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21st June 2024

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9 George Square,
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G2 1DY

Attn: Neil McAteer,
Planning Officer
Housing and Public Protection
North Ayrshire Council
Cunninghame House
Irvine
KA12 8EE

Dear Neil,

RE: ISLE OF PLADDA: PROPOSED REFURBISHMENT AND EXTENTION OF EXISTING STRUCTURES TO FORM A SUSTAINABLE HOLIDAY HOME – REQUEST FOR AN ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING OPINION UNDER REGULATIONS 7 AND 8 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED) FOR WORKS ON LAND AND TO THE MEAN LOW WATER SPRINGS MARK, AND REGULATION 9 OF THE OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017 (AS AMENDED), TO BE CONSENTED BY MARINE DIRECTORATE (MD-LOT) FOR WORKS BELOW THE MEAN HIGH WATER SPRINGS MARK.

Introduction

This letter is a request for an Environmental Impact Assessment (EIA) screening opinion from North Ayrshire Council (NAC) and MD-LOT in respect of a Proposed refurbishment and extension project on the Isle of Pladda (hereafter referred to as the proposed development). HB Developments Ltd. (the applicant), intends to submit a Local planning application and an application for a marine works licence. It should be read in conjunction with the enclosed Architects brochure which provides more detail on the proposals.

This EIA screening opinion request sets out the information required by Regulation 8 of the Town and Country Planning EIA 2017 Regulations ('TCPA EIA Regulations') and Regulation 9 of the Marine Works EIA 2017 Regulations ('MW EIA Regulations'). It details the proposed development and environmental conditions at and surrounding the site. It considers the potential environmental effects of the development and outlines how they will be addressed through the design process and documented within the planning application documents. In doing so, we have arrived at the conclusion that EIA is not required in this instance and the remainder of the request sets out our findings.

Consideration of the EIA Regulations

Under the EIA Regulations, certain developments should be screened to determine whether a statutory EIA should be carried out. Criteria and guidance thresholds are provided. Schedule 1 developments are mandatory EIA developments, whilst Schedule 2 developments require the discretion of the consenting authority. The proposed development does not fall within the developments identified as Schedule 1 development in the EIA Regulations that automatically requires an EIA. As there are several elements to the proposals, it doesn't fall neatly into any of the classifications set out in Schedule 2 of the Regulations. The principal components of the proposed development can be classified as 'Energy industry' (single wind

turbine) and 'Infrastructure projects' (refurbishment of jetty). The other primary aspects of the development are the alteration and extension of existing buildings and aren't covered by the EIA Regulations. Therefore the project may variously fall under Sections 3 and 10 of Schedule 2:

- Section 3(j) as it is considered to be: "Installations for the harnessing of wind power for energy production (wind farms)";
- Section 10(m) as it is considered to be: "Coastal work to combat erosion and maritime works capable of altering the coast through the construction, for example, of dykes, moles, jetties and other sea defence works, excluding the maintenance and reconstruction of such works".

A Schedule 2 development is an EIA Development only if it is likely to have significant effects on the environment by virtue of factors such as its size, characteristics or location. Scottish Government Planning Circular 1 2017: Environmental Impact Assessment Regulations 2017 confirms that the critical question to be addressed in EIA screening is therefore: "*Would this particular development be likely to have significant effects on the environment?*". To answer this question, it is necessary to provide the information detailed in Regulation 8 and screen the development against the criteria contained in Schedule 3 of the EIA Regulations.

Site and Surrounding Area

The site comprises Pladda Island, which is an uninhabited island, approximately 11.3 ha in area and is located approx. 1km to the south of the Isle of Arran in the Firth of Clyde. The island is situated within the South Arran Marine Protected Area (MPA)¹. This area was designated in 2014 and is home to a diversity of habitats and species including, but not limited to: ocean quahog, maerl and seagrass beds. Within the site, there are no further statutory designated sites or known areas of ecological interest. The closest designated site lies approx. 850m north across the Firth of Clyde and is the South Coast of Arran Site of Special Scientific Interest (SSSI). It is designated for both geological and biological features. Within a 10km radius of the Site lies various sites of Arran Moors SSSI and Special Protection Area (SPA) to the north (2.7km) and Dippin Head SSSI to the north east (2.8km). The site is not located within an Air Quality Management Area (AQMA). Paisley AQMA (amended) is the closest which lies approximately 60km north east of the site.

Schedule 3 of the TCPA EIA and MW EIA Regulations screening criteria relates to environmental sensitivity of the geographical area likely to be affected by a proposed development. The site and surrounding area are considered against these criteria in **Table 1** below.

