

## Note / Memo

**HaskoningDHV UK Ltd.  
Industry & Buildings**

To: Marine Management Organisation (MMO)  
From: Royal HaskoningDHV  
Date: 22 February 2023  
Copy: Teesworks  
Our reference: PC1084-RHD-EN-SB-ME-EV-1144  
Classification: Confidential  
Checked by: Matt Greaves, Chris Adnitt

**Subject: MLA/2022/00506/2 South Bank Quay Further Information Request 20  
Response**

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## 1 Introduction

A variation request (herein referred to as 'MLV2') for the following amendments to marine licence for Phase 1 of the South Bank Quay redevelopment (L/2021//00333/2) was submitted to the Marine Management Organisation (MMO) on 4 October 2022 for determination:

- An additional 231,000m<sup>3</sup> of material to be disposed of at sea (which was originally to be removed by land-based plant and disposed to land);
- An additional 29,000m<sup>3</sup> of material to be dredged from the Tees Dock turning circle;
- An additional 416,000m<sup>3</sup> of material to be dredged from the channel and berth pocket (which was to be originally removed by land-based plant); and
- Minor amendments to the wording of the licensed activity relating to the placement of rock within the berth pocket and the licensed activities relating to dredging to account for dredging tolerances.

Following a period of consultation, MMO have published a Further Information Request (RFI 20) in light of a third-round of comments received from their scientific advisers at the Centre for Environment, Fisheries and Aquaculture Science (Cefas) on the material submitted in response to a previous Further Information Request (RFI 19). The following Cefas teams provided comments on the response to RFI 19:

- Fish and Fisheries team;
- Shellfish team; and
- Benthic team.

This note sets out the Applicants position in relation to each of the comments received from each of the specialist teams within Cefas in turn. The following sections within this note set out the comment received from Cefas, the corresponding action requested by MMO and the Applicants response.

## 2 Benthic Ecology

### 2.1 Item 1

#### Cefas Comment

In Section 5.2 of the document PC1084-RHD-SB-EN-NT-EV-1142 MLA/2020/00506/2 South Bank Quay MLV2 Appraisal of Environmental Effects, it states “Given the changes requested as part of MLV2 apply to construction activities only, operation effects are not considered further within this section”. I cannot currently decide whether the changes to the dredging amounts and locations under MLV2 will bring about different indirect effects associated with altered hydrodynamic conditions which may result in modified changes to the erosional/depositional characteristics of the area relative to the original marine licence. ***Can the applicant please confirm that this has been considered and that such operational (indirect) effects associated with MLV2 have been considered and can be ruled out?***

#### Action Requested by MMO

Please confirm that operational (indirect) effects on benthic ecology associated with MLV2 have been considered and can be ruled out.

#### Applicant's Response

The Applicant confirms that the material that would have been excavated to land is now proposed to be dredged under MLV2. Therefore the final profile of the berth will remain the same as was assessed. As such, there is not anticipated to be any change in the final operational arrangement (as illustrated by the supplementary materials provided in **Appendix A**) and therefore no change to the operational effects on benthic ecology assessed within the original EIA.

### 2.2 Item 2

#### Cefas Comment

In Section 5.2.1, it states “However, the confidence in this habitat classification is low according to Defra’s MAGIC interactive mapping tool. This confidence level is supported by reviews of site observations, habitat surveys and photographs, which have identified that areas classified as mudflat are often not actually mudflat”. ***Can the applicant provide greater clarity on the robustness of this evidence? Can the photographs be provided?*** This is important as the applicant is indicating that the observed habitat is not actually the mudflat as predicted and the significance of impact of habitat loss is pivotal on this assertion.

#### Action Requested by MMO

Please provide greater clarity on the robustness of evidence described in section 5.2.1 of PC1084-RHD-SB-EN-NT-EV-1142 MLA/2020/00506/2 South Bank Quay MLV2 Appraisal of Environmental Effects. Can the photographs be provided?

#### Applicant's Response

The Applicant considers that this comment relates to work previously undertaken for the original EIA Report submitted in support of the now-approved original marine licence application. The Applicant therefore does not consider this point to be of relevance to the determination of MLV2.

