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Dear To Whom This May Concern,

1336625 – THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS (AMENDED 2017) AND THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

PROPOSED STRANRAER MARINA EXPANSION WORKS - REQUEST FOR SCREENING OPINION

Fairhurst are writing to request a formal Environmental Impact Assessment (EIA) Screening Opinion for the proposed expansion works at Stranraer Marina. These works include a new Marina layout with a total of approximately 223 berths; increased dredging and breakwaters to accommodate new marina layout; proposed water sports building; extension to boatyard; extension to the overspill car park; proposed new pavilion; extension to reception building; proposed ancillary buildings; proposed restaurant/ bar and a proposed new bridge.

This EIA Screening letter has been prepared to cover the entire project that consists of works both above and below Mean High Water Springs (MHWS). Fairhurst will seek to agree, following the submission of the request, as to who will be the competent authority, either Dumfries & Galloway Council or Marine Scotland.

Screening Opinion Request

Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

In accordance with the requirements of EIA Screening as set out in the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 please find included within this letter:

- a) A description of the location of the development, including a plan sufficient to identify the land; **(see Site Description below and see Drawing: Stranraer Maria Expansion Review (Rev 04/06/2020))**
- b) A description of the proposed development, including in particular:
 - i. a description of the physical characteristics of the development and, where relevant, of demolition works; **(see description of proposed development further on in this letter)**
 - ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected; **(see site description further on in this letter)**

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- c) a description of the aspects of the environment likely to be significantly affected by the proposed development **(see description of potential impacts of the environment further on in this letter)**; and
- d) a description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from:
 - i. the expected residues and emissions and the production of waste, where relevant; and
 - ii. the use of natural resources, in particular soil, land, water and biodiversity; **(see description of potential impacts further on in this letter)**

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

In accordance with the requirements of EIA Screening as set out in The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, please also find included within this letter:

- (a) a description of the location of the proposed works, including a plan sufficient to identify the area in which the works are proposed to be sited **(see Drawing: Stranraer Maria Expansion Review (Rev 04/06/2020);)**;
- (b) a description of the proposed works, including in particular—
 - (i) a list of all of the regulated activities which are proposed;
 - (ii) a description of the physical characteristics of the proposed works and, where relevant, works to be decommissioned **(see description of proposed development further on in this letter)**; and
- (ii) a description of the location of the proposed works, with particular regard to the environmental sensitivity of geographical areas likely to be affected **(see site description further on in this letter)**;
- (c) a description of the aspects of the environment likely to be significantly affected by the proposed works; and **(see description of potential impacts further on in this letter)**
- (d) a description of any likely significant effects, to the extent of the information available on such effects, of the proposed works on the environment resulting from either, or both, of the following:—
 - (i) the expected residues and emission and the production of waste, where relevant; and
 - (ii) the use of natural resources, in particular soil, land, water and biodiversity **(see description of potential impacts further on in this letter)**.

Site Description

The application site consists of Stranraer Marina, which will include both land and marine developments. The marina is located north of the town of Stranraer and is operated by Dumfries and Galloway Council.

The marina serves the southern end of Loch Ryan, which historically has been one of the busiest ports in the region. The marina itself currently consists of dogleg quay, and a finger pontoon, which is used by smaller fishing vessels, excursions and recreational craft. The marina can provide 63 Annual Berths and 7 Berths for visitors. Ferry terminals are also located north of the harbour, giving access to the Clyde, the Solway, Isle of Man and the North Channel, and beyond to the Irish Sea.

Description of the Proposed Development

The proposed development consists of a number of elements, which are detailed on the attached Stranraer Marina Expansion Review. The proposals include development both on land and marine-based, which consist of the following:

- Revised layout of the marina, with the inclusion of an additional 185 new berths;
- Increased dredging and breakwaters to accommodate new marina layout;
- Proposed water sports building;
- Extension to boatyard;
- Extension to the overspill car park ;
- Proposed new Pavilion;
- Extension to reception building;
- Proposed ancillary buildings;
- Proposed Restaurant/ Bar; and
- Proposed new bridge.

The above proposals will likely be subject to a phased construction, over a 5 year period.

Potential Impact of the Proposed Works

An initial desk-based study has been undertaken to identify any key environmental receptors in and around the application site. Fairhurst considers that it is reasonable to conclude that the main potential impacts of the proposed development are limited to:

- Potential for indirect impacts on the Glen App and Galloway Moors Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI);
- Potential for works to impact the Stranraer Conservation Area and the number of listed buildings in the immediate vicinity of the site;
- Potential for risk of discovery of contaminated sediment when extending the berth as a result of increased dredging;
- Potential for a temporary increase in noise levels during construction, whilst acknowledging that the site is currently located within exiting harbour operations;
- Potential impacts associated with flood risk and drainage; and
- Potential for water quality impacts because of increased dredging.

The above impacts generally fall under the following main topics:

- Ecology;
- Cultural Heritage;
- Noise;
- Water Environment;
- Townscape and Visual;
- Socio-Economic; and
- Inter-related impacts as a result of the above.

Ecology

Whilst there are no ecological designations within the development site. The nearest ecological designations are the Glen App and Galloway Moors Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI) are both located approximately 5km northeast of the site.

The qualifying features of these designations are Hen Harriers. Whilst they live in upland heather moorlands during the breeding season, they do move in winter to use lowland farmland, heathland, coastal marshes, fenland and river valleys. Whilst it is envisaged that impacts upon the protected sites are negligible it is considered that bird surveys are likely to be required to support of any future planning application or marine licence application.

Given the nature of the works, the existing operations on the site and the location of the proposed works, it is not anticipated that the proposed construction or operation of the proposal would have any significant impact in terms of ecology that would warrant the undertaking of an EIA.

Cultural Heritage

Following a desk-based review, Fairhurst recognises that the proposed land-based works are located within the Stranraer Conservation Area. Stranraer Conservation Area was first designated in 1977 and the boundary was further amended in 2014. The original Conservation Area consisted of most of the old town and waterside areas, with the later extension including the area of the old town along Lewis Street.

According to the Stranraer Conservation Area Character Appraisal and Management Plan (2019), the marina is located within the “*Agnew Crescent and The Waterfront Agnew Park, Market Street and Agnew Crescent*” conservation character area. The marina has been a part of the ‘Waterfront’ for well over 300 years, with maps pre-dating as far back as 1752. The character appraisal states that there is potential for development in the area, particularly along Market Street, as there are already a number of examples of modern buildings, which would benefit from new development to “*create a more interesting frontage than there is at present*”.

Fairhurst would consider that new development associated with the workings of the marina would be in keeping with the surrounding area, particularly the proposals included within this screening letter. This is because regeneration is commonly seen in industrial and working areas, including marinas. The proposal would increase the attractiveness of the marina and would benefit the longevity of an important asset to the town.

There are some listed buildings within the marina and in close proximity, mainly within the old town. There are 3no Category B listed buildings in the marina boundary, including houses 28 & 30, and a warehouse on Harbour Street. In addition, there is the Weighbridge/Harbour Office, located on Market Street, which is a Category C listed building. Again, it is considered that the proposals in their current locations would not adversely impact the setting of the listed buildings, due to the nature of developments.

Due to the importance of the conservation area and listed buildings, it is considered that a heritage assessment would be provided with a planning application. Although some impact may occur on the setting of the listed buildings and Conservation Area itself, the impacts are not predicted to be significant to warrant the undertaking of an EIA.

Noise

The impact of noise arising from the proposed development will be experienced mostly through the construction works. The overall scheme is to be built in phases, which should limit the noise output. However, it is also considered that works will be undertaken in accordance with the mitigation measures set out within an agreed noise assessment, which will form part of the best working practises.

When considered in the context of the marina as a whole, noise levels are not expected to significantly change as a result of the proposed development in comparison with the pre-existing background levels of other marina-related activity. The land-based proposals are to improve the existing features and facilities.

Whilst some of the marine-based works, such as dredging already takes place and the proposed dredging, (both capital and maintenance) will be undertaken as part of the main berth-dredging regime, therefore not giving rise to any significant changes in noise levels. The planned pontoons and fingers will be held in position by vertical tubular piling that is driven into the seabed and potentially socketed into bedrock. Piling may give some rise to noise; however, this would be temporary in nature.

Overall, it is considered that there are limited potential noise impacts. It is therefore considered that there would not be any significant impacts arising from noise, which would require consideration through an EIA.

Water Environment

The proposed development includes some dredging to the required depths in the channel. The proposed dredge will provide a general depth of water of 2.5m with additional 0.5m margin in all states of the tide. In the area where larger vessels such as superyachts can berth, the provided depth will be 4.0m with an additional 0.5m margin. The overall estimated dredge volumes are 115,000 cubic metres, which will be utilised in the scheme itself, i.e. not disposed offshore.

It should also be considered that as the proposed dredge is being kept within the confines of Stranraer Marina, there is likely to be a minimal impact from the transportation of dredge arising due to the reuse of the material for building the southwest corner. The dredge material will be pumped behind the retaining structure and allowed to consolidate and then be landscaped and car parking constructed. Two existing boreholes suggest a high proportion of sands and gravels, which would allow the material to dry out and consolidate naturally.

The works also include the installation of a number of Breakwaters, which will be used to manage and protect the marina and new berths from waves and adverse weather. It is considered that these installations are essential and highly effective in providing wave damping on exposed marinas and harbour sites.

The proposed works will provide the opportunity to coordinate and implement a strategy for improving Stranraer's resilience to the increased risk of coastal flooding associated with climate change. This will require careful consideration in the development of detailed design proposals for the renovation and extension of the harbour office and shoreside facilities and the new landscape and facilities along the breastworks and Market Street.

It is, therefore considered that the proposed dredging works would not create any adverse impact on the water quality. Consequently, there would not be any significant impacts on the water environment, which would require consideration through an EIA.

Socio-economic

The proposed development will improve the marina and expand the town into an established visitor location. Market research confirms that Stranraer has strong potential for marina expansion, which will deliver additional community and business activity could attract significant tourists and additional resident berthers.

Improvements to the waterfront and better connectivity with the town centre should also encourage more terrestrial tourism and longer tourist stays, resulting in more accommodation demand and higher tourism expenditure. The proposed Stranraer Watersports Activity Centre could add sufficient scale to the project to make Loch Ryan and particularly Stranraer a leading Watersports destination.

The project yields 9.7 additional marina related jobs and depending on related development could provide 30 additional indirect jobs and up to £3.7m per annum economic benefit.

Although the proposal is predicted to deliver positive socio-economics impacts, it is not considered that they would require consideration through an EIA.

Townscape and Visual Impact.

The site is allocated within the Development Plan for Mixed Use Development, under policy STR.MU1 (Stranraer Waterfront), with adopted supplementary guidance and master plan outlining the possible regeneration. Whilst located in the conservation area, the guidance states that development is possible and is much needed for the town to expand. It is believed that the proposed development would improve the townscape in this area.

Fairhurst considers that the proposed development is in keeping with the allocated use, surrounding area and intended use of the land. Consequently, there would not be any significant impacts on the townscape and visual impact, which would require consideration through an EIA.

Inter-related impacts as a result of the above

It is considered that the proposed development as a standalone project will not result in significant adverse environmental effects, even when the different elements proposed are considered in terms of inter-related impacts. As stated above, the works will be undertaken in a phased manner.

Determining whether EIA is required

Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Consideration has been given to whether the proposed development falls within Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 or Schedule 1 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, i.e. development which requires an EIA unless exceptional circumstances apply. There are no categories in Schedule 1 of either Regulation, which are considered of relevance to the proposed development.

Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

The proposed development is not a Schedule 1 project. In relation to Schedule 2, under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 an EIA **may** be required if:

- (a) any part of the development/works is to be carried out in a sensitive area; or
- (b) any applicable threshold or criterion in the corresponding part of column 2 of the table to Schedule 2 is respectively exceeded or met in relation to the development/works.

Considering Point a, no part of the proposed works are to be carried out in a 'sensitive area' as classed in the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

It could be considered that for Point b, the proposed development falls into Part 10(g) of Schedule 2, "*Construction of harbours and port installations including fishing harbours*" of both the Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

It is important to note that whilst the marine-based works do not exceed 1ha, the overall project boundary exceeds 1ha, hence why it has been considered under Part 10(g). and therefore an EIA may be required.

The purpose of this Screening Request, therefore, is to determine whether an EIA is required by considering the selection criteria in Schedule 3 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 provide considerations which should be taken into account when determining the characteristics of the potential impact, as set out below; these are the same as the considerations set out in Schedule 3 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 with the exception of references to "works" rather than "development":

Characteristics of Development

1. The characteristics of development must be considered having regard, in particular, to:
 - (a) the size and design of the development;
 - (b) cumulating with other existing development and/or approved development;
 - (c) the use of natural resources, in particular land, soil, water and biodiversity;
 - (d) the production of waste;
 - (e) pollution and nuisances;
 - (f) the risk of major accidents and/or disasters relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; and
 - (g) The risks to human health (for example due to water contamination or air pollution)

The size of the development is proportionate to the nature and location of the site and is considered appropriate for operational uses associated with Stranraer Marina. Development in this area has been proposed for many years now, including an adopted Local Development Plan supplementary guidance document, “*Stranraer Waterfront Urban Design Strategy and Masterplan*”. This document has assessed development in the area and concluded that its delivery is much needed for the area. It is worth noting that the scale of the development proposed in the guidance is of a much greater scale than what is proposed in this screening letter. However, it does prove that the area has the capacity for growth.

In terms of potential cumulative impacts, Fairhurst are not aware of any other proposals within the immediate surrounding area that could cause cumulative environmental impacts during either the construction of the operational stages of the proposed development. This opinion has been informed by a review of the online planning register and Marine Scotland application search page.

The proposed works will provide the opportunity to coordinate and implement a strategy for improving Stranraer’s resilience to the increased risk of coastal flooding associated with climate change. Due to the nature of the proposed use, there would not be a requirement for any significant use of natural resources or waste production. Waste from dredging is to be reused for land reclamation as explained previously.

Risk of pollution, nuisances, accidents and risks to human health are not considered significant, given the nature of the proposal.

Given the findings of this letter, it is not considered that the characteristics of the potential impacts are significant and would not, therefore, trigger the need for an EIA.

The Environmental Sensitivity of Geographical Areas

2. The environmental sensitivity of geographical areas likely to be affected by development must be considered having regard, in particular, to
 - (a) the existing and approved land use;

- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas:
 - i. wetlands, riparian areas, river mouths;
 - ii. coastal zones and the marine environment;
 - iii. mountain and forest areas;
 - iv. nature reserves and parks;
 - v. European sites and other areas classified or protected under national legislation;
 - vi. areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - vii. densely populated areas;
 - viii. landscapes and sites of historical, cultural or archaeological significance.

As identified throughout this Screening Request, the application site is currently in operational use associated with Stranraer Marina. The proposed development will maintain this use. In terms of environmental sensitivity, there may be some indirect impacts on the nearby SSSI and SPA, however, such impacts are considered unlikely due to the distance of the designations from the application site. The potential impacts associated with the environmental sensitivity of the area are therefore not considered to be significant and do not require EIA.

Likely Significant Effects

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 5(3) of the Marine Works (EIA) (Scotland) Regulations 2017, taking into account:
 - (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
 - (b) the nature of the impact;
 - (c) the transboundary nature of the impact;
 - (d) the intensity and complexity of the impact;
 - (e) the probability of the impact;
 - (f) the expected onset, duration, frequency and reversibility of the impact;
 - (g) the cumulation of the impact with the impact of other existing and/or approved development;
 - (h) the possibility of effectively reducing the impact.

An assessment of the likely significant effects of this proposal is provided in the 'Potential Impacts' section of this letter and it is concluded that no significant effects are likely.

Summary

It is concluded that the proposed development is of a scale, location, and nature, which would not have a significant adverse environmental impact and therefore an EIA is not required.

In accordance with Regulation 10, Part (7) of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, if Marine Scotland considers that it has not been provided with sufficient information to adopt a Screening Opinion, please notify Fairhurst in writing of the points on which additional information is required.

In accordance with Regulation 10, Part (6) of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, it is requested that Marine Scotland should adopt a Screening Opinion within 3 weeks of receipt of this letter, unless otherwise agreed in writing with Fairhurst.

I trust the above is self-explanatory but should you have any further queries please do not hesitate to contact me.

Yours sincerely

[Redacted]

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