Table 1 – Assessment of Locational Sensitivity

Screening Criteria	Assessment
Existing and approved land use	Land use at the site consists of a lighthouse, a former lighthouse keeper's accommodation and several outbuildings. The proposed development is compatible with existing and approved land uses on site. The land use is therefore not considered sensitive in this respect.

¹ [South Arran MPA - Scotlink](#)

Screening Criteria	Assessment
<p>The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground</p>	<p>The proposed development will re-use and extend the existing buildings on the island and will seek to minimise imported materials, such that it will not be a major user of natural resources within the site area itself and it is not considered likely to affect their relative abundance or availability. The precise location of material storage during construction will have due regard to soil, land and water resources in order to minimise potential adverse environmental effects where possible, including in relation to soil degradation and pollution prevention. Appropriate construction and operational phase drainage arrangements with regard to water quality, environmental impact and flood risk mitigation measures are being embedded within the design of the proposed development from the outset such that no residual likely significant adverse effects on water resources would arise. The site is located within the South Arran MPA. However, there are no further designated sites or known areas of ecological interest within the site or its immediate surroundings. The site does not contain any core paths, recreational assets or tourist routes.</p>
<p>The absorption capacity of the natural environment, paying particular attention to the following area:</p> <ul style="list-style-type: none"> • Wetlands, riparian areas, river mouths; • Coastal zones and the marine environment; • Mountain and forest areas; • Nature reserves and parks; • European sites and other areas classified or protected under national legislation; • Areas in which there has already been a failure to meet the environmental quality standards ... or in which it is considered that there is such a failure; • Densely populated areas; • Landscapes and sites of historical, cultural or archaeological significance. 	<p>There are no heritage designations within the site. There appears to have been a church or chapel on Pladda. Nothing now remains to mark its site, this is discussed further in Table 3.</p> <p>With regards to absorption capacity within the surrounding area, it is acknowledged that designated ecological features and protected species may be susceptible to adverse effects from potential construction and operational phase impacts (in particular disturbance effects). Key mitigation parameters will be deployed to minimise potential ecological impacts during construction.</p>

Proposed Development

The proposed development includes the following key components. Please refer to Appendix B for a Plan showing the locations:

1. Improved jetty for island access. Excavated foreshore for 14m work boat. New access pontoon and gangway. New rubble breakwater with capping access blocks to replace existing breakwater wall. 40m precast concrete slipway block.
2. Erection of a 12-15Kv wind turbine (15m pole height with 8.5m diameter rotor) to the west of the Jetty which will provide a sustainable energy solution for the island.
3. New outbuilding to house equipment for jetty and battery storage for wind turbine and solar panels. Approx 92m²
4. Solar panels on the West and East roof pitches of the existing ancillary building. 20x2m x 1m panels mounted on the existing roof
5. Refurbishment and extension of the existing lighthouse accommodation;
6. Replacement of existing septic tank and outfall with new tank and outfall

In accordance with Regulation 8(3) of the TCPA EIA Regulations and Regulation 10(3) of the MW EIA Regulations, a framework for design principles and environmental mitigation measures is being applied to guide the detailed design and construction of the proposed development in order to avoid or prevent any likely significant environmental effects. The design principles adopted for the proposed development are:

- **Avoidance** of the loss of sensitive environmental features and assets through careful siting decisions and options appraisals;
- **Minimisation** through siting and design of likely direct and indirect adverse environmental effects where these cannot be avoided; and
- **Mitigation** through the incorporation of appropriate measures into the construction and operation of the proposed development to address likely direct and indirect adverse environmental effects where these cannot be reduced to an acceptable level through siting or design.

The implementation of all embedded mitigation measures requires to be confirmed through the content of the planning application and any subsequent permissions granted for the proposed development. Standard environmental mitigation measures could include:

- Use of biodegradable fuel / oil for plant and equipment;
- Provision of spill kits and training on how to use;
- Limits on working hours;
- Dampening down any stockpiled materials;
- Refuelling over bunded areas;
- Well maintained and serviced plant and equipment;
- Designated waste management procedures / segregation of waste; and
- Adherence with relevant SEPA GPPs (guidance for pollution prevention) [Guidance for Pollution Prevention \(GPP\) documents | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland.](#)

In accordance with Regulation 8(3) of the TCPA EIA Regulations and Regulation 10(3) of the MW EIA Regulations, any measures proposed at this stage to avoid or prevent significant adverse effects on the

environment must be taken account of when determining this EIA screening request. Schedule 3 of the EIA Regulations identifies screening criteria relating specifically to the characteristics of a development proposal. The proposed development is considered against these criteria in **Table 2**.

