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RNLI Anstruther - Screening opinion

1 Introduction

Dear Sir/Madam

Following the application for a Marine Licence from the Royal National Lifeboat Institution (RNLI) (Application Reference Number MD-00010902), we are writing to request an Environmental Impact Assessment (EIA) screening opinion regarding whether proposals to demolish the existing station and rebuild a new station and ramp for the RNLI station at Anstruther require EIA under the Marine Works (EIA) Regulations 2017. Planning permission for the New RNLI station was granted by Fife Council in September 2020 with certain conditions to comply with. This planning permission is still valid as part of the works above high-water mark (works on the park and ride car park that formed part of the planning consent) has commenced.

To inform your decision, this letter provides an outline description of the proposed project under consideration, identifies the potential environmental issues within the marine environment and details the way in which the RNLI proposes to address them. It should be noted that all information is indicative given the early stage in scheme development, however, it is felt that it is close enough to the final scheme to allow a decision to be made as to whether EIA is required.

2 Relevant legislation

2.1 Marine Scotland Act 2010

Part 4 of the Marine Scotland Act 2010 provides a framework for the marine licensing system for those 'licensable marine activities' undertaken within Scottish waters below Mean High Water Springs. Marine Scotland is the regulatory authority for marine licensing in Scottish inshore and offshore waters.

The proposed works are considered to constitute a marine licensable activity, being classified as construction, alteration or improvement of any works within the Scottish marine area in or over the sea, or on or under the seabed, as listed in Section 21 of the Marine Scotland Act 2010.

2.2 Marine EIA Regulations

In Scotland, the legislation relevant to works within the marine area, up to 12nm, is The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, hereafter the Marine EIA Regulations. The Marine EIA Regulations contains two Schedules that identify projects that are considered EIA development and whether an EIA is mandatory or whether this is dependent upon set thresholds and criteria, as follows:

- Schedule 1: development of this type requires that an EIA is undertaken; and,
- Schedule 2: development of this type may require that an EIA is undertaken depending on the scale of the development, its characteristics, and the sensitivity of the environment in which the development will take place.

The Proposed Development does not fit the description of any project in Schedule 1 or 2 of either the MWR or TCPR EIA Regulations. The closest definition that might match the Proposed Works is Paragraph 10 (g) of Schedule 2 of the MWR EIA Regulations states:

10 (g) Construction of harbours and port installations, including fishing harbours (unless included in schedule 1);

It is therefore necessary to consider the scale and characteristics of the works and the sensitivity of the receiving environment.

3 Proposed Development

The RNLI propose to decommission the existing Anstruther Lifeboat Station and construct a new station. The new station is needed to house the larger Shannon lifeboat which is planned to replace the existing lifeboat for Anstruther. The Shannon lifeboat vastly improves the range and speed of operations, almost halving response times.

The existing station will remain operational throughout, and be demolished after the new one is complete, but the ramp will remain *in situ* for community use as required as part of the planning consent. **Figure 3-1**. The new station lies alongside the eastern pier within the harbour boundary.

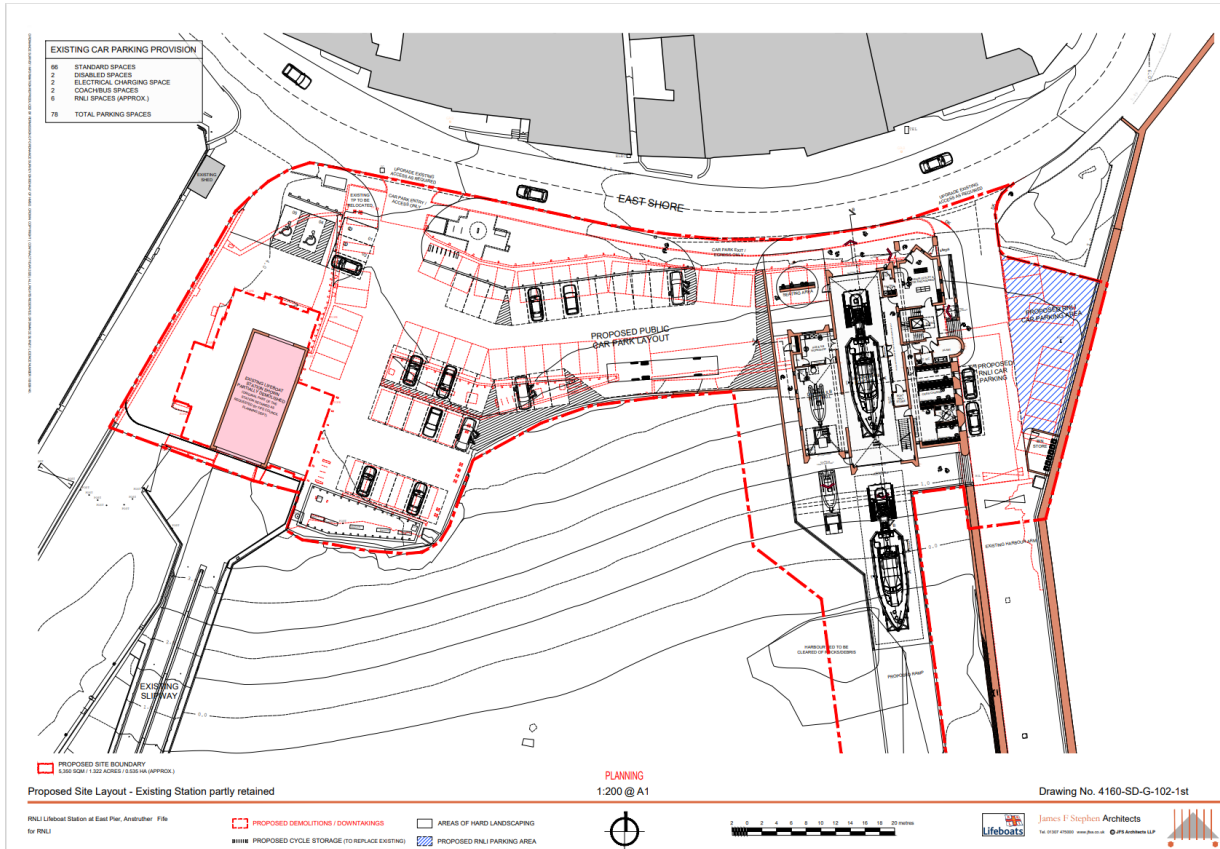


Figure 3-1 Figure of the existing RNLJ station (shown in pink) and ramp and the proposed RLNI station (to the right of the figure)

The construction compound for the Proposed Development is included in the red area, located on the public car park approximately 70m from the existing Lifeboat Station, this area has been agreed upon with the council.

The works will include works on the land side (consented through planning permission) as shown in the figures above together with 464m² of reclamation of the beach area to support part of the station and the launching ramp. The ramp for the new station will be an open structure comprising fourteen columns to a depth of 4.1mOD and a mass concrete base (L11.65m x W8.1m).

It is proposed to commence the construction of the RNLI station in late 2024 (assuming the relevant consents are in place) and that construction should be completed by summer/autumn 2026.

Photomontages of the proposed new RNLI station are shown below (**Figure 3-2**).

The proposed works for Anstruther Lifeboat Station, the 'Proposed Development', includes the partial demolition of the existing RNLI station (although the ramp will remain in place) and the construction of the following for the new RNLI station. Shown in Figure 32 a, b and c:

- Extension of car park hard standing;
- Retaining wall to the rear;
- Slipway / ramp;
- D-Class Boathall;
- Shannon Boat Hall; and
- Ancillary Accommodation.

The works within the marine area comprise part of the reclamation and the construction of the ramp and are shown in Figure 33 and **Figure 34**.





