

Postcard Signing Briefing

Friends of The Firth of Clyde – No Way Without an EIA

#SaveSouthannanSands

The sea shore from Fairlie to Portencross is very important for the welfare of the **environment** and the **wildlife** that call Southannan Sands their home.

It has been designated a SSSI – Site of Special Scientific Interest because of its importance to the Clyde environment.

The sea shore is a very gradual slope out towards the deep water channel which the large ships navigate - this makes the tide come in and out at Southannan Sands SSSI very gently – which in turn makes the perfect environment for protected species to grow including:

1. **Seagrass** – we have the rarest protected form here, called Eel Grass and Southannan Sands is the only remaining Seagrass Meadow on the Firth of Clyde mainland coastline.
2. **Shellfish** – We have some very rare and protected shellfish here. Because of this the waters are also designated as Protected Shellfish Waters (PSW).

Both the seagrass and shellfish anchor to the seabed, trapping the intertidal sediments. This makes a **perfect habitat for breeding fish and provide a safe fish nursery**. The baby fish provide food for the birds, which is why the area is visited by a huge range of birds including **rare migratory birds**, and is of interest to bird charities. Having a safe nursery for fish is also fundamental for larger marine life such as the **seals, porpoise, dolphins and even killer whales** we enjoy in the Clyde. We have our own world famous dolphin 'Kylie' who lives close to Hunterston and researchers have found she speaks porpoise!

We are in a **Climate Emergency**. Seagrass is one of the best carbon captures and Southannan Sands SSSI is a very rare **Natural Blue Carbon Sink**, which is **30-40 times more effective than the rainforest**. There are charities and researchers dedicated to saving and growing seagrass, because of its fundamental importance and the fact that it is at massive threat from **irresponsible developers** across the world.

Peel Ports have been working on plans to bring decommissioning of oilrigs and other marine vessels to Hunterston – slap bang in the middle of the SSSI since 2012.

It is an extremely **complex planning decision** as there are so many government bodies involved and has the potential to negatively impact on the **health and safety of residents, road traffic, heavy goods transport, marine life, fishing industry, leisure and the natural environment** as well as the future of our protected SSSI.

In a project as complex as this it is necessary to undertake an **Environmental Impact Assessment (EIA)** to understand the wider and cumulative effects of the development and what risks they pose.

In 2018, North Ayrshire Council (NAC) approved the land-based planning permissions without calling for an EIA, despite advice provided by other government regulators. We had a QC examine the process NAC undertook and he was highly critical.

In July 2019, the Scottish Environmental Protection Agency (SEPA) granted a Waste Management Licence to Peel for the decommissioning, which allows them to handle **1,000's tonnes of very dangerous materials such as asbestos, PCB's (which make holes in the ozone layer), rotting organic marine matter and radioactive waste**. We have lobbied hard against this licence as Peel have applied for a blank cheque to handle anything and everything, and we've witnessed their appalling attitude to health, safety and the environment over the years, so we have little confidence.

In order to bring in the oilrigs, the area needs to be dredged to create a deep marine channel. The dredging will have significant environmental effects. In recent years the Largs Yacht Haven silted up and needed to be dredged. It is not a protected area, yet it required an EIA before the works began! The marine environment is dynamic and one change can have significant knock-on effects.

Dredging has a number of known knock-on effects:

- The dynamics of the tidal energy are changed. The shellfish and seagrass only survive in low energy tidal environments; this risks destroying the seagrass meadow.
- Digging up such a large amount of the seashore releases toxins trapped in the sand (including a lot of coal dust from the badly managed coal yard) as well as churning up the seabed. These toxins are then free to move through the waters and release the carbon stored in them.
- Both Seagrass and Shellfish are sensitive to suffocation from this activity.

In addition, the water treatment works that will manage the large amounts of water used to clean and decontaminate the scrap from the site will pump the wastewater back into the waters of SSSI.

- Without an EIA there be no assessment of the impact of this on the SSSI and the extremely sensitive active shellfish site that needs clean waters to survive.
- Without an EIA there will no assessment of the negative cumulative effects on the Protected Shellfish Waters and nearby bathing beaches of combining the oilrig project with the additional proposals for fish farms by Great & Wee Cumbrae.

Peel Ports have used the number of licences and regulators to their advantage and over time have slowly extended the scope of the project. This is a well know strategy called '**salami slicing**'. When the land based planning was approved Peel had stated 200,000m³ of the seabed would be dredged. They then applied to marine Scotland for removed 2.4million m³!! And when that caused uproar they reduced their application to 615,000m³ which is still massive.

In addition they have changed their application to build a larger dock. Over the licenses **we have witnessed crazy requests, major inaccuracies and false statements, with new changes creeping in constantly...** that would give Peel free reign to operate as they want.

We know from the experience of communities in the North West of England that this how controversial Peel projects are implemented without full environmental scrutiny and at the expense of the communities and environment that live with the impacts for generations.

Last week Scottish Natural Heritage declared the SSSI at Menie Dunes in Aberdeenshire DESTROYED by irreparable damage caused by the Trump International Golf Course. Another irresponsible billionaire developer that lives offshore and promised jobs in place of the environment that never transpired.

We CANNOT let this happen to Southannan Sands SSSI.

This project involves the dismantling of huge quantities of dangerous materials in the marine environment, massive dredging, pile driving, huge increase in HGV road transport, massive quantities of polluted waste water, serious noise impact to residents and marine life, impact on tourism, fishing, leisure.

It should not go ahead without and Environmental Impact Assessment.

Marine Scotland are currently deciding if this is necessary and we need your help!!

THIS IS URGENT and we need you to send a post card and / or write to them in the next week: marinescotland@gov.scot.