



**FALMOUTH
HARBOUR**

UK's Atlantic gateway.

Falmouth Harbour
44 Arwenack Street
Falmouth
Cornwall
TR11 3JQ

Tel: 01326 213537

Email: info@falmouthharbour.co.uk

Our Ref: FHC/MMO/MLA 2025 00157 - Falmouth Docks Development/25/VS

Via email

1st September 2025

Subject: MLA/2025/00157 - Falmouth Docks Development

Dear Yvonne

Falmouth Harbour (FH) have reviewed documents related to the above referenced MMO licence application. The table below reviews the responses to the queries Falmouth Harbour raised at the Environmental Impact Assessment Scoping phase and concludes whether additional information or query is required.

Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
The site location plan includes an area in the jurisdiction of Falmouth Harbour – to the east. FH think it would be better to define the scope of the study to a charted area so that the site location can be determined accurately and we can understand whether any of our waters / owned fundus are included in the site area.	The site boundary will lie within the FDEC area as provided within the charted plan as shown in Appendix 1.	Closed
COASTAL PROCESSES & SEDIMENT REGIME		
Page 25 – table 5-3 notes maerl as being a sensitive environmental receptor to increased suspended sediment concentration and increased fine sediment deposition due to dredging and demolition. This is agreed but FH would like consideration also for seagrass beds within the inner harbour at Flushing and also within the Carrick roads as this habitat is also sensitive to increased turbidity and is in similar	Chapter 6 of ES Volume 1 - The potential for suspended sediment to reach sensitive receptors, such as maerl beds and seagrass beds are considered in this chapter.	Chapter 6 of ES vol 1 - reports on the predicted changes as a result of the proposed development on water levels, currents, waves, suspended sediment concentration, sediment deposition and sedimentation. The chapter presents the predicted changes to coastal processes and sediment regime but does not assess the effect of these changes (such as on ecology and water quality). These effects are reported in



Falmouth Harbour
01326 213537

info@falmouthharbour.co.uk



01326 310990

welcome@falmouthhaven.co.uk



**FALMOUTH
PILOT SERVICES**

01326 213533

info@falmouthpilotservices.co.uk



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
proximity to the site as the live maerl beds already mentioned.	Technical Appendix 6.3: Sediment Plume Modelling. Assessment of the impacts of the predictions on the maerl and seagrass are covered in Chapter 9: Marine Ecology Chapter 9: Marine Ecology - This chapter reports on the likely marine ecology effects associated with the demolition and construction stage and operational stage of the proposed development. The conclusions drawn on page are that the modelled sediment deposition plume does not indicate that any fine sediment would settle out on areas of seagrass so there is no pathway for impact and this habitat is not considered further.	their respective technical chapters. Tech Appendix 6.3 provides spatial images of the predicted flume relating to 3 dredging scenarios. None of the scenarios show the plume extending over the Flushing Seagrass bed / St Mawes maerl bed. Assumptions within the report related to tidal flow seem to differ to tidal diamond information available on admiralty charts. Due to the sediment plume predictions, the Marine Ecology chapter has concluded that the dredging will not impact on the Flushing Seagrass bed. The assumption that seagrass will not be impacted is based on the sediment plume analysis. Due to differences in tidal diamond and modelled tidal flows FH request ongoing monitoring to ensure sediment plume predictions are correct once dredging commences and that works are stopped should any issues be identified and the methodology reviewed. This is similar to the monitoring requirements related to the Eastern wharf works previously completed.
Page 25 – table 5-4 Changes to tidal currents, wave conditions, sediment transport and patterns of erosion and accretion during operational life of the scheme. Can this also assess the potential	Chapter 6 of ES Volume 1 - The footprint of changes to tidal currents, wave conditions, sediment transport and patterns of erosion and accretion are described in this chapter and	See above comments in relation to seagrass and maerl. The conclusions drawn in chapter 6 are based on the modelling work conducted by HR



