

REGIONAL MARINE LICENCE APPLICATION

RNLI Scottish Division- Regional Licence for Low Impact Mooring Maintenance Works



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RNLI Scotland Division

APPLICATION DOCUMENT- Regional Marine Licence for Low Impact Moorings Maintenance Works

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RNLI Scotland Division- Marine Licence Application for Moorings

EXECUTIVE SUMMARY

This Application Document contains the relevant information required to support the RNLI's regional marine licence for moorings application for the RNLI's Scotland Division. Marine Scotland has advised the RNLI to use the 'Marine Licence Application for Moorings' form (see copy attached at Appendix 3).

The RNLI is the charity that saves lives at sea. It has saved more than 140,000 lives since its foundation in 1824. The RNLI currently has 237 operational lifeboat stations and lifeguard facilities on over 200 beaches around the UK and the Republic of Ireland. Maintenance works (whether planned or emergency) to these lifeboat stations, beach lifeguard units and their supporting infrastructure is vital if the RNLI's lifeboats and lifeguards are to remain fully operational and able to maintain emergency launch response times. In addition the safety of the RNLI's local crew members and volunteers is paramount.

Many of the RNLI's lifeboat stations, beach lifeguard units and/or their supporting infrastructure are situated at least partly below Mean High Water Springs (MHWS) and therefore, unless an exemption applies, a marine licence is required for many maintenance activities. The RNLI's maintenance activities are low impact and can broadly be split into six categories:

1. Maintenance to Moorings (including replacement of fittings)
2. Maintenance to Pontoon Berths (and associated pilings, link-spans, quay walls and approach structures)
3. Minor beach re-profiling works (and launch route clearance works or minor re-charge works)
4. Maintenance to Lifeboat Station Boathouses (and associated slipways, quay walls, pilings, etc.) of the following form:
 - a. Boathouses seaward of MHWS
 - b. Boathouses where only a slipway or launch ramp is seaward of MHWS
5. Miscellaneous infrastructure and maintenance activities associated with safety of lifeboat launch and recovery
6. Installation, removal and maintenance of beach lifeguard units

(Note: Maintenance might include minor replacement or renewal of elements of structure or fittings, generally on a 'like for like' basis, and minor improvements or upgrading works.)

Regional marine licence application

Following correspondence with Marine Scotland on 20 July 2017, it is proposed that the RNLI applies for four regional licences of six years' duration to cover maintenance to moorings, pontoons, construction projects, and dredging and sea disposal in Scotland, excluding navigational dredging and pile replacement activities.

Whilst formal pre-application consultation is not required in relation to this application, the RNLI approached Scottish Natural Heritage (SNH) for their views on the proposed regional licence. Their response is attached at Appendix 1. After taking into account SNH's views, the RNLI is not seeking to include any replacement piling works in this regional licence application (unless an additional method statement is submitted a minimum of 2 months prior to any work).

This application document for a regional marine licence relates to sites within the RNLI's Scotland Division, which covers the entirety of the Scotland coastline from Kippford on the West Coast to Eyemouth on the East Coast. The actual sites included within this licence application are shown highlighted on the plan on page 3 (see below at pages 4-27 for a full list of stations where non-exempt moorings activities are carried out and their location co-ordinates).

This application document relates the moorings infrastructure set out in the table on pages 4-5 and its maintenance (category 1).

MAINTENANCE WORKS ACTIVITIES FOR INCLUSION IN MOORINGSLICENCE

Overview

Maintenance Works to Moorings

Generally comprise:

- Diving Inspections (mooring inspections)
- Replacement of mooring components in situ (including diving operations)
- Replacement / Inspection of mooring components by lifting (with vessel at mooring location)
- Deposit and removal of a mooring (including lifting and placing of blocks, anchors, sinkers, and other components)
- Airlifting of anchors / blocks as required for lifting of anchors / blocks
- Replacement and/or inspection of mooring rings to quay wall or jetty structures
- Associated cleaning of marine growth and clearance of sea bed material to inspect the mooring sinker or anchor, or other components
- Works to navigation markers (similar fittings and components to moorings)

LOCATION OF RNLI SCOTLAND LIFEBOAT STATIONS



RNLI Scotland Division - Moorings Licence Application

List of Stations and Moorings Sites

The table below lists the RNLI sites in geographical sequence starting at Kirkcudbright on the west coast to Dunbar (Torness) on the east coast. The Activity reference relates to the category of Works and the associated Method Statement. The lifeboat stations are identified as having an inshore lifeboat (ILB) and/or an All Weather Lifeboat(ALB).

RNLI Site Ref	Name of Lifeboat Station or Beach Lifeguard Area	Post Code	Type of Lifeboat	Summary Description of Infrastructure below MHWS, or Activity	Category of Maintenance Activities (Activity Reference)	Detailed Description of Infrastructure below MHWS, or Activity	Identified Harbour (SHA) or Harbour (CHA)	Statutory Authority Competent Authority
3	Kirkcudbright	DG6 4XQ	LB	Mooring	1	Channel navigation marker (green starb'd)	Dumfries & Galloway Council (SHA)	
5	Portpatrick	DG9 8AN	ALB	Mooring	1	swinging storm mooring	None	
13	Islay	PA46 7RB	ALB	Mooring	1	Main Lifeboat mooring with rings fixed to rock	None	
14	Islay	PA46 7RB	ALB	Mooring	1	Swinging storm mooring	None	
15	Oban	PA34 4LS	ALB	Mooring	1	Main lifeboat mooring with anchors and eye bolts in quay wall	None	
16	Tobermory	PA75 6NU	ALB	Mooring	1	Main lifeboat mooring with anchors	None	
17	Tobermory	PA75 6NU	ALB	Mooring	1	Swinging storm mooring	None	
20	Mallaig	PH41 4QD	ALB	Mooring	1	Swinging storm mooring (main)	None	
21	Mallaig	PH41 4QD	ALB	Mooring	1	Swinging storm mooring (reserve)	None	
23	Portree	IV51 9DD	ALB	Mooring	1	Main swinging mooring	None	
24	Portree	IV51 9DD	ALB	Mooring	1	Reserve swinging mooring in harbour	None	
25	Barra Island	HS9 5XD	ALB	Mooring	1	Mooring (anchored mooring adjacent to pontoon berth)	None	
26	Barra Island	HS9 5XD	ALB	Mooring	1	Reserve swinging storm mooring	None	

