Marine Policy Assessment

The following table provides an assessment of the proposal against the relevant policies of Scotland's National Marine Plan (SNMP)[1] as required by Section 10 of the Marine Licence Application Form for Construction Projects.

SNMP Policy	Assessment of Compliance
GEN 1 General planning principle *There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of this Plan.*	The proposed works align with the principles of sustainable development and the appropriate use of the marine environment, as set out within Policy GEN 1 of the Scottish National Marine Plan. The scheme comprises essential investigation, maintenance, and structural improvement works that are required to ensure the continued safe operation and longevity of the St Philans Structure. By maintaining and enhancing the existing infrastructure, the works support its ongoing function within the marine environment without introducing significant new development or additional pressures. As such, the proposal is considered to be consistent with the objectives of sustainable use and management of marine resources and does not conflict with the requirements of Policy GEN 1.
GEN 5 Climate change *Marine planners and decision makers must act in the way best calculated to mitigate, and adapt to, climate change.*	The proposed works to refurbish the existing structure are significantly less carbon intensive than replacing it with a new one. By retaining the embodied carbon of the existing structure, reducing the demand for virgin materials and extending its safe long-term use, carbon emissions are greatly reduced in line with GEN 5 Climate change policy and Scottish Carbon Reduction targets As such, the proposed works are considered to be compliant/not conflicting with Policy GEN 5 of the SNMP.
GEN 7 Landscape/seascape *Marine planners and decision makers should ensure that development and use of the marine environment take seascape, landscape, and visual impacts into account.*	Proposed works comprise of maintenance and refurbishment of the existing structure, largely with like-for-like replacements of existing features and therefore there are no anticipated significant effects upon the seascape/landscape. As such the proposed works are considered to be compliant/not conflicting with Policy GEN 7 of the SNMP.
GEN 8 Coastal process and flooding *Developments and activities in the marine environment should be resilient to coastal change and flooding, and not have unacceptable adverse impact on coastal processes or contribute to coastal flooding.*	Proposed works comprise of maintenance and refurbishment of the existing structure therefore not giving rise to potential impacts on coastal processes, with the continued free movement of tidal waters in the surrounding water environment, and with no anticipated effects and contribution to flood risk. As such the proposed works are considered to be compliant and not conflicting with Policy GEN 8 of the SNMP.

[1] Contents - Scotland's National Marine Plan - gov.scot (www.gov.scot)

GEN 10 Invasive non-native species *Opportunities to reduce the introduction of invasive non-native species to a minimum or proactively improve the practice of existing activity should be taken when decisions are being made.*	Japanese knotweed (*Reynoutria japonica*) and rhododendron (*Rhododendron ponticum*) were identified within the proposed works area. Both species are classified as INNS under the Wildlife and Natural Environment (Scotland) Act 2011, which makes it an offence to cause or allow these species to spread in the wild. In the absence of appropriate mitigation, works undertaken within close proximity to these species have the potential to facilitate their spread both within and beyond the site. As such, works within 7 m of Japanese knotweed and 5 m of rhododendron should be avoided where practicable. To minimise risks, all operatives will receive an INNS toolbox talk to raise awareness of the presence of these species and to ensure appropriate working practices are followed. Where works cannot avoid these buffer zones, a site-specific INNS Method Statement will be implemented to control and prevent their spread. Access to the structure will be via the existing road network, with no requirement for marine vessels or equipment. This reduces the potential pathways for both terrestrial and marine INNS transfer. Through the implementation of these avoidance and control measures, the proposed works will actively minimise the risk of introducing or spreading INNS and are therefore considered to be compliant with the requirements of Policy GEN 10 of the Scottish National Marine Plan.
GEN 11 Marine litter *Developers, users and those accessing the marine environment must take measures to address marine litter where appropriate. Reduction of litter must be taken into account by decision makers.*	Appropriate, full containment and other pollution prevention and control measures will be implemented to prevent pollution or debris from entering the water environment (for example where a temporary platform will be required for works grit-blasting). As such the proposed works are considered to be compliant and not conflicting with Policy GEN 11 of the SNMP.
GEN 12 Water quality and resource *Developments and activities should not result in a deterioration of the quality of waters to which the Water Framework Directive, Marine Strategy Framework Directive or other related Directives apply.*	There is potential for minor, temporary impacts to water quality during the proposed works, particularly from activities such as hydro-demolition of concrete, soffit repairs, and parapet replacement. These activities could result in pollution pathways to the Firth of Clyde Inner - Cumbraes through accidental spillages, concrete washout, or mobilisation of debris and particulates if not properly controlled. Without mitigation, there is a risk that such pollution events could indirectly affect the aquatic environment. However, all works will be undertaken in accordance with best practice construction methods and relevant environmental guidance, including SEPA's Guidance for Pollution Prevention (GPPs). Appropriate mitigation measures will be implemented to protect the water environment, including: • Use of containment systems (e.g. sheeting, drip trays, and bunding) to prevent debris and runoff entering the watercourse • Controlled handling and storage of fuels, oils, and chemicals

	• Implementation of silt and sediment control measures • Careful management of hydro-demolition and concrete repair activities to prevent washout • Emergency spill response procedures Further site-specific control measures are detailed within the ESA report. With these measures in place, the proposed works are not expected to result in deterioration of water quality and are therefore considered to be compliant with Policy GEN 12 of the Scottish National Marine Plan.
GEN 13 Noise *Development and use in the marine environment should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects.*	The proposed works have the potential to generate noise and vibration, particularly during noise-intensive activities such as hydro-demolition, use of heavy plant, and concrete repair operations. These activities will be required during night-time working hours for elements of the scheme, which may increase the potential for disturbance. There is potential for temporary impacts on nearby amenity receptors, including a single residential property located within the vicinity of the works. In the absence of mitigation, night-time construction activities could result in short-term disturbance due to elevated noise levels. However, all works will be undertaken in accordance with best practice construction methods and mitigation measures outlined within the Non-Statutory Environmental Review. These will include: • Use of well-maintained, modern plant to minimise noise generation • Selection of quieter working methods where practicable • Implementation of site-specific noise management measures (e.g. positioning of plant, use of temporary acoustic screening if required) • Careful programming of works to limit the duration of the most noise-intensive activities • Toolbox talks to ensure operatives are aware of noise-sensitive working practices With these measures in place, noise impacts will be temporary and localised, and are unlikely to result in significant adverse effects on sensitive receptors. As such, the proposed works are considered to be compliant with Policy GEN 13 of the Scottish National Marine Plan.
GEN 14 Air quality *Development and use of the marine environment should not result in the deterioration of air quality and should not breach any statutory air quality limits.*	Vehicle traffic along the A78 and surrounding local roads is anticipated to be the dominant impact to local air quality, with the potential for congestion with traffic management in place during various works stages. Operationally, there will be no significant air quality effects as traffic flow, speed and composition of vehicles on the carriageway is not anticipated to change, thus increased vehicle emissions and pollutant release is unlikely.

	Following best practice and mitigation measures outlined within the Non-Statutory Environmental Review, which includes best practice measures outlined by the Institute of Air Quality Management (IAQM) (2024), there are no significant impacts anticipated on air quality during, or as a result of the proposed works. As such the proposed works are considered to be compliant/not conflicting with Policy GEN 14 of the SNMP.