

RAMBOLL RESPONSE TO ST MAWES HARBOUR CONSERVATION TRUST

Project name **Falmouth Docks Redevelopment**
 Project no. **RUK2023N00104**
 Client **A&P**
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 Prepared by [REDACTED]

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Introduction

This note responds to the comments received from St Mawes Harbour Conservation Trust (Hereafter referred to as 'St Mawes HCT'). Fully summarised comments were provided by the MMO in Appendix 1 of their letter dated 03 October 2025. The subsequent sections of this memo provide our response to St Mawes HCT, and covers the following:

- Release of contaminated sediments
- Scientific and survey deficiencies
- Threat to protected habitats and species
- Inadequate assessment of environmental risks
- Air pollution, carbon emissions, and climate impacts
- Public health concerns
- Socio-economic and cultural impacts
- Legal non-compliance

Release of contaminated sediments

As recognised by St Mawes HCT, 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. Sediment curtains are not deemed effective in this location, and the existing proposed mitigation is deemed adequate in order to manage and mitigate effects.

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. The modelling shows that St Mawes Harbour and the maerl bed of St Mawes Bank is outside the Zone of Influence of the sediment dispersion and deposition resulting from the proposed development.

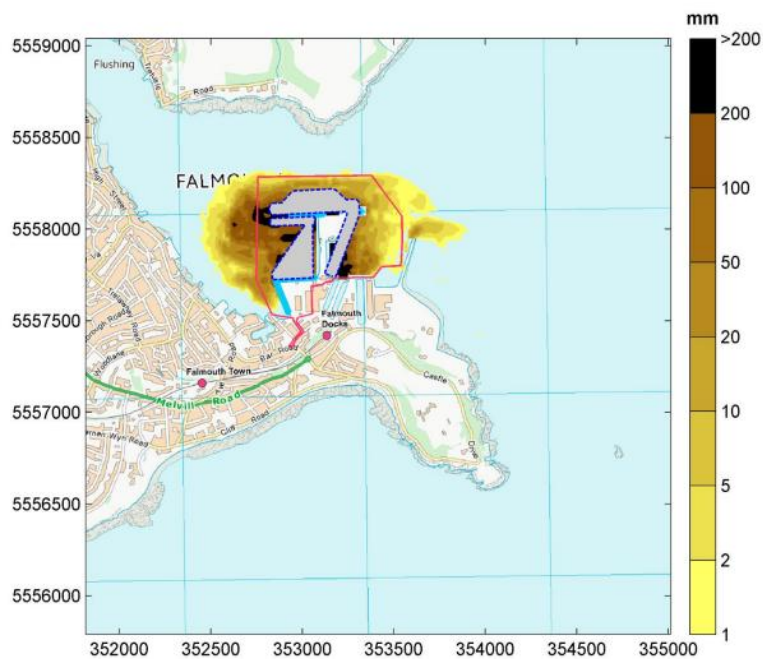


Figure 1 - Predicted fine sediment deposition resulting from proposed dredging works as a whole (dredging areas marked in grey)

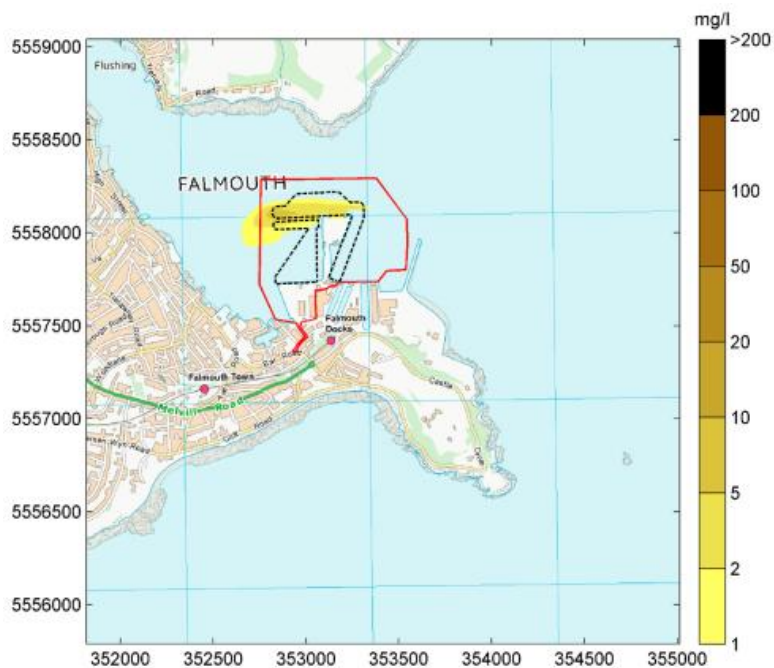


Figure 2 - Mean predicted increase in suspended sediment concentration, dredging in the north area (Queens Wharf) – worst-case area for SSC

