

Environment, Marine & Fisheries Group
Marine & Fisheries Division
Marine Licensing Branch



Department of
**Agriculture, Environment
and Rural Affairs**

An Roinn

**Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe**

Department of

**Fairmin, Environment
an' Kintra Matthers**

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Reference no: MLEIA2025041

Date: 22 May 2026

Dear ██████████

SCOPING OPINION UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (as amended)

Belfast Harbour Commissioners is proposing to further extend the marine licensable period by two years to facilitate the completion of the approved D3 Cruise Terminal.

I am writing in response to your request for a scoping opinion on 21 August 2025 and this request made in accordance with the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) (Marine Works Regulations). The consultation stage of this process was initiated by DAERA Marine Licensing Branch on 28 August 2025.

A marine licence application package and Environmental Statement was submitted to Marine Licensing branch on 17 October 2025 before the Department could issue this Scoping Opinion. This Scoping Opinion should be read as of that date.

The purpose of the Environmental Impact Assessment (EIA) scoping procedure is to determine what information should be provided in the Environmental Statement (ES). In reaching our scoping opinion we have considered the requirements of Schedule 3 of the Marine Works Regulations, consulted with the bodies that we consider to have any interest in the project by reason of their environmental responsibility. As required by the Marine Works (EIA) Regulations 2007 (as amended) we have had regard to their comments, and had regard to the information provided in the 'Proposed Applications to Vary Marine Licences relating to lands situated at D3, Belfast Harbour Estate, Belfast – Scoping Request' document dated 21 August 2025, produced by RPS Group.

Scoping Opinion

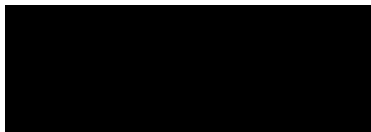
The scoping opinion is based on the information provided in the scoping request and attached link to the approved 2017 ES, submitted to us in August 2025. Our scoping opinion does not take into account any changes to the project that may have occurred after this date.

Annex 1 of this letter sets out the additional information that we consider necessary to be included and/ or assessed in the Environmental Statement for this project. Annex 2 provides the full responses from each consultee.

Please note that the matters identified in Annex 1 do not represent an exhaustive list of requirements. Additional information may be requested at the application stage to ensure comprehensive environmental assessment is undertaken.

Please also note that our scoping opinion will be provided to all those bodies that were consulted and will be published on our Public Register.

Yours sincerely,

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Marine Licensing Branch
Marine & Fisheries Division, DAERA

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Scoping Opinion (MLEIA2025041)

1. Summary of the Proposal

The D3 development at Belfast Harbour involves the construction of a multipurpose facility at D3 for the berthing of cruise ships up to 350m length, and for lay-by and transient storage of project cargo, break bulk, and dry bulk during the cruise ship off season. The development comprises construction below the Mean High Water Spring (MHWS) mark of a 340m solid quay with mooring dolphins and associated back filling behind the new quay with imported clean fill material and land reclamation, totalling circa 4.81 acres.

The project also involved the capital dredging of a berthing pocket to -9.8mCD, and subsequent sea disposal of dredge material. The total volume of dredged material is expected to be 372,000 m³.

The proposed development remains as per the Approved ES (June 2017), save for the following changes:

- An extension of time to the licences to facilitate completion of development in line with construction programme,
- The project is now being constructed in one phase instead of two
- Number of mooring dolphins has reduced from seven to four

2. Project Background

A formal scoping request was made on 21 August 2025 in accordance with Schedule 4 of the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) by RPS Tetra Tech on behalf of the applicant, Belfast Harbour Commissioners (BHC), in order to seek opinion on concerns raised by DAERA regarding the quality of the existing environmental information being relied on to determine the possible impacts of granting a further 2 years for the licences, to September 2027.

At the time of submission of the scoping request, Belfast Harbour Commissioners had 3 valid marine licences for the development of the approved multi purpose facility at D3, for berthing of cruise ships and storage of cargo during cruise ship off season, on lands situated in Belfast Harbour Estate. These were:

- Marine Construction Licence MLVAR2025026 (ML 122_15)
- Marine Capital Dredge Licence MLVAR2025027 (ML 149_16)
- Marine Sea Disposal Licence MLVAR2025026 (ML 150_6)

Applications were initially received in April 2025 from Belfast Harbour Commissioners, as the licence holders, seeking a variation to relevant parts of the above named licences, so that the validity could be extended by 2 years from 31 July 2025 to 30 September 2027, in order to facilitate the completion of the approved D3 Cruise Terminal. The licences were subject to a consultation period under Part 4 of the Marine and Coastal Access Act 2009 and the varied licences granted on 31 July 2025, extending the validity by 4 months to 30 November 2025.

At the time of the variation being granted, the department indicated there was insufficient information to justify the extension of time initially sought and concerns were expressed regarding the viability of some of the environmental information relied on within the existing Environmental Statement.

A further variation request was submitted on 17 October 2025 requesting that the construction licence validity was further extended. This was subsequently granted and an extant licence, MLVAR2025061, was issued on 29 November 2025, extending the licence validity date to 01 July 2026. The dredge and disposal licences were not sought to be extended and expired on 30 November 2025.

3. Location

The proposed development is located on lands within Belfast Harbour Estate, on the County Down side of Victoria Channel, directly opposite Victoria Terminal 4.

Planning permission ref. LA04/2016/0421/F (the 'Extant Permission') was approved by the Department for Infrastructure (Dfi) on 23 July 2019.



Figure 1. Location of proposed D3 Cruise Terminal within Belfast Harbour Estate



Figure 2. Aerial Photography of D3 site (21st July 2025, from RPS Scoping Request document)

4. Issues for consideration

General comments

A scoping request was submitted to DAERA Marine Licensing on 21 August 2025 by the acting agent, RPS Tetra Tech, on behalf of the future applicant, Belfast Harbour Commissioners, in respect of proposed applications to vary extant marine licences to facilitate the completion of the approved D3 cruise terminal by extending the life of the existing marine licences by two years until September 2027.

Since the previous Environmental Statement (ES), that was last updated in 2017 as part of the original submission of the three marine licences (ML122_15, ML149_16 and ML150_16), there has been a number of updates to legislation and policy which were required to be assessed by a new ES submitted with future application packages.

