

REGIONAL MARINE LICENCE APPLICATION

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



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RNLI Scotland Division

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

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RNLI Scotland Division- Marine Licence Application for Pontoons

EXECUTIVE SUMMARY

This Application Document contains the relevant information required to support the RNLI's regional marine licence application for pontoons for the RNLI's Scotland Division. Marine Scotland has advised the RNLI to use the 'Marine Licence Application for Pontoons' form (see copy attached at Appendix 2).

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 238 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.)

It should also be noted that exempted activities will not be included within the scope of the regional licence. Some of the maintenance activities carried out by the RNLI are exempt from the need to obtain a marine licence under the Marine Licensing (Exempted Activities) Order (Scottish Inshore region) 2011 (SI 2011/559 as amended). The most common exempt activities being carried out are those which fall within Article 27 and 28 (moorings and aids to navigation), and 29 (launching of vessels etc.).

This application applies to pontoon berths and their maintenance (category 2).

Regional marine licence application

Following correspondence with Marine Scotland on 20 July 2017, it was proposed that the RNLI applies for four regional licences of six years' duration to cover maintenance to pontoons, moorings, construction projects and dredging and sea disposal, excluding navigational dredging and pile replacement activities (unless an additional method statement is submitted a minimum of 2 months prior to any work). Three of these four licences have now been granted (construction - licence number 06643/19/0; moorings - licence number 06644/19/0; and beach re-profiling – licence number 06645/19/0)

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 the RNLI's Scotland Division, which covers the Scotland coastline from Portpatrick on the West Coast to Eyemouth on the East Coast (see below at pages 5-29 for a full list of stations where non-exempt licensable activities are carried out and their location co-ordinates).

Please note that redevelopment at one existing RNLI station: Stromness, will lead to changes to the infrastructure (including berthing and launching arrangements). Only the on-going maintenance needs for these redevelopments, once they have been completed, are included within the scope of this Regional Licence.

This licence application covers the pontoon infrastructure set out in the table (at pages 5-7) and its maintenance (category 2).

MAINTENANCE WORKS ACTIVITIES FOR INCLUSION IN REGIONAL PONTOON LICENCE

Overview

Maintenance Works to Pontoon Berths

Generally comprise:

- Maintenance, refurbishment, replacement of fittings or minor alterations (lights, anodes, telemetry, power & water supplies, fenders, hand-railing, pile brackets, storage cabinets, fuel pipes, etc.)
- Pontoon refurbishment / upgrade works (re-coating of corrosion protection, minor fabrication and other improvement works for operational or health and safety purposes) including for the removal and re-installation of the pontoon and link-span where needed
- Works to anodes
- Re-coating of piles (and their cleaning)
- Maintenance or minor alterations of pile fittings (mooring equipment, navigation lights, etc.)
- Maintenance, refurbishment, replacement of structure and fittings to link-span and approach structures (brows, gangways, bank-seats, and similar structures) including re-coating of corrosion protection, minor fabrication and other improvement works, and

including for the removal and re-installation where needed, and for painting of link-span and approach structures (partial re-coating), including the lifting out and re-installation where works are to be carried out ashore

- Repair works to associated quay walls (concrete / sheet piles / masonry) and associated timber/steel fittings or structure, and fenders (timber or synthetic)
- Installation of new pontoon fittings (for operational or H&S requirements)
- Scaffolding and access towers operations associated with maintenance activities above
- Minor Airlifting below pontoon(s) or base of piles
- Cleaning works for the purposes of inspections or maintenance works
- Works to pontoon anchors (including replacement of components and lifting of anchors and their replacement
- Diving activities associated with the above and minor airlifting (as needed for inspections).

The lifeboat launching and retrieval generates wear on the pontoon berths requiring maintenance to ensure operational effectiveness and the safety of crew members. The pontoon berth is also subject to environmental degradation due to the aggressive marine environment.

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

LOCATION OF RNLI SCOTLAND LIFEBOAT STATIONS



RNLI Scotland Division - Regional Licence Application for Pontoons

List of Stations

The table below lists the RNLI sites in geographical sequence starting at Portpatrick on the west coast to Eyemouth on the east coast. Each site is identified as a lifeboat station, and the table includes a summary description of the infrastructure (category) and an Activity reference. The Activity reference relates to the category of Works and the associated Method Statements. The lifeboat stations are identified as having an inshore lifeboat (ILB) and/or an All-Weather Lifeboat (ALB).