Table 2 – Assessment of Development Characteristics

Screening Criteria	Assessment
The size and design of the development.	The proposed development involves the six main elements listed above. Although the overall island has an area above Mean High Water Springs of 11.3ha, it is anticipated that the physical development works would require only limited land-take, much of which will be within the footprint of existing development. The red line boundary of the proposed development will be c. 1.7ha in extent. On this basis, the scale of proposed development is not itself considered likely to result in significant environmental effects as the design will be undertaken sympathetic to the surrounding environment.
Accumulation with other existing development and/or approved development.	All elements of the proposed development requiring authorisation from NAC and MD-LOT will be contained within the site. No development further to that listed above is required or proposed as part of the proposed development. The site area is not known to benefit from any relevant or extant planning permissions and there are also no known approved developments within the vicinity of the site which would interact with the proposed development. Following adoption of appropriate mitigation measures, no significant effects are considered likely in relation to the cumulative impact with other developments.
The use of natural resources, in particular land, soil, water and biodiversity.	Based on the absence of sources of potential contamination, sensitive human health receptors, it is considered that there will be no potentially significant effects from ground conditions, including instability, and contamination. Biodiversity and hydrological effects are considered in more detail in Table 3 .
The production of waste.	The construction phase of the proposed development will result in the generation of construction waste (e.g., construction materials packaging, offcuts etc). All waste management practices during construction will comply with appropriate regulations. Any unsuitable or contaminated materials encountered during the construction process would be extracted and subject to disposal in accordance with regulatory requirements, including through obtaining appropriate environmental permits from SEPA, if required. No significant environmental effects related to waste production are considered likely.
Pollution and nuisances.	The use of machinery and plant, including mechanical excavators, generators and pumps will adhere to best practice techniques and will be undertaken with standard construction hours to reduce risks associated with noise and air based pollutants. Exhaust gas emissions and adverse noise effects on sensitive receptors from machinery/plant are likely to be minimal given the nature and scale of the proposed development and the rural location of the site. Notwithstanding this, any likely adverse effects on air quality, soundscapes and vibration will be controlled to an acceptable level through standard site management and construction practices. During construction, materials and plant would be stored appropriately within the site area. Appropriate mitigation measures and

Screening Criteria	Assessment
	construction management best practice techniques would be utilised to minimise the risk of any environmental effects occurring, e.g. as a result of localised fuel spillages.
The risk of major accident and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge.	If not properly managed, potential construction and operational phase risks could result in amenity disturbance, injuries and/or fatalities to construction workers within and surrounding the site, as well as pollution migration to ground and any watercourses resulting in potential adverse effects on soil, land, water and biodiversity resources. However, with the implementation of construction management best practice techniques and adherence of all applicable regulations, no significant environmental effects are considered likely. As with any construction project, there are potential risks in relation to the use of plant and machinery, movement and placement of construction materials (including earthworks) working at height, accidental spillage of hazardous substances, fires and explosions. Given the nature of the proposed development, significant effects on human health are considered unlikely.
The risk to human health (for example, due to water contamination or air pollution).	The primary potential impact on air quality is windblown dust during the construction phase. As the island is currently uninhabited there is no potential impact to human receptors. The implementation of standard construction mitigation measures, construction management best practice techniques and adherence of all applicable regulations mean that no significant effects on human health are considered likely.

Potential and Likely Significant Environmental Effects

Table 3 – Assessment of Development Characteristics

Environmental Aspects (Regulation 4(3))	Relevant Environmental Topic	Potential Construction and Operation Effect	Proposed Approach and Mitigation	Significance of Likely Effects
Air and Climate	Air Quality, Noise, Vibration and Climate Change	<p>Construction: Noise and potential vibration from construction activities.</p> <p>Operation: Once operational, noise and vibration is not expected to be an issue as it will be similar to existing noise levels.</p>	<p>There are no known sensitive receptors close to the site and the dominant noise source will be from the action of the waves on the shore.</p> <p>During construction, appropriate noise management practices will be followed.</p>	Not Significant

