas of intertidal zone along some stretches of the developed coastline as these areas have become fragmented and degraded by the coalescence of development in the past.

2.8 As responsible authorities, planning authorities should promote measures already agreed in respect of relevant water bodies as well as considering other enhancement opportunities to contribute to River Basin Management Plan, Nature Conservation (Scotland) Act 2004 and sustainability development objectives. Examples may include restoration, coastal realignment, soft engineering or the incorporation of naturalistic features in the design of shoreline works, or planting with salt tolerant species. Guidance that may be drawn upon includes:

- Water Framework Directive Mitigation Measures Manual
- Estuary Edges: Ecological Design Guidance

3. Site layout and nature of construction for marine developments

<Delete subsections that do not apply to specific proposa>l

3.1 The ES should contain site plans and cross sections showing the location, footprint, type and design of all the engineering structures, including temporary works, in the marine environment. Information for onshore elements such as access tracks, buildings, temporary works etc. should also be included. Access routes and working compounds for vehicles should be specified during construction. This information will allow us to screen the proposals and determine whether they are likely to present a risk to ecological status.

3.2 For development projects involving **dredging** works, the ES should include information on the dredge footprint area, dredging method, quantities of material to be dredged and a description of the substrate type/habitats and species within the area. Although by its nature dredging is a destructive activity, adverse effects can be minimised (e.g. timing, dredging technique). Options for the subsequent disposal and beneficial reuse of the material should also be considered.

3.3 For **coastal protection and flood defence** the ES should include a section on the appraisal process and justification for the preferred defence option. The feasibility of soft

engineering and natural flood management techniques should always be considered in the appraisal process. Any coastal defence scheme should be appropriate in scale and type for the area.

3.4 For **coastal water abstractions and discharges** associated with new coastal power stations particular emphasis should be paid to assessing the significance and potential impacts of any proposed cooling water abstraction and discharge temperature effects in combination with those that may already exist in adjacent water bodies. Modelling should also consider the dilution and dispersion of biocides and any other pollutants. To ensure that the development will be consentable under Pollution Prevention and Control we recommend that modelling be carried out at the Environmental Impact Assessment stage.

Where existing discharges exist in the vicinity of the proposals the ES will need to demonstrate that the development will not result in significant changes to the dispersion characteristics of the receiving waters.

Discharges to marine waters, including those under Pollution Prevention and Control, are usually subject to the CAR supporting guidance document – WAT-SG-11: Modelling Discharges to Coastal and Transitional Waters. The most important part is the Appendix, which explains the mixing zone approach and the calculation of dilution. Typically, we would expect applicants to demonstrate that the discharge will undergo adequate initial dilution (50 times minimum initial dilution as a 95 percentile) and comply with any concentration limits at the edge of the mixing zone.

Please submit a detailed modelling method statement early in the application process to the SEPA planner who will forward to oceanmod@sepa.org.uk. By agreeing a modelling methodology before the modelling studies commence, potential problems and unnecessary work can be avoided later.

3.5 For **marine renewables** including **offshore wind, shoreline wave, tidal stream and barrage related developments** the ES should include plans showing the array of the devices, inter-array cabling, subsea cabling routes and landfall, and any associated off/onshore infrastructure (see section 8) within 3 nm of the shoreline. The ES should describe device and cable installation methods and should discuss the likelihood of any significant impacts during construction, operation and decommissioning. The significance of any potential impacts to the coastal zone e.g. sand dune and saltmarsh habitats, should be assessed with mitigation measures applied where appropriate.

Background information to help inform the ES process is available from Marine Scotland and the European Marine Energy Centre (EMEC). The EMEC guidance is designed to assist developers in considering the range and scale of impacts that may result from the testing of devices. Generally, if this standard industry guidance is followed for scoping, preparing and undertaking EIA for marine renewables, then SEPA is likely to be satisfied with the standard of assessment.

