

Aberdeen Harbour Expansion Project
Application to vary Marine Construction Licence
Question 12 continuation sheet

During AHEP Environmental Advisory Group meetings in June and July 2021, AHB explained the proposed works during the extension period and summarised the findings of the Supporting Environmental Document. Each organisation was also invited to a virtual meeting with AHB to discuss individual issues.

A list of the organisations consulted on the Supporting Environmental Document during June-July 2021, and their response (if received), is provided below.

- NatureScot: written responses received 27/07/21 and 29/07/21 – see below.
- Aberdeen City Council: no meeting requested, and no written response received.
- Scottish Environment Protection Agency – no meeting requested, and no written response received.
- Dee District Salmon Fishery Board – written response received 13/07/21 – see below.
- Whale and Dolphin Conservation – meeting held on 15/06/21. No significant concerns raised. No written response received.
- RSPB Scotland – meeting held on 22/06/21. No significant concerns raised. No written response received.

From: [Shirley Reid](#)
To: [Katherine Holmes](#)
Subject: RE: AHEP marine licence variation
Date: 29 July 2021 12:38:09

Hi Katherine,

Re the CEMD, I thought that might be the case so no bother. Whatever works for you.

Cheers

Shirley

The advice/information in this e-mail is provided by NatureScot, the operating name of Scottish Natural Heritage.

Shirley Reid | Area Officer

NatureScot | Alexander Fleming House | 8 Southfield Drive | Elgin | IV30 6GR | t: 01343 540 631 m: REDACTED
[nature.scot](#) | [@nature.scot](#) | Scotland's Nature Agency | Buidheann Nàdair na h-Alba

From: Katherine Holmes <K-Holmes@aberdeen-harbour.co.uk>
Sent: 28 July 2021 21:26
To: Shirley Reid <Shirley.Reid@nature.scot>
Subject: RE: AHEP marine licence variation

Hi Shirley,

Thanks very much for the feedback.

I'll update the report with any additional new monitoring data we have.

We did consider trying to summarise key mitigation & monitoring measures from the 2019 CEMD in the report, but when we looked across all the chapters, there are measures in most chapters that are relevant to any works carried out on site, so it didn't feel appropriate to highlight one set of measures as more important than the rest. It seemed simpler to state that the 2019 CEMD would be complied with in its entirety during the extension period. Hope this makes sense, if you feel it isn't a sensible approach do let me know.

Many thanks,
Katherine

Katherine Holmes
Environmental Advisor

T: 01224 597000
M: REDACTED

From: Shirley Reid <Shirley.Reid@nature.scot>
Sent: 27 July 2021 15:13
To: Katherine Holmes <K-Holmes@aberdeen-harbour.co.uk>
Subject: RE: AHEP marine licence variation

Hi Katherine,

I considered the Supporting Environmental Document to be clear in detailing the works to be covered by the marine licence variation and assessing the potential for additional environmental effects. Depending on your timescale for submission of the variation, you may wish to update the document to include any additional monitoring data that you have.

Noting that the latest version of the Construction Environmental Management Document (2019 CEMD) remains valid for the proposed extension period, you may wish to pull out the specific protection, mitigation and management plans relevant to the limited works covered by the variation. This could be incorporated as an annex to the supporting document, bringing together all relevant information in a single document.

Cheers

Shirley

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Shirley Reid | Area Officer

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From: Katherine Holmes <K-Holmes@aberdeen-harbour.co.uk>
Sent: 26 July 2021 14:29
To: Shirley Reid <Shirley.Reid@nature.scot>
Subject: RE: AHEP marine licence variation

Dear Shirley,

I hope all is well with you.

We've just received the EIA screening opinion from MS-LOT confirming that the proposed extension to the construction programme doesn't require an additional EIA.

We're gearing up to submit the marine licence application as soon as possible. Did you or your colleagues have any comments on the Supporting Environmental Document, that weren't relevant to the screening request but that may require an update to the Document before the marine licence application is submitted?

Many thanks,
Katherine

Katherine Holmes
Environmental Advisor

T: 01224 597000
M: REDACTED

From: Shirley Reid <Shirley.Reid@nature.scot>
Sent: 07 July 2021 15:17
To: Katherine Holmes <K.Holmes@aberdeen-harbour.co.uk>
Subject: RE: AHEP marine licence variation

No worries Katherine. :-)

As I said at the meeting, I have on my to-do list responding to MS-LOT on the EIA screening opinion consultation, noting the deadline for comments as the 15th July. Quite simply, it's in a queue and I haven't had time yet to look at it. I will respond by the due date.

I'll return any relevant comments to yourself as well.

Cheers

Shirley

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Shirley Reid | Area Officer

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From: Katherine Holmes <K.Holmes@aberdeen-harbour.co.uk>
Sent: 07 July 2021 14:30
To: Shirley Reid <Shirley.Reid@nature.scot>
Subject: RE: AHEP marine licence variation

Dear Shirley,

I'm so sorry I didn't respond to your email, I must have completely missed it.

We don't have a deadline for comments as such, although as you've just heard at the EAG we expect the EIA Screening Opinion from MS-LOT on 5th August. If it's not an EIA project, we'll be submitting the marine licence application straight away, and if it is an EIA project, there'll be a slight delay while we take stock and make sure we've met all the EIA requirements. So it would be great to have your comments at the beginning on August if that's possible.