The Applicant notes that there has been no change to the profile or design of the new quay wall (it is only the method of removal of sediment that has changed). Therefore, no change in the final operational

arrangement or habitat to be lost is anticipated as a result of MLV2 (please refer to the supplementary material provided in **Appendix A** illustrating the footprint of the berth assessed within the original EIA Report and at the time of applying for MLV2).

The area applied to be dredged instead of excavated by land-based machinery under MLV2 is an area of made ground overlying geological material. The proposal under MLV2 is to excavate the made ground material and dispose of this to land, then dredge the geological material for disposal at the licenced Tees Bay C offshore disposal site.

The photo below, taken from the original EIA Report (Plate 9.1), shows the habitat is not mudflat.



*Figure 2.1 The intertidal area to the south of the existing pier structure near the pumping station, showing poor quality of habitat and limited colonisation and species diversity (taken from Plate 9.1 of the original EIA Report).*

## 2.3 Item 3

### Cefas Comment

In Appendix D of the above-cited report, the updated modelling outputs infer that the physical impacts associated with placement of dredged material at random locations within the disposal sites are reduced compared to continued placements at the same location. Thus, will there be a licence condition for the applicant to ensure that each placement is 'strategic' (gridded or otherwise) within the disposal site if the modelling does indeed support this?

### Action Requested by MMO

Consideration of a condition that requires strategic placement of disposed material within Tees Bay C disposal site.

#### Applicant's Response

Whilst the decision to introduce a condition relating to the strategic placement of material disposed at Tees Bay C disposal site is for MMO to decide, if the addition of a condition to this effect addresses Cefas' concerns the Applicant would be happy to accept this request. Placing material evenly over the site would avoid the build-up of material in any one area, as could occur if material was always disposed at the same location within the disposal site. As observed on other marine licences including disposal as a licensed activity, the following standard marine licence condition wording is offered as a suggestion for the purposes of aiding and expediting the decision making process for the MMO:

*During the course of disposal, material must be distributed evenly over the Tees Bay C disposal site.*

*Reason: To ensure an even spread of material is achieved over the area of the disposal site in order to avoid shoaling and minimise risk to navigational safety.*

The Applicant notes that the River Works Licence issued to the Applicant by the statutory harbour authority (PD Teesport) includes as part of the legal agreement the Contractor's method statement which identifies the method of disposal and record-keeping of disposal locations and quantities, as follows:

*The location and amount of discharged material will be recorded by means of the Daily report from the discharging vessels. The disposal area will be divided into dumpboxes to ensure an evenly distribution of material over the disposal area.*

## **3 Shellfish**

### **3.1 Item 4**

#### Cefas Comment

The applicant has provided further information on changes in marine water quality and direct loss / alteration of habitat and food sources in the note MLA/2020/00506/2 South Bank Quay MLV2 Appraisal of Environmental Effects. Sections 4.2.1 and 4.2.2 of the note are focused on finfish and do not provide direct information regarding shellfish. The applicant concludes that the effect of changes requested under MLV2 would not result in any material change to the significance of effect recorded at the time of writing the EIA Report with respect to shellfish receptors (minor adverse).

#### Action Requested by MMO

Sections 4.2.1 and 4.2.2 of the note are focused on finfish and do not provide direct information regarding shellfish.

#### Applicant's Response

The Applicant notes that, as currently written, the Cefas comment or MMO action note do not request a response or indicate any concern in relation to the conclusion of potential effects upon shellfish. However, the Applicant notes the erroneous reference to shellfish within section 4.2.1 and 4.2.2 of the South Bank Quay MLV2 Appraisal of Environmental Effects and confirms that shellfish has been included within the benthic ecology section.

## 3.2 Item 5

### Cefas Comment

Title of Table 4.2, “Summary of findings from the original EIA Report and with consideration of MLV2 with regard to effects on fish” (p10, PC1084-RHD-SB-EN-NT-EV-1142). The topic of table mentions fish and shellfish.

### Action Requested by MMO

Update Table 4.2, “Summary of findings from the original EIA Report and with consideration of MLV2 with regard to effects on fish” (p10, PC1084-RHD-SB-EN-NT-EV-1142). The topic of table mentions fish and shellfish.

### Applicant's Response

Please refer to the Applicant's response to Item 4 above. The Applicant notes that the reference to shellfish within Table 4.2 has been made in error and consideration of shellfish is made within the benthic ecology section of the South Bank Quay MLV2 Appraisal of Environmental Effects.