No updated environmental information was submitted as part of this scoping request. Details of the proposed scope of updates required to the approved ES (2017) were set out under Table 3-1 of the scoping request document dated 21 August 2025, and a weblink to the approved ES document was provided within the document as a reference for consultees.

The scoping consultation was issued by Marine Licensing on 28 August 2025 for 28 days to statutory consultees determined appropriate by the marine licensing authority as per Schedule 4 (6) of the Marine Works (EIA) Regulations 2007 (as amended), requesting input on information to inform an Environmental Statement (ES) which is required to be submitted for the proposed development as part of a future licence application package.

Throughout the consultation period, DAERA Marine Licensing shared consultee responses with the agent, RPS Tetra Tech on the following dates:

- 12 September 2025 – sharing 10 responses, no action required by agent/ applicant

- 26 September 2025 – sharing 7 responses, consideration required by agent/applicant
- 29 September 2025 – sharing one response, no action required by agent/ applicant

The consultation period closed on 25 September 2025. Under Schedule 4(7) of the Marine Works (EIA) Regulations 2007 (as amended), DAERA Marine Licensing as the appropriate authority must, as soon as reasonably practicable, provide its scoping opinion and a written statement of the reasons for its opinion to;

- a) The applicant;
- b) If the appropriate authority is not also the regulator, the regulator; and
- c) Such of the consultation bodies as it consulted in accordance with paragraph 6.

A marine licence application package was subsequently received by marine licensing branch on 17 October 2025 without the scoping opinion being issued by the department for full consideration by the applicant.

Coastal Processes and Sediment Transport

The Department note there are existing chapters within the approved ES (dated 2017) relating to coastal processes and sediment transport:

- Chapter 10 'Flood Risk & Water Quality'
- Chapter 11 'Coastal Processes and Hydrodynamic Modelling'

It is recognised that these chapters are proposed to be updated prior to submission of an updated ES, as noted in Table 3-1 of the scoping request document dated and received by the department on 21 August 2025.

It is recommended that there is a continuation of embedded mitigation measures to include submission of a Construction Method Statement (CMS) to detail monitoring of movement of suspended sediment during in channel works to include piling and dredging activities.

MFD Marine Conservation & Reporting, Coastal Processes team highlighted that consideration should be given to the impact the proposal will have on coastal processes and advised that Chapter 11 should be updated to reflect the impacts that climate change, most notably sea level rise and increased intensity of extreme storm events, may have upon this structure in the future.

Inland Fisheries noted the the potential impact of dredging activities on the migratory route for salmon, seatrout, eels and lamprey to the Lagan. The Consolidated Environmental Statement (ES) must comprehensively assess the potential impacts of piling, dredging, and all other activities within the aquatic environment on the migration of the identified species. This assessment should also include a detailed evaluation of any proposed mitigation measures.

Biodiversity

The department notes the existing Chapter 6 'Marine Ecology' and proposed updates as per Table 3-1 of the scoping request document.

Consideration of the concerns raised by Inland Fisheries relating to potential impacts of activities in the Victoria Channel on the migrations of sensitive features like Salmon and Sea Trout, Eels and Lamprey should be highlighted. DAERA NIEA Species Team noted the proposed surveys were adequate in relation to species with no concerns raised regarding designated terrestrial (non bird) features. The department recommends continued embedded mitigation measures and submission of a shadow Habitats Regulation Assessment (sHRA).

Water Quality / Air Quality

The department would agree with the proposed chapter list noted in Section 3.1 of the scoping request, with Air Quality being considered as a stand alone chapter. Also noted in Table 3-1 of the scoping request document.

It is recognised that the potential impact on water quality from associated piling and dredging activities and would encourage the continuation of previously recognised and embedded mitigation and monitoring measures to ensure protection of the Water Framework Directive (WFS) water quality status.

The applicant should consider and adhere to the Standing Advice which is available at: [Standing advice for development that may have an effect on the water environment \(including groundwater and fisheries\) | Department of Agriculture, Environment and Rural Affairs](#)

Intertidal and Subtidal Benthic Ecology

The proposed updates to Chapter 6 'Marine Ecology' of the approved ES regarding benthic ecology noted in Table 3-1 of the scoping request are noted.

Marine Habitats

Recommended continuation of embedded mitigation and monitoring measures to mitigate against potential impacts on adjacent marine habitats during the construction and operational phases of this proposal. The proposed updates to Chapter 6 'Marine Ecology' of the approved ES noted in Table 3-1 of the scoping request are noted.

Spawning Areas, Recreational and Commercial Fisheries and Shellfisheries

The Consolidated Environmental Statement (ES) must comprehensively assess the potential impacts of piling, dredging, and all other activities within the aquatic environment on the migration of the identified species. This assessment should also include a detailed evaluation of any proposed mitigation measures.

Inland Fisheries would also recommend that Table 6.8 is updated to include reference to both The Fisheries Act (NI) 1966 as amended, and The Convention for the Conservation of Salmon in the North Atlantic Ocean (North Atlantic Salmon Conservation Organization – NASCO):

The proximity of the project to designated shellfish waters, namely Belfast Lough is highlighted. Due to the recognised hydrological connection, it is possible that the construction phase may have an indirect impact on shellfish water quality through increased suspended sediments (SS). The introduction and continuation of embedded mitigation and monitoring measures is recommended.

Marine Mammals

DAERA MFD Marine Wildlife team note that baseline data for seals is going to be updated, as noted in Table 3-1 of the scoping request under Chapter 6 'Marine Ecology'.

In relation to the Habitats Regulation Assessment (HRA) for this proposal it is advised, for MPAs that have marine mammals as a site selection feature, the following ranges should be used when screening for either Harbour (*Phoca vitulina*) or Grey seals (*Halichoerus grypus*) and Harbour porpoise (*Phocoena phocoena*):

- all SACs within 100km of the project should be screened for Grey seals (*Halichoerus grypus*)
- all SACs within 50km should be screened for Harbour seals (*Phoca vitulina*)
- all SACs within 100km should be screened for Harbour porpoise (*Phocoena phocoena*)

North Channel is a fully designated SAC now, previously it was a candidate, The Maidens SAC would be in range too for Grey Seal.