27	Leverburgh	HS5 3UF	ALB	Mooring	1	Main lifeboat mooring on anchors. The pontoon system is secured in place with mooring anchors, and the maintenance of these anchors is as for general moorings, albeit that the moorings are lightweight and may be lifted with small workboats or accessed from the foreshore during low water conditions. This application covers the moorings only, not the pontoon itself.	None
37	Kessock	IV1 3YQ	ILB	Mooring	1	The navigation markers are required to identify the location of the slipway (during launch and recovery of the lifeboat trailer and tractor unit) and are close in to the shore (but not drying), and therefore the maintenance of these markers is similar to the maintenance of moorings save that the tackle is lightweight and the workboats used for maintenance is correspondingly smaller.	None
39	Fraserburgh	AB43 9BR	ALB	Mooring	1	Main lifeboat mooring with associated rings in quay wall and on foreshore	Fraserburgh Harbour Commissioners (CHA)
40	Peterhead	AB42 1DZ	ALB	Mooring	1	Main lifeboat mooring with associated rings in quay wall and anchors	Peterhead Bay Authority & Trustees of the Harbour of Peterhead (CHA)
45	Broughty Ferry	DD5 1EF	ILB & ALB	Mooring	1	Moorings to rings in jetty	None
51	Dunbar (Torness)	EH42 1HS	ILB & ALB	Mooring	1	Main swinging mooring for lifeboat	The Dunbar Harbour Trust (SHA)

SCOTLAND - LIFEBOAT STATIONS, & MOORINGS SITES - SITE COORDINATES (WGS84 DATA)

The following coordinates for the sites describe the area of activity at each station, which generally is the boundary of infrastructure, but can also include access and launch routes

Further mapping information at pages 9-27.

RNLI Sites	COORDINATES - LAT	COORDINATES - LON	SITE NO.
Kirkcudbright (Mooring - channel marker)	54.794648	-4.062757	3
	54.794753	-4.062607	
	54.795016	-4.063089	
	54.794819	-4.063819	
	54.794521	-4.063611	
	54.794648	-4.062757	
Portpatrick (Mooring)	54.842099	-5.1194804	5
	54.842237	-5.1187105	
	54.842787	-5.1192964	
	54.842569	-5.1199584	
	54.842099	-5.1194804	
Islay (Lifeboat Station)	55.847419	-6.1045598	13
	55.84728	-6.1041455	
	55.847627	-6.1037344	
	55.847774	-6.1041816	
	55.847419	-6.1045598	
Islay (Mooring)	55.855175	-6.1084966	14
	55.854212	-6.1085067	
	55.854287	-6.1062921	
	55.855279	-6.1064769	
	55.855175	-6.1084966	
Oban	56.411077	-5.4802245	15
	56.41137	-5.4800248	
	56.411241	-5.4795102	
	56.411041	-5.4800275	
	56.411077	-5.4802245	
Tobermory (Lifeboat Station)	56.6232	-6.0637186	16
	56.622933	-6.0633488	
	56.623262	-6.0623565	

	56.623538	-6.0627287	
	56.6232	-6.0637186	
Tobermory (Mooring)	56.621017	-6.062604	17
	56.621455	-6.060471	
	56.622321	-6.061283	
	56.621883	-6.063449	
	56.621017	-6.062604	
Mallaig (Mooring - Main)	57.005513	-5.827420	20
	57.005109	-5.826679	
	57.004990	-5.824101	
	57.006615	-5.823215	
	57.007676	-5.823692	
	57.007362	-5.826427	
	57.005513	-5.827420	
Mallaig (Mooring - Reserve)	57.005519	-5.827412	21
	57.005096	-5.826635	
	57.004980	-5.824095	
	57.006641	-5.823183	
	57.007662	-5.823772	
	57.007358	-5.826398	
	57.005519	-5.827412	
Portree Lifeboat Mooring (Main)	57.411271	-6.1878445	23
	57.411373	-6.1869231	
	57.410873	-6.1865493	
	57.410775	-6.1876212	
	57.411271	-6.1878445	
Portree Lifeboat Mooring (Reserve)	57.411444	-6.1866978	24
	57.411259	-6.1860269	
	57.411506	-6.1856551	
	57.411686	-6.1864422	
	57.411444	-6.1866978	
Barra Island (Lifeboat Station)	56.95324	-7.48788	25
	56.95339	-7.48745	
	56.95369	-7.48781	
	56.95357	-7.48828	
	56.95324	-7.48788	
Barra Island (Mooring)	56.951801	-7.485459	26
	56.95278	-7.483551	
	56.953617	-7.485115	

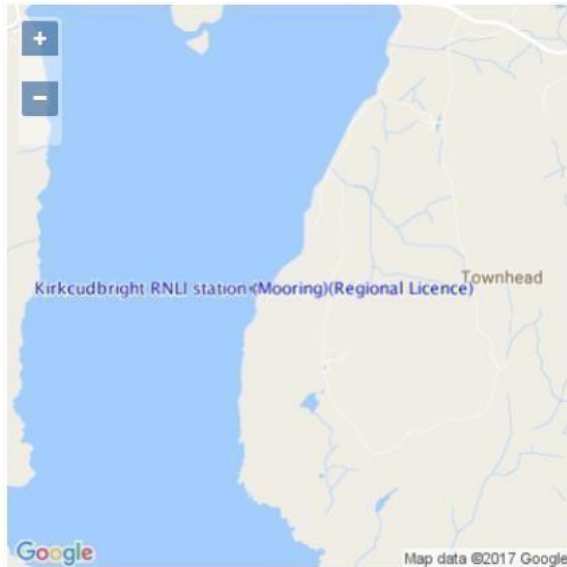
	56.95284	-7.486948	
	56.951801	-7.485459	
Leverburgh Lifeboat Station	57.766978	-7.025807	27

	57.767116	-7.0252874	
	57.766899	-7.0250889	
	57.766743	-7.0256227	
	57.766978	-7.025807	
Kessock Lifeboat Station	57.500638	-4.235266	37
	57.500548	-4.235023	
	57.500673	-4.234924	
	57.500655	-4.234617	
	57.500700	-4.234361	
	57.500832	-4.234129	
	57.500827	-4.233559	
	57.501136	-4.233675	
	57.501020	-4.234299	
	57.500893	-4.234394	
	57.500794	-4.234650	
	57.500861	-4.235044	
	57.500638	-4.235266	
Fraserburgh Lifeboat Station	57.69339	-2.00239	39
	57.6935	-2.00239	
	57.69349	-2.00182	
	57.69339	-2.00181	
	57.69339	-2.00239	
Peterhead Lifeboat Station	57.50243	-1.77398	40
	57.50248	-1.77336	
	57.50264	-1.77341	
	57.50258	-1.77404	
	57.50243	-1.77398	
Broughty Ferry Lifeboat Station	56.46386	-2.87714	45
	56.46406	-2.877	
	56.46414	-2.8775	
	56.46502	-2.87712	
	56.46507	-2.87748	
	56.46399	-2.87798	
	56.46386	-2.87714	
Dunbar (Torness) (Main Mooring)	55.972776	-2.4073085	51
	55.972149	-2.4068533	
	55.971737	-2.409124	
	55.97249	-2.4095486	
	55.972776	-2.4073085	