I assume you and your colleagues will be reviewing the report as part of the EIA screening process anyway, so if you have any comments/questions that aren't relevant to the EIA screening, perhaps you could forward these onto me?

Many thanks,
Katherine

Katherine Holmes
Environmental Advisor

T: 01224 597000
M: REDACTED

From: Shirley Reid <Shirley.Reid@nature.scot>
Sent: 22 June 2021 12:41
To: Katherine Holmes <K.Holmes@aberdeen-harbour.co.uk>
Subject: RE: AHEP marine licence variation

Hi Katherine,

Yes, good to meet you too albeit briefly and by VC!

The receptors scoped on and out seems reasonable to me and I'm happy to review your report ahead of submission to MS-LOT.

As I'm sure you understand, we're quite short staffed at the moment and I plan to take some leave at the end of July. It will be helpful if you can let me know any deadline for comments which I will aim to meet.

Cheers

Shirley

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Shirley Reid | Area Officer

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From: Katherine Holmes <K-Holmes@aberdeen-harbour.co.uk>

Sent: 17 June 2021 10:20

To: Shirley Reid <Shirley.Reid@nature.scot>

Subject: AHEP marine licence variation

Hi Shirley,

It was good to see you at the recent EAG meeting.

To keep you up to date on the marine licence variation, we've just submitted an EIA screening request to Marine Scotland, so we expect a screening decision in around 6-8 weeks. We'll be submitting the marine licence application as soon as possible after that.

As I explained at the EAG meeting, AHB have prepared a report which considers the potential environmental effects of extending limited aspects of the construction programme by up to 10 months in 2022. As the works covered by the extension are within the marine environment, the report focuses on marine receptors including fish & shellfish, marine birds, marine mammals and the Nigg Bay SSSI. All other receptors (including terrestrial) have been 'scoped out' of the assessment as described in the report.

We'd like to use the next few weeks to consult statutory and other key stakeholders on the proposals. Does NatureScot have any concerns or comments on the proposed extension? Would you be prepared to review the report in advance of the marine licence application being submitted?

Many thanks,
Katherine

Katherine Holmes
Environmental Advisor

T: 01224 597000
M: REDACTED



Dee District Salmon Fishery Board

13th July 2021

Dear Katherine,

Aberdeen Harbour Expansion Project Request to vary Construction Marine Licence: Supporting Environmental Document June 2021.

The Dee District Salmon Fishery Board (Dee DSFB) welcomes the opportunity to comment upon the Supporting Environmental Document for the Licence Variation Request for the Aberdeen Harbour Expansion Project (AHEP).

Background

Designations & Conservation Status

As a statutory body charged with the protection of Atlantic salmon and sea trout stocks within its district, the Dee DSFB has a duty to ensure that there are no significant adverse impacts upon the populations of these species.

The Dee has been designated as a Special Area of Conservation under the EC Habitats Directive 92/43 EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna for Atlantic salmon (the principal species for which it receives this designation). The Dee District also supports populations of trout, eels and brook, river and sea lampreys.

Sea trout, common to all the rivers within the Dee District, are a priority species under the United Kingdom's Biodiversity Action Plan (UKBAP).

All lamprey species are protected under the EC Habitats Directive whilst river and sea lampreys are additionally protected under the UKBAP priority list.

Eels are a UKBAP priority species, critically endangered under the IUCN red list and protected under CITES.

Adult Atlantic salmon enter the Dee each month of the year and are therefore likely to be present on the adjacent coast throughout the year in varying numbers. Adult salmon and sea trout are known to travel back and forth along the coastal zone in preparation for entering their natal rivers when conditions are suitable.

Acoustic tagging and tracking have been used to investigate the freshwater and estuarine migration of salmon smolts from 2016 onwards. Tracking of smolts has indicated that the peak of outward migration occurs in April and May each year and smolts may pass close to the site of the AHEP.

Response

The Dee DSFB understands that the extension of limited aspects of the marine works by up to 10 months has the potential to disturb salmon, sea trout and other fish species for a longer period than was previously assessed. We note that the extension does not include high impact marine works such as dredging and sea disposal, marine impact piling and underwater blasting. These activities were previously of most concern in terms of negative impacts on salmon and trout. It is understood that any propagation of underwater noise outside the bay from rotary piling will be reduced due to the construction of the north breakwater and partial construction of the south breakwater.

Although the variation means an extension of some construction disturbance at Nig Bay, if all works specified in the licence variation are undertaken in strict adherence to the 2019 CEMD the Dee DSFB would not object in principle to AHB's request to vary the Construction Marine Licence to allow works to be extended until October 2022, (it is noted that works are predicted to be complete by Q1 of 2022).

The Dee DSFB wishes to fully engage with this development through regular EAG meetings and would seek to resolve any issues that may arise over the remaining period of construction. In the meantime if you require further information then please do not hesitate to contact me.

Yours sincerely

E. Third.

Edwin Third
River Operations Manager
For and on behalf of the Dee District Salmon Fishery Board.

River Office, Mill of Dinnet, Dinnet, Aboyne, Aberdeenshire, AB34 5LA

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