

Mr A. Cadzow

<Redacted>

Date: 10 October 2023

Dear Mr Cadzow,

SCREENING OPINION UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

Thank you for your screening opinion request dated 10 July 2023 in regards to the proposed harbour improvement works, including installation of a floating pontoon and gangway, sea defence works and dredging/removal of rocks at Blackmill Bay, Isle of Luing (“the Proposed Works”).

The Scottish Ministers consider the Proposed Works to fall under paragraph 10(m) of Schedule 2 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) (“the 2017 MW Regulations”), with the Proposed Works being carried out in a sensitive area, as defined by the 2017 MW Regulations. Consequently, the Scottish Ministers are obliged to adopt a screening opinion as to whether the Proposed Works are an Environmental Impact Assessment (“EIA”) project under the 2017 MW Regulations.

Under regulation 10(5) of the 2017 MW Regulations, the Scottish Ministers have consulted with NatureScot (formerly Scottish Natural Heritage), the Scottish Environment Protection Agency (“SEPA”), Argyll and Bute Council and Historic Environment Scotland (“HES”) as to their view on whether the Proposed Works are an EIA project. Copies of the consultation responses received are attached for your review (at Appendix I).

When making a determination as to whether schedule 2 works are an EIA project, the Scottish Ministers must provide their reasons in a written statement, taking into account the selection criteria set out in schedule 3 of the 2017 MW Regulations, as are relevant to the Proposed Works. This is set out below.

Characteristics of the works

The Proposed Works seek to extend the existing rock armour sea defences, create a raised car park and turning area and install a pontoon and gangway to improve the harbour infrastructure at Blackmill Bay.

The proposed rock armour extension will be approximately 30 meters (“m”) in length and 2 – 6 meters in width. Construction of the rock armour will be carried out by a land based excavator and rocks will be sourced locally on the Isle of Luing. The total area of the rock armour extension will be 120m².

To ensure safe navigation in and out of the cove rocks from the seabed within the harbour area will be removed as currently they present a hazard to vessels. All material to be removed is above Mean Low Water Springs and works will therefore be carried out using a land based excavator and removed to above Mean High Water Springs. The total area of rock removal is 40m².

A floating pontoon and access gangway will be installed. The pontoon will be 12 m by 2 m, catering for vessels up to 11 m length. The pontoon will be moored at the seaward side and anchored to rocks at the landward side. No piling will be required.

A raised car parking area to provide access to the cove is also proposed covering an area approximately 80m².

All Proposed Works will take place at low tide and encompass a total area of 160m².

Location of the works

Blackmill Bay is situated on the west side of the Isle of Luing with the Proposed Works lying adjacent to the Firth of Lorn SAC, Loch Sunart to the Sound of Jura MPA and The Inner Hebrides and Minches SAC.

NatureScot advised it is unlikely that the Proposed Works will result in a significant effect on the protected sites. It stated that there is likely to be otters present in the vicinity of the Proposed Works and therefore an otter survey will be required to confirm the presence/absence of otter holts. However, it does not consider the Proposed Works to require an EIA.

Argyll and Bute Council highlighted that the Proposed Works are adjacent to the Priority Marine Feature of Native oyster (*Ostrea edulis*). The Native oyster has conservation status and is under threat mainly due to habitat loss, pollution, over exploitation, disease and non-native species. Siltation from the disturbance of sediment can also have negative impacts, such as smothering to Native oysters. In addition, it noted that harbour porpoise frequent the area and may come close inshore and that important biogenic reefs may extend to shallow depths close to the shoreline. However, it is anticipated that any potential impacts from the Proposed Works can be effectively addressed and mitigated through the marine licence application process. In conclusion, Argyll and Bute Council advised that the Proposed Works will not require an EIA.

HES advised that there are no cultural heritage assets recorded in the area and no specific evidence to indicate the potential for unidentified remains within the development area.

