

Graeme Duff

From: Ian Cornforth <Ian.Cornforth@nature.scot>
Sent: 30 April 2024 11:33
To: Graeme Duff
Cc: Lyndsey Kinnes
Subject: RE: Hunterston Dredge Pocket Relaxation
Attachments: Hunterston Marine Yard HCY CEA173290 MD -SCOP-0033 MW-EIA - NatureScot response - 21 December 2023 .pdf

Categories: Red Category

Hi Graeme

Hope this finds you well,

thank you for your updated information re the proposed Dredge pocket at Hunterston Marine yard.

We have reviewed the information about the slightly smaller new dredge pocket and we agree with EnviroCentre there is unlikely to be slumping at the edge of the Southannan Sands SSSI.

Whilst we welcome the reduction in the dredge area, this reduced dredge area does not change our previous benthic scoping opinion advice (our letter of 21/12/2023 to the MD) regarding dredge area and quayside (relevant extracts copied below and full letter attached)

The scoping report states what work is planned to assess impacts. We agree with the aspects scoped in and the proposed investigations. The proposed assessments include

- *A coastal modelling study. The coastal modelling study will include modelling of dredge plume dispersal to inform the assessment of impact on water quality.*
- *Assessment of the potential for particulate and chemical contamination of water as a result of the proposed dredging and construction works will be central to the assessment.*
- *The prevention of pollution during construction will be a specific focus.*
- *Identification of baseline data on the intertidal and subtidal benthic environment and that full mitigation and enhancement measures will be determined following ecological work*

Some aspects of these assessments have been omitted or are not clear in the scoping report and we advise the following should be included in Environmental Statement (ES).

- *Clarity needed on the volume of dredge material predicted to be removed along with estimated timings for dredge operations*
- *The coastal modelling study should cover the dredge plume dispersal from the dredge work associated with the construction of quay and subsequent maintenance dredging that will be carried out during the operation of the port. The outputs should include likely sedimentation levels, turbidity (SSC) and impacts on benthic species and habitats.*
- *If a dredge spoil site is planned to be used then this will also need to be assessed if there is connectivity with designated sites or protected species and habitats.*
- *Habitat loss/change as result of development should be assessed. The coastal modelling study should include assessment of changes to hydrodynamics as a result of changes to bathymetry and quay construction.*
- *Regarding baseline data on benthic environment, it is proposed that a review of existing data will be undertaken and where required, surveys will be taken[1]. I advise that surveys will be required both in the footprint of development site and in the zone of influence of site e.g. the dredge plumes, areas predicted changes to hydrodynamics. Data is limited some designated habitat/species and the eelgrass and horse mussel survey that has been referenced (Annex 3 of the scoping report) was not fit for purpose – the subtidal survey methods used in this*

study were not standard. An example of standard methodologies can be found in Davies, J.M., Baxter, J., Bradley, M., Connor, D., Khan, J., Murray, E., Sanderson, W., Turnbull, C. & Vincent, M. (eds.), 2001. Marine monitoring handbook. Available at: JNCC website."

I hope that is of assistance, please get in touch to discuss as required

All the best

Ian

Ian Cornforth | NatureScot Operations Officer – West Central Scotland

From: Graeme Duff <gduff@envirocentre.co.uk>

Sent: Thursday, April 11, 2024 11:54 AM

To: Ian Cornforth <Ian.Cornforth@nature.scot>

Subject: Hunterston Dredge Pocket Relaxation

Ian

Hope you are well.

Further to the NatureScot Scoping Response on Hunterston we noted the commentary in relation to the dredge pocket and potential for side slope relaxation:

The drawings of "dredge option - General Arrangement Plan" include a note that the dredge-area side slopes will be created with a "min acceptable gradient of 1:3 (vertical:horizontal)". We suggest that the slopes might over time 'relax back' in a way that (depending on the extent of the dredge area) erodes material from MLWS at the SSSI boundary. Therefore potential effects of side-slope relaxation on the SSSI sandflat feature should be assessed as a separate operational-phase effect. Potentially this could require a full geotechnical assessment. Our advice is that the developer should consult us as soon as possible on their proposed assessment methodology (at the same time as addressing point 1.17 below).

Since the Scoping submission there has been ongoing design work, as a result the maximum dredge pocket extent has now been reduced as per the attached drawing (176482_GIS016). On the basis of this maximum dredge pocket the closest edge of the dredge pocket is 278m from the SSSI boundaries.

The dredge pocket design has also changed to have shallower edges (1 in 6 noted as indicative in the attached HMY-AHN-01 drawing however will be fixed as part of our mitigation requirements from the coastal modelling).

On the basis of the reduction in the dredge area, the shallower edges of the dredge pocket and the distance from the SSSI boundary we would consider that there is unlikely to be any significant slumping that would subsequently result in impact to the SSSI edge.

As noted in the response NatureScot recommended we consult on this, so on the basis of the above would it be possible to discuss to allow us to understand what further detail may be required.

Kind Regards

Graeme Duff
Director

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