Site Location Plans

3. Kirkcudbright RNLI station(Mooring)

Location Plan



Site Plan



5. Portpatrick RNL Station (Mooring)

Location Plan

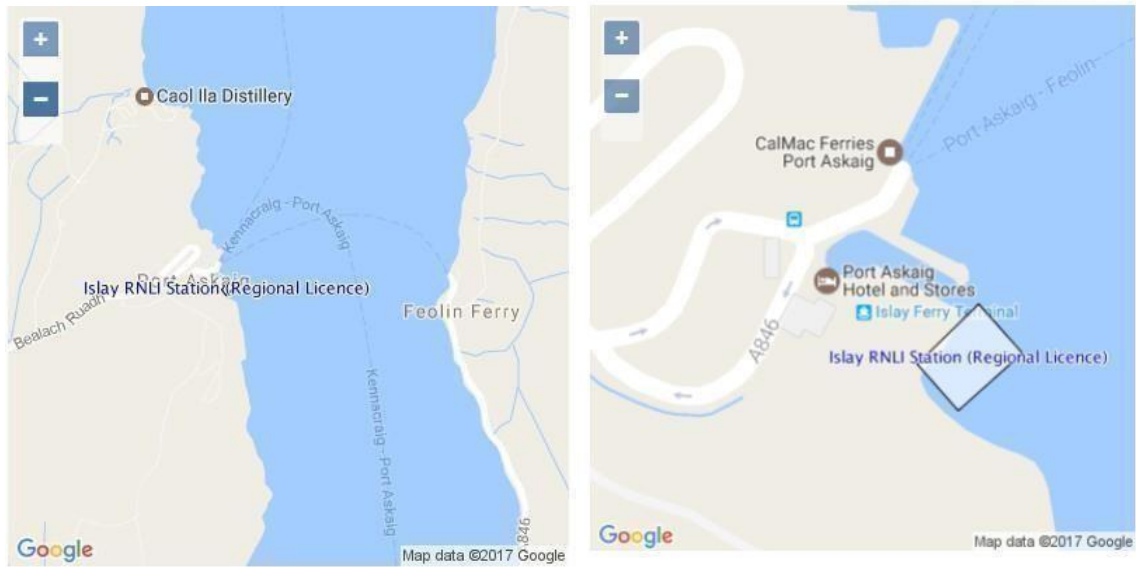


Site Plan



13. Islay RNLI Lifeboat Station

Location Plan



Site Plan



14. Islay RNLI Lifeboat Station(Mooring)

Location Plan

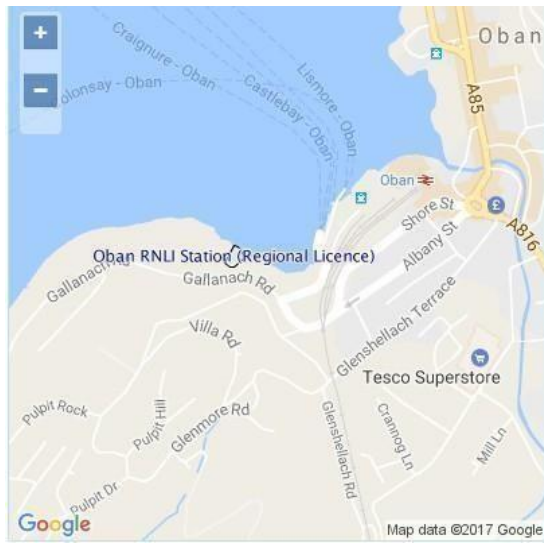


Site Plan



15. Oban RNLI Lifeboat Station

Location Plan



Site Plan



16. Tobermory RNLI Lifeboat Station

Location Plan

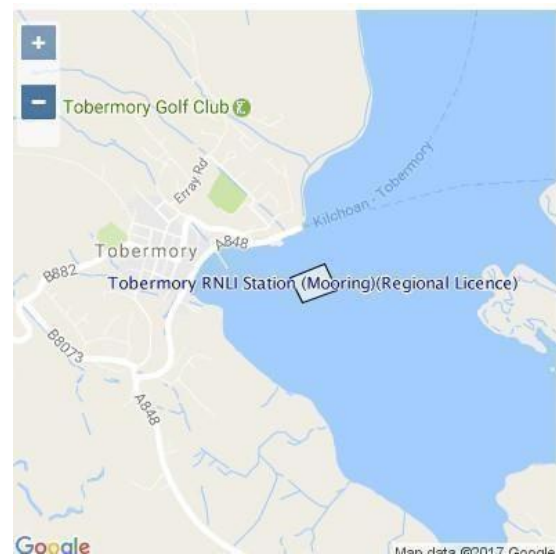
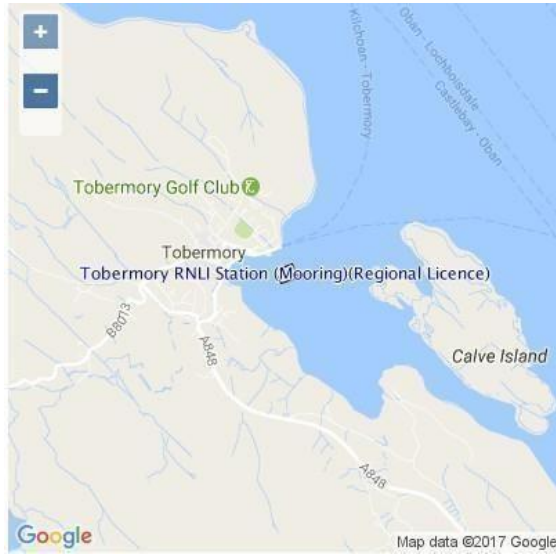