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
impacts of nearby infrastructure such as marinas and moorings as well as key habitats such as maerl & Seagrass. We have infrastructure including listed heritage quays, operational marinas and over 600 swing moorings. Changes to tidal currents could impact these through increased flow and accretion resulting in increased operational and capital expenditure.	associated Technical Appendices. The assessment of the impact of these changes on nearby infrastructure is presented in subsequent relative chapters, for example, Chapter 9: Marine Ecology. In relation to the infrastructure related inquiry, the following conclusions have been drawn detailed in Chapter 6: Operational Stage Tidal flow, wave and sediment transport models were run for the baseline environment (without the proposed development) and run with the proposed development in place, to predict changes to coastal processes and sediment regime as a result of the proposed development. The modelling provided the following results: • No effect on tidal water levels with the proposed development in place; • Some current speed increases for the flow passing the Western Wharf on both the ebb and flood tide, however these changes are small and transient; • Some current speed decreases associated with the increased cross sectional area with the dredging to the north of the proposed development; • Minimum change in wave heights at the proposed development (up to 0.35 m increase for a storm event); • Overall effect of the proposed development on suspended sediment concentrations is small; and	Wallingford with the same tidal flow assumptions detailed above. FH request bathymetry surveys of the inner harbour prior to and after the works are completed to check assumptions of the HR Wallingford modelling are correct. It may also be prudent to consider whether sediment sampling prior to and after works completion to ensure that any contamination caused by the dredging is recorded.



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
	The predicted change in infill volume for the overall port operational area is very small	
Page 25 table 5-4 maintenance dredging increased fine sediment deposition and increased suspended sediment – include seagrass as sensitive environmental receptor as per above reasons.	The potential for suspended sediment to reach sensitive receptors, such as maerl and seagrass are considered in this chapter and in Technical Appendix 6.3: Sediment Plume Modelling. The requirement for changes to the volumes and regularity of maintenance dredging is also considered. Assessment of the impacts of the predictions on the maerl and seagrass are covered in Chapter 9: Marine Ecology Chapter 9 has concluded that: Effects relating to maintenance dredging which would be minor adverse (not significant) for all benthic ecological communities; - Benthic habitats within the dredge footprint immediately post-construction have a low nature conservation value. Algal communities may develop in the dredge pockets and recover in a relatively short period of time (< 1-2years). The value/sensitivity of the re-colonised habitat would also be low.	Maintenance dredge volumes are significantly lower than the capital dredge volumes stated as 643,000m³ predicted to be around 8000m³ every 5 years. No modelling has been conducted on plumes associated with maintenance dredging. Would this still be able to use a back hoe dredger to remove material or would this need different methodology? Chapter 9 concludes impacts would be not significant however this assessment appears to only be relevant to the dredged areas and not the wider area that could potentially be impacted by dredge plume associated with maintenance dredging activities.
MARINE WATER AND SEDIMENT QUALITY		
Page 33 Table 6-2 we would ask that seagrass is included as a sensitive habitats as well as maerl in relation to increased suspended sediment concentration in water column during maintenance dredging due to the proximity and sensitivity of these habitats.	Chapter 9: Marine Ecology - All protected/sensitive habitats such as seagrass/maerl have been considered within this ES chapter, including assessment of the impact of the capital dredging proposed.	Ch 9 does not appear to have assessed the impact of raised levels of Cu, Zn, Pb, Hg, TBT etc is on the surrounding flora and fauna. Clarification on this would be appreciated. Is it inevitable that these contaminants eventually fall out of solution? If so, how likely are they to pollute sediments below



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
		the area of dispersal. Does this add to the contaminant loading of these sediments?
Also to note that suspension of contaminants into the water column may result in transportation to other local sediments outside of the site resulting in increased contamination levels impacting on other organisations ability to dredge to maintain safe navigational channels.	Dissolved contaminant plumes Contaminant release was simulated for Scenario 1 (all tide dredging) as a worst case. The EQS water quality threshold AA and MAC values for TBT are predicted to be exceeded in the dredging of all 3 zones: east, north and west and these exceedances are predicted to extend some distance from the site area. The AA values for Copper and Zinc are predicted to be exceeded during dredging in the east and west dredging zones, but only locally within the site area. The AA value for lead is predicted to be exceeded during dredging in the west dredging zone and the footprint of exceedance is predicted to be largely contained within the site area, with a small exceedance west of the site area (by 20 m). For all other contaminants/dredging zones the AA and MAC values are not exceeded. For Scenario 2 or 3, average contaminant concentrations in the water column can be expected to roughly halve.	FH are still not 100% clear on the potential impact dissolved contaminants will have on surrounding sediments including those within our harbour area. Recommend monitoring throughout dredge and testing of sediments is undertaken prior to (as an evidence benchmark), during after works have been completed to establish whether any contamination has occurred over and above current levels.