3.6 For **oil and gas,** related development plans should be included showing the pipeline routes and associated onshore infrastructure within 3 nm of the shoreline. The ES should describe pipeline installation methods and should discuss the significance of impacts during construction, operation and decommissioning. Potential impacts to the shoreline and coastal zone, e.g. sand dune and saltmarsh habitats and appropriate mitigation should also be addressed.

3.7 The applicant should consider if the nature of the proposal or the nature of the location could result in disturbance of contaminated sediments. The ES should demonstrate that this issue has been addressed, and, if a significant issue, then measures to minimise disturbance and subsequent relocation of such contamination, and to monitor impacts, should be set out within the ES. If it is suspected that such sediments may be contaminated with radioactive substances, further advice should be sought from SEPA as disturbance and movement of radioactively contaminated sediments may require authorisation under the Radioactive Substances Act 1993.

3.8 Should the proposal involve the disposal of radioactive waste, this will need to be undertaken in accordance with an authorisation issued by SEPA under the Radioactive Substances Act 1993. The applicant will need to give further consideration to how these wastes will be managed and details of the proposed methods will need to be submitted to SEPA as part of their application for authorisation under the Radioactive Substances Act 1993. As this information relates to potential significant environmental effects, SEPA's advice is that such information should also be included within the ES.

3.9 Please note that Oil Spill Contingency Plans should be sent directly to SEPA's Emergency Planning Unit to co-ordinate a response.

4. Marine ecological interests

4.1 Advice on designated sites and European Protected Species should be sought from Scottish Natural Heritage. Marine and transitional Special Areas of Conservation (SAC) and Special Protected Areas (SPA) and Marine Protected Areas (MPA) are also Water Framework Directive Protected Areas. Therefore, their objectives are also River Basin Management Plan objectives which should be taken into account when developing the ES. In such situations, Scottish Natural Heritage may contact SEPA for input on the consultation.

4.2 The Nature Conservation (Scotland) Act 2004 gives all public bodies, including SEPA and planning authorities, a duty to further the conservation of biodiversity. The developer is recommended to consult both the UK Biodiversity Action Plan and Local Biodiversity Action Plan lists for marine and coastal features found within the proposed areas of development, and consider mitigation measures, as appropriate. During the construction, operation and maintenance phases, it is important that good working practice is adopted and that wider habitat damage is mitigated against or kept to a minimum within defined acceptable limits. These should be controlled through a Construction Environmental Management Plan (see section 6 below).

4.3 Given that the accidental introduction of Marine Non-Native Species (MNNS) has been highlighted as a risk for water body degradation, we recommend that controls should be included in development planning and marine licensing for MNNS in line with Water Framework Directive and Marine Strategy Framework Directive objectives, and EU Biodiversity Strategy targets. Under the Water Framework Directive the presence of MNNS within a water body can constitute a significant pressure on the biological elements. Good status is usually the maximum a water body can achieve if MNNS are detected and this can fall to moderate status if MNNS are present above certain thresholds. Once well established, efforts to eliminate MNNS species have proven to be extremely expensive and so far, no non-native species have been successfully eradicated from the marine environment. Therefore, in view of these difficulties, we support the GB Non-Native Species Secretariat recommendation to put into place effective biosecurity measures to prevent introduction and to stop their spread.

Accidental introduction of MNNS can also occur via attachment to construction plant, specialised equipment and moorings as these are moved from one area to another. Please detail the measures to minimise the risks of introducing of MNNS into the adjacent water bodies within the ES and draft Construction Environmental Management Plan. Guidance that may be drawn upon includes:

- The alien invasive species and the oil and gas industry guidance produced by the Oil and Gas industry;
- SNH web-based advice on Marine non-native species;
- Marine non-native guidance from the GreenBlue (recreation advice).