## 3.3 Item 6

### Cefas Comment

On page 12 (PC1084-RHD-SB-EN-NT-EV-1142), the applicant mentions “Epifaunal surveys identified that the most abundant species was shrimp. *C. maenas* and *A. alba* were also abundant.”. I would like to note that *C. maenas* should be identified as a crab in this sentence. I acknowledge that is correctly identified in the rest of the note.

### Action Requested by MMO

*C. maenas* should be identified as a crab on page 12 (PC1084-RHD-SB-EN-NT-EV-1142).

### Applicant's Response

The Applicant notes that *C. maenas* and *A. alba* were being described as just abundant, whereas shrimp were identified as the most abundant species.

## 4 Fish and Fisheries

### 4.1 Item 7

#### Cefas Comment

Section 4.2.2 of document PC1084-RHD-SB-EN-NT-EV-1142 discusses direct loss and alteration of habitat and food sources as a result of the removal of existing structures obstructing the construction of the scheme. The Applicant considers that direct loss and alteration of habitat and food sources as a result of the removal of existing structures, is “offset by the relatively small area of such habitat being affected (~2ha) and the fact that numerous other intertidal locations and sheltering structures exist within the vicinity and wider Tees estuary”. However, there is no discussion of the effects of direct loss and alteration of riverbed habitat as a result of dredging activities within this section. In my opinion, this is not a suitable assessment of the effects of direct loss of habitat and alteration of habitat, as the total area of habitat impacted by the planned activities (i.e., including riverbed habitat affected by dredging) is not assessed.

Given that MLV2 is proposing that an additional 445,000m<sup>3</sup> of material be dredged (29,000m<sup>3</sup> of material from the Tees Dock Turning Circle, and 416,000m<sup>3</sup> from the channel and berth pocket), a much

clearer explanation of the total area of habitat impacted is needed. I recognise that a brief summary of the marine licence and subsequent applications is provided within document 5 (Table 1.2), however this does not include numerical values of the area of habitat impacted, nor the dredge volumes permitted at each stage. I ask that the Applicant please provide a table which presents specific values for the worst-case scenarios of the total area of habitat lost or altered (inclusive of dredging activity and other activities), alongside the total amount of material proposed to be removed, under the environmental statement (ES), MLV1 and MLV2. Given the number of changes made and consultation cycles held since the original application, in my opinion, it is necessary to demonstrate how the scope of the works and associated dredging activity has changed between the original ES and subsequent variations (an example of the type of table needed is provided in Annex 2).

#### Action Requested by MMO

Please provide a table presenting the specific values for the worst-case scenarios for the total area of habitat lost or altered, alongside the total amount of material proposed to be removed, under the original EIA (ideally the values presented as a total assessed under the EIA, and values for Phases 1 and 2 separately), as well as MLV1 and MLV2.

#### Applicant's Response

The Applicant notes there is no change in the footprint of material to be removed (or therefore affected habitat) by MLV2 and reiterates that the following points:

- There has been no change to the profile or design of the new quay wall (it is only a change in the method of the removal of sediment under MLV2) and therefore no change in the final operational arrangement (please refer to the supplementary material provided in **Appendix A**);
- The changes requested under MLV2 relate solely to construction methods, specifically changing the method of removing bank material from land-based excavation to dredging; and
- The area applied to be dredged instead of excavated by land-based machinery under MLV2 is an area of made ground overlying geological material. The proposal under MLV2 is to excavate the made ground material and dispose of this to land, then dredge the geological material for disposal at the licenced Tees Bay C offshore disposal site.

The Applicant's position, therefore, is that the conclusions of the original EIA Report with respect to the assessment of direct loss and alteration of habitat and food sources remains unchanged.

Furthermore, it is considered that this comment relates to work previously undertaken for the original EIA Report submitted in support of the now-approved original marine licence application. The Applicant therefore considers this point irrelevant to the decision process of MLV2.