Site Plan



17. Tobermory RNLI Lifeboat Station(Mooring)

Location Plan



Site Plan



20. Mallaig RNLI Lifeboat Mooring(Main)

Location Plan



Site Plan



21. Mallaig RNLI Lifeboat Mooring(Reserve)

Location Plan



Site Plan



23. Portree RNLI Lifeboat Station

Location Plan



Site Plan



24. Portree RNLI Mooring(Reserve)

Location Plan



Site Plan



25. Barra Island RNLI Mooring

Location Plan

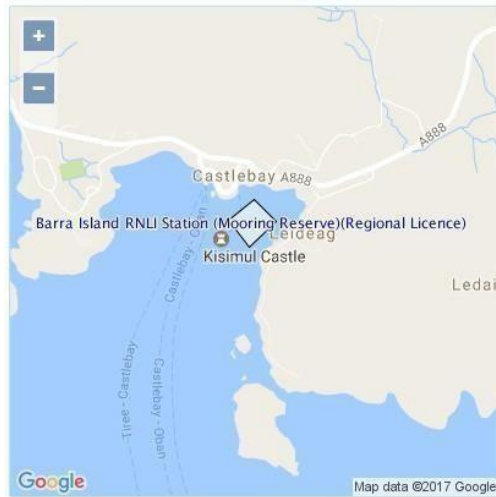


Site Plan



26. Barra Island RNLI Mooring(Reserve)

Location Plan

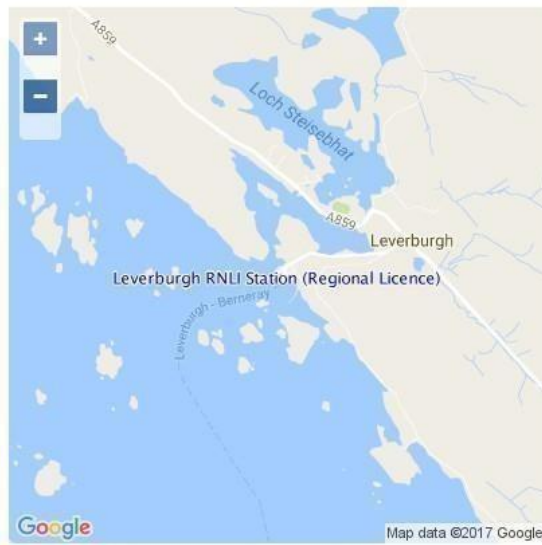


Site Plan



27. Leverburgh RNLI Lifeboat Station

Location Plan



Site Plan



37. Kessock RNLI Lifeboat Station

Location Plan



Site Plan



39. Fraserburgh RNLI Lifeboat Station

Location Plan

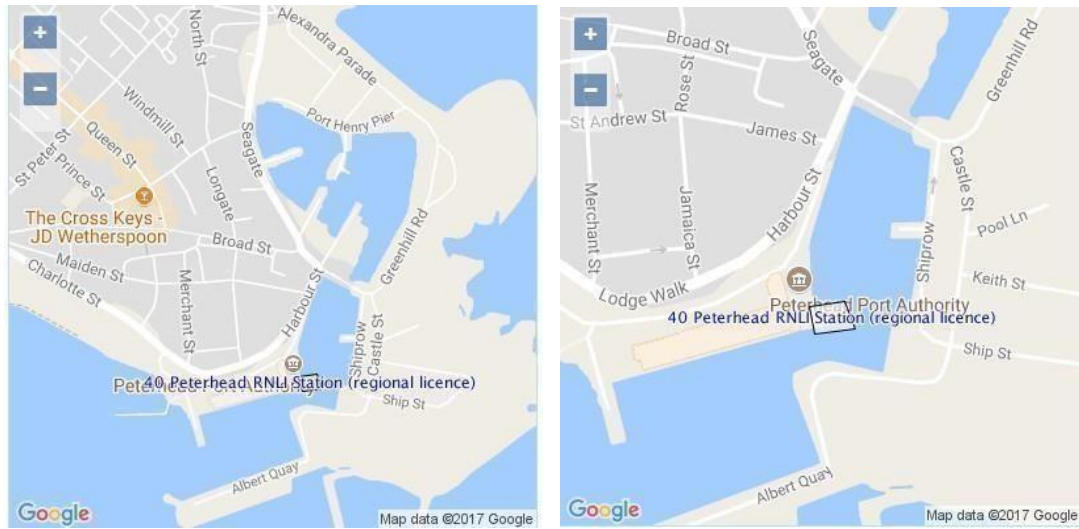


Site Plan



40. **Peterhead RNLI Lifeboat Station**

Location Plan



Site Plan



45. Broughty Ferry RNLI Lifeboat Station

Location Plan

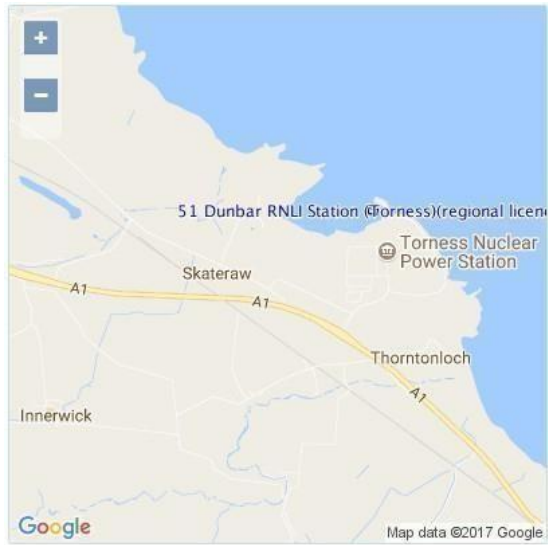


Site Plan



51. Dunbar RNLI Lifeboat Station(Torness)

Location Plan



Site Plan



WATER FRAMEWORK DIRECTIVE (2000/60/EC)ASSESSMENT

RNLI Scotland Division - Regional Licence Application

General Method Statement for Category 1 Works

Regional Method Statement - Scope ofActivities

This Method Statement covers Category 1 Works and supports the RNLI Scottish Division Regional Licence for Low Impact Moorings Maintenance Works application:

Category 1 Works – Maintenance to Moorings

The RNLI moorings are generally conventional swinging moorings (either used continuously or as a temporary mooring when the lifeboat cannot be recovered back to a boathouse) or 'breasting' moorings for slipway recovery, when the mooring is used to assist the recovery of the lifeboat. The mooring tackle incorporates a single (sometimes multiple) concrete sinker block, or steel anchors, usually multiple in a spread pattern. The riser (chain), buoy and attached mooring line are conventional configurations. Moorings are used for both ILB and ALB lifeboats. Some moorings are anchored into rock (where the mooring is close in to the foreshore).