4.4 For operations that require coastal water abstractions, e.g. new coastal power stations, particular emphasis should be paid to assessing the impacts of fish (all mobile species) entrainment and how this will be mitigated. The assessment should also consider the potential impact of the proposed cooling water abstraction and discharge infrastructure in combination with those already existing in the vicinity. Studies show that the greatest rate of impingement is at low water, as fish are more concentrated than at high water – this effect can be increased where estuaries narrow. The ES should include drawings showing the design of the cooling water intakes and discharge infrastructure. Guidance that may be drawn upon includes British Energy Estuarine and Marine Studies, Scientific Advisory Report Series 2010 No 005 Ed2 - Methodology for the measurement of Entrainment Edition 2.

5. Coastal processes

5.1 Depending upon the nature, scale and location of the proposed development the potential exists for there to be changes to coastal and sediment transport processes in the adjacent water body on completion of the development. The ES should assess the significance of such alterations and discuss the implications of these with respect to shoreline and seabed morphology, and wider ecosystem health in line with RBMP objectives. Marine Scotland is the responsible authority for licensing coastal development under the Marine Scotland Act 2010, and therefore we recommend that they be consulted with respect to the scope of any assessments.

6. Pollution prevention and environmental management

6.1 One of SEPA's key interests in relation to major developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. The construction phase includes construction of access roads, borrow pits, temporary storage areas and any other site infrastructure.

6.2 We advise that the applicant should, through the EIA process, systematically identify all aspects of site work that might impact upon the environment, potential pollution risks associated with the proposals and identify the principles of preventative measures and mitigation. This will establish a robust environmental management process for the development. A draft Schedule of Mitigation should be produced as part of this process. This should cover all the environmental sensitivities, pollution prevention and mitigation measures identified to avoid or minimise environmental effects. Please refer to the Pollution prevention guidelines. Other pollution prevention and environmental best practice guidance that may be drawn upon includes that produced by CIRIA .

6.3 Any application involving large scale beach replenishment and/or dredging works should be cross checked as to whether the proposals lie within or close to a designated bathing water or shellfish growing water. Ideally all physical works should be done outwith the Bathing Water Season (1 June to 15 September) and spatfall periods. Please refer to the Bathing waters section of our website for further guidance on the Bathing Waters Directive (2006/7/EC).

6.4 A Construction Environmental Management Plan is a key management tool to implement the Schedule of Mitigation. We recommend that the principles of this document are set out in the ES outlining how the draft Schedule of Mitigation will be implemented. This document should form the basis of more detailed site specific Construction Environmental Management Plans which, along with detailed method statements, may be required by planning condition or, in certain cases, through environmental regulation. Best practice advice developed by The Highland Council (in conjunction with industry and other key agencies) on the Construction Environmental Management Process is available in the guidance note Construction Environmental Management Process for Large Scale Projects.

7. Flood risk

7.1 Any coastal development should be assessed for flood risk from all sources in line with Scottish Planning Policy (paragraphs 254-268). The Flood Maps for Scotland are available to view online and further information and advice can be sought from your local authority technical or engineering services department and from the planning and flood risk section of our website, which also contains information on SEPA's role in flood risk.

7.2 If a flood risk is identified then a Flood Risk Assessment should be carried out following the guidance set out in the document Technical flood risk guidance for stakeholders.

7.3 Climate change is placing increasing pressures on coastal marine environments. SEPA's guidance within this document helps to demonstrate SEPA's commitment to its public body duties under Section 44 of the Climate Change (Scotland) Act 2009, by assisting in ensuring that a consistent and proportionate approach is taken to maintaining the resilience of our coast to changes in our climate.

8. Onshore engineering activities in the water environment

8.1 In order to meet the objectives of the Water Framework Directive, the onshore components of the development should be designed wherever possible to avoid engineering activities in the water environment. The water environment includes burns, rivers, lochs, wetlands, groundwater and reservoirs. We require it to be demonstrated that every effort has been made to leave the water environment in its natural state. Engineering activities such as culverts, bridges, watercourse diversions, bank modifications or dams should be avoided unless there is no practicable alternative. Paragraph 255 of Scottish Planning Policy deters unnecessary culverting. Where a watercourse crossing cannot be avoided, bridging solutions or bottomless or arched culverts which do not affect the bed and banks of the watercourse should be used. Further guidance on the design and implementation of crossings can be found in our Construction of River Crossings Good Practice Guide. Other best practice guidance is also available within the water engineering section of our website.