Environmental Aspects (Regulation 4(3))	Relevant Environmental Topic	Potential Construction and Operation Effect	Proposed Approach and Mitigation	Significance of Likely Effects
		<p>Construction: Dust emissions from construction activities.</p> <p>Operation: There will be no additional dust emissions during operation.</p>	<p>During construction, dust from on-site activities and trackout by construction vehicles has the potential to generate dust, within the site; the main potential impacts are loss of amenity (as a result of dust soiling) and deterioration of human health of construction workers (as a result of concentrations of PM10, however with appropriate dust mitigation measures in place and the fact that there are no receptors in close proximity to the site, the effects of construction dust will not be significant (IAQM, 2014).</p>	Not Significant
		<p>Construction: embedded carbon from materials used and construction machinery.</p> <p>Operation: erection of wind turbine will provide sustainable energy for the island.</p>	<p>Use local contractors, local materials where possible.</p>	Not Significant
Biodiversity, flora, fauna, land and soil	Ground Conditions and Land Use	Construction + Operation: Disturbance to ground conditions / land use.	There is low likelihood of significant effects arising in relation to land use, ground conditions and geology as a result of the works. The proposals are primarily comprised of extensions and refurbishment to existing structures.	Not Significant
	Ecology and Marine Ecology	Construction: Loss and disturbance of existing habitat and noise disturbance.	Construction: Best practice techniques to reduce noise, and timing of works to reduce impact on any species using the site. Marine elements will be controlled	Not Significant

Environmental Aspects (Regulation 4(3))	Relevant Environmental Topic	Potential Construction and Operation Effect	Proposed Approach and Mitigation	Significance of Likely Effects
	Island Ecology	Construction: Loss and disturbance of existing habitat and noise disturbance.	<p>separately through the marine licence, and appropriate ecological survey information will be submitted as part of that licence application.</p> <p>An ecology survey will accompany the planning application including an extended phase 1 habitat survey and protected species surveys. Any recommended mitigation relating to contractor methodology, equipment and timings will be incorporated at that stage developed. Construction: Best practice techniques to reduce noise, and timing of works to reduce impact on any species using the site. Marine elements will be controlled separately through the marine licence.</p>	Not Significant
Water	Hydrology	According to SEPA flood maps there is a high likelihood of coastal flooding surrounding the island but not within the footprint of proposed development. Fresh water is currently abstracted from a well on the west of the island and this will continue to serve the proposed development.	The design and construction methodology to be adopted for the proposed development will incorporate appropriate physical mitigation measures and procedures to protect against flood risk or pollution release into the sea or groundwater.	Not Significant
Population, human health and	Traffic, Transport and Access	Construction: All materials are likely to be consolidated at an appropriate port. Any land based traffic	No mitigation measures are considered to be necessary in relation to traffic and transport due to the scale of the project.	Not Significant

Environmental Aspects (Regulation 4(3))	Relevant Environmental Topic	Potential Construction and Operation Effect	Proposed Approach and Mitigation	Significance of Likely Effects
material assets		<p>impacts are expected to be negligible.</p> <p>Operation: It is proposed that the refurbished and extended jetty will be the primary access point for visitors and clients of the holiday lodges.</p>		
	Population and Human Health	It is anticipated that the proposed development would not result in any significant population and human health effects during construction and operation as the island is currently uninhabited.	No mitigation measures are considered to be necessary as the island is currently uninhabited.	Not Significant
	Waste	Construction: waste from construction activities.	The construction of the development will result in the generation of construction waste. All waste management practices during construction will comply with appropriate regulations. Any unsuitable or contaminated materials encountered during the construction process would be extracted and subject to disposal in accordance with all regulation requirements, including through obtaining appropriate SEPA licences, if required.	Not Significant
Cultural heritage and landscape	Heritage	Construction: potential disturbance to heritage assets if present on the site.	From an initial search it is considered unlikely that significant effects will arise due to an absence of heritage assets. The historic presence of a lighthouse	Not Significant

Environmental Aspects (Regulation 4(3))	Relevant Environmental Topic	Potential Construction and Operation Effect	Proposed Approach and Mitigation	Significance of Likely Effects
			and ancillary buildings on the island is noted and the proposed interventions to the ancillary buildings will be covered in the design statement submitted with the application	
	Landscape and Visual	It is anticipated that the proposed development would not result in any significant landscape / seascape or visual effects during construction or operation. This conclusion is reached due to the context of the existing landscape and site and the nature of the proposed development, this being small scale, of limited geographical extent and utilising existing buildings.	The design and construction methodology to be adopted for the proposed development will incorporate appropriate mitigation measures to minimise landscape and visual impacts. The proposed development is likely to result in an improvement in the appearance of the island as a result of investment and tidy up of existing unused buildings.	Not Significant

