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9 March 2022

STAFFIN COMMUNITY TRUST (PER AFFRIC LTD) - HARBOUR DEVELOPMENT - STAFFIN SLIPWAY, SKYE

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

General comment

MSS note that there was no scoping exercise for this project. Whilst we found the EIA to be largely fit for purpose and of a good standard and level of detail, but there are aspects where we are not aware of the justification for which receptors and impacts were scoped out. In particular, please note our comments under the Marine Fish Ecology section below.

Marine Mammals

MSS acknowledge that there are no proposed activities from this development that would result in significant emissions of underwater noise, or significant risks to marine mammals. We agree with NatureScot's advice that an appropriate assessment will not be required for harbour porpoise, grey seal or harbour seal, due to no Likely Significant Effects on any marine mammal Special Areas of Conservation.

MSS are also content with the best practice measures described in section 17.6 of the EIA, including a temporary cessation of rock dumping activities if marine mammals are in the vicinity.

Diadromous fish

MSS agree that the diadromous fish species likely to be present have been correctly identified and are content with the risk assessment for diadromous fish in the EIA (Chapter 9).

MSS would note that there is now an increasing amount of information becoming available from recent acoustic tracking of salmon smolts through the waters off the West coast of Scotland, which confirms that there are unlikely to be any significant migration paths for salmon smolts between any salmon SAC and the site. MSS advise that no salmon SACs need screened in.

Marine fish ecology

The Fish Ecology chapter of the Staffin Community Harbour Development Environmental Impact Assessment (EIA) Report focuses on diadromous fish species, flapper skate and basking sharks and

there is no reference to other marine fish species. We assume that impacts to other fish species were scoped out, *a priori*.

Shallow bays and harbours can act as nursery areas for juvenile fish species such as herring and whiting which have been observed in other harbour areas such as the Aberdeen Harbour. There is also the potential for other fish species to be within the area such as sandeels considering the development area is within a low intensity spawning area for sandeel (Ellis et al. 2012).

MSS therefore recommend that, in the absence of a EIA scoping report which describes how species and impacts were scoped in/out in some detail, the applicant should consider the broader marine fish community, and justify the exclusion of other marine fish species, and relevant impact pathways (e.g. habitat disturbance / destruction, increased suspended sediment) from further assessment in the EIA report. We do however note that this development is unlikely to have significant impacts on marine fish due to the spatial scale of the development and duration of construction activities.

Commercial fisheries

MSS note that the works appear to be a benefit to commercial fisheries through improvements to access and safety and therefore have no further comments.

Benthic Ecology

MSS agree with the comments made by NatureScot in their advice (dated 18 February 2022), noting additionally that kelp forest has recently been added to the OSPAR List of Threatened and/or Declining Species and Habitats.

Physical environment / coastal processes

MSS have reviewed the relevant documentation with regard to coastal processes. Effects on coastal processes are unlikely and any potential impacts are small. Hydraulic modelling was used to understand effects of the proposal on waves and currents during various conditions and storm events. The modelling suggests that the proposed breakwater reduced the wave height within the harbour area and very little change occurs in wave conditions and current speeds along the coast line. From the material (EIA report and associated documents) provided we agree with the statement that the construction of the breakwater will not give rise to significant effects on coastal processes. In addition, we do not expect any significant effects on sediment transport within the Staffin area.

References

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. Sci. Ser. Tech. Rep., Cefas Lowestoft, 147: 56pp

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