Figure 3-2 (a,b and c) Photomontages of the proposed new RNLI station at Anstruther (taken from RNLI website¹)

¹ <https://www.anstrutherlifeboat.org/plans-for-the-new-boathouse.html>

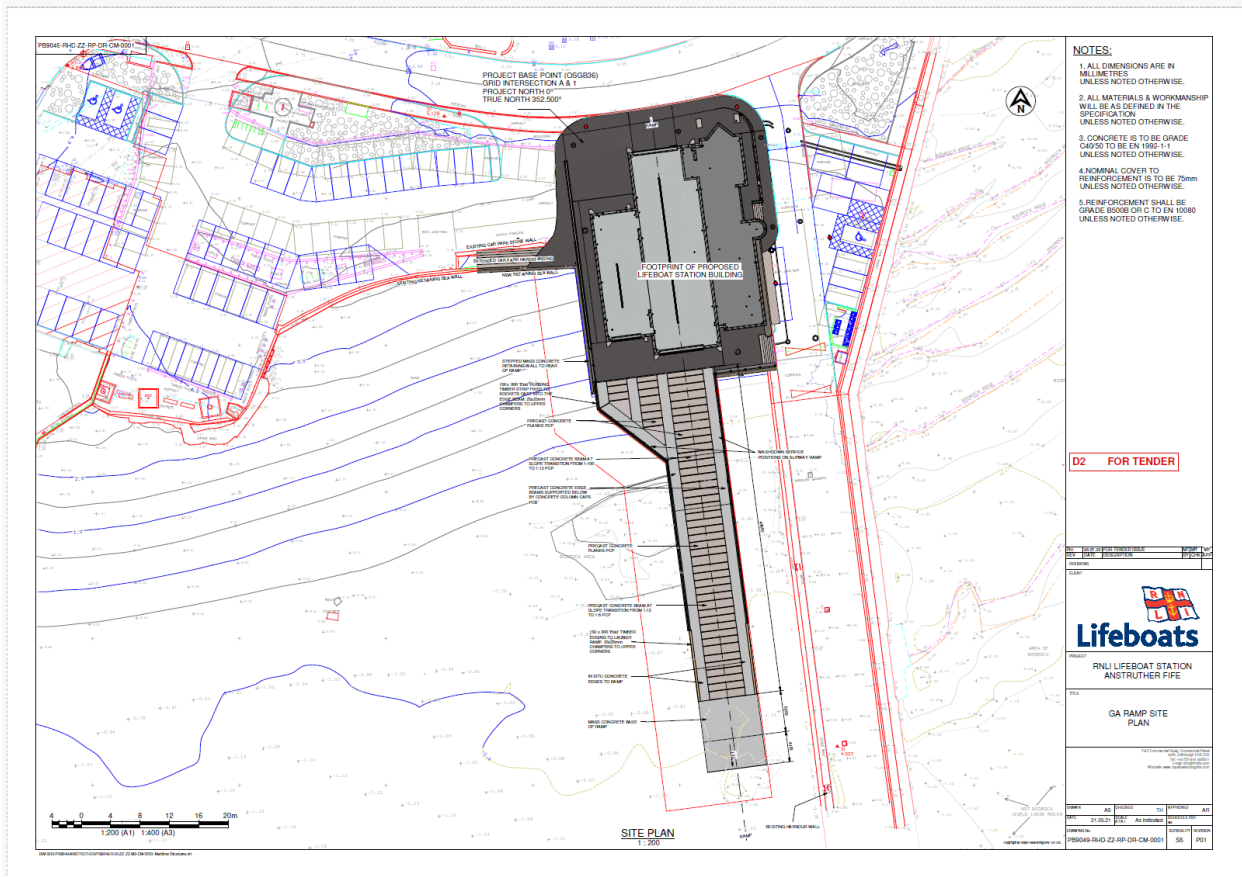


Figure 3-3 Proposed Development site plan

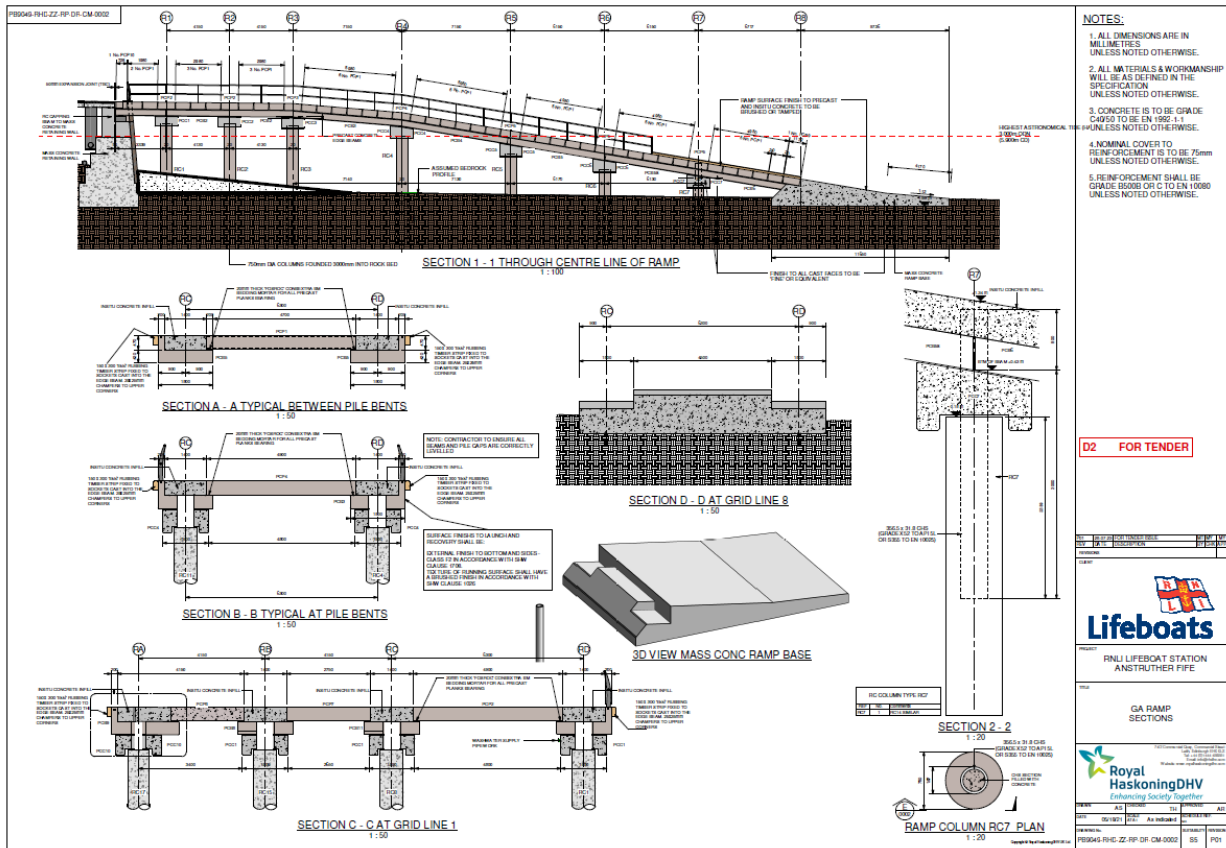


Figure 3-4 Proposed ramp construction

3.1 Site and Surrounding area

The town of Anstruther is a small town in Fife, Scotland, on the northern coastline of the Firth of Forth. -The proposed development site is located to the southeast of Anstruther town centre. The site is bounded to the north by East Shore, to the east and south by the North Sea and to the west by Anstruther Harbour.

4 Environmental baseline for receptors affected by marine works

4.1 Geology

The British Geological Survey (BGS) Geology of Britain viewer indicates that superficial marine deposits of gravel, sand and silt exist along the nearshore portion of the site at Anstruther harbour, constrained between the East pier and the mouth of the stream Dreel Burn. Significant rock outcrops border the site, including Sandlins Craig, Craignoon and Billowness. It is anticipated that made ground will be present along roadsides and the waterfront.

EUSeaMap (2023) Broad-Scale Predictive Habitat Map - EUNIS 2019 classification² classifies the sediment around the harbour as infralittoral sediment and EUNIS code MB12: Infralittoral rock or other hard substrate.

