

RESPONSE TO PUBLIC CONSULTATION COMMENTS

Project name **Falmouth Docks Redevelopment**
 Project no. **RUK2023N00104**
 Client **A&P**
 Memo no. **07**
 Version **0.1**
 Date **23/10/2025**
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 Checked by **[REDACTED]**
 Approved by **[REDACTED]**

Response to Public Consultation Comment

Application reference Planning Application Reference: PA25/01598, Marine Licence Application
 Reference: MLA/2025/00157

This note addresses comments received from members of the public to the marine licence application MLA/2025/00157. To allow for a coordinated response, the comments have been grouped into themes as follows, with responses to these provide in subsequent sections of this note:

- Dredging and ecological concerns
- Effects of sediment disposal
- Effects of Vessel Movements and Underwater Noise
- Economic and social implications

Dredging and Ecological Concerns

Summary of comments:

Respondents raised concerns that dredging approximately 850,000 tonnes of sediment would directly damage sensitive benthic habitats, including maerl beds, seagrass, and other reef-forming species, located close to the dredge footprint. They noted that dredging would release toxic contaminants, with wider risks to water quality and to the ecological integrity of the Fal & Helford SAC. Consultees also challenged the adequacy of baseline surveys, citing limited grab samples, out-of-date habitat maps, and surveys undertaken in a season of low biological activity.

Response:

The EIA has assessed the potential effects of dredging on all relevant sensitive receptors. The scope of surveys undertaken have been agreed with both Natural England and Cefas and are deemed appropriate and representative of the zone of influence of the proposed development. They have allowed a robust assessment to be undertaken for both the Environmental Impact Assessment and Habitats Regulations Assessment.

In particular, refer to the following documents for details:

- Technical Appendix 9.1 - Port Falmouth DDV Survey Report
- Technical Appendix 9.2 – Benthic Survey Scope Agreements with Natural England and MMO
- Technical Appendix 9.3 – Falmouth Benthic Survey Report
- Technical Appendix 9.5 – Maerl Technical Note

Embedded mitigation will be put in place during construction to ensure construction methods avoid and reduce the dispersion of sediments. This includes dredge pockets being formed using a backhoe dredger with a lidded bucket to minimise sediment mobilisation. In addition, dredging will only be undertaken from 1.75 hours before low water to 1.75 hours before high water, which significantly minimises fine sediment deposition in more sensitive areas, resulting in no significant effects on sensitive ecological receptors. Extracts of figures from the modelling are provided in Figures 1 and 2 below, along with point source information shown in Figure 3 and associated data in Table 1.

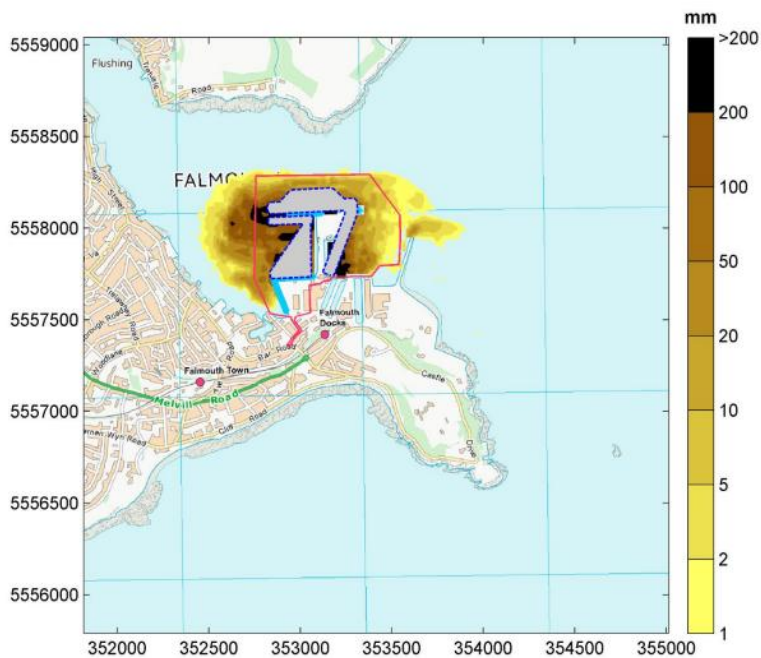


Figure 1 - Predicted fine sediment deposition resulting from proposed dredging works as a whole (dredging areas marked in grey)

