

Appendix One:

Consultation Responses

NatureScot

From: [Redacted]
To:
Subject: SCR-0120 - Annan Harbour Action Group - Harbour Redevelopment
Date: 01 April 2026 16:55:16

Dear Andrew,

CPA183246 - ID 104310 - Pre-app - Annan Harbour Redevelopment - SCR-0120

I'll issue a formal response in due course, but as the development is relatively small scale, we do not feel that an EIA is necessary.

However, the development is just under 150 m away from the following designated sites:

- Solway Firth SPA
- Solway Firth SAC
- Upper Solway Flats and Marshes Ramsar Site
- Upper Solway Flats and Marshes SSSI

As these lie within our published disturbance distances for various qualifying features of the European sites (<https://www.nature.scot/doc/disturbance-distances-selected-scottish-bird-species-naturescot-guidance>), mitigation measures and an Appropriate Assessment will be required for the Marine Licence.

Please feel free to get in touch if you have any questions in the meantime.

All the best,

Ian

Ian Stewart | Operations Officer – Coastal Infrastructure | South

NàdairAlba | Taigh Bruach an Àilein , 6^{mh} Làr a Deas, 153 Rathad Kunnainn, Dùn Èideann EH8 7AU | 01738 458612

[nature.scot](https://www.nature.scot) - Scotland's Nature Agency - Buidheann Nàdair na h-Alba - [@nature_scot](https://twitter.com/nature_scot)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager or the sender. Please note that for business purposes, outgoing and incoming emails from and to NatureScot may be monitored.

Tha am post-dealain seo agus fiosrachadh sam bith na chois diomhair agus airson an neach no buidheann ainmichte a-mhàin. Mas e gun d' fhuair sibh am post-dealain seo le mearachd, cuiribh fios dhan manaidsear-siostaim no neach-sgrìobhaidh.

Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho NàdarAlba.

Historic Environment Scotland



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to:
MD.MarineLicensing@gov.scot

Andrew Kyle
Marine Licensing Casework Officer
Licensing Operations Team
Marine Directorate

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300085021
Your ref: SCR-0120
23 February 2026

Dear Andrew Kyle

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
SCR-0120 - Annan Harbour Action Group (per Narro Associates Ltd) - Harbour
Regeneration Project
Screening

Thank you for consulting us on this Environmental Impact Assessment (EIA) screening request, which we received on 2 February 2026, and the clarification email which we received on 23 February 2026. This letter contains our comments for our historic environment interests. That is cultural World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas.

From 1 January 2025 we no longer provide advice on undesignated underwater cultural heritage. This includes the preparation of documents for post-consent activities including Written Schemes of Investigation or Protocols for Archaeological Discoveries. For EIA projects, the relevant competent authority must ensure that they have access to sufficient expertise to examine the EIA Report in accordance with the relevant regulations.

The relevant local authority archaeological and conservation advisors will also be able to offer advice on historic environment impacts. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Our advice

We understand from the applicant's Method Statement that the proposed works include enabling works, installation of cofferdam with ancillary water control features, remedial works to existing quay wall and lining of lagoon. From the applicant's diagrams it also appears to us that some structures are proposed in an area below mean high water spring, including a boating pontoon and a swimming deck.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH
Scottish Charity No. **SC045925**
VAT No. **GB 221 8680 15**

We have reviewed the information received and consider the proposals unlikely to have impacts on our historic environment interests of a level that would require consideration through the EIA process.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Adrian Lee at adrian.lee@hes.scot.

Yours sincerely

Historic Environment Scotland

Local Authority - Argyll and Bute Council

From: [Redacted]
To:
Cc:
Subject: RE: EXTERNAL: SCR-0120 - Annan Harbour Action Group (per Narro Associates Ltd) - Harbour Regeneration Project - Consultation on Request for Screening Opinion - Estimated consultation response date
Date: 18 March 2026 12:27:45
Attachments: [image004.png](#)
[image005.png](#)
[240357ful.delegated.report.28.03.2025.pdf](#)
[240998lbc.delegated.report.pdf](#)

OFFICIAL

Morning Andrew,

Thanks for your email of 2 February 2026 and please accept my apologies for the delay in responding on behalf of Dumfries and Galloway Council. I am conscious that you were seeking this response no later than 23 February 2026 and it is now substantially overdue. I've not got any direct experience of providing previous consultation responses in relation to The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, so please forgive my tardiness.