## **4.2 Item 8**

#### Cefas Comment

Cefas fisheries advisors have raised concerns in relation to impacts on fish from increased suspended sediment concentrations during previous consultations, and I noted in my previous advice that "it would be helpful if the Applicant could please provide a more detailed reassessment or discussion of how the additional dredged material is likely to compare with the suspended sediment concentrations and plumes modelled within the original EIA, in order for me to determine whether impacts from the proposed variation are sufficiently negligible". I note from recent advice by Cefas Coastal Processes advisors (provided during consultation for MLV1 in relation to the Hydrodynamic and Sediment Plume Modelling Technical Note), that "the Applicant has stated that the overall footprint within the river is reduced (due to

considering only Phase 1) so the impacts are reduced relative to those previously assessed. I wish to note that it is not clear if the overall impact of phase 1 and 2 will have increased relative to the ES". I agree that it remains unclear whether the combined dredge volumes of Phase 1 and Phase 2 (inclusive of the additional dredge quantities proposed under MLV2) will remain within the scope of the original EIA assessment. I recognise that the Applicant has provided the Hydrodynamic and Sediment Plume Modelling Technical Note within this consultation, however, to the best of my knowledge this document was prepared in support of MLV1 and it is unclear whether the additional dredge quantities proposed under MLV2 are adequately reflected in this assessment. As such, I am not certain that my original concern has been adequately addressed, and I would ask the Applicant to please provide a side-by-side comparison of the suspended sediment concentrations and plumes modelled within the original EIA, with the most up to date modelling which take into account the additional dredge volumes. Please refer to comment 20ii below for further detail. Please note that I am not recommending additional modelling is necessary at this stage.

#### Action Requested by MMO

Please provide a side-by-side comparison of the suspended sediment concentrations and plumes modelled within the original EIA, with the most up to date modelling which take into account the additional dredge volumes.

#### Applicant's Response

The updated modelling note submitted in support of MLV1 included the material that was previously to be excavated from the landside but is now included within the additional dredge and disposal volumes within MLV2. It also used the same dredge methodology to be used to remove the additional volume of sediment applied for within MLV2. Therefore, given that the material type and dredge methodology has already been modelled, the sediment plume should not be any more extensive than that already assessed (as submitted in support of MLV1).

*Table 4.1 Summary of dredge, disposal and landside material excavation volumes assessed and with the variation requests. Note the difference between dredge and disposal volumes arises due to the requirement to dispose of an area of contaminated dredge material to land.*

Activity	EIA Report (m <sup>3</sup> )	EIA Report -Phase 1 (m <sup>3</sup> )	EIA Report - Phase 2 (m <sup>3</sup> )	MLV1 (m <sup>3</sup> )	MLV2 (m <sup>3</sup> )
Dredging	Total 1,800,000 <sup>1</sup> Increased to 1,980,000 for the marine licences  Comprising 187,000 within the turning circle and 1,793,000 within the channel & berth pocket	Total 820,000 <sup>1</sup> Increased to 902,000 for the marine licence  Comprising 187,000 within the turning circle and 715,000 within the channel & berth pocket	Total 980,000 Increased to 1,078,000 for the marine licence	Same as EIA Report Phase 1 column (902,000)	Total 1,347,000 Representing an increase of 445,000  Comprising 902,000 from Phase 1, an additional 29,000 within the turning circle (to account for dredging tolerances) and 416,000 for the landside material

Activity	EIA Report (m <sup>3</sup> )	EIA Report -Phase 1 (m <sup>3</sup> )	EIA Report - Phase 2 (m <sup>3</sup> )	MLV1 (m <sup>3</sup> )	MLV2 (m <sup>3</sup> )
Disposal	1,800,000 <sup>1</sup>	820,000 m <sup>3</sup> <sup>1</sup>	980,000 m <sup>3</sup> <sup>1</sup>	The hydrodynamic and sediment plume modelling report took into account (i.e. pre-empted) the increased disposal volumes requested under MLV2. The modelling accounted for 1.235 million m <sup>3</sup> of material to be disposed offshore (requested under MLV2).	1,133,000 m <sup>3</sup>

Following discussions with the MMO and Cefas on RFI 20, the Applicant notes concerns regarding the potential for cumulative dredge and disposal volumes of Phase 1 and Phase 2 of the South Bank Quay project to exceed the total dredge and disposal volumes assessed within the original EIA Report. It was agreed that, in the event cumulative dredge and disposal volumes associated with Phase 1 and Phase 2 of the project approach or exceed the total volumes originally assessed within the EIA Report, the Applicant will liaise with the MMO to understand what is required to apply for increased dredge and disposal volumes. It is understood that an EIA Report may be required to be submitted in support of a marine licence variation request or new marine licence application for Phase 2 of the project.