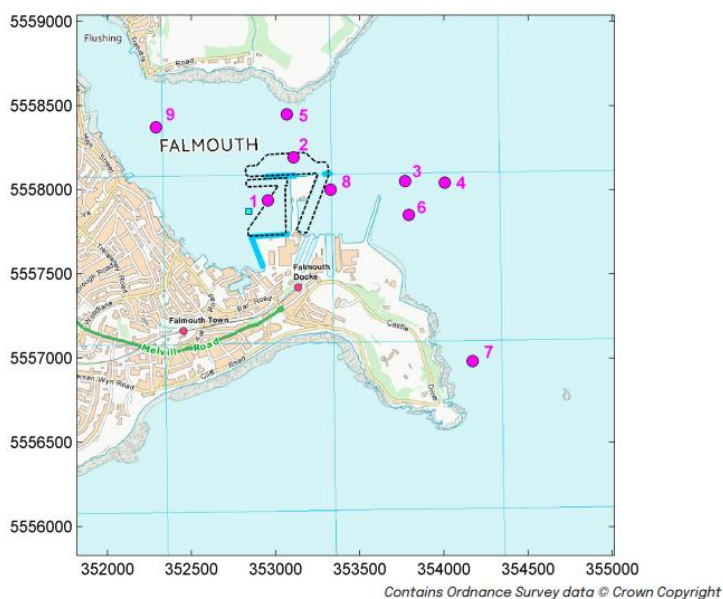


Figure 3 – Locations of time series data provided in Table 1

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.'

Scientific and survey deficiencies

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:

- 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

Threat to protected habitats and species

A Habitats Regulations Assessment, including information to support Appropriate Assessment, has been submitted as part of the marine licence and planning application. In addition, two addendums have been produced to respond to specific queries from Natural England. The assessment is based on robust evidence and concludes no adverse effect on site integrity with respect to the Fal and Helford SAC.

Inadequate assessment of environmental risks

Both sediment plume modelling and underwater noise modelling have been undertaken to inform the magnitude of impacts resulting from the proposed development. The associated technical reports have been reviewed by Cefas technical advisors to the MMO and deemed appropriate. Full Cefas comments are available for review via the marine licence case management system.

Air pollution, carbon emissions, and climate impacts

ES Chapter 15 (Air Quality) and ES Chapter 16 (Climate) assess related effects as a result of the proposed development, and conclude no significant effects with mitigation in place.

Public health concerns

The comments provided by St Mawes HCT are assessed within the following ES chapters, which conclude no significant adverse effects:

- ES Chapter 8 – Marine Water and Sediment Quality
- ES Chapter 9 – Marine Ecology
- ES Chapter 15 – Air Quality

Socio-economic and cultural impacts

The comments provided by St Mawes HCT are assessed within the following ES chapters, which conclude no significant adverse effects:

- ES Chapter 8 – Marine Water and Sediment Quality
- ES Chapter 9 – Marine Ecology
- ES Chapter 10 – Commercial Fisheries and Shellfisheries

Legal non-compliance

The EIA and HRA have been undertaken in line with their respective regulations and based on robust evidence and assessments. The scope of the EIA was agreed with the appropriate statutory bodies and regular consultation has been undertaken throughout the pre-application process to ensure a robust approach to the assessments.

Assessments and technical work to support the EIA and HRA have been undertaken by a team of experts in their field, as set out in ES Technical Appendix 1.2 Regulation 18(5)(b) Statement.

Regulation 18(5)(a) of the EIA Regulations requires a developer to ensure that an Environmental Statement is prepared by competent experts and Regulation 18(5)(b) provides that the Environmental Statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts. Technical Appendix 1.2 has therefore been prepared and sets out the competent experts appointed by the Applicant and their respective expertise and qualifications.