Some moorings are located within a harbour adjacent to quay walls or jetty structures, where the mooring tackle may be anchored directly to the quay or jetty via a mooring block or ring lying below MHWS.

Maintenance generally comprises:

- Diving Inspections (mooring inspections)
- Replacement of mooring components in situ (including diving operations)
- Replacement / Inspection of mooring components by lifting (with vessel at mooring location)
- Deposit and removal of a mooring (including lifting and placing of blocks, anchors, sinkers, and other components)
- Airlifting of anchors / blocks as required for lifting of anchors/blocks
- Replacement and/or inspection of mooring rings to quay wall or jetty structures
- Associated cleaning of marine growth and clearance of sea bed material to inspect the mooring sinker or anchor, or other components
- Works to navigation markers (similar fittings and components to moorings)

The RNLI has a requirement to carry out maintenance works to their lifeboat moorings and navigation markers to ensure operational effectiveness and safety. The moorings and markers are subject to both wear and environmental degradation, and failure of a mooring or navigation marker could jeopardise the launching of a lifeboat. The maintenance works comprise any of the following:

- a) Diving inspections (including minor cleaning for inspection purposes) are carried out by specialist diving contractors, usually operating from a specialist dive support vessel. The activity might include component replacement where urgent action is required.
- b) Inspection by lifting of mooring tackle components (shackles, chains, mooring rings, mooring buoy, rope, buoy marker, mooring blocks, mooring anchors, etc.) and re-depositing on sea bed, at the same location.

WATER FRAMEWORK DIRECTIVE (2000/60/EC)ASSESSMENT

c) Replacement of mooring tackle components in situ (shackles, chains, mooring rings, mooring buoy, rope, buoy marker, etc.) with support vessel and divers in attendance.

d) Replacement of mooring tackle components by lifting the mooring anchors or blocks (shackles, chains, mooring rings, mooring buoy, rope, buoy marker, mooring blocks, mooring anchors, etc.) and re-depositing on sea bed with new components at the same location.

e) Inspection and replacement of mooring components adjacent to lifeboat berth i.e. works to moorings rings, chains, anchors, etc. including components anchored to rock

The works are carried out by specialist marine contractors using specialist vessels (incorporating lifting equipment).

Some maintenance actions are required on predictable cycles, whereas others are reactive.

The frequency of these maintenance works is influenced by environmental and operational degradation but anticipated / predicted cycles of works are summarised in Table 1 below:

Table 1 – Predicted Activity Schedule

Activity	Predicted Scale of Activity and Frequency	Comment
Mooring / navigation marker inspection	Every 6 -12 months and reactive	The cycle of inspections is moderated to suit both the previous inspection findings, and the particular environmental factors at each station. Generally, reactive inspections out of the maintenance cycle will be carried out where the station has reported a problem or where the mooring might have moved (due to severe storms)
Replacement of mooring / navigation marker components	Every 6 -12 months and reactive	Replacement of components are generally timed to coincide with mooring inspection cycles, as components are replaced on a precautionary basis when wear or degradation exceeds specified limits

The timing of the maintenance activities varies, but as the lifeboat remains fully operational at all times typically works to a mooring will take place within a single day's visit. Scheduled works are normally planned for the spring or autumn, but can be at other times dependent upon mobilisation, weather, etc.

Access to the mooring will be from the lifeboat station or from a nearby slipway or quayside (subject to normal harbor authority permissions where required), or often directly from a workboat that has passed to the mooring location under a scheduled cycle of inspections and maintenance.

The works involve dismantling the mooring components (undoing shackles and fittings) with hand tools, and generally, replacing on a 'like for like' basis. Works on

WATER FRAMEWORK DIRECTIVE (2000/60/EC)ASSESSMENT

the deck of the support vessel might include welding and lifting, using powered or hydraulic tools.

All works will be carried out in compliance with the pollution control information on SEPA's website (which has replaced the Scottish Environment Protection Agency document PPG5: Works and maintenance in or near water.)

<https://www.sepa.org.uk/regulations/water/pollution-control/>

The Station Specific Information in table 2 below contains details of any particular variations from this General MethodStatement.

Table 2 - Station specific Information – Annex to General MethodStatement

Lifeboat Station & Works	Predicted Scale of Activity and Frequency	Additional Comments
Islay	Every 6 -12 months and reactive	The mooring lines are attached to rings fixed to rock and access to the foreshore may be required at low water to carry out inspections and works
Fraserburgh	Every 6 -12 months and reactive	The mooring lines are attached to rings fixed to rock and access to the foreshore may be required at low water to carry out inspections and works

ILLUSTRATIVE PHOTOGRAPHS OF LIFEBOAT STATIONS FOR SCOTTISH MOORING LICENCE

The following photographs are intended to illustrate the type of station infrastructure and thereby the categories of maintenance works.



Picture 1 – Leverburgh Mooring



Picture 2 - View of Islay Mooring



Picture 3 – Mooring Maintenance showing specialist vessel lifting mooringsinker



Photo 4 – Typical Breasting Mooring Arrangement for All Weather Lifeboats with 3 anchors, to central mooring buoy and pick-upfloat

MARINE POLICY STATEMENT (MPS) AND SCOTTISH MARINE PLAN

The works proposed in this application do not constitute new development but relate to the operation and maintenance of existing infrastructure and are consistent with Scotland's National Marine Plan ('SNMP'). The licensable activity which would be permitted by the proposed regional marine licence is low impact maintenance activity and is sustainable use of the marine environment which is consistent with the policies and objectives of the SNMP (GEN 1 'general planning principle').

The proposed maintenance activity provides the social benefit of a functioning life-saving service, promoting health and wellbeing that benefits not only coastal communities but also those who travel to and use the marine and coastal environment (GEN 3 'social benefit').

'Landscape and seascape are important elements of people's enjoyment of the coastal and marine environment. They are also important as the setting for coastal communities, contributing to sense of place, economic livelihoods and quality of life.' (GEN 7 'landscape/seascape'). It is not envisaged that the proposed maintenance activities would develop, change or adversely impact the landscape character and visual amenity of each site, as no new development is proposed as part of this marine licence application.

The RNLI has undertaken a high level review of each site included in this application for a regional marine licence to identify sites that are located within 2km of a Protected Area (see Habitats Assessment at page 37). The RNLI has consulted Scottish Natural Heritage (SNH) in relation to the potential impact that the proposed low impact maintenance activities may have on the legally protected areas and species in the marine environment (GEN 9 'Natural Heritage'); see Appendix 1 for the relevant SNH pre-consultation response.