The management unit boundaries for cetaceans have been revised. Latest version is available here: Review of Management Unit boundaries for cetaceans in UK waters (2023) <https://data.jncc.gov.uk/data/b48b8332-349f-4358-b080-b4506384f4f7/jncc-report-734.pdf>

The continuation of embedded mitigation measures with the submission of a Marine Mammal Protocol for agreement by the Department prior to works commencing, as well as the appointment of a JNCC approved Marine Mammal Observer (MMO) and Ecological Clerk of Works (ECoW) is strongly recommended.

Ornithology

The department welcomes the proposed surveys throughout passage and overwintering bird season, to include vantage point surveys as necessary, noted in Table 3-1 of the scoping request.

RSPB commented that correspondence provided previously for licences ML122_15, ML149_16 and ML150_16 remains relevant and should be considered for future applications.

The recommendation by RSPB of further matters for consideration to be included in a consolidated ES, noted in points i to iv under the RSPB scoping consultation response in Annex 2 of this opinion is noted.

The department also recommends continuation of embedded mitigation measures for the protection of ornithological features.

Designated Sites

The land aspect of the D3 proposal is designated as part of Inner Belfast Lough ASSI and adjacent to

- Belfast Lough RAMSAR site is adjacent
- Belfast Lough Open Water SPA adjacent
- East Coast Marine pSPA is adjacent
- Belfast Lough SPA is adjacent
- North Channel SAC is roughly 10.8 miles away
- Outer Belfast Lough MCZ is roughly 11.4 miles away
- The Maidens SAC is roughly 17 miles away

The department welcome the preparation and submission of an updated shadow Habitats Regulation Assessment (sHRA) in accordance with the Conservation of Habitats and Species Regulations (NI) 2017, as noted in section 3.2 of the scoping request.

Invasive Non Native Marine Species

There are a number of potential pathways which could result in the introduction / spread of INNS throughout the construction and operational phases of this proposal. The department recommends consideration of the following advice:

- Biosecurity plans should be in place for all stages of the project – this may be a condition of any future licence.
- All vehicles and equipment used to prevent spread or intro of INNS following [Northern Ireland Biosecurity guidelines](#), and [DAERA Marine Non-Native Invasive Non-Native Species standing advice](#) guidance.
- Check Clean Dry Procedures should be applied before and after the sediment removal and deposition at a non-hydrologically linked location.
- A contingency plan should be put in place outlining procedures to be followed if an INNS is found on site or on any equipment. Staff should be provided with the following marine [invasive species identification guides](#) and must report any INNS to DAERA MFD/CEDaR. No INNS should be released back into the marine environment, instead, they should be disposed of in landfill or incinerated.

Please consider the Biodiversity – Marine Invasive Species and Non-Native Species layer in the DAERA Marine Map Viewer for species distribution: [Marine Mapviewer | Department of Agriculture, Environment and Rural Affairs](#)

Note this may not include the most up to date data. NBN Atlas can also be used.

Marine Noise Assessment

The department welcome the proposed updates to Chapter 8 'Noise and Vibration' to include monitoring surveys to include attended noise monitoring at 2 locations, capturing 4 hours of daytime and 4 hours of night time data at each location, noted in Table 3-1 of the scoping request.

Marine Wildlife recommended inclusion of The National Marine Fisheries Service (NOAA Fisheries 2024) for marine mammal noise exposure criteria and noise assessments for Harbour Porpoise SACs.

Electronic copies of the document containing the revised section of the 2024 updated acoustic guidance can be found at: <https://www.fisheries.noaa.gov/national/marine-mammal-protection/marine-mammal-acoustic-technical-guidance-other-acoustic-tools>

Assessment of impacts from underwater noise would best be made against these updated criteria. There is also guidance and an update relating to noise assessments in Harbour Porpoise SACs.

The department also recommends continuation of embedded mitigation measures against the impacts of underwater noise during piling and dredging activities.

Inland Fisheries note that a soft-start process has been proposed, with the gradual ramping up of piling power incrementally over a set time period until full operational power is achieved. As fish are mobile, they will vacate the area during this process, however this may impact on the migratory behaviors of these fish species.

The ES non-technical summary previously stated that – “The sensitivity of Atlantic salmon is considered to be moderate and the overall importance of this species is considered to be high given its nature conservation interest. Therefore, the temporary noise impact during construction has been assessed as moderate adverse on Atlantic salmon.”

Flood Risk

The department welcomes the proposed updates to desk based flood risk analysis, noted for Chapter 10 'Flood Risk & Water Quality' in Table 3-1 of the scoping request.

Consideration should be given to the Flood Maps (NI), available through the Department for Infrastructure DfI online mapviewer, to ensure all main sources of potential flooding have been assessed. Any assessments should fully explore the mitigation and management required to ensure that water draining from the proposed site is free from pollutants.

The 'Coastal Processes and Hydrodynamic Modelling' assessment should be updated to reflect the impacts that climate change, most notably sea level rise and increased intensity of extreme storm events, may have upon this structure in the future.

The location of the proposal puts it at risk of coastal flooding. Future sea level rises and consequential risk of flooding and increased surface water run off due to Climate Change should be considered.

Historic Environment

DAERA Marine Conservation & Reporting, Marine Archaeology team were content that Marine Archaeology and Cultural Heritage was included in the proposed scope of updates required to the Approved ES and agreed that the conclusions are not likely to change. The continued implementation of an archaeological written scheme of investigation (WSI), as required in the original marine licence (ML149_16, Condition 13) was recommended.

Pollution Prevention

There is a significant risk of marine pollution being introduced into the marine environment through the project lifecycle from construction through to operation. Construction activities such as piling and dredge activities, use of marine and terrestrial plant machinery, chemical spills and construction materials such as the addition of 7,000m³ concrete as part of the quay construction. There is the continued risk of pollution during the operational phase

Strict adherence to DAERA's Standing Advice on Pollution Prevention Guidance, Discharges to the Water Environment, and Abstractions and Impoundments, which are available at <https://www.daera-ni.gov.uk/publications/standing-advice-development-may-have-effect-water-environment-including-groundwater-and-fisheries>

Consideration should be given to Guidance for Pollution Prevention (GPP) guidance documents which can be found at the NetRegs site: <https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/> and DAERA standing advice on pollution prevention: [DAERA Standing Advice - WTR - Pollution Prevention Guidance - Sept 2022 Final.pdf](#)

The department would recommend continued mitigation measures including the submission of a Construction Environmental Management Plan (CEMP) / Construction Method Statement (CMS) prior to commencement of works.