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 Authority (CHA)	Statutory Competent Authority
4	Portpatrick	DG9 8AN	ALB	Pontoon berth	2	Conventional steel pontoon and link-span, with two steel piles holding the pontoon, and two separate steel mooring piles	None	
7	Girvan	KA26 9AG	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel piles, and the steel bank-seat structure is supported on a steel pile at one end and a timber jetty at the other end. Some minor works to the deck timber jetty are included including non-slip surfacing	None	
8	Troon	KA10 6DX	ILB & ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel piles, and the steel bank-seat structure is supported on a steel pile at one end and onto the adjacent stone quay at the other end. The bank-seat pile also has two diagonal steel bracings to the quay	None	
12	Campbeltown	PA28 6ED	ILB & ALB	Pontoon berth	2	Conventional steel pontoon alongside steel sheet piled pier with concrete deck, with mooring lines (chains) to rings/bollards on pier, including access gangway to pontoon and fenders on pier	None	

16	Tobermory	PA75 6NU	ALB	Pontoon berth	2	Large piled steel berthing	None
19	Mallaig	PH41 4QD	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon and bank-seat structures are secured by steel piles;	None
27	Leverburgh	HS5 3UF	ALB	Pontoon berth	2	Approach floating jetty (Aqua-dock type system) with anchors. The infrastructure is essentially a proprietary lightweight pontoon systems and maintenance is limited to replacement of small modular components as needed.	None
28	Lochinver	IV27 4JY	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel piles;	None
29	Thurso	KW14 7UJ	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel guide piles attached to sheet piled quay wall	None
30	Longhope	KW16 3PG	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel guide piles attached to sheet piled quay wall	None
31	Stromness	KW16 3AA	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel guide piles attached to sheet piled quay wall	None
32	Kirkwall	KW15 1LE	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel guide piles attached to sheet piled quay wall	None
33	Wick	KW1 5HA	ALB	Pontoon berth	2	Conventional steel pontoon with link-span and separate steel bank-seat structure; the pontoon is secured by steel guide piles attached to sheet piled quay wall	Wick Harbour Trust (CHA)
36	Invergordon	IV18 0HD	ALB	Pontoon berth	2	Conventional steel pontoon (shared with	The Cromarty Firth Port

						Harbour Authority) with link-span and separate steel bank-seat structure; the pontoon is secured by steel guide piles attached to sheet piled quay wall.	Authority (SHA)
38	Buckie	AB56 1TX	ALB	Pontoon berth	2	Conventional steel pontoon with link-span; the pontoon is secured by steel	Moray Council (CHA)
40	Peterhead	AB42 1DZ	ALB	Pontoon berth	2	Conventional steel pontoon (shared with Harbour Authority) with link-span and separate steel bank-seat structure; the pontoon is secured by steel piles	Peterhead Bay Authority & Trustees of the Harbour of Peterhead (CHA)
41	Aberdeen	AB11 5DF	ILB & ALB	Pontoon berth	2	Conventional steel pontoon (shared with Harbour Authority) with link-span and bank-seat structure; the pontoon is secured by steel guide piles attached to sheet piled quay wall	Aberdeen Harbour Board (CHA)
43	Montrose	DD10 8BD	ILB & ALB	Pontoon berth	2	Conventional steel pontoon with link-span; the pontoon is secured by steel piles	None
52	Eyemouth	TD14 5AD	ILB	Pontoon berth	2	Conventional steel pontoon with steel pile guides on quay with separate steel access structure and vertical ladder and separate inset steps within quay, with separate floating dock (Aqua-dock type system) attached to steel pontoon for the ILB	None

SCOTLAND - LIFEBOAT STATIONS, MOORINGS & BEACH LIFEGUARD 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 is attached at page 11 - 29.

RNLI Sites	COORDINATES LAT	- COORDINATES LON	RNLI SITE REF
Portpatrick (Lifeboat Station)	54.84194	-5.1197937	4
	54.84214	-5.1190146	
	54.84191	-5.1188411	
	54.841719	-5.1196364	
	54.84194	-5.1197937	
Girvan	55.244276	-4.8592657	7
	55.244011	-4.8594512	
	55.243864	-4.8588113	
	55.244166	-4.8585969	
	55.244276	-4.8592657	
Troon	55.548349	-4.6815807	8
	55.548038	-4.6810046	
	55.548233	-4.6807166	
	55.548508	-4.681322	
	55.548349	-4.6815807	
Campbeltown	55.425306	-5.6018877	12
	55.425533	-5.6020982	
	55.425407	-5.6027191	
	55.42517	-5.6025078	
	55.425306	-5.6018877	
Tobermory (Lifeboat Station)	56.6232	-6.0637186	16
	56.622933	-6.0633488	
	56.623262	-6.0623565	
	56.623538	-6.0627287	
	56.6232	-6.0637186	
Mallaig (Lifeboat Station)	57.00581	-5.82696	19
	57.00589	-5.82662	
	57.00612	-5.82682	
	57.00604	-5.82717	
	57.00581	-5.82696	
Leverburgh Lifeboat Station	57.766978	-7.025807	27