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
	Even with the expected reduction in average TBT concentration in the water column for Scenarios 2 or 3 the EQS water quality threshold AA and MAC values are still likely to be exceeded outside of the site area, although with a reduced footprint of effect.	
FLOOD RISK		
Falmouth Harbour would expect that the necessary Flood Risk Assessment would include impacts on local infrastructure outside of the site. Our own infrastructure and that of a number of local stakeholders are within close proximity of the proposed work site so changes to the docks infrastructure could potentially have an impact (positive / negative) on flood risk. This should be assessed, and potential impacts communicated to relevant stakeholders.	There is no expected significant impact.	Closed.
MARINE ECOLOGY		
Page 47 9.2.10 We would question the decision not to conduct marine mammal surveys. Marine mammals are regularly sighted in and around the planned development site throughout the year. Predominantly seals, dolphins and harbour porpoise. In addition certain seasons see significant changes in frequency of sightings, this needs consideration in relation to works methodology and timing. The following paragraph describes the current data so further clarification on decision not to survey would be of interest. Is it because sufficient	Chapter 9 It was considered that a dedicated marine mammal survey would not have provided significantly more information for the baseline of the marine ecology ES chapter than is readily available. The presence of marine mammals in the vicinity is acknowledged and significant extant survey information is available. A precautionary/conservative approach to the estimation of marine mammal abundance in the vicinity of the proposed development has been taken. It was considered that a dedicated marine mammal	Closed.



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
temporal data exists? If so clarification of the reasons behind this decision would be appreciated. Table 9-1 does not consider noise and disturbance from vessel movement, piling and dredging. Are there additional effects to consider associated with the removal of bedrock that would need to be considered here also? Have the methodologies been assessed at this stage or are they included within the definition of dredging? Further clarification in addition to use of back hoe dredger would be useful to enable full understanding. Table 9-2 vessel strike causing injury to marine mammals. Vessel strike would be an extreme rarity however more likely and cumulatively potentially equally of impact would be ongoing disturbance of marine mammals. This would be good to add and consider in line with the recent DEFRA guidance.	survey would not have provided significantly more information for the baseline of the marine ecology ES chapter than is readily available. The presence of marine mammals in the vicinity is acknowledged and significant extant survey information is available. A precautionary/conservative approach to the estimation of marine mammal abundance in the vicinity of the proposed development will be taken. No further surveys are therefore deemed necessary given this precautionary approach. Disturbance to marine mammals will be included within the ES. Low-level noise such as that generated by vessels is acknowledged to be a disturbance to marine mammals and will be assessed in the noise and vibration section Table 9-1 of the scoping report states that noise and disturbance from vessel movement, piling and dredging will be assessed in the Marine Ecology ES chapter. Specifics relating to impacts of particular dredging methodologies are included in this ES chapter. The consideration of disturbance to marine mammals is included within this ES chapter. Low-level noise such as that generated by vessels and dredging, and impulsive sound from piling have been assessed in this ES chapter. The project has committed to JNCC 2010 guidance to minimise	



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
	injury to marine mammals from underwater sound.	
COMMERCIAL FINFISHERIES AND SHELLFISHERIES		
Page 51 Table 10-1 this table seems to consider impacts just within the site boundary. The impacts of these works potentially extend further than that, particularly with regards to suspended sediments therefore should an increased area be considered to ensure all impacts are adequately considered and mitigated. This may be being assessed within the ecological section for the relevant habitats for spawning etc? If so this would benefit from clarification.	Impact on fisheries has been assessed in the ES	Closed.
HERITAGE		
Page 69 heritage – Custom House Quay, North Quay and Environs are listed structures and not specifically mentioned / detailed in fig. 13-1. Falmouth Harbour are concerned that construction could affect/damage these in particular piling / excavation close to assets and therefore consider that this area should be in scope for impact assessment and mitigation as necessary.	As grade II listed buildings N Quay and CH Quay have been assessed in the following document: ES_Vol2_TA12.2_GPA3_Exercise_and_Technical_Note Step 1 of the approach is to 'identify which heritage assets and their settings are affected'; Step 2 requires assessment of 'the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated'; Step 3 is to 'assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it'; Step 4 is to explore ways to 'maximise enhancement and avoid or minimise harm'; and	Quays are considered to have a high significance based on grade II listed status. The proposed development is not expected to have a significant impact as 'the ability to experience the relationship between the quays and waterway as facilitating their development and role as elements of a historic port area would be unaffected.' The demolition and dredging phase is also not expected to have an impact on the quays. Closed.