The proposed maintenance activities should not result in a deterioration of the quality of water (GEN 12 'Water quality and resource') (see WFD assessment at page 34). The maintenance activities do not involve any new pathways that might introduce marine non-native species (MNNS) (GEN 10 'Invasive non-native species'). The proposed activities will not result in additional marine litter (GEN 11 'Marine litter') (see Method Statements at page 28).

As the proposed activities are low impact, there will not be any significant adverse effects of man-made noise and vibration in the marine environment (GEN 13 'Noise').

The maintenance activities proposed for the sites in this regional marine licence application would not have a significant cumulative impact that would outweigh the benefit of the activities (GEN 21 'Cumulative impacts'). These are low impact activities that are essential to keep RNLI lifeboat stations operational in order to launch and recover lifeboats in response to emergency call-outs.

1. WFD requirements

- 1.1. River basins comprise all transitional waters (estuaries) and coastal waters extending to 3nm seaward from the territorial baseline. Any proposed development within 3nm must have regard to the requirements of the Water Framework Directive (WFD) (2000/60/EC) to ensure that all transitional and coastal water bodies achieve 'Good Ecological Status' and that there is no deterioration in status.
- 1.2. The WFD was implemented in Scotland by The Water Environment and Water Services (Scotland) Act 2003. Further regulatory controls over activities which may affect Scotland's water environment are contained within The Water Environment (Controlled Activities) (Scotland) Regulations 2011 – more commonly known as the Controlled Activity Regulations (CAR). However, pursuant to regulation 3(1)(2), the CAR do not apply to any activity where a licence is required under Part 4 of the Marine Licensing (Scotland) Act 2010 and are therefore not applicable for the purposes of this WFD assessment.
- 1.3. The WFD requires all European countries to manage the water environment to consistent standards. This will be achieved through a number of objectives, which include:
 - (i) Preventing deterioration in the status of aquatic ecosystems, protect them, and improve the ecological condition of waters.
 - (ii) Aim to achieve at least good status for all water bodies by 2015. Where this is not possible and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027.
- 1.4. If a project is determined as resulting in an adverse effect to a water body causing a potential deterioration in status or if it prevents the actions which are required to raise the status of the water body, then the project must be assessed and justified with mitigation proposed as is specified in Article 4(7) of the WFD.
- 1.5. The aim of this screening assessment is to determine whether the works associated with the RNLI Regional Licence application are WFD compliant or will cause an adverse impact and thus whether an assessment of the project under Section 4(7) of the WFD is required.

2. Proposed works activities

- 2.1. The RNLI's proposed regional licence covers low impact maintenance activities to moorings.

3. Intention of assessment

- 3.1. There is no formal guidance for carrying out WFD assessments in Scotland. The Environment Agency provides guidance where marine dredging activities will take place in its publication, 'Clearing the Waters'. The Northern Ireland Environment Agency provides guidance for EIA developments on carrying out a WFD assessment. In essence, these documents highlight similar approaches and have been used throughout the course of this assessment. This assessment is not a comprehensive review based on that process, rather a high level review of the likely or potential impacts which form the basis of a screening process.

3.2. The intention of this assessment is to set out whether the RNLI low impact mooring maintenance activities will affect status at water body level. If there are instances where the activities may have a bearing, this assessment will ensure that any potential effect on status can be successfully mitigated, and on that basis to demonstrate that the activity is WFD compliant and the consenting process can continue.

4. Consideration of exemption

4.1. One of the objectives of the WFD is to ensure the status of rivers, lakes, estuaries, coastal waters and groundwater is protected from deterioration. In specific circumstances the Directive does provide for exemptions or reasons why this objective should not be applied. Although protecting the water environment is a priority, some new modifications may provide important benefits to human health, human safety and/or sustainable development. Such benefits can include:

- a) Public water supply
- b) Flood defence/alleviation
- c) Hydropower generation
- d) Navigation

4.2. This licence application does not specifically seek exemption, as the impact of the proposed activities is not considered to have an effect that is likely to be significant at water body level. However, the activities directly impact on safety at sea through the lifesaving function of the infrastructure and consequently, this assessment recognises the social and human safety benefit of the licence i.e. that given the scale and nature of the activities that an exemption, if required, might be appropriate.

5. WFD assessment

5.1. To provide a proportionate assessment of whether any activities might have a significant adverse impact on a water body, the activities have been assessed against the following criteria:

- 1) No changes that will result in a deterioration of current ecological potential;
- 2) No changes that will cause failure to meet Good Ecological Potential (GEP); and
- 3) No changes that will permanently prevent or compromise the relevant Environmental Objectives being met in other waterbodies.

5.2. The ecological status of the water bodies potentially impacted by the activities have been reviewed, based on currently available mapping data from the Scottish Environment Protection Agency i.e. the River Basin Management Plan interactive map. Generally it is evident that both the scale and nature of the activity is insignificant compared with the extent of the water body and its potential to be deteriorated by the nature of works.

5.3. The screening assessment suggests that the potential effect on the water body is limited to chemical pollutants, but that this can be mitigated by standard precautionary measures, and appropriate licensing conditions e.g. compliance with the pollution control information on SEPA's website

(<https://www.sepa.org.uk/regulations/water/pollution-control/>)

6. Findings of assessment

The findings are that the proposed maintenance activities are unlikely to lead to a deterioration of the ecological potential of any water body, and that no further assessment (scoping) or mitigation beyond that already planned is required.

HABITATS REGULATIONASSESSMENT

A high level review has been carried out at each site to determine the protected sites, each site is in or near (within 2 km), if any. The table below lists the RNLI sites in geographical sequence, from Kirkcudbright to Dunbar.

The proposed activities are not considered to have a significant effect on those sites identified as being in or near a protected Site.

Scottish Natural Heritage has provided their initial assessment following pre-application consultation. The comments relevant to maintenance of moorings are included in Appendix 1.