### 4.3 Item 9

#### Cefas Comment

Document PC1084-RHD-SB-EN-NT-EV-1141 MLA/2020/00506/2 South Bank Quay Further Information Request 19 Response section 3.6, states that “as noted in the Hydrodynamic and Sediment Plume

<sup>1</sup> A 10% uplift on the disposal volumes was agreed with MMO during the determination of the original marine licence application.



Modelling Technical Note submitted to support Variation 1, the capital dredging with the CSD will take approximately 9 weeks. This duration does not account for any weather delays. The current CSD programme for the work starts on 30th January 2023". The Applicant's response directs me to the Hydrodynamic and Sediment Plume Modelling Technical Note provided as Appendix D in document 5 in which an overview of the proposed dredging schedule for MLV1 is presented in section 3.4.2. The technical note details how 1.2 million m<sup>3</sup> of bed material is to be dredged over the nine-week dredging period, however, the dredging schedule provided relates to dredging activities permitted under MLV1. To my understanding, as changes to the quantity of material to be dredged were not requested under MLV1, the dredging schedule provided does not reflect the additional dredge quantities proposed under the current variation (MLV2). It remains unclear as to whether a higher intensity dredging schedule will be implemented in order for the dredging to be completed within the quoted 9 week timeframe, or whether a longer dredging schedule will be required to remove the new total volume of material (i.e. including the additional material proposed under MLV2). I recommend the Applicant presents a table detailing how they expect to remove the total dredge volume for Phase 1 of the project (which clearly indicates the additional volumes proposed under MLV2) or provide a clear explanation of how and where the additional volume has already been accommodated within the dredging schedule provided, if this is the case.

#### Action Requested by MMO

Please present a table detailing how you expect to remove the total dredge volume for Phase 1 of the project (which clearly indicates the additional volumes proposed under MLV2). The dredging schedule provided in Table 3-3 of Appendix D in PC1084-RHD-SB-EN-NT-EV-1142 may be used as a template but this table should not be recycled. There must be clarification of where or how the additional dredge material proposed under MLV2 is accounted for within the dredging schedule provided in Table 3-3, if the additional material has already been included in the schedule.

#### Applicant's Response

The hydrodynamic and sediment plume modelling report took into account (i.e., pre-empted) the increased disposal volumes requested under MLV2. The modelling report submitted in support of MLV1 states that the updated report has taken account of:

*inclusion of currently landside soils (i.e. soils within the riverbank) within the proposed dredging campaign (it should be noted that consultation with the MMO is being undertaken to determine whether this is a feasible approach, however the modelling has conservatively assumed that it will be acceptable to MMO)*

Therefore, the 9-weeks specified within the hydrodynamic and sediment modelling report reflects the anticipated programme to undertake dredging of the additional volume applied for under MLV2 (weather permitting).

## **4.4 Item 10**

#### Cefas Comment

Previous comments provided by Cefas fisheries advisors, in relation to the cumulative impact assessment in the original EIA for South Bank Quay (SBQ), identified a number of other projects with dredging elements (including the Northern Gateway Container Terminal (NGCT), Anglo American Harbour Facilities (AAHF), and Tees GasPort which was under application at the time of writing the SBQ EIA, among others) which may interact cumulatively. To the best of my knowledge these concerns were not directly addressed in subsequent consultations. In my opinion, the MMO's acceptance of the

Applicant's letter (Appendix A of document 6), electing to comply with option b of licence condition 5.2.13, is not a sufficient answer to my original concern. The reason for this is, firstly, the wording of condition 5.2.13 considers that simultaneous capital dredging campaigns by SBQ and the NGCT to remove material from the Tees estuary are permitted, provided that the total quantity of material to be disposed of does not exceed the set limit. I do not believe that this addresses my concerns in relation to cumulative impacts to fish from simultaneous dredging activity within the Tees estuary as the impacts to fish associated with dredging (i.e., removal of material by dredging) are different to those associated with disposal (i.e., deposition of material at the disposal site). Secondly, it is not clear to me where the limit of 1.34million m<sup>3</sup> has been drawn from as I cannot find reference to this figure in the EIA (document 8). I recognise that the marine licence issued in relation to this project carries various conditions which require the Applicant to liaise with other operators, spatially restrict dredging to one side of the channel at any one time, impose a seasonal restriction on dredging activity, and carry out a scheme of monitoring. However, in order to address my concerns, an overview or timeline of how the South Bank Quay works fit within the wider dynamic environment of development works in the River Tees is needed to put the project works into the context of other activity (particularly dredging activity) within the estuary.