Characteristics of the potential impact

Argyll and Bute Council note potential impacts from noise, on water quality, pollution and the potential for the introduction of invasive non-native species from the Proposed Works. However, potential impacts can be effectively addressed and mitigated through the marine licence application process and through the development of a Construction Environment Management Plan.

SEPA advised that the application falls below the threshold for which SEPA will provide site specific advice.

Conclusion

In view of the findings above, the Scottish Ministers are of the opinion that the Proposed Works **are not** an EIA project under the 2017 MW Regulations and, therefore, an EIA **is not** required to be carried out in respect of the Proposed Works.

If you increase, alter or extend the Proposed Works, you are advised to contact Marine Directorate - Licensing Operations Team again to confirm if the screening opinion is still valid.

A copy of the screening opinion has been forwarded to Argyll and Bute Council planning department. The screening opinion has also been made publicly available through the Marine Scotland Information website <https://marine.gov.scot/node/24272>.

If you require any further assistance or advice on this matter, please do not hesitate to contact me.

Yours sincerely,

Claire Crookston

Marine Directorate - Licensing Operations Team

Annex One

Consultation Responses





By email to: Claire.Crookston@gov.scot

Claire Crookston
Marine Licensing Officer
Marine Scotland

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

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

Our case ID: 300067510

24 August 2023

Dear Claire Crookston

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Cadzow Brothers - Harbour Improvements - Blackmill Bay, Isle of Luing
Request for Screening Opinion

Thank you for your consultation seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for the above proposed development, which we received on 03 August 2023. This letter contains our comments for our historic environment interests. That is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, gardens and designed landscapes and battlefields on their respective Inventories.

Our Screening opinion

We have no comments to make on the requirement or otherwise for an EIA for the marine aspects of this proposed development. However, you may find the information provided below helpful in reaching your decision on the matter.

Our advice

There are no cultural heritage assets recorded in the area that will be directly affected by the proposed development and no specific evidence to indicate that there is potential for unidentified remains within the development area. We consider that the works described that are relevant to marine licensing should not result in significant impacts to cultural heritage interests if they are undertaken in the manner outlined in the information supporting the screening request.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is [REDACTED] who can be contacted by phone on [REDACTED] or by email on [REDACTED]@hes.scot.

Yours sincerely

Historic Environment Scotland



Development And Economic Growth
Director: Kirsty Flanagan

Marine and Coastal Development Unit
Municipal Buildings, Albany Street, Oban, Argyll, PA34 4AW
E-mail: [REDACTED]@argyll-bute.gov.uk
www.argyll-bute.gov.uk
Direct Line: [REDACTED]

19th September 2023

Claire Crookston
Licensing Officer
Licensing Operations Team
Marine Directorate
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017 (“the EIA Regulations”)**

CONSULTATION UNDER PART 2, REGULATION 10(5) OF THE EIA REGULATIONS

**Cadzow Brothers - Harbour Improvements - Blackmill Bay, Isle of Luing - Consultation on
Request for Screening Opinion**

Dear Ms. Crookston,

Thank you for consulting Argyll and Bute Council on the above Screening Opinion. Please note that the proposal has not been granted planning permission for the proposed car park and turning area. The applicant will therefore be required to apply for planning permission before any works can commence.

From a marine planning and policy perspective, please refer to information below for relevant comments from the Council’s Marine and Coastal Development Policy Officer.

Yours sincerely,

[REDACTED]
Marine and Coastal Development Policy Officer



Proposal

The proposal is for harbour and access improvements for the community at Blackmill Bay, Isle of Luing.

The scope of work for Includes:

- To extend the existing rock armour further along the promontory below the Mean High Water Springs (MHWS) tide line. The proposed rock armour will measure approximately 30 meters in length and between 2-6 meters in width. The total area of the rock armour will be 120m².
- Create a raised car park and turning area above the MHWS using existing material. The area will be no more than 80m².
- Install a pontoon and gangway to further improve safe access to vessels. The pontoon's dimensions will be 12m long by 2m wide and will cater for boats up to 11 meters in length. The pontoon will be anchored in place using chain and two mooring blocks, no piling will be required.
- The total combined area of site works below MHWS for the proposal is 160m² (120m² of rock armour and 40m² of stone removal).