The Habitat Map of Scotland EUNIS Land Cover Scotland identifies³ the land cover around the Proposed Development to be predominantly EUNIS Habitat O – Bare field with a small amount of habitat C - Surface standing and inland surface waters, I1 - Arable land and market gardens, E2 - Mesic grasslands, G1 - Broadleaved deciduous woodland and F3 - Temperate and mediterranean-montane scrub. See **Figure 4-1**

² [EMODnet Map Viewer \(europa.eu\)](https://emodnet.eu/)

³ <https://map.environment.gov.scot/>

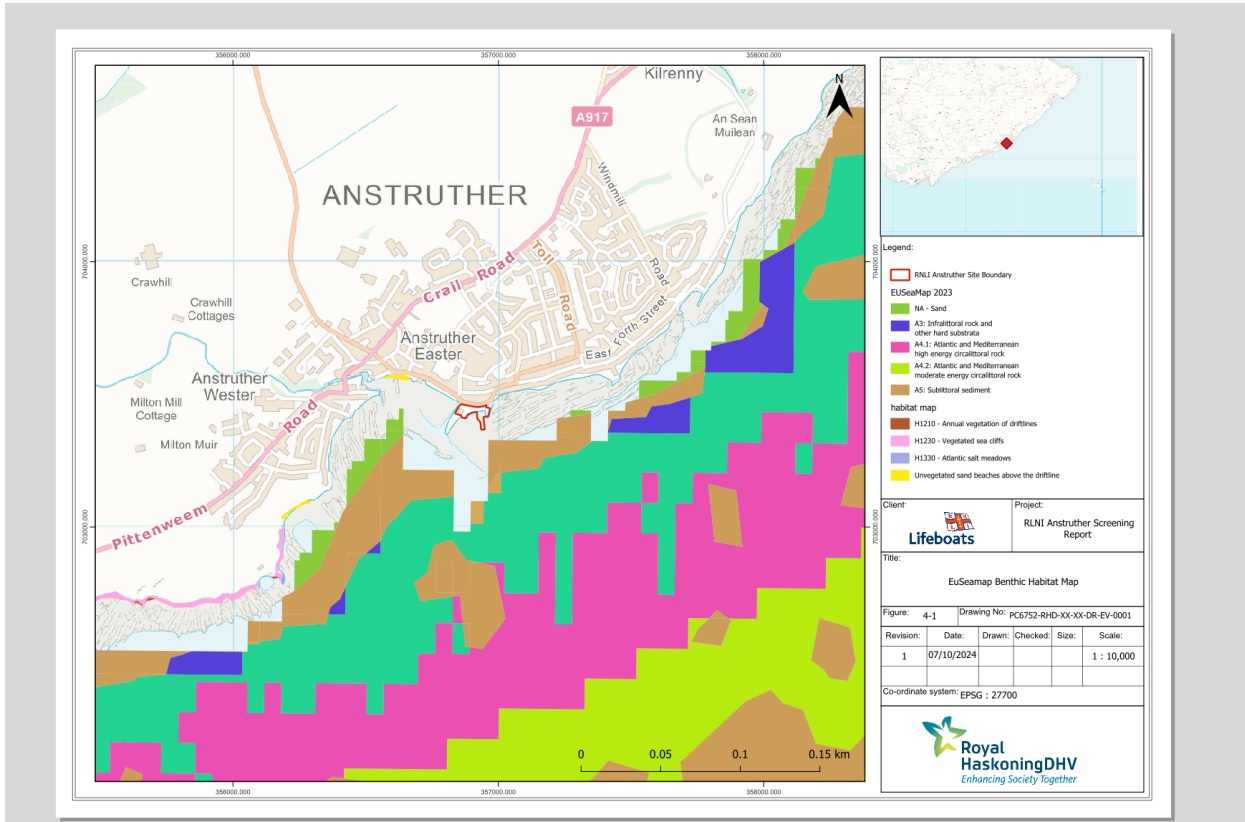


Figure 4-1 Habitat map with EUSeaMap benthic habitats

4.2 Environmental designations

The Firth of Forth Site of Special Scientific Interest (SSSI) and The Outer Firth of Forth and St Andrews Bay Complex Special Protection Area are the nearest National Site Network sites. The Firth of Forth SSSI covers an extensive coastal area (7423 ha) and is designated for its variety of geological and geomorphological features, coastal and terrestrial habitats, vascular plants, invertebrates, breeding, passage and wintering birds. The proposed RNLI station is not within the designated site but is situated within the harbour complex with the closest boundary approximately 150m away to the west, outside of the piers for the harbour complex. The SPA is designated for ornithological interest (and is designated up to the Low Water Mark with the boundary located approximately 0.05 km away from the proposed development). The SPA supports a range of seabirds and waterbirds including Sandwich tern, bar-tailed godwit, golden plover, red-throated diver, Slavonian grebe, knot, pink-footed goose, redshank, shelduck and turnstone. See Figure 4-2 a and b for designated sites within 10km and 1km of the proposed development.

The Proposed Development is less than 100m from three designed sites, with a further 8 designated sites within 10km (**Table 4-1**).

Table 4-1 Nature conservation designated sites within 10km of The Proposed Development

| Site Name | Designation | Qualifying Features | Distance from proposed development (km) |
|---|-------------|--|---|
| Outer Firth of Forth and St Andrews Bay Complex | SPA | Non-breeding: <ul style="list-style-type: none"> Red-throated diver; Slavonian grebe; and Little gull. Eider. Breeding: <ul style="list-style-type: none"> Common tern; and Arctic tern, Shag; and Gannet. Waterfowl assemblage and Seabird assemblage | Border for SPA runs along MLWS |
| Firth of Forth | SSSI | <ul style="list-style-type: none"> Arthropoda Bar-tailed godwit Beetle assemblage Carboniferous – permin Ingneuus | 0.15 |
| Barnsmuir Coast | SSSI | <ul style="list-style-type: none"> Maritime cliff Saltmarsh shingle | 3.6 |
| Firth of Forth | Ramsar | <ul style="list-style-type: none"> Scaup, Velvet scoter, Oystercatcher, Dunlin, and Cormorant. | 5.8 |
| Fife Ness Coast | SSSI | <ul style="list-style-type: none"> Lower Carboniferous Dinantian - Namurian (part) Saltmarsh Maritime cliff | 5.8 |
| Forth Islands | SPA | Breeding: <ul style="list-style-type: none"> Arctic tern Common tern | 6.0 |

| | | | |
|------------------|-------------------|--|-----|
| | | <ul style="list-style-type: none"> • Cormorant • Gannet • Guillemot • Herring gull • Kittiwake • Leaser black-backed gull • Puffin • Razorbill • Roseate tern • Sandwich tern • Shag • Seabird assemblage | |
| Swinkie Muir | SSSI | <ul style="list-style-type: none"> • Lowland dry heath • Lowland wet heath • Upland birch wood | 7.1 |
| Kilconquhar Loch | SSSI | <ul style="list-style-type: none"> • Breeding bird assemblage • Eutrophic loch • Open water transition fen • Pochard | 7.7 |
| Isle of May | SAC, SSSI and NNR | <ul style="list-style-type: none"> • Grey seals • Reef • Eider (breeding) • Guillemot (breeding) • Kittiwake (breeding) • Puffin (breeding) • Purple sandpiper (non-breeding) • Seabird colony (breeding) • Shag (breeding) • Turnstone (non-breeding) | 7.8 |