8.2 If the engineering works proposed are likely to result in increased flood risk to people or property then a Flood Risk Assessment should be submitted in support of the planning application.

8.3 A site survey of existing water features and a map of the location of all proposed engineering activities in the water environment should be included in the ES. A systematic table detailing the justification for the activity and how any adverse impact will be mitigated should also be included. The table should be accompanied by a photograph of each affected water body along with its dimensions. Justification for the location of any proposed activity is a key issue for us to assess at the planning stage.

8.4 Where developments cover a large area, there will usually be opportunities to incorporate improvements in the water environment required by the Water Framework Directive within and/or immediately adjacent to the site either as part of mitigation measures for proposed works or as compensation for environmental impact. We encourage applicants to seek such opportunities to avoid or offset environmental impacts. Improvements which might be considered could include the removal of redundant weirs, the creation of buffer strips and provision of fencing along watercourses. Fencing off watercourses and creating buffer strips both helps reduce the risk of diffuse water pollution and affords protection to the riparian habitat.

9. Onshore water abstraction

9.1 Where water abstraction is proposed we request that the ES details if a public or private source will be used. If a private source is to be used the information below should be included. Whilst we regulate water abstractions under CAR, the following information is required at the planning stage to advise on the acceptability of the abstraction at this location:

- Source e.g. ground water, the sea or surface water;
- Location e.g. grid reference and description of site;
- Volume e.g. quantity of water to be extracted;
- Timing of abstraction e.g. will there be a continuous abstraction?;
- Nature of abstraction e.g. sump or impoundment;
- Proposed operating regime e.g. details of abstraction limits and hands off flow;
- Survey of existing water environment including any existing water features;
- Impacts of the proposed abstraction upon the surrounding water environment.

9.2 If other development projects are present or proposed within the same water catchment then we advise that the applicant considers whether the cumulative impact upon the water environment needs to be assessed. The ES should also contain a justification for the approach taken.

10. Disruption to wetlands including peatlands

10.1 If there are wetlands or peatland systems present, the ES should demonstrate how the layout and design of the proposal, including any associated borrow pits, hard standing and roads, avoid impact on such areas.

10.2 A Phase 1 habitat survey should be carried out for the whole site and the guidance A Functional Wetland Typology for Scotland should be used to help identify all wetland areas. National Vegetation Classification (NVC) should be completed for any wetlands identified. Results of these findings should be submitted, including a map with the entire proposed infrastructure overlain on the vegetation maps to clearly show which areas will be impacted and avoided.

10.3 Groundwater dependent terrestrial ecosystems, which are types of wetland, are specifically

protected under the Water Framework Directive. The results of the NVC survey and Appendix 2 (which is also applicable to other types of developments) of our Planning guidance on windfarm developments should be used to identify if wetlands are groundwater dependent terrestrial ecosystems.

10.4 The route of roads, tracks or trenches within 100 m of groundwater dependent terrestrial ecosystems (identified in Appendix 2) should be reconsidered. Similarly, the locations of borrow pits or foundations within 250 m of such ecosystems should be reconsidered. If infrastructure cannot be relocated outwith the buffer zones of these ecosystems then the likely impact on them will require further assessment. This assessment should be carried out if these ecosystems occur within or outwith the site boundary so that the full impacts on the proposals are assessed. The results of this assessment and necessary mitigation measures should be included in the ES.