Overall screening comments that relate to the marine and coastal environment

- It is the Officer's opinion that the proposed development does not constitute an Environmental Impact Assessment (EIA) as defined under Schedule 2 of the EIA Regulations.
- The proposal must conform to all relevant National Planning Framework 4 (NPF4) policies, Local Development Plan (LDP) and National Marine Plan (NMP) policies as detailed below.

The applicant is required to develop and submit:

- A Construction Environment Management Plan (CEMP) and Method Statement for all aspects of the proposed development. The CEMP must include full details of the proposed construction programme; duration of the construction, operation and completion phases. The proposal will need to consider mitigation techniques during the works, and to ensure continued safe access / egress during this time. I further recommend that a precautionary approach be undertaken for the duration of works.
- A full Site Waste Management Plan (SWMP), with appropriate mitigation measures. The SWMP must detail how waste materials will be dealt with.
- A Biosecurity Management Plan.
- A Noise Method Statement.

National Planning Framework 4 (NPF4) overarching policies

Policy 1: Tackling the climate and nature crises

- The development will need to demonstrate reduced emissions as far as practically possible and adapt to current and future risks of climate change by promoting nature recovery and restoration in the area. In this respect, the applicant must aim to conserve and recycle assets where possible.

Policy 3: Biodiversity



a) The development proposal will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.

d) Any potential adverse impacts, including cumulative impacts, of the development proposal on biodiversity, nature networks and the natural environment will be minimised through careful planning and design. This will take into account the need to reverse biodiversity loss, safeguard the ecosystem services that the natural environment provides, and build resilience by enhancing nature networks and maximising the potential for restoration.

Policy 4: Natural places

b) The development proposal that is likely to have a significant effect on an existing or proposed European site (Special Area of Conservation or Special Protection Areas) and are not directly connected with or necessary to their conservation management are required to be subject to an “appropriate assessment” of the implications for the conservation objectives.

e) The precautionary principle will be applied in accordance with relevant legislation and Scottish Government guidance.

f) Development proposals that are likely to have an adverse effect on species protected by legislation will only be supported where the proposal meets the relevant statutory tests. If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application.

Policy 12: Zero waste

a) The development proposal will seek to reduce, reuse, or recycle materials in line with the waste hierarchy.

b) The development proposal will be supported where they:

- i. reuse existing buildings and infrastructure;
- ii. minimise demolition and salvage materials for reuse;
- iii. minimise waste, reduce pressure on virgin resources and enable building materials, components and products to be disassembled, and reused at the end of their useful life;
- iv. use materials with the lowest forms of embodied emissions, such as recycled and natural construction materials;
- v. use materials that are suitable for reuse with minimal reprocessing.

c) The development proposal that is likely to generate waste when operational, including residential, commercial, and industrial properties, will set out how much waste the proposal is expected to generate and how it will be managed including:

- i. provision to maximise waste reduction and waste separation at source, and
- ii. measures to minimise the cross-contamination of materials, through appropriate segregation and storage of waste; convenient access for the collection of waste; and recycling and localised waste management facilities.