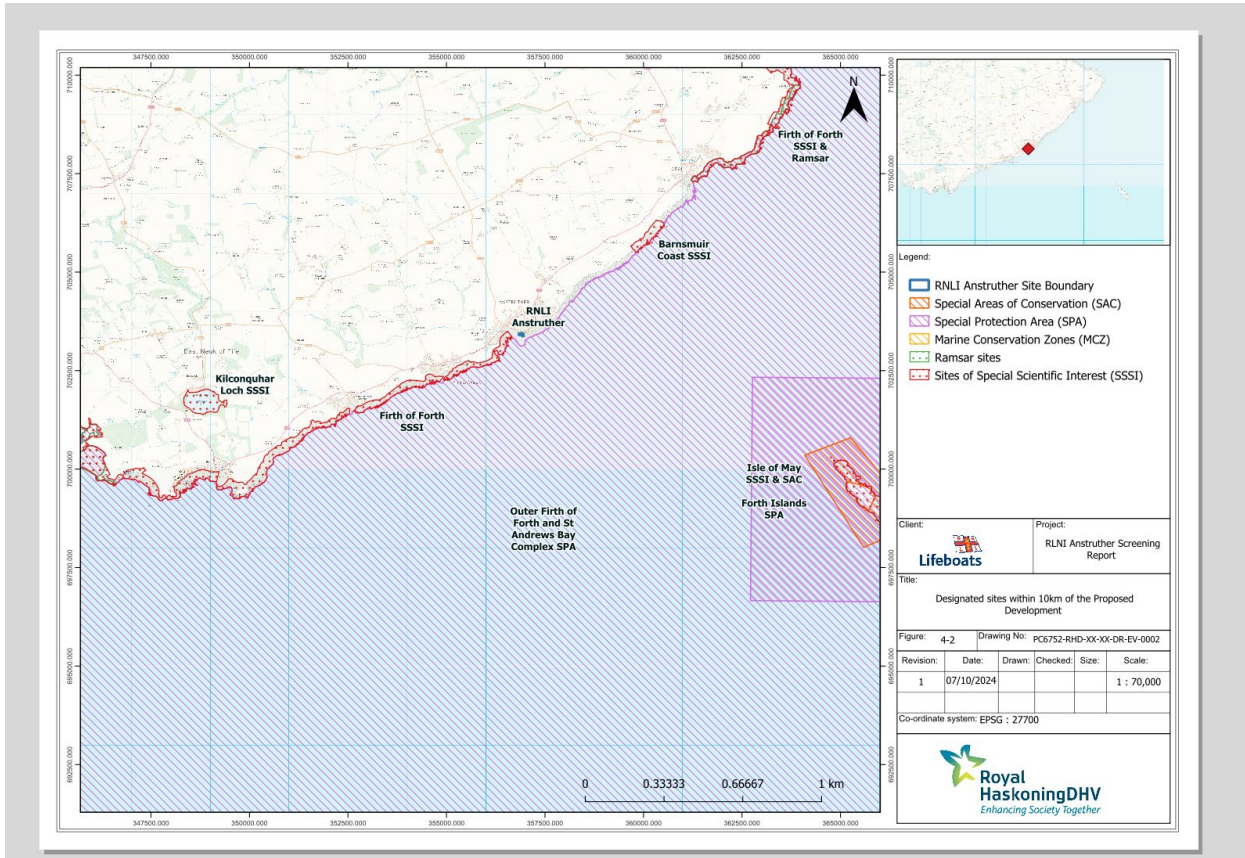


Figure 4-2a Designated sites within 10km of the Proposed Development

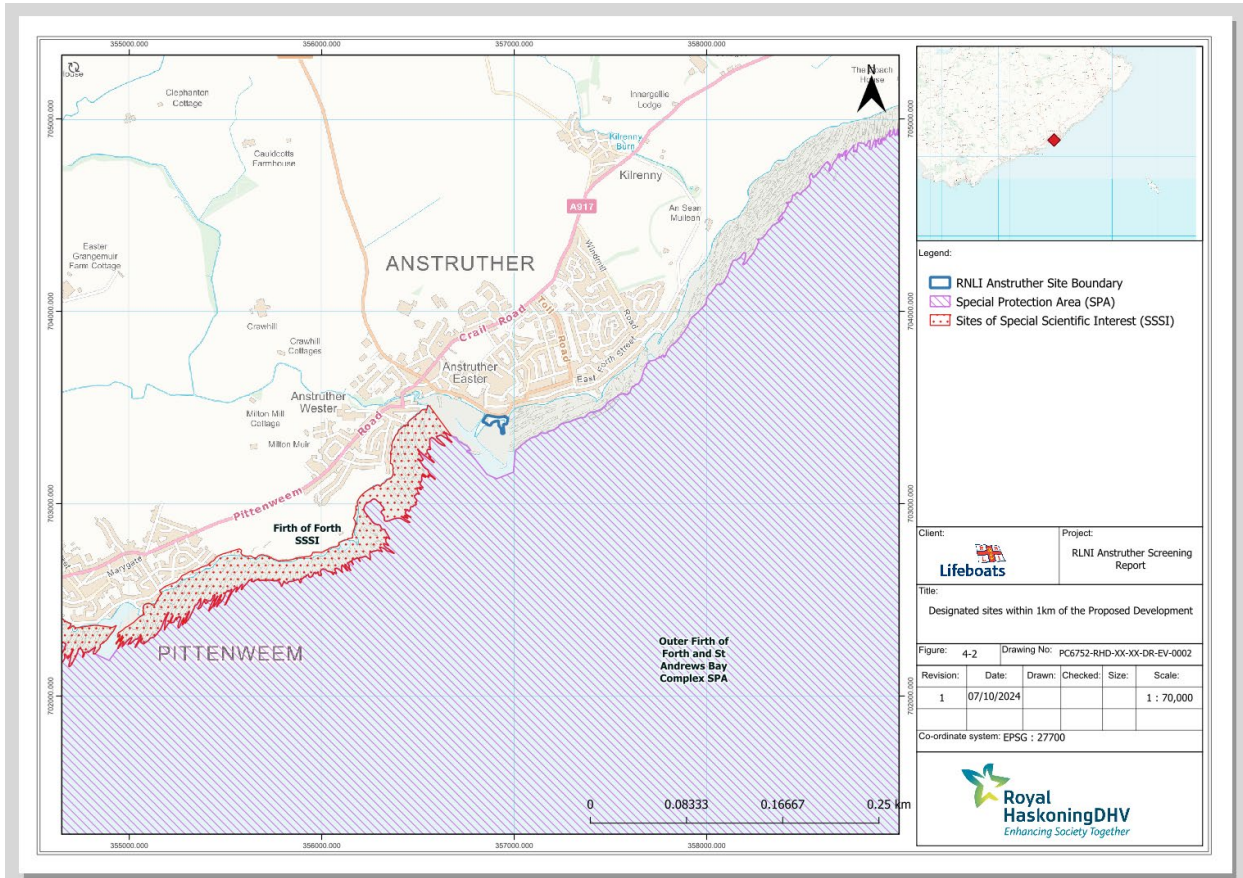


Figure 4-2b Designated sites within 1km of the Proposed Development

4.3 Habitats and species

A review of data available on the Geodatabase of Marine features adjacent to Scotland (GeMS) reports the following Priority Marine Features (PMFs) within 5km of Anstruther harbour⁴:

Table 5-2 PMF within 5km of Anstruther Harbour

| PMF | Year of record | Distance |
|---|----------------|----------|
| Mussel and/or barnacle communities | 2001 | 1.6km |
| <i>Verrucaria maura</i> on very exposed to very sheltered upper littoral fringe rock | 2001 | 1.5km |
| <i>Fucus vesiculosus</i> and barnacle mosaics on moderately exposed mid eulittoral rock | 2001 | 4km |

Within the Firth of Forth, a relatively high number of grey seals breed, with a total pup production of 6,894 in 2018, an increase of 4.2% from the previous count in 2014 (SCOS, 2020). Along the east coast of Scotland (from the English border to Fraserburgh), the number of harbour seals are lower, with approximately 343 individuals (SCOS, 2020⁵). Within the Firth of Forth, there are densities of grey seal of up to 0.109 individuals per 25km², and harbour seal densities up to 0.151 individuals per 25km² (Carter *et al.*, 2020⁶). Within the Firth of Forth the closest designated seal haul-out site is Craigeith, Breeding Colony Seal Haul Out for grey seal, approximately 32km from the proposed development.

Bottlenose dolphin (*Tursiops truncatus*) are regularly reported in the Firth of Forth, including the area around Anstruther (Hebridean Whale and Dolphin Trust, 2024⁷). Other cetacean species commonly reported from the Firth of Forth include, short-beaked common dolphin (*Delphinus delphis*) and minke whale (*Balaenoptera acutorostrata*) and with other species including basking shark (*Cetorhinus maximus*) and Humpback whale recorded on occasion.

The following notable terrestrial species records were found from a review of data available on the National Biodiversity Network (NBN, 2024^{8,9}) within 1km of the port in the last 20 years:

- Eurasian Otter *Lutra lutra*

The intertidal area that would be affected is classified on Defra's MAGIC Mapping Tool as mud habitat within the harbour and the harbour approach, with a rock platform (with a bank of gravel in some areas) to either side. The Harbour basins and entrance channel are dredged to maintain the navigation access and as such they will already be affected by disturbance and are likely to be colonised by opportunistic species that are adapted to change.

The following Invasive Non-Native Species (INNS) have been recorded in the Firth of Forth¹⁰:

- *Spartina anglica* (Common cord-grass)

⁴ [gems_habitat_point_dataset | NatureScot Spatial Data Hub](#)

⁵ SCOS (2020) Scientific Advice on Matters Related to the Management of Seal Populations: 2020. Available from: <http://www.smru.st-andrews.ac.uk/files/2021/06/SCOS-2020.pdf>

⁶ Carter, M. I. D., Boehme, L., Cronin, M. A., Duck, C. D., Grecian, W. J., Hastie, G. D., Jessopp, M., Matthiopoulos, J., McConnell, B. J., Miller, D. L., Morris, C. D., Moss, S. E. W., Thompson, D., Thompson, P. M., & Russell, D. J. F. (2022). Sympatric seals, satellite tracking and protected areas: habitat-based distribution estimates for conservation and management. *Frontiers in Marine Science*, 9, Article 875869. <https://doi.org/10.3389/fmars.2022.875869>

⁷ <https://whaletrack.hwtdt.org/sightings-map/> (accessed May 2024)

⁸ <https://scotland.nbnatlas.org/> (accessed May 2024)

⁹ Only records available under OGL, CC-BY or CCO licence were reviewed.