10.5 For areas where avoidance is impossible, details of how impacts upon wetlands including peatlands are minimised and mitigated should be provided within the ES or planning submission. In particular impacts that should be considered include those from drainage, pollution and waste management. This should include preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, dewatering, excavations, drainage channels, cable trenches, or the storage and re-use of excavated peat. Detailed information on waste management is required as detailed below. Any mitigation proposals should also be detailed within the Construction Environmental Management Plan as detailed below.

11. Carbon balance

11.1 Scottish Planning Policy (SPP) states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO2 to the atmosphere. Developments should aim to minimise this release." The ES or planning submission should include a) a summary demonstrating how the development has been designed with regards to layout and mitigation to minimise release of CO2 and b) preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat.

12. Disturbance and re-use of excavated peat

12.1 Where the proposed terrestrial infrastructure will impact upon peatlands, a detailed map of peat depths (this must be to full depth) should be submitted. The peat depth survey should include details of the basic peatland characteristics.

12.2 By adopting an approach of minimising disruption to peatland, the volume of excavated peat can be minimised, reducing CO2 emissions and the commonly experienced difficulties in dealing with surplus peat. The generation of surplus peat is a difficult area which needs to be addressed from the outset given the limited scope for re-use.

12.3 The ES should detail the likely volumes of surplus peat that will be generated, including quantification of catotelmic and acrotelmic peat, and the principles of how the surplus peat will be reused or disposed of.

12.4 There are important waste management implications of measures to deal with surplus peat as set out within our Regulatory Position Statement – Developments on Peat. Landscaping

with surplus peat (or soil) may not be of ecological benefit and consequently a waste management exemption may not apply. In addition we consider disposal of significant depth of peat as being land-filled waste, and this again may not be consentable under our regulatory regimes. Experience has shown that peat used as cover can suffer from significant drying and oxidation, and that peat redeposited at depth can lose structure and create a hazard when the stability of the material deteriorates. This creates a risk to people who may enter such areas or through the possibility of peat slide and we are aware that barbed-wire fencing has been erected around some sites in response to such risks.

12.5 It is, therefore, essential that the scope for minimising the extraction of peat is explored and alternative options identified that minimise risk in terms of carbon release, human health and environmental impact. Early discussion of proposals with us is essential, and an overall approach of minimisation of peatland disruption should be adopted. If it is proposed to use some excavated peat within borrow pits or bunding then details of the proposals, including depth of peat and how the hydrology of the peat will be maintained, should be outlined in the ES.

12.6 Our Energy/Renewable webpage provides links to current best practice guidance on peat survey, excavation and management.

13. Existing groundwater abstractions

13.1 Roads, foundations and other construction works associated with large scale developments can disrupt groundwater flow and impact on groundwater abstractions. To address this risk a list of groundwater abstractions both within and outwith the site boundary, within a radius of i)100 m from roads, tracks and trenches and ii) 250 m from borrow pits and foundations) should be provided.

13.2 If groundwater abstractions are identified within the 100 m radius of roads, tracks and trenches or 250 m radius from borrow pits and foundations, then either the applicant should ensure that the route or location of engineering operations avoid this buffer area or further information and investigations will be required to show that impacts on abstractions are acceptable. Further details can be found in Appendix 2 (which is also applicable to other types of developments) of our Planning guidance on windfarm developments.

14. Borrow pits

14.1 Scottish Planning Policy (SPP) states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The ES or planning submission should provide sufficient information to address this policy statement.

14.2 Additionally, a map of all proposed borrow pits must be submitted along with a site specific plan of each borrow pit detailing the:

a) Location, size, depths and dimensions of each borrow pit;

b) Existing water table and volumes of all dewatering;

c) Proposed drainage and settlement traps, turf and overburden removal and storage areas;

d) Restoration profile, nature and volume of infill materials, and, if wetland features form part of the restoration, management proposals.