Marine Litter

We recommend that consideration is given to how litter will be managed to prevent this entering the marine environment. Marine litter is defined as items arising from human activity, deliberately discarded or unintentionally lost, that end up in the sea and on beaches and coastlines. Marine litter is any persistent, manufactured or processed solid material discarded, disposed of or abandoned in the marine and coastal environment. Marine litter can cause significant impacts to marine ecosystems, including direct damage to wildlife through entanglement, entrapment and/ or ingestion and can also destroy coastal habitats, by interfering with biological production and smothering of the seabed.

Further information can be found in the Marine Litter Standing Advice: [DAERA Standing Advice - Marine Litter.pdf](#)

Furthermore, The Draft Marine Plan for Northern Ireland states that Public authorities must consider the potential risk of litter entering the marine area as a result of proposals. Where a proposal creates the potential for litter to enter the marine area, a Public Authority may require the proposer to demonstrate:

- a) how the risk has been considered;
- b) appropriate measures to minimise the risk.

Marine Information on how this is to be achieved is set out in paragraphs 187 to 199 of the Draft Plan for Northern Ireland: [Marine Plan for NI](#)

Navigation and Safety

The Environmental Statement should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk
- Navigational Safety
- Visual intrusion and noise
- Risk Management and Emergency response
- Marking and lighting of site and information to mariners
- Effect on small craft navigational and communication equipment
- The risk to drifting recreational craft in adverse weather or tidal conditions
- The likely squeeze of small craft into the routes of larger commercial vessels.

The department recognises that the location of D3 at the mouth of Victoria Channel, the main navigation channel into Belfast Harbour and would agree with the recommendation from MCA to include a Shipping and Navigation Risk Assessment (NRA) Chapter 19 of the updated Environmental Statement and that this NRA covers both the construction and operation phase of the project.

Maritime and Coastguard Agency noted that the project is located in a Statutory Harbour Authority (SHA) – Belfast Harbour Commissioners and are therefore responsible for the safety of navigation in their waters.

Adherence to the Port and Marine Facilities Safety Code (PMSC) and its Guide to Good Practice, and development of a robust Safety Management System (SMS) for the project under this code. The Guide to Good Practice, section 10 Conservancy Duty - a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port, however other non-statutory organisations may be required to fulfil similar duties. The Harbour Authority also has a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 10.14 Regulating harbour works covers this in more detail and this is the extract below from the Guide to Good Practice: '10.14 Regulating harbour works - Some harbour authorities have the powers to license works where they extend below the high watermark and are thus liable to affect navigation. Such powers do not, however, usually extend to developments on the foreshore.'

Examples of where navigation could be so affected include:

- high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation
- high constructions, which potentially affect wind patterns
- lighting of a shore development in such a manner that the night vision of mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous.

Seascape, Landscape and Visual Assessment

The proposal is of a scale that could have an impact on the visual seascape of Belfast Harbour. Seascape is a core policy of the Draft Marine Plan for Northern Ireland and states that *'public authorities must consider the potential impact from proposals on seascape, taking account of the existing character of an area, how highly is it valued, and its capacity to accommodate change'*.

The proposed updated Landscape and Visual Impact Assessment (LVIA) to include 9 view point locations (as per 2017 ES), including revised photomontages to take account of updated baseline photography, is welcomed.

Mitigation and Monitoring

The ES should consider and include:

- Continuation of embedded mitigation measures
- Continuous monitoring plans for marine biodiversity, ornithology, water quality and fishery and aquaculture interests
- Regular reporting and engagement with relevant bodies to report findings and addressing concerns
- Adaptive management strategies to address unforeseen issues and regular review of processes

Cumulative Impacts

Cumulative impacts and inter relationships should be presented within the ES. It should outline the main factors which would have cumulative/ inter-relationship impacts.

The ES should explain the interrelationship between each of the aspects outlined in the ES chapters. The department note and welcome the proposed in Table 3-1: Proposed Scope of updates of the EIA Scoping Report dated 21 August 2025, and assess the environmental impacts of this project and if these would be likely to be considered significant.

The department note the proposed updates to be made to Chapter 20 'Interactions' to take into account of additional environmental topics included as new chapters to be added as noted in Other issues for consideration.

Standing Advice

The applicants attention is drawn to the following links which provide standing advice to be considered:

- [DAERA Pollution Standing Advice](#)
- [DAERA Marine Litter Standing Advice](#)
- [DAERA Marine Invasive Non-native Species Guidance](#)
- [DAERA Marine Wildlife Disturbance Guidance](#)

- [Check Clean Dry](#)
- [Decisions affected by marine policy - authorisation decisions](#)
- [DAERA Standing advice for development that may have an effect on the water environment \(including groundwater and fisheries\)](#)
- [DAERA Culverting Standing Advice](#)
- [DAERA Discharges to the water environment Standing Advice](#)
- [DAERA Sustainable Drainage Systems Standing Advice](#)

The applicant is advised that any planning application based on the information provided should be made to the local planning authority, Belfast City Council. The department is aware that at the time of this opinion being published, a revised planning application for LA04/2016/0421/F was submitted to Belfast City Council on 27 February 2026 for revisions to terrestrial elements of the proposal.

In terms of general advice in terms of the structure and content of the terrestrial part of the ES, for the purposes of assisting the planning authority in reaching a reasoned conclusion (as required under the 2017 EIA Planning Regulations) on the significant effects of the proposed development on the environment, the ES should include a summary table of effects and their level of significance, both before and after any proposed mitigation measures.

Other issues for consideration

- Climate Change

The Climate Change Act (Northern Ireland) 2022 has been published since the previous Environmental Statement was drafted. Issues relating to climate change have moved on considerably since the ES was originally submitted in 2017. An update to Chapter 7 of the approved ES (Air Quality and Climate) is required to comply with the legislation and climate change policies now in place, to ensure that the project work aligned itself to the legislative requirements and include an assessment of impacts and appropriate mitigation.

As part of the draft Marine Plan for Northern Ireland, where climate change has the potential to impact on a proposal during its lifetime, a public authority may required the proposer to demonstrate:

- How the impact has been considered; and
- Measures to address the adverse impact, where appropriate.

It is welcomed that a stand alone chapter for climate change is to be included in the updated ES, as noted in Table 3-1 of the submitted scoping request.