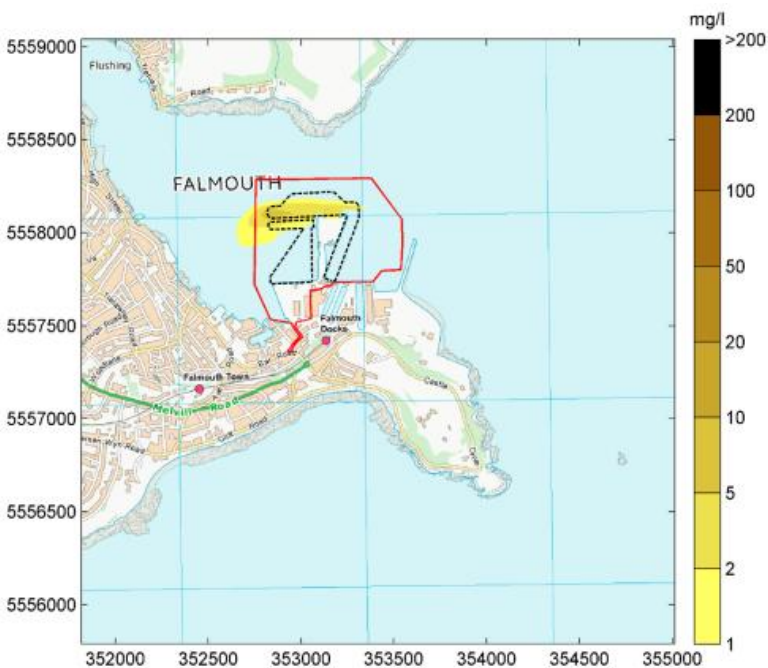


Figure 2 - Mean predicted increase in suspended sediment concentration, dredging in the north area (Queens Wharf) – worst-case area for SSC

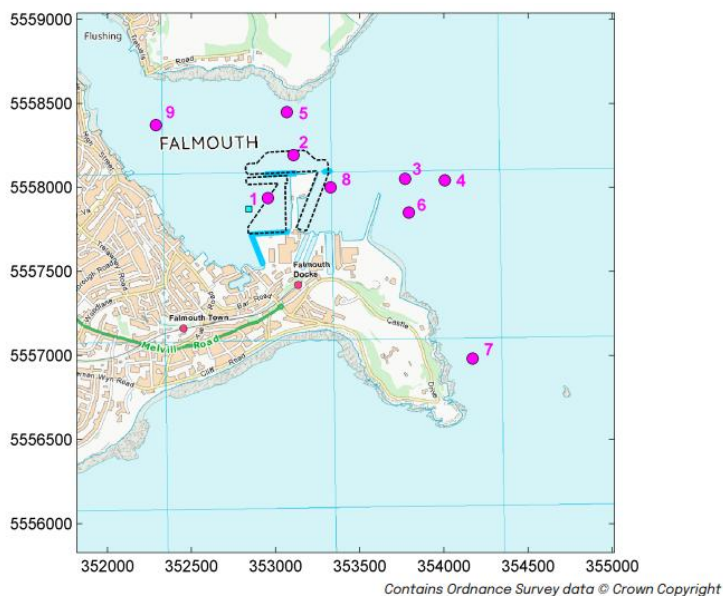


Figure 3 – Locations of time series data provided in Table 1

Table 1 – Summary of predicted suspended sediment concentration, dredging to the north of the site

Point	1	2	3	4	5	6	7	8	9
Maximum increase in SSC (mg/l)	4.7	13.7	3.5	0.2	0.1	0.5	0.1	12.6	0.1
Average increase in SSC (mg/l)	0.4	0.8	<0.1	<0.1	<0.1	<0.1	<0.1	0.2	<0.1
95% of increase in SSC (mg/l)	1.6	5.3	<0.1	<0.1	<0.1	0.1	<0.1	1.5	<0.1

Further information on the modelling, establishment of baseline and assessment of effects can be found in the following documents:

- ES Chapter 6 – Coastal Processes and Technical Appendices 6.1-6.4
- ES Chapter 9 – Marine Ecology and Technical Appendices 9.1-9.5
- Habitats Regulations Assessment
- Water Framework Directive Assessment

Note, the above documents have been technically reviewed by Cefas as advisors to the MMO in terms of the modelling undertaken and confirming that it is appropriate, along with the conclusions drawn.