14.3 The impact of such facilities (including dust, blasting and impact on water) must be assessed in accordance with Planning Advice Note PAN 50 Controlling the Environmental Effects of Surface Mineral Workings (Paragraph 53). In relation to groundwater, information (Paragraph 52 of PAN 50) only needs to be provided where there is an existing abstraction or GWDTE within 250 m of the borrow pit.

15. Air quality <Delete this section if not relevant>

15.1 The local authority is the responsible authority for local air quality management under the Environment Act 1995, and therefore we recommend that Environmental Health within the local authority be consulted.

15.2 They can advise on the need for this development proposal to be assessed alongside other developments that could contribute to an increase in road traffic. They can also advise on potential impacts such as exacerbation of local air pollution, noise and nuisance issues and cumulative impacts of all development in the local area. Further guidance regarding these issues is provided in Scottish Planning Specific Advice (2004) available on the Scottish Government's Planning website entitled Air Quality and Land Use Planning.

16. Regulatory advice for the applicant

16.1 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 regulations team in your local SEPA office at: Insert local office details

If you have any queries relating to this letter, please contact me by telephone on insert contact number or e-mail at insert area planning office e-mail.

Yours insert closure (sincerely/faithfully)

!!OFFICER!!
Insert job title
Planning Service

ECopy to: !!COPYTO!!; Planning Authority case Officer Direct Email if Available and Requested

Transport Scotland

Development Management and Strategic Road Safety
Roads Directorate

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF
Direct Line: 0141 272 7379, Fax: 0141 272 7350
[redacted]

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Hamish Wright
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

ms.marinelicensing@gov.scot

Your ref:

Our ref:
GB01T19K05

Date:
16/09/2021

Dear Sirs,

MARINE LICENCE - IONA HARBOUR DEVELOPMENT – IONA HARBOUR, SOUND OF IONA

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

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

Proposed Development

The proposal comprises a new Berthing Structure and Breakwater at Iona, to the south-west of the Isle of Mull. The nearest trunk road to the site is the A85(T) on the mainland at Oban, approximately 73km to the east.

Assessment of Environmental Impacts

Section 3.11 of the SR considers the potential effects of Traffic and Transportation associated with the proposed development. This states that as road connections are not feasible, the material for construction works will brought to the site via barge, therefore, the traffic and transport impacts will be insignificant.

Given the distance of the development from the trunk road network and the fact that construction materials will travel by barge, Transport Scotland is satisfied that the proposal will not have any significant impacts on the trunk road. Consequently, no further information is required in this regard.

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

Yours faithfully

[redacted]

Gerard McPhillips

Transport Scotland
Roads Directorate

cc Alan DeVenny – SYSTRA Ltd.

Whale and Dolphin Conservation

Horrill J (Judith)

From: Fiona Read <fiona.read@whales.org>
Sent: 23 August 2021 08:38
To: MS Marine Licensing
Subject: RE: Argyll and Bute Council (Per RPS) – Iona Harbour Development – Iona Harbour, Sound of Iona - Scoping Opinion - Consultation - Response required by 19 September 2021

Dear Hamish,

Thank you for your email. Due to lack of capacity, we will not be responding to the present consultation.

Best wishes,

Fiona

Fiona Read
Policy officer
End Bycatch

WDC, Whale and Dolphin Conservation
Telephone: +44 (0)791 869 3023
whales.org

From: MS.MarineLicensing@gov.scot <MS.MarineLicensing@gov.scot>
Sent: 20 August 2021 16:54
Subject: Argyll and Bute Council (Per RPS) – Iona Harbour Development – Iona Harbour, Sound of Iona - Scoping Opinion - Consultation - Response required by 19 September 2021

Dear Sir/Madam,

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) ("the EIA Regulations")

Argyll and Bute Counci (Per RPS)l – Iona Harbour Development – Iona Harbour, Sound of Iona

In respect of the proposed marine licence applications for the above works under the Marine (Scotland) Act 2010, Argyll and Bute Council has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under regulation 14(1) of the EIA Regulations.

The scoping report submitted by the applicant can be found at: