

Falmouth Docks Development: Response to MMO: St. Mawes HCT Comments

Project name **Falmouth Docks Development**
 Project no. **1620015743-006**
 Client **A&P Group**
 Revision **01**
 Date **16/12/2025**
 Prepared by **[REDACTED]**

Case Reference: MLA/2025/00157

1 Introduction

This note has been produced in response to comments received from St Mawes Harbour Conservation Trust (the Trust) via the Marine Management Organisation (MMO) on 01 December 2025, as part of the marine licence application for the proposed redevelopment at Falmouth Docks (MLA/2025/00157). The Applicant would be happy for representatives from the Trust to attend site for a walkover and meeting about the proposed development.

2 Response

As noted by the Trust, a response to their comments dated 03 October 2025 was produced by Ramboll dated 22 October 2025. The Applicant would point the Trust to the information contained within that note, along with the significant and robust assessment documentation submitted with the marine licence application, in particular the technical appendices to the Environmental Statement which contains the detail the Trust requests. The Applicant would like to point the Trust to the information contained within Environmental Statement (ES) Chapters 2, 4 and 5, which set out the methodology and worst-case parameters assessed in the ES.

As stated in the Habitats Regulations Assessment (Ramboll, May 2025) and Environmental Statement Chapter 2 (EIA Process and Methodology), no other plans or projects have been identified that could interact with the scale and scope of the proposed development. Both the planning portal and MCMS system were reviewed for potential plans or projects during preparation of the application material, and again during the determination period (October 2025) as well as consultation with Cornwall Council and the MMO.

The Applicant has ensured regular consultation with regulators throughout the process, in particular:

- **Design phase** – the Applicant engaged stakeholders at an early stage to ensure impacts were avoided and mitigated through design where possible. Environmental considerations have been at the heart of the design and driven key design decisions – this led to a reduced dredge footprint to avoid impacts on mearl beds and minimise dredging within the SAC, in particular avoiding dredging in the channel. A key consideration in the design to enable the dredge area to be reduced, is the operational use of the tides to bring vessels into the docks. This has enabled dredging in the channel to be avoided altogether, with only dredge pockets being proposed in the vicinity of the wharfs.
- **Construction methodology** - Alternative construction methods, particularly with respect to dredging, were explored to reduce environmental effects and ensure no adverse effects on site

integrity with respect to the SAC. The proposed dredge pockets would be formed using a backhoe dredger(s) to minimise sediment mobilisation. In addition, an 'environmental bucket' will be used for all materials. This is a lidded bucket which is designed to minimise the release of suspended sediment losses to the water column. Dredging will be limited to occur during the flood tide. Following investigation of the sensitivity of released sediment deposition in the area, the timing of the period of dredging was amended to be from 1.75 hours before low water to 1.75 hours before high water, which further minimises fine sediment deposition in the more sensitive areas.

- **Survey scope** – the scope of surveys (benthic and sediment testing) have been discussed and agreed with Natural England, the MMO and Cefas prior to being undertaken and are considered robust in terms of coverage, timing and resolution and in order to robustly assess impacts. Cefas have also reviewed and agreed with the sediment testing results and assessment outcomes.
- **Modelling** - The technical annexes submitted with the application material contain detailed information on the modelling calibration, predictions under varying tidal conditions and numerical as well as graphical outputs. The modelling and outputs have been reviewed and agreed independently by Cefas during determination of the marine licence.