#### Action Requested by MMO

Prepare an overview of other works surrounding the South Bank Quay project which were scoped into the original EIA assessment in order to put the project works into the context of wider activity ongoing within the Tees estuary

#### Applicant's Response

As per marine licence condition 5.2.13, the Applicant is already committed to not disposing greater than 1.34million m<sup>3</sup> of dredged sediment cumulatively in any given month with Northern Gateway Container Terminal (NGCT).

Whilst the Applicant does not have sight of the programme of other capital schemes on the River Tees, to the best of their knowledge the Applicant is not aware that any other capital dredging schemes on the River Tees overlap with the capital dredging campaign being undertaken for Phase 1 of the South Bank Quay. This matter was discussed with the MMO and Cefas in a meeting on 22<sup>nd</sup> February 2023, with the MMO confirming that no capital dredge schemes are anticipated to come forward within the timescales of the South Bank Quay Phase 1 capital dredge campaign.

## **4.5 Item 11**

#### Cefas Comment

There is a long and complex history of consultation attached to the South Bank development and it is clear that dredging is frequently undertaken within the Tees estuary, whether in direct association with any given development or through routine maintenance dredging. In my opinion, the evidence provided by the Applicant as a standalone response within this consultation, is not sufficient for me to make an informed decision. There have been substantial changes to the scope of this development since the original EIA and, in my opinion, it would take significant consideration of the entire case history in order to determine whether the impacts to fish from the current scope of the development remain within the envelope of those originally assessed under the current EIA. This would be a significant undertaking which I estimate would require at least 3 full days. As such, I will not make further comment on this point until the information requested is provided.

**Annex 2 Template for a table comparing total impacted habitat.**

	EIA Report (Total)	EIA Report (Phase 1 only)	EIA Report (Phase 2 only)	MLV1	MLV2
<i>Direct loss or alteration of habitat</i>					
Area of habitat directly lost /altered by removal of existing structures m <sup>2</sup> / km <sup>2</sup>					
Area of habitat directly lost /altered by dredging activity m <sup>2</sup> / km <sup>2</sup>					
<i>Dredging Activity</i>					
Amount of material to be dredged from River Tees within the scope of each assessment m <sup>3</sup>					
Amount of material to be disposed of at Tees Bay C disposal site within the scope of each assessment m <sup>3</sup>					
Amount of material to be excavated to land within the scope of each assessment m <sup>3</sup>					

Action Requested by MMO

No specific action was identified by MMO through the formal RFI 20. However, for completeness, the Applicant has provided a response to Cefas' comment below.

Applicant's Response

The Applicant's position is that a review of the case history will not provide any further context or information to that which has already been provided. Therefore, the comment from Cefas is not considered relevant to the application for MLV2.

The Applicant notes the MMO's response to the EIA screening request submitted regarding MLV2, confirming that this variation would not require an EIA. As such, the Applicant considers that MMO have assessed the changes requested under MLV2 to be within the parameters of the original EIA Report upon which the original consent was decided.

It is therefore considered that the scope MLV2 is within the parameters assessed within the original EIA Report and the updated hydrodynamic and sediment plume modelling report submitted in support of MLV1.

## **Appendix A – Supplementary Materials for Meeting on 22-02-2023**

- Microsoft PowerPoint slides illustrating the footprint of the South Bank Quay scheme, as assessed within the original EIA Report and at the time of submitting MLV2.