¹⁰ [Non-native species | Scotland's Marine Assessment 2020](#)

- *Undaria pinnatifida* (wakame algae)
- *Magallana gigas* (formerly *Crassostrea gigas*) (Pacific oyster)
- *Caprella mutica* (Japanese skeleton shrimp)

4.4 Water Quality

Anstruther (Billow Ness) bathing water lies between two rocky outcrops and is approximately 300m wide (see **Figure 4.3**). Water quality is monitored out to 2 nautical miles from the coast for the requirements of the WFD, therefore water quality information is presented here to provide a general water quality baseline. A review of the most recent data published by SEPA shows the overall status of the Anstruther (Billow Ness) bathing water as excellent¹¹.

The Proposed Development is located adjacent to the Fife Ness to Elie coastal waterbody (asset ID 200054) (see **Figure 4.4**) covering an area of 125.79 km². A review of the most recent data published by SEPA shows the overall status of the Fife Ness to Elie waterbody has been classified as 'Good'. As of 2022, there are currently no pressures identified on this water body¹¹.

The Proposed Development overlies the Leven Valley and South Fife Coastal groundwater body (asset ID 150799) (see **Figure 4.4**) covering an area of 75.5 km². A review of the most recent data published by SEPA shows the overall chemistry of Leven Valley and South Fife Coastal groundwater body has been classified as 'Poor' in 2022¹¹. The River Basin Management Plan for this water body identifies rural diffuse pollution and irrigation as a result of a range of activities as the contributing factor towards its overall poor status. The area is identified as action not required for 2021-2027¹².

A sediment quality assessment was undertaken as part of a Best Practical Environmental Option (BPEO) Assessment in 2018. Sediment within the harbour was described as a mixture of sand and silt, with coarser sandy material located in the approach channel and around the heads of the breakwaters¹³.

There is no current Marine Licence for Maintenance Dredging and Sea Disposal with the previous licence 06784/20/1 expiring on the 28/02/2021. Marine Licence variation 06784/20/1 allowed for 27,334 wet tonnes of maintenance dredge substances or objects may be deposited between 15 May 2020 and 28 February 2021¹⁴.

¹¹ [Water Classification Hub \(sepa.org.uk\)](https://www.sepa.org.uk/water-classification-hub)

¹² [RBMP3 \(sepa.org.uk\)](https://www.sepa.org.uk/rbmp3)

¹³ https://marine.gov.scot/sites/default/files/06784_-_bpeo_report.pdf

¹⁴ [Food And Environment Protection Act \(Fepa\) 1985, Part Ii Deposits In The Sea \(As Amended\)](#)

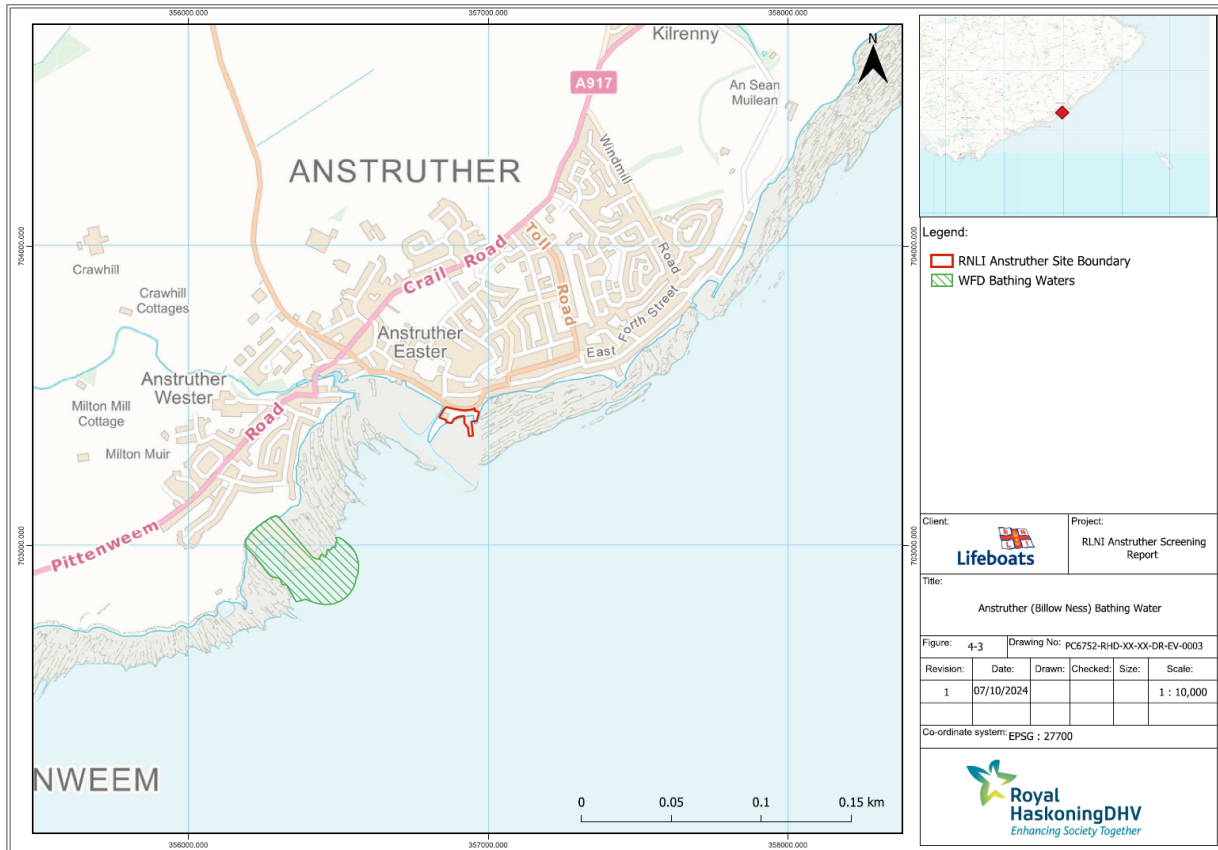


Figure 4-3 Anstruther (Billow Ness) Bathing Water

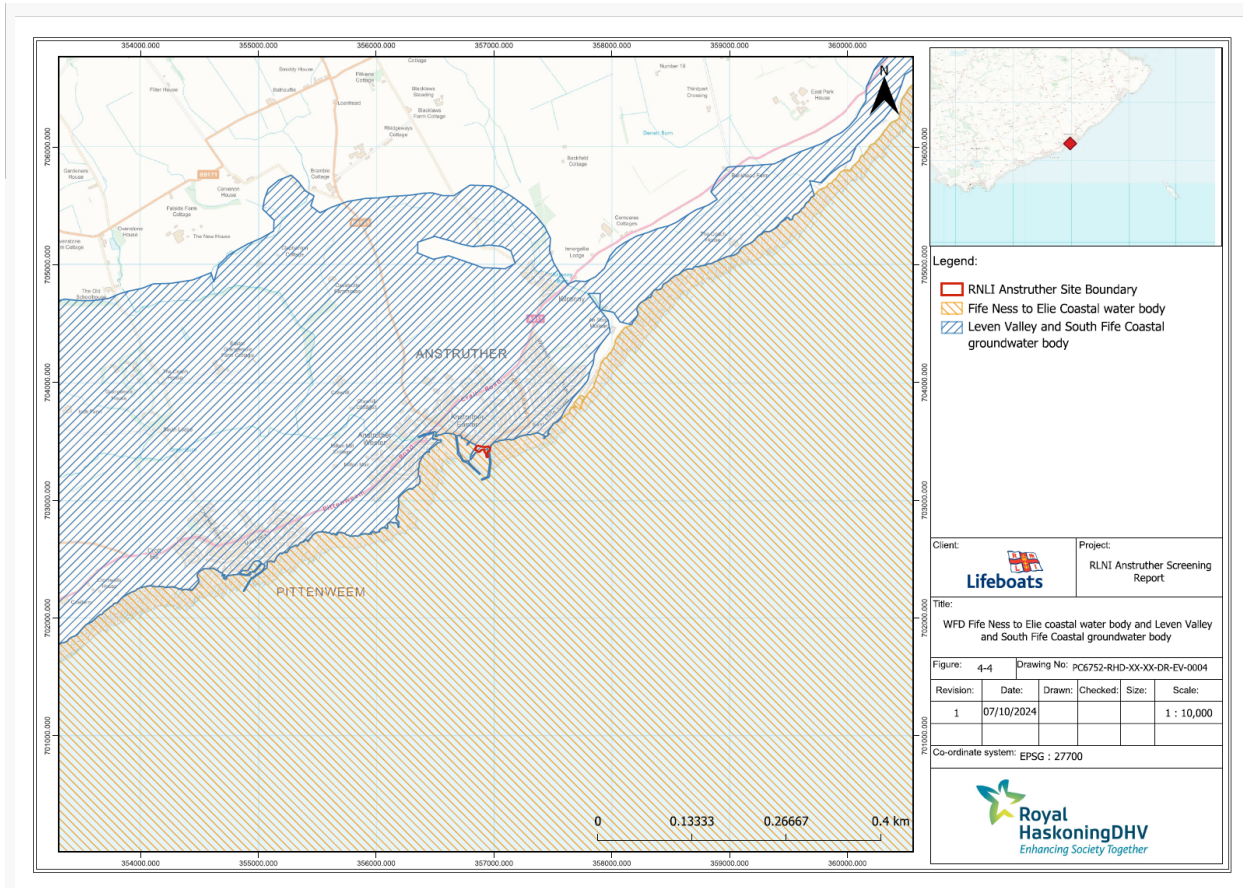


Figure 4-4 WFD Fife Ness to Elie coastal water body and Leven Valley and South Fife Coastal groundwater body adjacent to the new lifeboat station footprint