- Draft Marine Plan

The Draft Marine Plan for Northern Ireland was published on 18 April 2018, before the final consideration of the original applications. The Plan must be used for all planning decisions for the sea, coast, estuaries and tidal waters, as well as developments that impact, or might impact, these areas, such as infrastructure. Although at the date of this opinion being issued, the Plan has not been formally adopted, all public authorities are responsible for implementing the Plan through existing regulatory and decision-making processes. The draft Marine Plan for Northern Ireland should be fully considered by the applicant and included in any future consolidated ES.

- Surveys and Data

A number of surveys and data used to form the basis of the 2017 ES are proposed to be updated, as noted in Table 3-1 of the scoping request. New data and updated data and information is required to better inform the impact of the proposed works and what mitigations would be suitable to reduce any impacts. Since the previous ES, a new designation of the North Channel SAC had been given in 2019 which was not considered before.

- Addition of chapters

The department welcomes the noted addition of chapters to the updated ES in light of legislative changes:

- Climate Change
- Human Health
- Risk of Major Accidents and Disasters

ANNEX 2. Full list of Scoping Report Consultation Responses

List of Consultee Responses	Consultees that did not respond
<ul style="list-style-type: none"> - DAERA (NED) Wildlife Team - DAERA Marine Monitoring & Assessment Team - UK Hydrographic Office (UKHO) - DAERA (NIEA) Freshwater Team - Northern Ireland Water - DAERA (NED) Species Team - DAERA (NED) Habitats Team - DAERA (MFD) Marine Historic Environment - Maritime & Coastguard Agency - Belfast City Council – Planning Team - DAERA (MFD) Marine Strategy - Bathing Waters & Shellfish Team - NIEA Water Management Unit - DAERA (MFD) Sea Fisheries Inspectorate - DAERA (MFD) Marine Conservation – Coastal Processes Team - The Commissioners of Irish Lights - RSPB - DAERA (MFD) Marine Conservation – Marine Wildlife Team - DAERA (MFD) Inland Fisheries 	<ul style="list-style-type: none"> - NIEA Conservation, Designation & Protection Branch (CDP) - DAERA (NED) Biodiversity Team - DAERA (NED) Ornithology Team - DAERA (NED) Invasive Species Team - Department for Infrastructure (Dfi) – Roads & Rivers - Department for Infrastructure (Dfi) – Air & Sea Ports - Agri-Food & Biosciences Institute (AFBI) - The Crown Estate - British Trust for Ornithology (BTO) - Belfast City Council – Environmental Health

EIA Scoping Responses	
Consultee	DAERA (NED) Wildlife Team
WLT have no additional comments from those comments previously supplied	
Consultee	DAERA Marine Monitoring & Assessment Team
There are no issues for MMAT regarding the extensions, as previously identified mitigation measures still apply for the protection of WFD water quality status.	
Consultee	UK Hydrographic Office (UKHO)
The UKHO has no objections to the proposals in the scoping request for D3 Belfast harbour.	
Consultee	DAERA Freshwater Team

Nil response	
Consultee	Northern Ireland Water
No objections	
Consultee	DAERA NED Species Team
Proposed surveys referred to in Table 3-1 appear adequate in relation to species. There are no concerns regarding terrestrial (non-bird) designated feature species	
Consultee	DAERA NED Habitats Team
<p>The impacts of the planned works on the terrestrial habitat features of ASSIs within an appropriate impact risk zone has been considered.</p> <p>An updated Environmental Statement is welcomed. Based on the information provided the Habitat Survey Team do not have any further comment to make regarding the ES.</p> <p>Unless there are significant changes to the proposal (including the disposal of waste), Habitat Survey Team do not need to be engaged with when the application is received for this proposal.</p>	
Consultee	DAERA MFD Marine Historic Environment
<p>Thank you for your email consultation requesting a Scoping Opinion as to the information required in an updated Environmental Statement (ES) to be supplied for this development. The proposed development consists of the construction of a new multi-purpose facility at D3 for the berthing of cruise ships at Belfast Harbour.</p> <p>We note that Marine Archaeology and Cultural Heritage has been included in the proposed scope of updates required to the Approved ES and agree that the conclusions are not likely to change. We are also in agreement with the proposed construction phase mitigation as proposed in the ES and this requirement has been articulated in previous correspondence. We do not have any further comment to make in regard to the ES.</p> <p>The dredging aspect of the development in particular could potentially have significant environmental effect on previously unrecorded heritage assets – underwater cultural heritage, historic shipwrecks, etc. For this reason the implementation of an archaeological written scheme of investigation (WSI) was required as a condition of the capital dredge aspect of the development, see ML149_16 (Condition 13) and this requirement reiterated again in response to MLVAR2025_027.</p> <p>Please continue to engage with these offices if and when an application is received for this proposal to ensure this mitigation strategy is implemented.</p>	
Consultee	Maritime & Coastguard Agency
<p>Thank you for your email dated 28 August 2025 inviting the Maritime and Coastguard Agency (MCA) to comment on the Scoping Opinion for the variation of above marine licenses for the construction of a new facility at Belfast Harbour.</p> <p>The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any</p>	

impact on our search and rescue obligations. The Scoping Report has been considered by representatives of the UK Technical Services Navigation team at the MCA, and we like to comment as follows:

We note that marine licenses are already approved and that this scoping request is to extend the validation period of the existing licenses until September 2027, and that the proposed development detailed in the current licences remain unchanged (apart from the project being constructed in one phase instead of two and the reduction in number of mooring dolphins from seven to four). We also welcome the inclusion of a Shipping and Navigation Risk Assessment (NRA) in Chapter 19 of the updated Environmental Statement; the MCA would recommend this NRA covers both the construction and operation phase of the project.

We note that the project is located in a Statutory Harbour Authority (SHA) – Belfast Harbour Commissioners and therefore the SHA is responsible for the safety of navigation in their waters. To address the ongoing safe operation of the marine interface for this project, we would like to point the applicant in the direction of the Port and Marine Facilities Safety Code (PMSC) and its Guide to Good Practice. They will need to develop a robust Safety Management System (SMS) for the project under this code.

