

Marine Management Organisation  
NEWCASTLE UPON TYNE, NE99 5BN

Reference: DC-2025-124989/04  
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07 August 2026

## **Falmouth Docks Development**

**SW 87371 28816 Falmouth Docks, Cornwall**

Dear Yvonne Golightly,

Thank you for contacting us.

This is our response to your consultation MLA/2025/00157.

Thank you for the additional information submitted in response to the Environment Agency's previous request for further information regarding the proposed piling works.

The Environment Agency has reviewed the additional information provided and welcomes the applicant's continued engagement in developing an alternative mitigation-based approach to reduce the potential impacts of piling on migratory salmonids.

Having reviewed the submission, our Fisheries & Biodiversity specialists remain of the view that there is still limited consideration of the potential behavioural impacts of construction activity on migratory salmonids, with the assessment continuing to focus primarily on Temporary Threshold Shift (TTS), physical injury and mortality.

However, the modelling indicates that the proposed use of bubble curtains has the potential to significantly reduce the predicted acoustic impact associated with the piling works, provided the mitigation is implemented as assumed within the assessment.

The Environment Agency therefore considers that an evidence-led mitigation approach remains an appropriate pathway for this application. However, our position remains that we must be satisfied that an appropriate mitigation methodology can be

agreed prior to determination and that it is capable of reducing the identified risks to an acceptable level.

To provide confidence that the proposed mitigation can be consistently implemented throughout the construction programme, the detailed piling method statement should:

- provide a single overarching methodology applicable to all contractors and subcontractors undertaking the piling works;
- clearly define the mitigation measures to be implemented, including operational controls, sequencing of works and any agreed tidal timing measures;
- include the final specification and operational requirements for the proposed bubble curtain mitigation;
- clearly identify the contingency measures to be implemented where any element of the agreed mitigation cannot be delivered as anticipated, including where bubble curtains cannot be deployed or are demonstrated to be ineffective under site conditions;
- set out the proposed acoustic monitoring strategy, including further consideration of the use of Passive Acoustic Monitoring (PAM), or provide a clear justification where an alternative monitoring methodology is proposed, together with an explanation of how the monitoring results will be used to inform construction activities;
- clearly define any monitoring trigger levels, the adaptive management measures that would be implemented where those trigger levels are exceeded, and the process for reviewing or modifying construction activities where necessary; and
- be approved prior to commencement of the relevant works, with any material amendments subject to approval by the Marine Management Organisation following consultation with the Environment Agency.

The Environment Agency would welcome the opportunity to review the detailed piling method statement prior to its approval, as there may be further opportunities to refine the methodology, including the timing of works around tidal conditions and the monitoring arrangements.

Subject to the above, the Environment Agency remains supportive in principle of an evidence-led mitigation approach in place of a blanket seasonal restriction, provided the final methodology demonstrates that the risks to the recovering Atlantic salmon population have been reduced to an acceptable level.

Yours sincerely,

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