A Water Framework Directive (WFD) Assessment has been undertaken to ensure the water environment is adequately protected and that the effects of the proposed development on the water body are considered in terms of physico-chemical, chemical, hydromorphological and ecological aspects. Cefas have reviewed the WFD Assessment and responded to the marine licence consultation and confirmed that:

'The WFD assessment has adequately considered the potential effects from increased suspended sediment concentrations (SSC (Section 4.3.7 of the WFD)), and the mobilisation/disturbance of sediment-bound contaminants (Chapter 8 'Marine and Water and Sediment Quality' (paragraph 10)), which is appropriate.'

In addition, the Environment Agency have reviewed the WFD and in their response to the marine licence consultation, have confirmed that:

'We have reviewed the WFD assessment and do not have any concerns; it covers everything we would expect to see. The waterbody is at Good Ecological Status, so the focus of the assessment needs to be on no deterioration and mitigating any risks for activities that may cause deterioration. We are satisfied that the assessment considers these adequately.'

Effects of Sediment Disposal

Summary of comments:

There were comments relating to contaminated sediment being disposed of to sea and affecting marine ecological species.

Response:

Analysis and consultation with Cefas has been undertaken to ensure that only dredge material that is suitable for disposal at sea is disposed of at the Falmouth Bay (B) Disposal Site. This is based on sediment testing across the proposed dredge area, with samples taken at representative locations and analysed for chemicals as approved by Cefas. Cefas technical advisor for dredge and disposal has technically reviewed the application material and concluded:

'I consider that the conclusions presented within Chapter 8 of ES (see paragraph 21) regarding the potential impacts from dredging Falmouth Docks and subsequent disposal to Falmouth Bay (B) disposal site (PL075) have been based appropriately on both the survey contaminant data and plume modelling of the dredging and disposal activities in each of the three specific modelling scenarios. Therefore, I am content with the conclusions given that they are well-evidenced and detailed; however, I again invite comment from the EA regarding aspects of the conclusions in which water quality is referenced.'

Comments from the Environment Agency on the WFD have been provided above.

Material that has been analysed and considered as contaminated and not suitable for disposal at sea (in consultation with Cefas) will be disposed of on land at appropriate waste facilities.

Effects of Vessel Movements and Underwater Noise

Summary of comments:

Respondents expressed concern that increased vessel traffic during dredging and operational phases would generate underwater noise affecting marine mammals (cetaceans and seals), contribute to air emissions reducing air quality, and increase disturbance within the SAC. Consultees noted the absence of robust acoustic modelling.

Response:

The EIA has robustly assessed the effects of vessel movements on underwater noise, disturbance to marine mammals, and emissions to air. These assessments included underwater noise propagation modelling, vessel traffic forecasts, and air dispersion modelling. The underwater noise modelling has been reviewed by Cefas technical advisors and deemed appropriate, and also noted that it was overly

conservative. The outcomes are documented in ES Chapter 8 Marine Ecology, and supported by a number of technical appendices.

Economic and social implications

Summary of comments:

The economic benefits of cruise were queried, citing minimal economic gains versus the environmental impacts. Concerns were raised with respect to the pressure on local infrastructure.

Response:

ES Chapter 19 Socioeconomics, assesses the socioeconomic impact of the proposed development and is supported by Technical Appendix 19.1 Economic Impact of the Proposed Redevelopment at Falmouth Docks. This sets out the economic benefits, along with an assessment of the impact of this on the local economy, including disruption effects. Overall, it is concluded that there are some significant beneficial impacts as a result of the proposed development in terms of the local economy (employment and economic output), with no significant adverse effects.