We would like to highlight from the Guide to Good Practice, section 10 Conservancy Duty - a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port, however other non-statutory organisations may be required to fulfil similar duties. The Harbour Authority also has a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 10.14 Regulating harbour works covers this in more detail and this is the extract below from the Guide to Good Practice:

10.14 Regulating harbour works

Some harbour authorities have the powers to license works where they extend below the high watermark and are thus liable to affect navigation. Such powers do not, however, usually extend to developments on the foreshore.

Some Harbour Authorities are statutory consultees for planning applications, as a function of owning the seabed, and thus being the adjacent landowner. Where this is not the case, Harbour Authorities should be alert to developments on shore that could adversely affect the safety of navigation. In any case Harbour Authorities should ensure that the MMO or appropriate licensing authority consults them regarding any applications for works or developments in or adjacent to the harbour area.

Where necessary, consideration should be given to requiring the planning applicants to conduct a Risk Assessment in order to establish that the safety of navigation is not about to be put at risk. Examples of where navigation could be so affected include:

- high constructions, which inhibit line of sight of microwave transmissions, or the performance of port radar, or interfere with the line of sight of aids to navigation
- high constructions, which potentially affect wind patterns
- lighting of a shore development in such a manner that the night vision of mariners is impeded, or that navigation lights, either ashore and onboard vessels are masked, or made less conspicuous.

There is a British Standards Institution publication on Road Lighting, BS5489. Part 8 relates to a Code of practice for lighting which may affect the safe use of aerodromes, railways, harbours and navigable Inland waterways.

I can confirm that on this occasion the MCA has no concerns to raise with regards to the proposals on the understanding that the conditions in the original marine licenses are adhered

to and all maritime safety legislation is complied with. I can also confirm that we wish to be notified when an application is received for this proposal.

Consultee	Belfast City Council – Planning
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I have reviewed this and we are content that BCC Planning do not need to be consulted. I am sure my colleagues in BCC Environmental Health will respond and I will raise it with them to ensure they are aware of the timeframes.

Consultee	DAERA (MFD) Marine Strategy - Bathing Waters & Shellfish Team
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Marine Strategy and Catchments have no objections to the proposed extension request.

Consultee	NIEA Water Management Unit
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Water Management Unit notes the nature of the application and the request for variation to extend the validation date of the Marine Licences MLVAR2025026, MLVAR2025027 and MLVAR2025028 by two years.

MLVAR2025026

Water Management Unit is content, subject to the applicant strictly referring and adhering to DAERA's Standing Advice on Pollution Prevention Guidance, Discharges to the Water Environment, and Abstractions and Impoundments, which are available at <https://www.daera-ni.gov.uk/publications/standing-advice-development-may-have-effect-water-environment-including-groundwater-and-fisheries>

Water Management Unit's comments are on the basis of any relevant waste authorisations being obtained.

All infill material used as part of this development must be strictly inert.

Water Management Unit notes that an indicative Method Statement has been provided in the application form, and would advise that once a contractor has been appointed, a final detailed Construction Environmental Management Plan (CEMP) / Construction Method Statement (CMS) should be submitted to Water Management Unit at least eight weeks prior to the commencement of the works or phase of works (see section regarding 'further information to be forwarded').

NIEA discharge consent, issued under the Water (Northern Ireland) Order 1999, is required for any discharges of potentially contaminated water to the aquatic environment and may be required for the discharge of foul sewage and site drainage during the decommissioning, construction and operational phases of the proposal (including from any dewatering activities).

However, there is no guarantee that the relevant NIEA discharge consent(s) will be granted, as a number of site-specific factors need to be taken into account in assessing the suitability of the proposed means of effluent disposal.

The NIEA Water Regulation Team can be contacted at industrialconsents@daera-ni.gov.uk for further information regarding NIEA discharge consents.

Where the use of chemical / portable toilets is proposed, wastewater from chemical toilets must not be discharged to the environment. Any proposed portable toilet must be watertight with no outlet or leaks. Any overflow / leak from such a toilet may constitute a pollution incident, which is an offence under the Water (NI) Order 1999. The chemical toilet must be emptied regularly by a registered waste carrier and Water Management Unit recommends the installation of a warning device.

Cement, concrete and grouts are highly alkaline and corrosive and can cause serious and significant pollution to the ground and watercourses. Water wildlife, such as invertebrates and fish, are very sensitive to changes in pH (acid / alkaline) levels.

Suitable arrangements to deal with any concrete-contaminated washings and waste must always be in place to prevent pollution. Treated or untreated washings or wastes must never enter into any drain, or surface water. Wash waters from concrete and cement work should never be discharged into the water environment.

All work must comply with the Control Of Pollution (Oil Storage) Regulations (Northern Ireland) 2010. A key requirement of the Regulations is that oil storage containers (including temporary storage) must have a secondary containment system (a bund, which is an outer wall or enclosure designed to contain the contents of an inner tank, or a drip tray) to ensure that any leaking oil is contained and does not enter the aquatic environment.

All areas where fuels are stored / dispensed / delivered to, must have an impermeable surface, and the drainage of the area must be engineered in such a way that all potentially contaminated site drainage is contained and prevented from entering the aquatic environment without treatment, and the discharge quality must be within the limits of the appropriate consents. This will depend on correct use and maintenance of treatment systems e.g. oil separators.

Water Management Unit would also emphasise the importance of ensuring equipment / plant / vessels are in good working order to minimise the risk of pollution from hydrocarbons and / or hydraulic fluids.

Depending on the geological setting, the potential exists for the water table to be encountered during these works which may require dewatering to take place.

In accordance with the Water Abstraction and Impoundment (Licensing) Regulations (Northern Ireland) 2006 (as amended) it is a mandatory requirement that upon the abstraction and / or diversion and / or impoundment of water from the natural river channel / lake, coastal or groundwater sources, an abstraction / impoundment licence should be obtained from the Department unless the operations specified are Permitted Controlled Activities: <https://www.daera-ni.gov.uk/publications/water-abstraction-and-impoundment-licensing-regulations-northern-ireland-2006-permitted>

The following Guidance for Pollution Prevention (GPP) documents provide guidance on good working practices:

GPP 1: Understanding your environmental responsibilities - good environmental practices

GPP 2: Above ground oil storage tanks

GPP 3: Use and design of oil separators in surface water drainage systems

GPP 4: Treatment and disposal of wastewater where there is no connection to the public foul sewer

GPP 5: Works and maintenance in or near water

GPP 6: Working on construction and demolition sites

GPP 8: Safe storage and disposal of used oils

GPP 20: Dewatering underground ducts and chambers

GPP 21: Pollution incident response planning

GPP 22: Incident response - dealing with spills

GPP 26: Safe storage - drums and intermediate bulk containers

GPP 27: Installation, decommissioning and removal of underground storage tanks

A full list of these GPP guidance documents can be found at the NetRegs site:

<https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/>

MLVAR2025027 / MLVAR2025028

Water Management Unit is content, subject to any contaminated material being transported by a licensed waste carrier, all relevant waste authorisations being obtained for the treatment and disposal of any contaminated material, and the applicant referring and adhering to DAERA Standing Advice on Pollution Prevention Guidance and Discharges to the Water Environment which are available at: <https://www.daera-ni.gov.uk/publications/standing-advice-development-may-have-effect-water-environment-including-groundwater-and-fisheries>

Any infill material used as part of this project must be strictly inert.