Policy 29: Rural development



- a) The development proposal that contributes to the viability, sustainability and diversity of rural communities and local rural economy will be supported, including:
- i. farms, crofts, woodland crofts or other land use businesses, where use of good quality land for development is minimised and business viability is not adversely affected;
 - ii. diversification of existing businesses;
 - iii. production and processing facilities for local produce and materials, for example sawmills, or local food production;
 - iv. essential community services;
 - v. **essential infrastructure**;
 - vi. reuse of a redundant or unused building;
 - vii. appropriate use of a historic environment asset or is appropriate enabling development to secure the future of historic environment assets;
 - viii. reuse of brownfield land where a return to a natural state has not or will not happen without intervention;
 - ix. small scale developments that support new ways of working such as remote working, homeworking and community hubs; or
 - x. **improvement or restoration of the natural environment.**
- b) The development proposal in a rural area should be suitably scaled, sited and designed to be in keeping with the character of the area. The applicant should also consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location.
- c) The development proposal is in a remote rural area, where new development can often help to sustain fragile communities, will be supported where the proposal:
- i. will support local employment;
 - ii. supports and sustains existing communities, for example through provision of digital infrastructure; and
 - iii. is suitable in terms of location, access, siting, design and environmental impact.

Local Development Plan (LDP)

- The proposal must conform to all relevant general policies of the adopted LDP (2015) and Supplementary Guidance (2016), and in particular with the policies stated below:
 1. Policy LDP 3 Supporting the Protection, Conservation and Enhancement of our Environment;
 2. Policy LDP 4 – Supporting the Sustainable Development of our Coastal Zone;
 3. Policy LDP 9 - Development Setting, Layout and Design;
 4. Policy LDP 10 - Maximising our Resources and Reducing Our Consumption;
 5. Policy LDP DM1 - Development within the Development Management Zones.
 6. **SG LDP ENV 1 - Development Impact on Habitats, Species and our Biodiversity;**
 7. SG LDP ENV 5 Development Impact on Local Nature Conservation Sites (LNCS);
 8. SG LDP ENV 7 - Water Quality and the Environment;
 9. SG SERV 7 - Flooding and Land Erosion – The Risk Framework for Development; and
 10. SG LDP CST 1 - Coastal Development.
- In terms of SG LDP CST 1, note that there is a presumption against development of the Natural Foreshore unless:
 1. there is a specific operational purpose for the proposal's Natural Foreshore location;
 2. there is no effective alternative location for the development landward of the natural foreshore;



3. the development does not damage or undermine the key features of the natural foreshore area including;
 - the dynamics and balance of the ecology of the foreshore, and
 - the effective functioning of the foreshore in providing access between land and water activity.
- The proposal should also take into consideration all the relevant and general proposed policies of the 2019 LDP Written Statement (https://www.argyll-bute.gov.uk/sites/default/files/migrated_files/finalpldp2writtenstatementdepositv2_ac1.pdf). In particular:
 1. Policy 02 – Outwith Settlement Areas;
 2. Policy 04 – Sustainable Development;
 3. Policy 55 – Flooding;
 4. Policy 56 – Land Erosion;
 5. Policy 59 – Water Quality and the Environment;
 6. Policy 63 – Waste Related Development and Waste Management;
 7. Policy 71 – Development Impact on Local Landscape Areas (LLA), and
 8. Policy 73 – Development Impact on Habitats, Species and Biodiversity.

Marine Planning Policy

- The proposed development extends into the marine environment and therefore the Council as a public body is required to take authorisation decisions in accordance with the National Marine Plan (NMP), unless relevant considerations indicate otherwise.
- The proposal must be consistent with General Policies of the NMP, that include:
 - GEN 1 General planning principle,
 - GEN 2 Economic benefit,
 - GEN 3 Social benefit,
 - GEN 5 Climate change,
 - GEN 7 Landscape/seascape,
 - GEN 8 Coastal process and flooding,
 - GEN 9 Natural heritage,
 - GEN 10 Invasive non-native species,
 - GEN 11 Marine litter,
 - GEN 12 Water quality and resource, and
 - GEN 13 Noise.

