

Underwater Noise

On page 316, the report states that “underwater noise levels expected during TSHD use are likely to fall within the range experienced with passing vessels, although it will be sustained for as long as dredging is ongoing (a period of approximately four months)”. Page 317 then states that “the TSHD campaign is predicted to last for approximately four weeks”. Please can the duration of the proposed dredging works be clarified?

Coastal Processes

- Disposal assessments do not present the maximum bed thickness change due to the sediment disposal, though this would be the most important coastal process impact. In contrast to all other data presented, deposition at the disposal site is presented for a single disposal event only (Figure 6.65), but the key data required is the maximum total bed level change from the cumulative disposal of the entire dredge load. This should be presented and discussed with respect to the licensed disposal site.
- The ES appears to make limited specific mention of the rock bed created in the berthing pocket (other than in terms of bed area lost). In view of the potentially large changes in flow velocity (see following comment), should the dynamic consequence of the change in bed substrate also be addressed e.g., does the potentially accelerated deposition due to flow velocity reduction impact the future dredge requirement in this area?
- Flow speeds due to scheme are described as being reduced by ‘only’ 5-10cm/s, but this is not discussed in terms of actual flow speeds at the site, and it appears that this may be up to 50% reduction? Dredging of the turning circle is also reported as having no hydrodynamic impact, which seems counter-intuitive. The applicant should provide a clear description of the baseline case and indicate the magnitude of the change relative to the present. The dredged pocket and area of affected flows appears to occupy the full width of the channel and therefore may have consequences on both banks, leading to a possible long-lasting change, in turn affected by future climate-induced changes. Cefas are concerned that you have not justified your conclusions of the significance of this specific impact sufficiently.

Fisheries

Further information and modelling is requested in order to inform the assessment and to determine whether additional mitigation measures are required. Listed the information required below:

- Revised modelling of the plume that takes into account other dredging activity which may be occurring concurrently
- Clarification on the proposed exact times (i.e. months) of dredging works so that the likelihood of potential impacts to fish receptors can be more accurately assessed
- Recommend that the you consider the feasibility of undertaking dredging works outside the peak upstream migration season for salmon (July-August).

- Cefas recommend that you present a revised sediment dispersion model that includes the dredging proposed for NGCT and regular maintenance dredging (i.e. dredge material quantities, times and locations). This would enable Cefas advisors to evaluate the adequacy of the proposed measure of limiting dredging to one side of the river at a time and better determine the likelihood of potential cumulative effects to fish.
- Cumulative impacts have been correctly considered within section 27 of the EIA report (document 4). However, Cefas note that the Net Zero Teesside (NZT) is missing from the list of projects identified in the vicinity of the proposed scheme (Table 27.1). The NZT site, if consented, will comprise works affecting marine receptors in the river Tees therefore, Cefas would expect this project to be included and further assessed.

Benthic

- A dedicated survey has been conducted during 2020, the data from which were not available at the time of writing the EIA report. It is presently assumed that the benthic communities within the proposed project area are comparable to those previously observed in the nearby sampling stations of the NGCT (Northern Gateway Container Terminal) survey in 2019. While this is fine in principle, Cefas assume there is the capacity for the understanding of the baseline, and the associated assessment of impacts, to be revised within the EIA process should the new data not support those of previous findings. Can you please confirm this is the case?
- Given that mudflats are a UK Priority Habitat, Cefas would assume they would be regarded as 'high' sensitivity. Given this, the risk assessment process would conclude an overall significance would be 'moderate adverse'. Cefas suggest you provides a greater rationale to support the 'medium' sensitivity given.
- It is stated that there is predicted to be an increase in the tidal prism of 0.8% and that this is considered to be of low magnitude. However, while a prism change of 0.8% may seemingly appear small, there is no evidence to indicate what effect this 0.8% change will have on the extent of intertidal vs subtidal area. Is there any evidence of this in the EIA report to quantify this which may therefore be used to support the conclusion of low magnitude?

Dredge & Disposal

Conclusions about sediment quality largely rely on the assessment of previous licensing sample data as discussed in points 13 - 15. These conclusions adhere to the respective Cefas licence consultations under MLA/2018/00555 (Joe Perry, 28th February 2019), MLA/2019/00469 and MLA/2020/00079 (Joe Perry, 29th April 2020), in that the applicant recognises the Tees river's known presence of hydrocarbons and other organic pollutants (like Polybrominated Diphenylethers (PBDEs)). This presents an adequate characterisation of the general Tees area, but as detailed in previous comments, the data presented are not appropriate to characterise the South Bank project area. You state that you have sought sampling advice (SAM/2020/00026) for these works and are collecting data. Therefore, the evidence base is not complete until these data are provided.