Water Management Unit notes the operational processes involved are highly likely to cause the release of suspended solids, and would advise the operational methods utilised should be completed at a pace whereby the level of suspended solids is minimised.

Water Management Unit would also emphasise the importance of ensuring vessels and equipment are in good working order to minimise the risk of pollution from hydrocarbons and / or hydraulic fluids. All work must be carried out in compliance with the Control Of Pollution (Oil Storage) Regulations (NI) 2010.

Consultee	DAERA (MFD) Sea Fisheries Inspectorate
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NIL response from Sea Fisheries Inspectorate

Consultee	DAERA (MFD) Marine Conservation – Coastal Processes Team
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We are unlikely to have any concerns with this application. However, we would note that after assessing the information provided, coastal processes were not considered in the initial responses by Marine Conservation, back in 2016/2017.

We would highlight that it is important that the EIA Scoping Report for the D3 Quay Development should consider the impact that it will have upon coastal processes, both locally and to the adjacent areas. The 'Coastal Processes and Hydrodynamic Modelling' section of this Scoping Report should be updated to reflect the impacts that climate change, most notably sea level rise and increased intensity of extreme storm events, may have upon this structure in the future.

Consultee	Commissioner of Irish Lights
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Nil response

Consultee	RSPB
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RSPB is Europe's largest voluntary nature conservation organisation and is supported by over 1 million members in the UK, around 12,500 of which reside in Northern Ireland (NI). As such we thank you for sending the above named application through to us for comment.

We would refer to our previous correspondences in respect of ML149_16 Dredge Application; MI122_15 Construction Application; and ML150_16 Disposal Application dated 17 December 2015, 15 June 2016 and 12 September 2017 which remain relevant to the current MCL applications for an extension of time until 30 September 2027 and should therefore be considered. Copies of the aforementioned RSPB NI correspondences are attached in the covering email for your convenience.

In addition to the contents of the aforementioned correspondence, we would we request that the following matters are considered:

i Within the Scoping Request document, we note the areas of the Environmental Statement (ES) to be updated, and with particular regard to the Terrestrial Ecology and Ornithology section, we further note that an update to breeding bird data has been omitted - RSPB NI can provide data for its Reserve (D2) upon request.

ii Consideration in the updated ES/shadow Habitats Regulation Assessment (sHRA) should also be given to the increase in cruise ship activity from the time of the original assessment – anticipated to be around 100 calls¹ per season at the time of the original application, while the 2025 cruise season has now recorded 146 calls².

iii An updated in-combination/cumulative assessment with other plans or projects.

While more detail is now provided in respect of the construction timetable, RSPB NI would continue to advocate that particular regard is had to sensitive ornithological periods and that the cumulative/in-combination potential effects of multiple simultaneous construction activities are considered and assessed both from the marine and

i terrestrial construction components in accordance with the mitigation hierarchy (see point (vii) below for further details) .

ii While we note that a Construction Environmental Management Plan (CEMP) has previously been submitted in respect of the original MCLs, this should be updated to reflect any changes/modifications and should be submitted with the updated ES and sHRA.

iii With regards to our comments on contamination in our correspondence dated 15 June 2016, following a meeting with RPS Tetrattech and Belfast Harbour on 24 September 2025, we are now advised that additional testing has since been undertaken and that no TBT is present and that dredge material can now be disposed of at sea in the approved disposal site. This should occur in accordance with all dredging protocols. Given the location of the application, combined with the potential environmental impacts of contaminant remobilisation in the aquatic environment site, a precautionary position should however be maintained with regards to the potential discovery of previously unknown contamination.

iv As a general point, when mitigating against harm to nature in the natural environment, the mitigation hierarchy must be followed: where in the first instance, any impacts must be avoided, where this is not possible then the impacts must be minimised. Only where this is not possible then sufficient mitigation measures must be put in place.

Consultee

DAERA (MFD) Marine Conservation – Marine Wildlife Team

Following the coastal geomorphology response, we are content from the benthic and MPAs perspective with updates and overall assessment.

Please see below regarding marine mammals and updated guidance documents:

We note that baseline data for seals is going to be updated.

Ref Appendix 9.1 Habitats Regulation Assessment (HRA)

In relation to the Habitats Regulations Assessment we advise, for MPAs that have marine mammals as a site selection feature, the following ranges should be used when screening for either Harbour (*Phoca vitulina*) or Grey seals (*Halichoerus grypus*) and Harbour porpoise (*Phocoena phocoena*):

- all SACs within 100km of the project should be screened for Grey seals (*Halichoerus grypus*)
- all SACs within 50km should be screened for Harbour seals (*Phoca vitulina*)
- all SACs within 100km should be screened for Harbour porpoise (*Phocoena phocoena*)

North Channel is a fully designated SAC now, previously it was a candidate, The Maidens SAC would be in range too for Grey Seal.

Marine mammal noise exposure criteria have been updated and we now use NOAA Fisheries 2024.

The National Marine Fisheries Service (NOAA Fisheries) has developed the “2024 Update to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 3.0): Underwater and In-Air Criteria for Onset of Auditory Injury and Temporary Threshold Shifts.” for NOAA Fisheries’ jurisdiction. The thresholds have also been adopted for use by Statutory Nature Conservation Bodies in the UK. This document provides updated received level thresholds and auditory weighting functions, or acoustic criteria, based on the best available science, at which individual marine mammals are predicted to experience changes in their hearing sensitivity (either auditory injury or temporary threshold shift) for all anthropogenic sound sources. The 2024 Updated Technical Guidance is intended to be used by NOAA Fisheries analysts and managers and other relevant user groups, including other federal agencies, when seeking to determine whether and how their activities are expected to result in particular types of impacts to marine mammals via acoustic exposure. The 2024 Updated Technical Guidance replaces the previous 2018 Revised Technical Guidance.