You may already be aware that this project has the benefit of planning permission and listed building consent, and the applicant is now in the process of discharging the various planning permission and listed building consent conditions relating to these 2 applications:-

24/0357/FUL PLANNING PERMISSION FOR ALTERATIONS INCLUDING RAISING OF ROOF HEIGHT AND INSTALLATION OF ROOF MOUNTED SOLAR PANELS, FORMATION OF BALCONY ON WEST ELEVATION, NEW DOOR OPENING IN EAST ELEVATION, STEPPED SEATING AND ACCESS RAMP TO SOUTH ELEVATION AND CHANGE OF USE OF FORMER WAREHOUSE TO FORM HERITAGE CENTRE/ACTIVITY HUB WITH ASSOCIATED CAFE, FORMATION OF DAM TO CREATE A RECREATIONAL AND HABITAT TIDAL LAGOON, ERECTION OF BOATHOUSE, INSTALLATION OF PEDESTRIAN BRIDGE, FORMATION OF PARKING AREA, PATHWAYS, HARD AND SOFT LANDSCAPING AND ASSOCIATED WORKS
AT COLLETTS BUILDING AND MINISTERS MERSE, PORT STREET, ANNAN HARBOUR, ANNAN

Granted subject to conditions on 31 March 2025

24/0998/LBC LISTED BUILDING CONSENT FOR FORMATION OF TIDAL DAM TO ABUT HARBOUR WALL INCLUDING MASONRY REPAIRS, REPOINTING AND NEW FIXING DETAILS FOR TIMBER POSTS, LADDERS AND BRACKETS
AT COLLETTS BUILDING AND MINISTERS MERSE, PORT STREET, ANNAN HARBOUR, ANNAN

Approved subject to conditions on 25 July 2024

This proposed development did not require to be screened under the terms of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 by virtue of its absence (by type) from Schedules 1 and 2 to these Regulations.

In preparing this response I've taken cognisance of the advice and guidance document entitled

“Marine and licensing and consenting – Environmental Impact Assessment: overview”, dated 4 May 2023, and presently published on www.gov.scot . I’m aware that the site of the proposed development is located close to, but not within, the Solway Firth Special Area of Conservation, as well as the Upper Solway Flats and Marshes Special Protection Area, and the Upper Solway Flats and Marshes SSSI. I’m therefore satisfied that the proposed works are not located within a ‘sensitive area’. I’ve therefore looked at Schedule 2 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, relevant to projects from 0 to 12 nautical miles from shore (as this is). My view is that the works covered by applications 24/0357/FUL and 24/0998/LBC are not contained within Schedule 2 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and, as a result, the Council is of the view an EIA Report does not require to be submitted in relation to these works.

As an aid I’ve attached the Reports on Handling for applications 24/0357/FUL and 24/0998/LBC which I hope are helpful. You can see a range of consultees have responded to these cases, and I think the comments of NatureScot at 2.8 of the Report on Handling for application 24/0357/FUL are particularly pertinent in relation to the question of environmental impacts arising. It should also be noted that the Council as planning authority also undertook an appropriate assessment for this proposal and concluded that the development would be unlikely to have an adverse impact on the integrity of the nearby protected sites. This is also summarised within the Report on Handling for application 24/0357/FUL but please let me know if you would like a copy of the appropriate assessment itself. The Listed Building Consent assessment process is much narrower in its scope, and this is reflected in the attached Report.

I hope this belated response is helpful to you but if you require any further information or clarification of any point please do not hesitate to come back to me directly.

Best regards,
Robert

Robert Duncan
Team Leader (Major Developments)

Planning and Development
Economy and Environment
Dumfries and Galloway Council

Scottish Environmental Protection Agency

From: [Planning South](#)
To: [Redacted]
Cc:
Subject: PCS-20007898 SEPA Response to SCR-0120
Date: 05 February 2026 14:48:25
Attachments: [image.png](#)

Dear Andrew Kyle,

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

SCR-0120

Annan Harbour Action Group (per Narro Associates Ltd) - Harbour Regeneration Project - Consultation on Request for Screening Opinion - Annan Harbour

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,
Silvia Cagnoni
Senior Planning Officer



For the future of our environment