RNLI SCOTLAND DIVISION SITES – Review of Protected Sites

RNLI Site Ref	Name of Station	Postcode	Protected sites which each site location is in or near (within 2km)
3	Kirkcudbright Lifeboat Mooring	DG6 4XQ	Torrs to Mason's Walk SSSI
5	Portpatrick Lifeboat Mooring	DG9 8AN	None
13	Islay Lifeboat Station	PA46 7RB	Jura, Scarba and the Garvellachs SPA
14	Islay Lifeboat Mooring	PA46 7RB	Jura, Scarba and the Garvellachs SPA
15	Oban Lifeboat Station	PA34 4LS	None
16	Tobermory Lifeboat Station	PA75 6NU	None
17	Tobermory Lifeboat Mooring	PA75 6NU	None
20	Mallaig Lifeboat Mooring	PH41 4QD	None
21	Mallaig Lifeboat Mooring	PH41 4QD	None
23	Portree Lifeboat Station	IV51 9DD	None
24	Portree Lifeboat Mooring	IV51 9DD	None
25	Barra Island Lifeboat Station	HS9 5XD	None
26	Barra Island Lifeboat Mooring	HS9 5XD	None
27	Leverburgh Lifeboat	HS5 3UF	West Coast of the Outer Hebrides SPA

	Station		South Lewis, Harris and North Uist National Scenic Area
37	Kessock Lifeboat Station	IV1 3YQ	Moray Firth SAC
39	Fraserburgh Lifeboat Station	AB43 9BR	Roseheartly to Fraserburgh Coast SSSI
40	Peterhead Lifeboat Station	AB42 1DZ	Buchan Ness to Collieston Coast SPA
45	Broughty Ferry Lifeboat Station	DD5 1EF	Firth of Tay and Eden Estuary SAC Firth of Tay and Eden Estuary SPA Firth of Tay and Eden Estuary Ramsar Site Monifieth Bay SSSI
51	Dunbar Lifeboat Mooring	EH42 1HS	Firth of Forth SPA Firth of Forth Ramsar Site Barns Ness Coast SSSI Firth of Forth SSSI

APPENDIX 1- SNH Advice received relevant to moorings

SNH Advice in relation to proposal for maintenance marine licence for RNLI stations in Scotland

Our view is that a single licence will be able to consider the issues adequately.

The Sites

The documents provided use a standardised 2.5km distance to judge which designated sites to consider. Although this is a useful start to considering the issues, we advise that the fundamental consideration should be the possibility of connectivity for the qualifying/notified interest features to the activities proposed.

Kirkcudbright – The Torrs to Mason’s Walk SSSI uses the lifeboat station slipway as the boundary. Qualifying features include Geological (Wenlock stratigraphy) and Biological (saltmarsh, shingle, cliff and vascular plant assemblage). We have considered if activities proposed could lead to significant and unrecoverable loss of any of these features. Records don’t indicate vascular plant assemblage or saltmarsh important close to the slipway. I am still looking into this to see if a limiting condition may be appropriate.

Islay – Sound of Islay separates the lifeboat station and the Port Askaig from the eagle SPA, and there is a regular ferry. No connectivity.

Oban and Tobermory are both within buffer distance of the proposed Loch of Sunart to Sound of Jura MPA – for a) skate and b) Quaternary of Scotland - glaciated channels/troughs. The harbours themselves aren’t included within the proposed boundary. Unlikely to be connectivity to activity proposed by RNLI.

Mallaig – possible connectivity to Rum SPA if lighting issues increased. When considering work there may need to be a lighting strategy, but only if works will increase lighting in the harbour during the post fledging period for Manx Shearwater from mid-August to early October (fledgling birds are attracted by light and can become stranded/predated by gulls).

Barra – the proposed West Coast and Outer Hebrides SPA needs to be accounted for but the harbour isn’t in the proposed boundary and there is unlikely to be connectivity to activity proposed by RNLI.

Anstruther – designated sites should reflect those noted for Kinghorn etc. All will also need to account for the proposed Firth of Forth and St Andrews Bay Complex SPA, though connectivity is unlikely for most maintenance activities. This applies for Kinghorn, Dunbar, St Abbs. The Firth of Forth SSSI/SPA is excluded from the Anstruther town and old harbour environs and connectivity unlikely.

Dunbar – although within search boundary, the Firth of Forth and Barns Ness SSSI and the SPA is excluded from the town and old harbour environ and connectivity unlikely.

Leverburgh – Proposed boundary of the West Coast and Outer Hebrides SPA doesn’t include the pier/harbour but need to consider connectivity to features (wintering divers and grebes) and if there’s an “in principle” way of dealing with it.

Fraserburgh - Rosehearty to Fraserburgh Coast SSSI for non-breeding birds (purple sandpiper, turnstone, eider, curlew) and geology. No connectivity.

Peterhead - Buchan ness to Collieston Coast sufficiently distant that connectivity not likely. Site is for breeding seabirds.

Broughty - Needs to include consideration of the proposed Firth of Forth and St Andrews Bay complex (but boundary doesn't include harbour and connectivity unlikely) and Firth of Tay and Eden Estuary SPA/RAMSAR. Also the SAC (seals and estuarine habitats). Connectivity to the Monifieth Bay SSSI sanderling feature unlikely.

There are no designated sites where the works will impact directly physically on qualifying habitats (subject to further check for Kirkcudbright).

As such the most likely impact pathway are those on mobile species qualifying features such as birds, fish and marine mammals.

Possible impact pathways – pollution input – dealt with through standard anti-pollution protocols required by statutory regulation

APPENDIX 2- Lifeboat types and sizes

Any of the moorings may have a casualty vessel of unknown size on them.

SITE REF	NAME OF LIFEBOAT STATION OR BEACH LIFEGUARD AREA	POSTCODE	TYPE OF LIFEBOAT (class)	SIZE (metres)
3	Kirkcudbright	DG6 4XQ	B	Atlantic 75- 7.383 x 2.65 x 0.41 Atlantic 85- 8.44 x 2.85 x 0.53
5	Portpatrick	DG9 8AN	TAMAR	16.3 x 5.3 x 1.4
13	Islay	PA46 7RB	SEVERN	17.3 x 5.9 x 1.78
14	Islay	PA46 7RB	SEVERN	17.3 x 5.9 x 1.78
15	Oban	PA34 4LS	TRENT	14.3 x 4.9 x 1.45
16	Tobermory	PA75 6NU	SEVERN	17.3 x 5.9 x 1.78
17	Tobermory	PA75 6NU	SEVERN	17.3 x 5.9 x 1.78
20	Mallaig	PH41 4QD	SEVERN	17.3 x 5.9 x 1.78
21	Mallaig	PH41 4QD	SEVERN	17.3 x 5.9 x 1.78
23	Portree	IV51 9DD	TRENT	14.3 x 4.9 x 1.45
24	Portree	IV51 9DD	TRENT	14.3 x 4.9 x 1.45
25	Barra Island	HS9 5XD	SEVERN	17.3 x 5.9 x 1.78
26	Barra Island	HS9 5XD	SEVERN	17.3 x 5.9 x 1.78
27	Leverburgh	HS5 3UF	MERSEY	11.62 x 4 x 1.02
37	Kessock	IV1 3YQ	B	Atlantic 75- 7.383 x 2.65 x 0.41 Atlantic 85- 8.44 x 2.85 x 0.53
39	Fraserburgh	AB43 9BR	TRENT	14.3 x 4.9 x 1.45
40	Peterhead	AB42 1DZ	TAMAR	16.3 x 5.3 x 1.4
45	Broughty Ferry	DD5 1EF	TRENT; and D	14.3 x 4.9 x 1.45 5 x 2 x 0.52

51	Dunbar (Torness)	EH42 1HS	TRENT; and MERSEY	14.3 x 4.9 x 1.45 11.62 x 4 x 1.02

NB The Atlantic 85 is gradually replacing the Atlantic 75 (Class B).