2. Summary

We therefore consider that this screening opinion request demonstrates that the proposed development **does not** constitute EIA development in accordance with the EIA Regulations. The potential for environmental effects of the proposed development will be covered by the proposed technical assessments and studies that will be submitted with the planning application, to include:

- Design Statement
- Planning statement
- Landscape and visual assessment
- First Iteration Construction Environmental Management Plan (FiEMP)
- Marine Ecology assessment
- Ecology Assessment (including bats, seals and sea otter)

The applicant is therefore seeking written confirmation from NAC and MD-LOT that an EIA is **not** required, and that the planning application or Marine Licence application does not need to be accompanied by an

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EIA Report. We would be grateful if NAC and MD-LOT could provide a formal screening opinion and confirmation if any additional stand-alone documents that would be required other than those identified above. We understand the statutory response time to be three weeks from the date of receiving this request in accordance the EIA Regulations.

Yours sincerely,

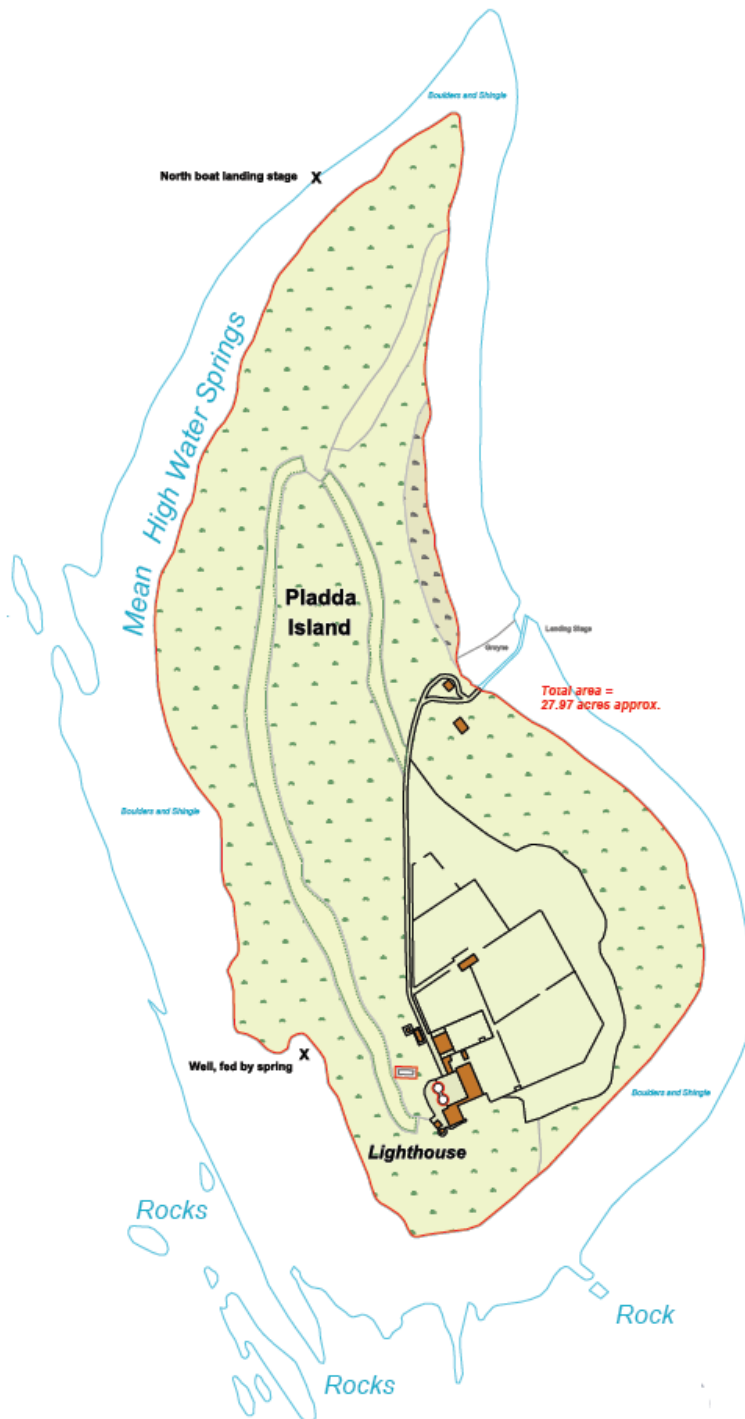
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Mark Johnston

Planning Director

cc MD.Marinelicensing@gov.scot

A. Site Location Plan, Isle of Pladda



B. Consolidated proposal plan