4.5 Flood Risk

Flood mapping provided by SEPA¹⁵ shows that the area of the proposed development has a high likelihood of coastal and river flooding with a 10% chance of flooding each year. The Proposed development is in an area of low risk of surface waterflooding with a 0.1% chance of flooding each year. The indicative floodplain mapping does not take account of any flood defences which may be in place along the estuary. A Flood Risk Assessment was submitted as part of the application for the granted Planning Permission in 2019.

4.6 Noise

Anstruther is predominantly occupied by residential properties, with several shops, restaurants and tourist accommodation. The existing ambient soundscape in the locale of the project redline boundary is likely to consist of commercial and leisure boats using the harbour and marina, sound sources (i.e. fixed plant) from retail/commercial premises, including servicing at The Waterfront Hotel along Shore Street and East Shore, and vehicular noise along the local road network. There are no obvious significant industrial noise sources within the immediate vicinity of the proposed new lifeboat station footprint.

4.7 Climate and Air

The proposed development is not located within or adjacent to an existing statutory designated Air Quality Management Areas (AQMAs), with the closest AQMA located 22.15km northwest at Bonnygate, Cupar. As monitoring is not carried out by Fife Council in Anstruther, -it can be assumed that air quality in the area is generally good and not a cause for concern¹⁶.

The Annual Progress Report monitoring data collected by Fife Council throughout 2022, carried out monitoring of nitrogen dioxide (NO₂) at four automatic stations in Cupar, Dunfermline, Kirkcaldy and Rosyth. Non-automatic monitoring of NO₂ was carried out using diffusion tubes at 42 sites (total of 58 tubes). All NO₂ concentrations measured during 2022 were below the annual mean objective of 40 µg m⁻³¹⁶.

PM₁₀ and PM_{2.5} was measured at the four automatic sites within Fife at Cupar, Dunfermline, Kirkcaldy and Rosyth. During 2022 all concentrations were below the annual mean objective of 18 µg m⁻³ for PM₁₀ and 10 µg m⁻³ for PM_{2.5}¹⁶.

Residential properties are located within the vicinity of the Proposed Development (within 50m of the proposed construction works). The Firth of Forth SSSI is also located approximately 300m from the Proposed Development at its closest point.

Good practice measures would be in place for the works, such as ensuring that equipment is well maintained and clean to minimise any air pollution and that engines are not left running unnecessarily.

4.8 Archaeology and Cultural Heritage

Heritage Assets

Anstruther contains a number of known heritage assets. The town contains eight Category A buildings the closest being 24m from the Proposed Development and 84 Category B and 88 C listed buildings (Fife Council, 2010). The Scottish Fisheries Museum is situated opposite the harbour and is Category A listed

¹⁵ [Flood Risk Management Maps \(sepa.org.uk\)](https://sepa.org.uk)

¹⁶ [Fife Air Quality Annual Progress Report 2023 \(fife.gov.uk\)](https://fife.gov.uk)

(LB 36169). The existing lifeboat station building is part of the Category B listed harbour (LB 36137). Planning application 20/00459/CAC Conservation Area Consent for demolition of building was granted on 3rd December 2020.

There are no gardens and designated landscapes, battlefields or historic marine protected areas in the vicinity of Anstruther. The location of the known heritage assets in relation to the Proposed Development footprint are shown in **Figure 4.6**.

A memorial is located on the edge of the carpark to commemorate the submariners on submarines K4 and K17 who perished off the Isle of May in 1918.

Anstruther Conservation Area

The original Conservation Area of Anstruther was designated by Fife County Council in 1972, doubling in size in 1984 to incorporate areas of 18th and 19th century development.

Anstruther has a rich fishing history, with much of the town's prosperity derived from salmon fishing. At one period, more fish were caught, processed and traded in the town than any other harbour in Scotland (scotfishmuseum.org, undated). Towards the end of the 20th century, the fishing industry was dwindling and as a result, the Scottish Fisheries Museum Trust was established in an effort to commemorate Scotland's fishing heritage. In 1969, the Scottish Fisheries Museum was opened at St Ayle's on the harbourside at East Shore, adjacent to the proposed development footprint. One of the oldest buildings at the site, Abbot's Lodging, dates back to the 15th century and was originally used by the monks of Balmerino Abbey. Several of the buildings comprising the museum are Category A – C Listed Buildings (**see Figure 4.6**)¹⁷.

The archaeological potential of the area is to date untested, however, archaeological findings in other medieval coastal burghs in Fife suggest that there is a possibility of significant archaeological discoveries at Anstruther.

A heritage design and access statement was provided in support of the planning application submitted to Fife Council.

¹⁷ [Anstruther Conservation Area Appraisal And Management Plan](#)

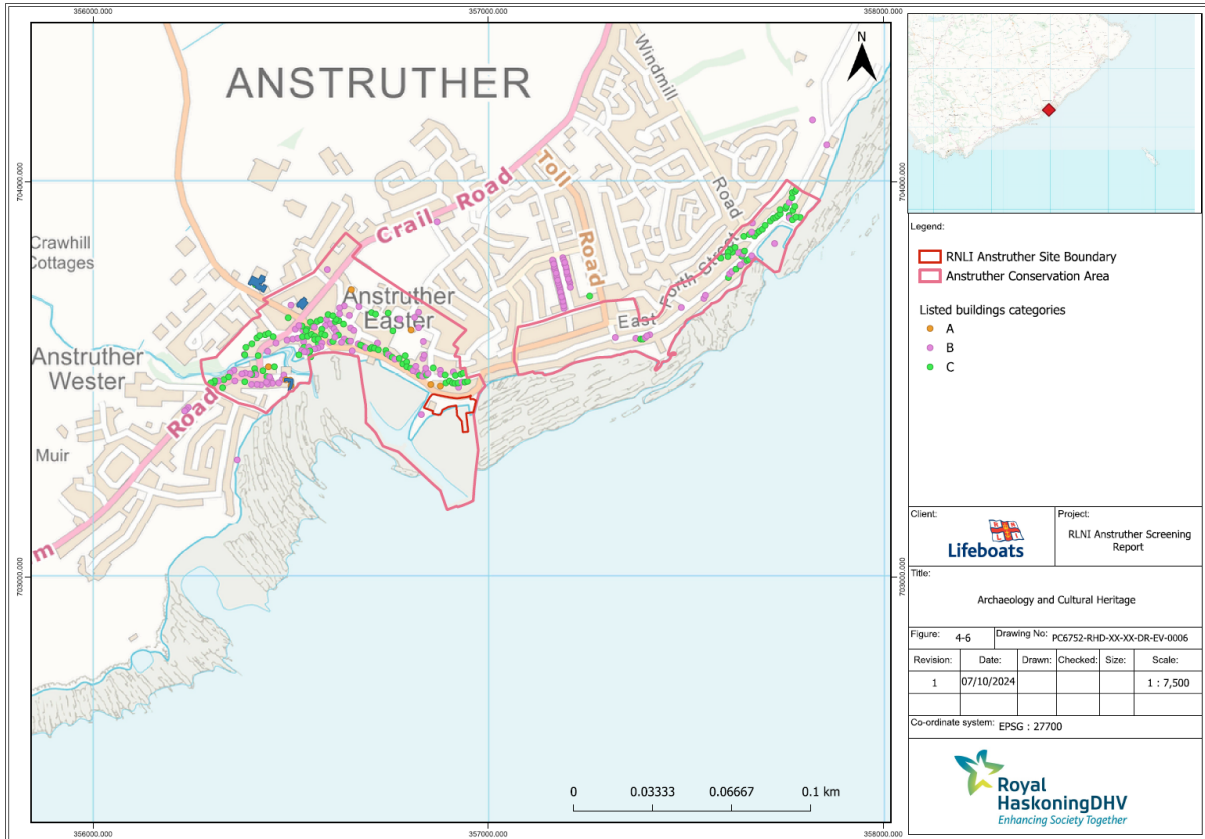


Figure 4-5 Anstruther Conservation Area (Fife Council, 2010)

4.9 Landscape, seascape and visual amenity

The Proposed Development falls within Landscape Character Type (LCT) Coastal Terraces in Fife¹⁸. The Landscape Character Assessment: Fife - Landscape Evolution and Influences complements the 2019 LCT.