Effect on nature conservation interests/Ecological Impacts

- The proposal lies adjacent to the Priority Marine Feature (PMF): Native oyster (*Ostrea edulis*) beds on shallow sublittoral muddy mixed sediment. The Native oyster has conservation status and is under threat mainly due to habitat loss, pollution, over exploitation, disease and non-native species. Siltation from the disturbance of sediment can have negative impacts, such as the smothering to Native oysters. It will therefore be important that the applicant follow mitigation measures that are detailed below under: Impacts on water quality.
- The proposed rock armour placement lies marginally (a few meters approximately) out-with the following designated areas:
 - Inner Hebrides and the Minches Special Area of Conservation (SAC), designated for Harbour porpoise (*Phocoena phocoena*);
 - Firth of Lorn Special Area of Conservation (SAC), designated for biogenic reefs.
 - Loch Sunart to Sound of Jura Nature Conservation Marine Protected Area (NCMPA), partly designated for Flapper Skate (*Dipturus intermedius*).



- Given that Harbour porpoise frequent the area and may come close inshore, and important biogenic reefs may extend to shallow depths close to the shoreline, it will be important for the applicant work on a precautionary basis.
- The applicant has confirmed that no piling will be required as a result of the development. However, if any piling and core drilling is required at a later stage, the applicant would need to apply for a European Protected Species (EPS) licence under the Conservation (Natural Habitats, &c.) Regulations 1994.
- The applicant is required to follow existing guidance and best practice methods during pontoon and gangway installation works. As a measure of good practice the applicant is advised to apply for: a European Protected Species (EPS) Licence for possible disturbance to cetaceans.
- The applicant is further advised to review The Protection of Marine European Protected Species from Injury and Disturbance - Guidance for Scottish Inshore Waters (July 2020) document on the following web link:
 - <https://www.gov.scot/publications/marine-european-protected-species-protection-from-injury-and-disturbance/>.
- The applicant is further asked to submit a Noise Method Statement that outlines the works timing, duration and expected noise levels. The Noise Method Statement should detail potential Likely Significant Effects (LSEs) and be agreed by the Planning Authority prior to works being commenced. It will be important for the applicant to demonstrate that any generated underwater noise, including any effects from excavation will be minimal and mitigated against during site operations, and in particular during the placing of rock armour.

Impacts on water quality

- The applicant will need to apply for a Marine Licence from Marine Scotland - Licensing Operations Team (MS – LOT) and The Crown Estate (Scotland) for any marine construction projects, installation of a pontoon, and any moorings on the seabed. All licensable marine work information is available on the following web links:
 - <https://www.gov.scot/publications/marine-licensing-applications-and-guidance>
 - <https://www.crownstatescotland.com/scotlands-property/coastal/marine-works>
- The scope of engineering works are regulated and authorised by the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR); and their amendments applies to all engineering, building or other works in inland surface waters (including wetlands) and works in the vicinity of inland surface waters where those works pose a risk of significant adverse impact. In this respect, the applicant is advised to seek advice from SEPA to determine whether an application for a CAR licence is required. Full details on how to apply for a CAR licence and guidance is located at: <https://www.sepa.org.uk/regulations/water/engineering/>.
- Engineering works that includes the removal of sediment, gravel and boulders can cause damage and contamination to the water environment. It is therefore important that the applicant install a silt curtain boom for the duration of works. The application of a silt curtain will help avoid unnecessary siltation and debris in the surrounding waterbody during the movement and installation of rock armour.
- It will be important for the applicant to adhere to good practice measures for working immediately alongside the water during the construction phase, and should aim to avoid siltation, debris, minimise unchecked contaminated run-off, including diesel and hydraulic spillages into the marine environment, and avoid any poured concrete or bitumen spillages. All debris must be removed from the site and disposed of appropriately.

- It will be important that the applicant detail mitigation measures within their planning application and Marine Licence application respectively.