Electronic copies of the document containing the revised section of the 2024 updated acoustic guidance can be found at: <https://www.fisheries.noaa.gov/national/marine-mammal-protection/marine-mammal-acoustic-technical-guidance-other-acoustic-tools>

Assessment of impacts from underwater noise would best be made against these updated criteria.

There is also guidance and an update relating to noise assessments in Harbour Porpoise SACs. In 2020 joint advice from JNCC, Natural England and the Department for Agriculture Environment and Rural Affairs (Northern Ireland) was published on assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs in England, Wales and Northern Ireland (<https://hub.jncc.gov.uk/assets/2e60a9a0-4366-4971-9327-2bc409e09784>). The guidance describes how the area of SAC disturbed might be determined through use of Effective Deterrent Radii (EDR). It suggests that noise disturbance within an SAC is considered significant if it excludes harbour porpoises from more than 20% of the site in any given day, or an average of 10% over a season. These thresholds are used by developers and the SNCBs in the Habitats Regulations Assessment/Appraisal (HRA) process. New updated Effective Deterrent Ranges (EDRs) were published in 2025. <https://hub.jncc.gov.uk/assets/2e60a9a0-4366-4971-9327-2bc409e09784#jncc-report-803.pdf>

The management unit boundaries for cetaceans have been revised. Latest version is available here: Review of Management Unit boundaries for cetaceans in UK waters (2023) <https://data.jncc.gov.uk/data/b48b8332-349f-4358-b080-b4506384f4f7/jncc-report-734.pdf>

Consultee	DAERA (MFD) Inland Fisheries
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‘Inland Fisheries response to - Scoping Request - D3 Belfast Harbour.
Inland Fisheries have considered the documents provided and have the following comments.
Inland Fisheries notes the location and nature of the application for the ongoing works required to facilitate a Cruise Ship berth in Belfast Harbour within the Victoria Channel, Belfast Lough.

Belfast Lough supports significant fisheries interests and sustains populations of resident and migratory salmonids (salmon, trout/sea trout) and eels, with the potential presence of lamprey. Inland Fisheries, in cooperation with the Agri-Food and Biosciences Institute, has invested considerable time and resources in a programme to reintroduce a self-sustaining population of Atlantic salmon to the Lagan catchment, alongside long-term monitoring of these populations at various life stages. Additional investment has been made in habitat enhancement initiatives within the catchment.

As outlined in the Approved Environmental Statement (Chapter 6), Belfast Lough serves as a critical migratory corridor for several diadromous and catadromous fish species moving between marine and freshwater habitats. Populations of European eel and Atlantic salmon have experienced severe declines over the past two decades. Atlantic salmon are listed as an Annex II species under the Habitats Directive, while European eel is classified as *critically endangered* on the IUCN Red List.

Salmon and sea trout populations within the Lagan catchment remain under significant pressure from multiple stressors, resulting in low numbers of fish successfully migrating to sea and returning to spawn. Protecting these migrations is essential to prevent the potential extirpation of these species from the catchment. The River Lagan also represents an important recreational angling resource, actively supported by several local angling clubs. Inland Fisheries' primary concerns relate to the potential impacts of activities within the Victoria Channel on the migrations of salmon, sea trout, eels, and lamprey. The applicant has indicated that significant piling is required within the main channel which is the migratory corridor through which all salmon, seatrout, eels and lamprey must pass to gain access to and from the marine and freshwater habitats. A soft-start process has been proposed, with the gradual ramping up of piling power incrementally over a set time period until full operational power is achieved. As fish are mobile, they will vacate the area during this process, however this may impact on the migratory behaviors of these fish species. The ES non-technical summary previously stated that – *“The sensitivity of Atlantic salmon is considered to be moderate and the overall importance of this species is considered to be high given its nature conservation interest. Therefore, the temporary noise impact during construction has been assessed as moderate adverse on Atlantic salmon.”*

Inland Fisheries also note the requirement for significant dredging activities within the main channel and the migratory route for salmon, seatrout, eels and lamprey to the Lagan. The release of sediments and associated anoxic plumes to the water column and the reduction of oxygen levels can create a barrier to salmon migration. As fish are mobile they will vacate the area during this process. Piling was initially proposed to be a 24-7 operation for 4 months in Phase 1 and 7 months in Phase 2. The “environmental dredging” is proposed for 12hrs during the day for 1 month in Phase 1 and 2 months in Phase 2.

Whilst these activities are expected to have minimal impact on individual fish health, they may disrupt migratory patterns. Given the low salmon population within the catchment, any such disruption could have significant consequences.

The ES Scoping document provides a timetable for the proposed works (Table 1-1: Construction Programme):

- Quay wall piling: January 2026 – August 2026
- Quay wall construction (anchor installation): March 2026 – October 2026
- Dredging: October 2026 – December 2026
- Dolphin piling: November 2026 – January 2027

Although only some of the proposed construction activities overlap with the main migratory periods for salmon, there is potential for these timings to change. The primary migration

period for adult salmon in this area is likely to occur during July and August, while juvenile salmon typically migrate in April and May. Any works scheduled within these months must clearly define the operational hours for piling and dredging to minimize potential impacts. The Consolidated Environmental Statement (ES) must comprehensively assess the potential impacts of piling, dredging, and all other activities within the aquatic environment on the migration of the identified species. This assessment should also include a detailed evaluation of any proposed mitigation measures.

Inland Fisheries would also recommend that Table 6.8 is updated to include reference to both

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The Fisheries Act (NI) 1966 as amended.

And;

The Convention for the Conservation of Salmon in the North Atlantic Ocean (North Atlantic Salmon Conservation Organization – NASCO): This international treaty obliges signatory states, including the UK, to conserve, restore, and rationally manage Atlantic salmon populations and their habitats. Parties must implement programmes of work, provide scientific data, and apply precautionary measures where information is lacking. NASCO monitors compliance and facilitates international cooperation to protect salmon stocks throughout their migratory range.'