Fife is a large peninsula of lowlands and hills located on Scotland's east coast, covering 1,235km². Around the coast of Fife there is a series of coastal hills mainly located above the coastal cliffs, braes, and terraces, which slope gradually towards the sea offering panoramic views of the Firths. They are characterised by their strong association with the sights, sounds and smells of the coast. These are medium to large-scale, often open or exposed coastal landscapes where the character is always influenced by the sea and can be particularly affected by the weather conditions and views of the sky and the sea. These coastal hills are generally a simple, sloping, balanced, active, organised, tended, farming landscape with regular or geometric patterns. Marking the transition between the coastal and landward areas of Fife sharing the characteristics of both.

Particularly around the east and south coast of Fife coastal terraces and raised beaches are mostly flat or gently sloping towards the coast. These are coastal landscapes where the character is always influenced by the sea and typically, they are a simple, undulating, balanced landscape with muted colours, varied textures and slow movement.

In the landward area of Fife, the landscape has been influenced by millennia of human interaction. Over this time, inhabitants adapted the landscape to their needs and affected almost all aspects of vegetation cover, through drainage, clearance and planting, cultivation, soil management, etc. On the coasts intertidal areas dunes, rocks and coastal cliffs and braes have been less affected by human occupation.

The East Neuk fishing villages in the southeast of Fife, such as Elie, St Monans and Anstruther, are particularly picturesque, with distinctive harbours. They are popular with visitors, especially in the summer months. Smaller towns, such as Anstruther, Lower Largo and Leven have all experienced limited pockets of housing development in recent years, which has generally had limited influence on the landscape setting of these settlements¹⁹.

The study area for the project is based on a ~3-5km radius circle from the boundary of the proposed new lifeboat station footprint. An outline of the baseline landscape and visual receptors are outlined below:

Landscape Receptors

- The Conservation Area of Anstruther;
- The Landscape Character Assessment: Fife - Landscape Evolution and Influences. Specifically, the Proposed Development falls within the Coastal Terrace of the LCT; and
- Local Landscape Areas within Fife, including The Anstruther Golf Course, the coastal grassland between Anstruther Wester and Crail and the Isle of May.

Visual Receptors

- Residential Receptors and Settlements: within ~3-5 km of study area;
- Road Users: on main transport routes including the A917 as well as selected local roads in Anstruther including Shore Street, East Shore Street (adjacent to proposed new lifeboat station footprint), Pittenweem Road and Crail Road; and

¹⁸ [Scottish Landscape Character Types Map and Descriptions | NatureScot](#)

¹⁹ [Landscape Character Assessment: Fife - Landscape Evolution and Influences | NatureScot](#)

- Non-motorised transport routes; including Public Rights of Way (PROW), locally promoted footpaths, cycleways (NCR), riding routes (e.g. Pittenweem to Kilrenny Safe Cycle Route) and promoted viewpoints within the study area;
- Seascape views from vessels using the area for commercial and recreational uses.

Landscape constraints were considered as part of the planning application for the proposed RNLI station.

4.10 Recreation

Tourism

Anstruther has a largely tourism-based economy, with many shops, cafes, B&Bs, hostels and restaurants catering to the demands of short stay day trippers during the summer months. Some of the main attractions include:

- Fife Coastal Path;
- Anstruther Harbour;
- Isle of May Boat Trips;
- Anstruther Lifeboat Station;
- The Scottish Fisheries Museum;
- Anstruther War Memorial;
- The Caves of Caiplie;
- Scotland's Secret Bunker; and,
- The Anstruther Fish Bar and Restaurant.

Recreation

Anstruther offers a range of recreational opportunities, including:

- Anstruther Golf Club;
- Anstruther Sailing;
- St Ayle's Coastal Rowing Club;
- East Neuk Outdoors;
- Silverdykes Caravan Park;
- Anstruther Bowling Club;
- Bars and restaurants within Anstruther; and,
- Bird watching, dog walking, paddling and rock pooling.

The closest beach to Anstruther is Billow Ness (a designated bathing water, see **Figure 4.3**), located approximately 300m from the proposed development (rated Excellent SEPA, 2022 see **Section 4.4**). The beach is a quiet sandy bay to the west of Anstruther harbour and part of the Fife Coastal Path and is a recent recipient of a Seaside Award from Tidy Britain²⁰. The next closest beach to Anstruther is at Pittenweem, located approximately 2.5km west of Anstruther. There is no bathing water data for this site.

²⁰ [Billow Ness, Anstruther – Beaches | VisitScotland](#)

4.11 Terrestrial and marine traffic

Marine

Anstruther harbour has approximately 400m of pier side berthing, 100 serviced berths for pleasure boats and 8 pontoon berths for visitors²¹. The harbour is classified as a fishing harbour, predominantly occupied by leisure boats with some small licensed independent creel boats¹³. Dredging within Anstruther Harbour entrance channel (from the northern most navigation buoy to the Outer Harbour) is regularly undertaken to maintain access for these vessels. There is no current Marine Licence for Maintenance Dredging and Sea Disposal with the previous licence 06784/20/1 expiring on the 28/02/2021¹⁴.

The harbour caters for a growing leisure trade, both for locally owned boats and activities such as sailing, windsurfing and kayaking and use of the area by yachts is common. The town also has a sailing club. Boat trips depart from the harbour to The Isle of May almost daily from 1st April to 30th September. Visitors to the Isle of May topped record numbers for the fourth consecutive season, attracting 9,656 visitors in 2022²².

Terrestrial

Anstruther is a popular tourist destination during the summer period and the area adjacent to the proposed development footprint is particularly busy due to the daily departure of the Isle of May Boat Trips and visitors to the Scottish Fisheries Museum opposite the harbour (two of the main attractions which provide the main economy for the businesses in the town).

The harbour provides three disabled spaces, two electrical charging spaces, two coach/bus spaces, sixteen RNLI spaces (approximately) and 64 standard car parking spaces (80 total parking spaces). There will be a coach layby for a single coach within the reconfigured car park.

The Proposed Development is located immediately adjacent to the B9131 (East Shore Street), which is subject to a 30mph speed limit with footpaths on either side. Within the vicinity of the Proposed Development, the A917 follows the coastline, connecting St Andrews in the northeast of Fife to Lundin west of Anstruther. Anstruther Primary School and Waid Academy are within 0.6 km of the proposed development.

The Fife Cycle Network is a 350-mile sign posted cycle route network in Fife. One of the on-road routes is along East Shore Street, immediately adjacent to the proposed scheme footprint and continues through inland Anstruther.

East Shore Street is wide enough for two cars to pass, although larger vehicles may experience issues if they are trying to deliver during busy holiday periods.

A transport statement was provided to Fife Council in support of the planning application for the proposed RNLI station.