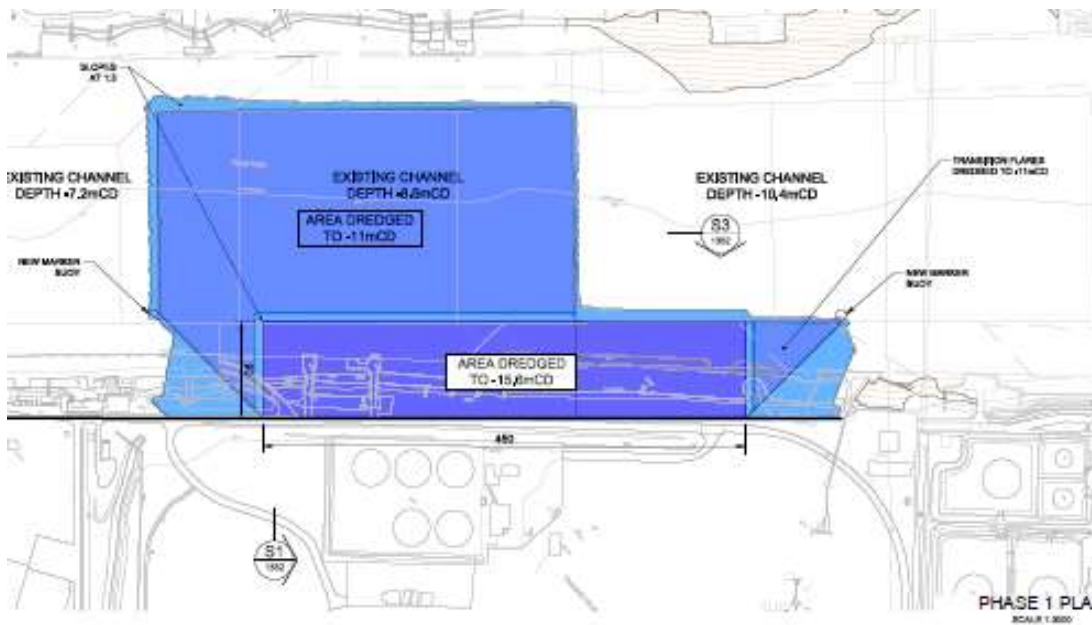
# Agenda

1. Introductions
2. Recap on the scheme and variation
3. Review of FIR20 responses

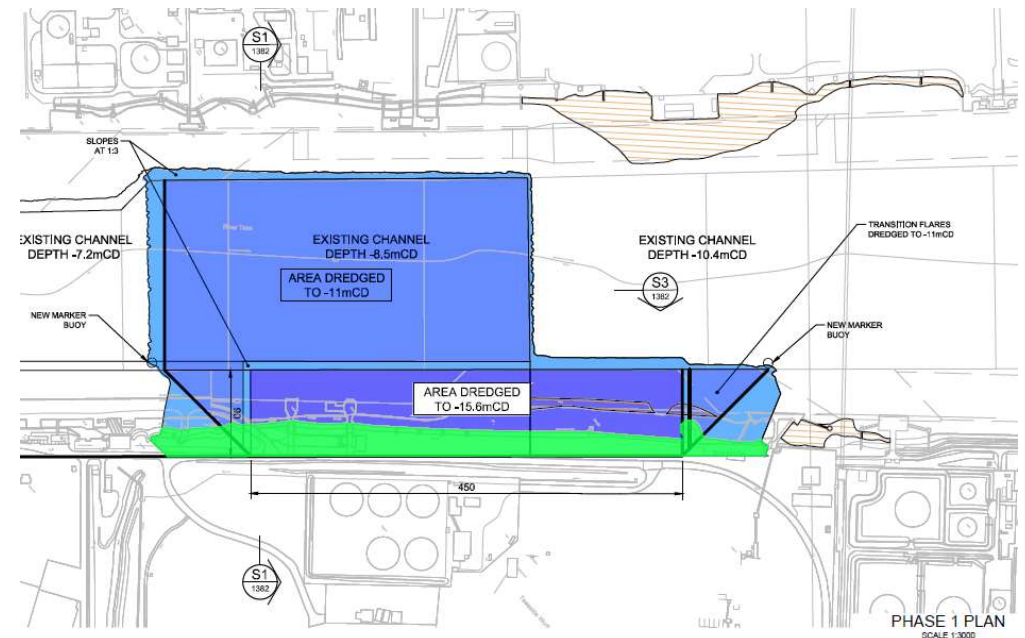
## Aim of the Call:

- Discuss the FIR20 responses and close out in the meeting enabling MMO to proceed with preparing licence revision

# Dredging Concept Design – Informing the EIA



# Dredging Proposal – Informing MLV2



Change	Variation
Addition of CSD methodology	MLV1
Modifications to dredge area and depths to suit CSD method	MLV1
Increase in dredge and disposal volume (see green area)	MLV2

# Dredging Concept Design – Informing the EIA

# Dredging Proposal – Informing MLV2