APPENDIX 3: Marine Scotland Form - Marine Licence Application for Moorings

Marine Licence Application for Moorings

Version 1.0

Marine (Scotland) Act 2010

It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.

Under Section 54 of the Marine (Scotland) Act 2010, all information contained within and provided in support of this application will be placed on a Public Register. There are no national security grounds for application information not going on the Register under the 2010 Act

Public Register

Do you consider that any of the information contained within or provided in support of this application should not be disclosed:

- (a) for reasons of national security; YES ☐ NO ☒
- (b) for reasons of confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate commercial interest? YES ☐ NO ☒

If **YES**, to either (a) or (b), please provide full justification as to why all or part of the information you have provided should be withheld.

WARNING

It is an offence under the Act under which this application is made to fail to disclose information or to provide false or misleading information.

Target duration for determination is 14 weeks. Please note that missing or erroneous information in your application and complications resulting from consultation may result in the application being refused or delayed.

Marine licence applications will not be accepted unless accompanied by a cheque for the correct application fee, or if an invoice is requested, until that invoice is settled. Target timelines for determining applications do not begin until the application fee is paid.

Declaration

I declare to the best of my knowledge and belief that the information given in this form and related papers is true.

Signature

[Redacted]

Date

25.9.17

Name in BLOCK LETTERS

[Redacted]

Application Check List

Please check that you provide all relevant information in support of your application, including but not limited to the following:

- Completed and signed application form
- Maps/Charts
- Additional information e.g. photographs, consultation correspondence (if applicable)
- Payment (if paying by cheque)



1. Applicant Details

Title: Initials: Surname:

Trading Title (if appropriate): **ROYAL NATIONAL LIFEBOAT INSTITUTION**

Address: **Unit 3, Ruthvenfield Grove, Perth, Pethshire, PH1 3GL**

Name of contact (if different): **[Redacted]**

Telephone No. (inc. dialing code):

Email: **[Redacted]**

Statutory Harbour Authority? YES ☐ NO ☒

If **YES**, please provide a list of the latitude and longitude co-ordinates (WGS84) of the boundary points of the area of harbour jurisdiction using Appendix 01 Additional Co-ordinates form if necessary.

2. Agent Details (if any)

Title: **Mr** Initials: **N** Surname: **Harris**

Trading Title (if appropriate):

Address:

Name of contact (if different):

Telephone No. (inc. dialing code):

Email: **[Redacted]**

3. Payment

Enclosed Cheque ☐ Invoice ☒

Contact and address to send invoice to:

Applicant ☐ Agent ☒ Other ☐

If **OTHER**, please provide contact details:

Title: Initials: Surname:

Address:

Email:

4. Application Type

Is this application for a new mooring(s) site or an existing mooring(s) site:

New Site ☐ Existing Site ☐

If an **EXISTING SITE**, please provide the consent/licence number and expiry date:

Consent/Licence Number	Expiry Date
n/a- This is an application for a Regional Moorings Marine Licence for low impact maintenance activities to existing moorings [see attached Application Document].	

5. Mooring(s) Details

(a) Type of mooring(s) to be **deposited**:

Private ☒ Commercial ☐

(b) Number of mooring(s) to be **deposited**:

19 (for maintenance)

(c) Type of mooring(s) to be **removed** (if applicable):

Private ☒ Commercial ☐

(d) Number of mooring(s) to be **removed** (if applicable):

19 (for maintenance)

(e) Type and Size of vessel(s) to be moored (continue on a separate sheet if necessary):

Type	Size (metres)
see attached Application Document (Appendix 2)	

(f) Proposed start date (Target duration for determination of a marine licence application is 14 weeks):

(g) Location:

[see page 3 of the Application Document for a map indicating the location of sites, pages 6-8 for a list of coordinates and pages 9-27 for further mapping information for the sites].

Latitude and Longitude co-ordinates (WGS84) defining the location of each mooring or for the boundary points of any moorings area (continue on Appendix 01 Additional Co-ordinates form if necessary):

Latitude										Longitude									
		°			.				' N				°			.			' W
		°			.				' N				°			.			' W
		°			.				' N				°			.			' W
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		°			.				' N				°			.			' W
		°			.				' N				°			.			' W

(h) Is the mooring located within the jurisdiction of a statutory harbour authority?

YES ☐ NO ☐

If YES, please specify statutory harbour authority:

[See pages 4-5 where the jurisdiction of SHAs are indicated as applicable].

(i) Potential impacts the works may have (including details of areas of concern e.g designated conservation and shellfish harvesting areas) and proposed mitigation in response to potential impacts (continue on separate sheet if necessary):

The proposed works by their nature are low impact maintenance activities. It is not envisaged that the works will have adverse impacts that might be of concern [see Appendix 1 to the Application Document for the initial response from Scottish Natural Heritage].

6. Scotland's National Marine Plan

Have you considered the application with reference to Scotland's National Marine Plan?

YES ☒ NO ☐

If **YES**, provide details of considerations made including reference to the policies that have been considered:

[See page 33 of the Application Document].

If **NO**, please provide an explanation of why you haven't considered the National Marine Plan?

7. Consultation

List all bodies you have consulted and provide copies of correspondence:

Scottish Natural Heritage [see Appendix 1 to the Application Document]
Marine Scotland

8. Associated Works

Provide details of other related marine projects, including reference/licence numbers (if applicable):

Regional Marine Licence for Construction Projects (Islay, Oban, Tobermory, Barra Island, Fraserburgh, and Broughty Ferry)
Regional Marine Licence for Pontoons (Tobermory, and Peterhead).