The applicant must:

- Install silt interception traps, where appropriate to minimise/avoid unchecked contaminated run-off during construction;
- Secure fuels, oils and other chemicals securely within the site construction compound;
- Have appropriate wash-out facilities available for vehicles and machinery;
- Cover trenches and excavations at the end of each working day;
- Adopt pollution prevent strategies for potential diesel, hydraulic and battery spillages into the environment (shoreline).
- It is advised that the applicant develop appropriate mitigation measures and follow Pollution Prevention Guidelines located on the NetRegs and SEPA web links respectively:
 - <https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/>
 - <https://www.netregs.org.uk/media/1418/gpp-5-works-and-maintenance-in-or-near-water.pdf>
 - <https://www.netregs.org.uk/environmental-topics/water/>
 - <https://www.sepa.org.uk/regulations/water/guidance/>.
- The applicant is further asked to develop and submit a full Site Waste Management Plan (SWMP), with appropriate mitigation measures. A Construction Environment Management Plan (CEMP) should also be included and submitted to MS-LOT and the Planning Authority respectively prior to works commencing.

Invasive Non-Native Species (INNS)

- Recreational boating and vessel movements have the potential to introduce Invasive Non Native Species (INNS) into the waters and coastline of Argyll. These can include the carpet sea squirt (*Didemnum vexillum*), the leathery sea squirt (*Styela clava*), and wireweed (*Sargassum muticum*). The applicant is therefore asked to provide a Biosecurity Management Plan (BMP) and to submit it before development work commences. The BMP should detail good practice methods to avoid and limit the introduction and spread of INNS that relate to the recreational boating and vessel movements in particular.

Landscape and Visual Impacts

- The proposal is located within the Knapdale/Melfort Local Landscape Area and Minor Settlement Zone as identified in the adopted Local Development Plan LDP 2015.
- The proposal will be expected to be consistent with Policy LDP 9 – Development Setting, Layout and Design, associated SG and the relevant Argyll and Bute Landscape Capacity Assessment.
- The proposal is likely to create a small change to the coastal experience, with minor levels of significance. To mitigate against adverse landscape impacts, the development's design and scale should not be visually intrusive. It is advised that the pontoon and gangway design be non-reflective and neutral in colour, preferably matt dark grey or matt black.
- Construction impacts are likely to be temporary. It is therefore considered unlikely that the proposed development will result in significant adverse landscape and visual impacts.

Navigation



- The applicant should provide sufficient protocols for navigational warnings and safety measures during construction and operation works. The Northern Lighthouse Board should be able to provide appropriate navigational lighting advice. It is however considered unlikely that the proposal will significantly affect safe navigation for commercial fisheries, and recreational boating during the construction and operation periods.

Noise

- Refer to comments above under Effect on nature conservation interests/Ecological Impacts.

Interaction with other activities

- The Council is required to protect public access rights to and along the foreshore for all non-motorised users. Where there is a structure that will obstruct access along a foreshore or loch side, a reasonable means of passing by the obstruction should be provided to allow the public to exercise their right of access along the shore.
- It is considered that the proposed construction will not result in any significant access rights or conflicts with other marine and coastal users.
- The works should be marked according to advice from the Northern Lighthouse Board.

From: [REDACTED]
To: [MS Marine Licensing](#)
Cc: <Redacted>
Subject: SEPA Ref: 10035 - Blackmill Bay
Date: 25 August 2023 15:40:20

OFFICIAL

Dear Claire Crookston

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Cadzow Brothers – Harbour Improvements Blackmill Bay, Isle of Luing

In line with the advice in the [Transitional Arrangements for National Planning Framework 4 letter](#), issued by the Chief Planner, Fiona Simpson, on 8 February 2023, that “From 13 February, on adoption and publication by Scottish Ministers, NPF4 will form part of the statutory development plan, along with the LDP applicable to the area at that time and its supplementary guidance. NPF4 will supersede National Planning Framework 3 and Scottish Planning Policy (SPP) (2014). NPF3 and SPP will no longer represent Scottish Ministers’ planning policy and should not therefore form the basis for, or be a consideration to be taken into account, when determining planning applications on or after 13 February”, our position and advice given below is based on the NPF4 policy.

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our [website](#). In addition, please also refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available [here](#).

If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,

[REDACTED]

Senior Planning Officer

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required