²¹ [Anstruther Harbour | Fife Council](#)

²² [Isle of May National Nature Reserve Annual Report 2022 | NatureScot](#)

5 Potential for environmental effects

Possible impacts, along with the likelihood of potential significance on the marine environment, both during the construction period, and during the operational phase, are considered in the table below.

| Topic / Receptor | Potential Impacts | Potential Mitigation | Likelihood for potential significant effects |
|--------------------------------|--|--|--|
| Geology and coastal morphology | <ul style="list-style-type: none"> Potential changes to local wave and bedload sediment transport along the Anstruther coastline Potential changes to local tidal currents on the Anstruther coastline during operation | <p>Sedimentary processes within the harbour are limited given the sheltered nature of the site to waves therefore no significant erosion of the harbour beach is anticipated.</p> <p>The proposed RNLI station is situated within the existing Anstruther Harbour and as such there would not be any effects on the coastline. The new RNLI station is adjacent to the western pier and is not expected to influence sediment movement. It would be an open structure and allow sediment movement to occur.</p> | Not likely |
| Environmental designations | <ul style="list-style-type: none"> Direct and indirect effects on designated sites and their features. | <p>There are no designations directly within the harbour area.</p> <p>Given that the works will be constrained within the harbour it is not likely that there would be any significant effects on features of interest. Ecological constraints have been discussed below.</p> | Not likely |
| Ecological constraints | <ul style="list-style-type: none"> Generation of underwater noise from piling operations and other construction activities; and Indirect impacts due to changes to water quality. Species mortality/injury. Permanent loss of habitats as a result of construction activities; Disruption of foraging and commuting activity as a result of construction activities Direct and indirect impacts to habitat and species | <p>Although Anstruther is a busy tourist town, there is potential for otters to traverse the Anstruther coastline as they move between headlands and records of the species have been made in the area. There is a consent condition for the Planning Permission for the proposals that ensure protection of otters. This requires that a pre-start survey shall be undertaken by a suitably qualified professional to check for any changes in use of the site by otters and identify any mitigation and licencing requirements. The results should be submitted to the planning authority for prior written approval.</p> <p>Piling would be temporary and for a short period only. Effects from underwater noise are limited as it is expected that the works would be undertaken in the dry using shuttering around the works area to enable construction works to be undertaken at all states of the tide. Given the location of the works inside the harbour piers this further reduces the likelihood of any significant effects from underwater noise.</p> <p>Intertidal and shallow subtidal species living in the habitats are expected to be adapted to disturbance as it is understood that the harbour is dredged periodically for maintenance. As such it is not expected that there would be any long-lived sessile</p> | Not likely |

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| | | <p>species that would be sensitive to the works being undertaken.</p> <p>The ramp construction is for an open structure which limits any loss of the intertidal area. The ramp piles would provide a habitat for settlement of species which could increase the biodiversity of the area. There are already hard structures in the marine environment due to the presence of the harbour. As such the created habitat is not unusual in this environment.</p> <p>Birds use the surrounding areas and given the proximity of the Forth of Forth SSSI and the Outer Firth of Forth and St Andrews Bay Complex SPA this has been considered. However, the works are constrained within the Harbour complex which would shield the visual and noise disturbance. Given that the harbour is a busy working harbour the noise and visual disturbance are not likely to affect the species using the adjacent areas.</p> | |
| Invasive Non-Native Species | <ul style="list-style-type: none"> Spread of INNS. | <p>Spread of INNS would be managed using standard mitigation measures in line with recommendations in the Scottish Government Code of Practice on Non-Native Species, a precautionary approach will be taken for materials/equipment used.</p> | Not Likely |
| Water quality | <ul style="list-style-type: none"> Reduced water quality associated with sediment disturbance during construction of the new ramp Increases in suspended sediment concentrations from construction activities; Surface water run-off from construction activities; and Accidental spills or leaks from construction or vessels. | <p>Given that the works would be undertaken within the confines of the Harbour it is not expected that there would be any significant change to water quality. It is expected that the concrete works for the ramp would be undertaken in the dry (with shuttering around the works area) and as such any mobilisation of sediment would be retained. Within the harbour area there are likely to be movements of sediment as vessels enter and leave the shallower areas and during maintenance dredging. As such it is not expected that the proposed works would significantly change the water quality of the area.</p> <p>The short-term disturbance and re-suspension of sediment during such activities has the potential to adversely impact upon water quality off Anstruther (due to increased concentrations of suspended solids). However, given that the works would be undertaken in the dry with shuttering around the works to enable works at all states of the tide, and given the relatively sheltered nature of the site, any sediment plume created by construction activities is limited, locally distributed and temporary in nature.</p> <p>Surface water run-off and accidental spills and leakages are standard construction industry hazards and are commonly and routinely managed using current industry standard practices and procedures and a CEMP.</p> | Not Likely |
| Flood risk | <ul style="list-style-type: none"> Risk of flooding to construction compounds | <p>A flood risk assessment was undertaken and submitted as part of the approved planning application. The implementation of Best Practice Measures will be adopted (including signing up to</p> | Not Likely |

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| | | flood alerts) to avoid flood risk to construction workers during the construction phase. | |
| Noise | <ul style="list-style-type: none"> • Generation of noise from construction activities | <p>The proposed construction work is considered to have the potential to cause significant levels of noise. The implementation of Best Practice Measures and compliance with planning conditions will manage potential noise impacts to human receptors.</p> <p>Given that the works are constrained within a harbour area and would be undertaken in the dry (at low water and within a screened area) it is not likely that there would be any effect on marine species.</p> <p>Impacts from increased marine and terrestrial traffic and transport during operation are not anticipated as the activity is in line with the current use of the port and is close to the existing RNLI station.</p> | Not Likely |
| Climate and air | <ul style="list-style-type: none"> • Dust emission from construction activities; • Emissions to air from HGVs, cars, and non-road mobile machinery; • Embodied carbon in construction materials; and • An increase in emissions caused by an increase in vessel movements. | <p>Application of the standard dust control and management techniques, as laid out in the Institute of Air Quality Management (IAQM) guidance document²³ and CEMP would ensure that no significant effects arise in respect of dust or fine particulate matter.</p> <p>The main emissions to air from construction of the proposed development are likely to be the products of combustion from construction vehicles including NO₂, PM₁₀ and PM_{2.5}. It is not anticipated that the scheme will generate sufficient traffic to breach the above Design Manual for Roads and Bridges criteria. Assessment of air quality impacts is therefore not proposed to be undertaken and this impact is Screened Out.</p> <p>There is no significant change anticipated to the number of lifeboat movements as a result of the new lifeboat station, and therefore this impact is scoped out of further assessment.</p> | Not Likely |
| Archaeology and Cultural Heritage | <ul style="list-style-type: none"> • Direct impacts on known and currently unknown heritage archaeological resources • Indirect impacts on known and unknown heritage resources • Impacts to setting on nearby listed buildings and conservation area • Direct physical impacts | <p>The Proposed Development is located within the existing harbour area at Anstruther, where there are 2 A listed buildings within 100m of the Proposed Development.</p> <p>A Heritage and Design Access Statement and Listed Building site analysis was submitted as part of the Planning Application for the approved Planning Permission for the project. These sites are not within the marine environment and will have been considered as part of the Planning Consent.</p> <p>The existing lifeboat station building is part of the Category B listed harbour (LB 36137). Planning application 20/00459/CAC Conservation area consent for demolition of building was granted on 3rd December 2020.</p> | Not Likely |

²³ [construction-dust-2014.pdf \(iaqm.co.uk\)](#)

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| Landscape, seascape and Visual Amenity | <ul style="list-style-type: none"> • Presence of construction works and disturbance to visual amenity • New lifeboat station positioned within Anstruther Conservation Area | <p>The construction period for the RNLi station and ramp is anticipated to cover a period of approximately 20 months in total. Although it is considered that there will be visual disturbance during the works, this will be a temporary impact.</p> <p>Given that the RNLi station will be constructed within an existing harbour it is not expected that there would be any long-term effects on land or seascape.</p> <p>The new lifeboat station will be a modern design set within a Conservation Area of several A, B and C listed buildings. The layout of the proposed new lifeboat station and its elements is shown in Figure 3-1.</p> <p>The Planning Authority consent application included a site analysis which incorporated various viewpoints.</p> | Not Likely |
| Recreation | <ul style="list-style-type: none"> • Disturbance to tourism and recreational users • Increased tourism to new RNLi lifeboat station | <p>The construction works have the potential to temporarily impact upon tourism and recreational users of the area (over at least one summer period). Users of the sea will be used to seeing vessel movements and activity within the Harbour Area and as such are not expected to be significantly affected by the works. In many situations, construction work can provide an interest to many people.</p> <p>It is not envisaged that the new lifeboat station will have a significant impact on tourism. It is proposed that the new station will have better visitor engagement facilities provided.</p> | Not Likely |
| Terrestrial and Marine traffic | <ul style="list-style-type: none"> • Restriction or delay to traffic and transport due to the presence of construction vessels; and, • Reduced visibility of other nearby vessels at night due to construction lighting. | <p>Standard best practice mitigations measures will be used, including a Traffic Management Plan agreed with the local Planning Authority. Marine construction and operation activities associated with the proposed development will be managed through the issuing of Notice to Mariners.</p> | Not Likely |

6 Conclusion

Given the above it is not anticipated that there would be any significant effects on the marine environment and the users of the marine environment.

The proposed station has already received planning consent in September 2020 and there are various conditions relating to the landside works that would be implemented.

We would be grateful if MD-LOT could provide a formal EIA screening opinion confirming whether an EIA is required for submission with the Marine Licence application.

On behalf of Royal Haskoning

Yours sincerely

Rachel Greaves

Marine Environment Consultant
Water & Maritime