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
	Step 5 is to 'make and document the decision and monitor outcomes'. Concluded that the quays required further assessment and have been included in the ES to assess whether the development would have an effect on them. ES_Chapter 12_Heritage assessed the impact of the development on CHQ, NQ and KCQ during operation the following impacts and effects have been assessed: Custom House Quay, King Charles Quay, North Quay and Quay Walls and Steps (Grade II* Listed Building), Quay Walls (Grade II Listed Building) and Quay Walls and Pier (Grade II Listed Building) - Not significant negligible adverse effect	
NAVIGATION AND RECREATION		
FH are disappointed that we (or the Pilots LLP) have not been consulted in defining the scope. That is clearly the intention described in the document; however these key organisations are not included as critical consultees. This is key due to the close operational relationship with the docks required to maintain navigational safety of the area including access to and from the docks (the site).	Consultation has been conducted.	Closed.
NOISE & VIBRATION		
Falmouth Harbour operate a marina, anchorage and moorings near to the potential works site. Visitors and residents come to Falmouth for holidays and to relax. We are concerned about	Technical Appendix 14.1 – 14.4: Noise and Vibration Quay Street was selected as unattended survey locations to establish what the ambient,	This is still a concern in relation to the customer experience at the FH marina & moorings throughout the inner harbour.



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
the additional noise these works may produce over potentially quite an extended period as works are likely to be staged. We regularly receive noise complaints that come to us in the first instance so are aware of noise impacting local residents. We feel it would be wise for further investigation and investment in noise abatement as a mitigation to be considered wider than the proposed 250m zone.	background and typical maximum noise levels are at the nearby sensitive receptors. This document establishes baseline noise levels and sets plant noise levels. No conclusions were made in relation to the increased noise levels that are predicted throughout the works.	FH would be grateful for additional information on the expected increased noise levels that will be experienced at the marina and information on any planned noise abatement in particular if any works are carried out after hours or at particularly busy summer season
LANDSCAPE, SEASCAPE AND VISUAL AMENITY		
Falmouth Harbour own the historic quays overlooking the docks area. There is an area described in the document as the following ' <i>Character area 3, The waterfront (approximately 300 m from the site at the closest point), where "historic topography and fabric form a striking and distinctive area of townscape, both from land and water. Large-scale modern developments are visually prominent but the area is particularly notable for the fine grain, diversity and charm of its historic components."</i> ' We would be grateful if you would confirm that the above described area includes Custom House Quay and North Quay. If this area does not include these quays we respectfully ask that this area is included within the scope of the EIA as it will have a direct view of the proposed changes.	See Heritage section above.	Closed.
SOCIOECONOMICS		
In section 22-3-3 Table 22-3 does not address the potential negative impacts the works may	ES_Vol1_Ch19_Socioeconomics The potential effects (beneficial and adverse) of the proposed	The impact on FH marina & mooring customers could potentially be significant at times



Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
have on local and regional tourism. The site works will likely put some visitors off. Particularly in the summer months and restrictions around the works may result in events going elsewhere. We respectfully ask that this impact is considered within the EIA.	development on the visitor and tourist economy has been assessed at local, district and regional levels. ‘The demolition and construction activities on site would have the potential to create impact upon tourist and visitor experience because of noise, visual and other construction related environmental impacts. The site and wider Falmouth docks site is not accessible to the public and these impacts would be experienced by visitors and tourists from some distance away at tourist and visitor attractions within and around Falmouth. In terms of cruise passengers disembarking for day visits, these passengers are taken straight to visitor attractions via coach direct from the port, and therefore any disturbance would be temporary. Potential noise, visual and other construction related impacts would also be subject to environmental controls through the construction management process and this mitigation would reduce impacts.’ Impact of demolition and construction: No direct disruption to cruise visits or decrease in cruise visitors, however demolition and construction activities may negatively impact tourist/visitor experience, resulting in a minor adverse (not significant) effect at a local level and negligible adverse (not significant) effect at	because of increased noise and perceived visual impact. FH would be grateful for additional information on the expected increased noise levels that will be experienced at the marina and information on any planned noise abatement. It may be advisable that works are not carried out during peak holiday season Mid July- August as a mitigation.

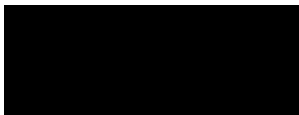


**FALMOUTH
HARBOUR**

UK's Atlantic gateway.

Query raised @ EIA Scoping stage	Environment Statement response	Conclusion
	district and regional levels. A temporary effect on local visitor accommodation due to construction workers could become significant during summer (peak holiday season). This will need to be monitored.	

Yours sincerely



Environment and Systems Quality Manager