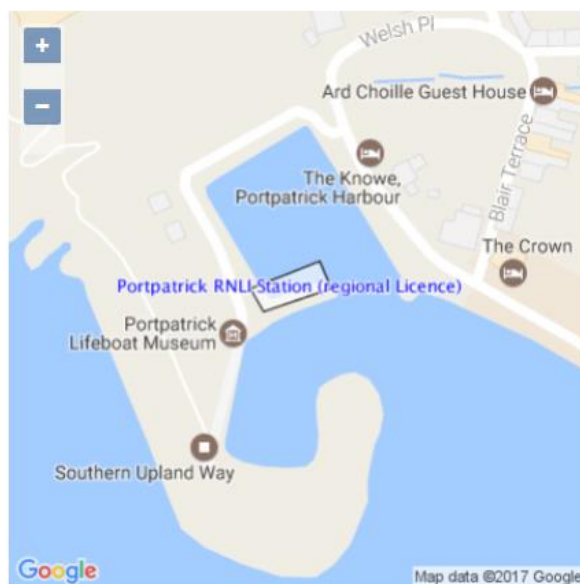
	57.767116	-7.0252874	
	57.766899	-7.0250889	
	57.766743	-7.0256227	
	57.766978	-7.025807	
Lochinver Lifeboat Station	58.14691	-5.24794	28
	58.14736	-5.24834	
	58.14741	-5.23802	
	58.14695	-5.24765	
	58.14691	-5.24794	
Thurso Lifeboat Station	58.61173	-3.54729	29
	58.61177	-3.547	
	58.61216	-3.5473	
	58.61211	-3.54758	
	58.61173	-3.54729	
Longhope Lifeboat Station	58.80102	-3.20602	30
	58.80111	-3.20581	
	58.80134	-3.20612	
	58.80125	-3.20636	
	58.80102	-3.20602	
Stromness Lifeboat Station	58.9618	-3.29701	31
	58.96234	-3.29693	
	58.96238	-3.29763	
	58.96184	-3.2977	
	58.9618	-3.29701	
Kirkwall Lifeboat Station	58.98521	-2.96005	32
	58.98523	-2.96034	
	58.98554	-2.96028	
	58.98551	-2.96001	
	58.98521	-2.96005	
Wick Lifeboat Station	58.43938	-3.0832	33
	58.43942	-3.08269	
	58.43953	-3.08272	
	58.43952	-3.08325	
	58.43938	-3.0832	
Invergordon Lifeboat Station	57.68557	-4.16723	36
	57.68667	-4.167212	
	57.68655	-4.167563	
	57.68625	-4.167444	
	57.68591	-4.167446	
	57.6859	-4.16767	
	57.68556	-4.167627	

	57.68557	-4.16723	
Buckie Lifeboat Station	57.68063	-2.9534	38
	57.6808	-2.95352	
	57.68096	-2.95258	
	57.68081	-2.95249	
	57.68063	-2.9534	
Peterhead Lifeboat Station	57.50243	-1.77398	40
	57.50248	-1.77336	
	57.50264	-1.77341	
	57.50258	-1.77404	
	57.50243	-1.77398	
Aberdeen Lifeboat Station	57.1437	-2.0791	41
	57.14385	-2.08031	
	57.14412	-2.08007	
	57.14391	-2.07894	
	57.1437	-2.0791	
Montrose Lifeboat Station	56.70322	-2.46372	43
	56.7034	-2.46345	
	56.70354	-2.4638	
	56.70338	-2.46404	
	56.70322	-2.46372	
Eyemouth	55.872933	-2.0864483	52
	55.872637	-2.0862239	
	55.872745	-2.0860004	
	55.873005	-2.0861768	
	55.872933	-2.0864483	

Site Location Plans

4. Portpatrick RNLI Station

Location Plan



Site Plan



7. Girvan RNLI Lifeboat Station

Location Plan

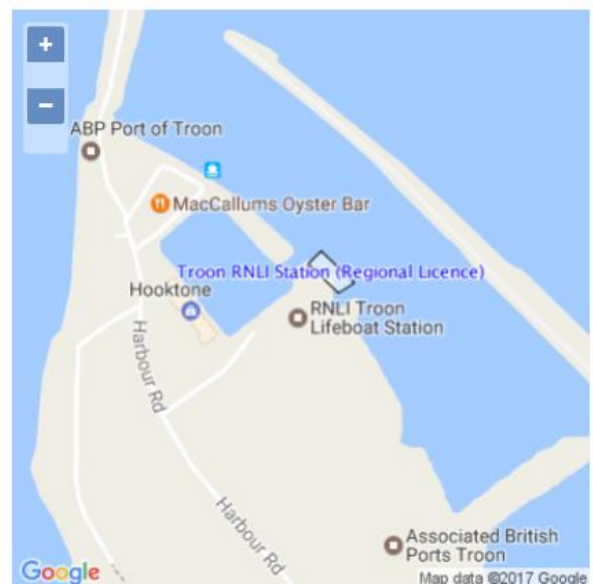
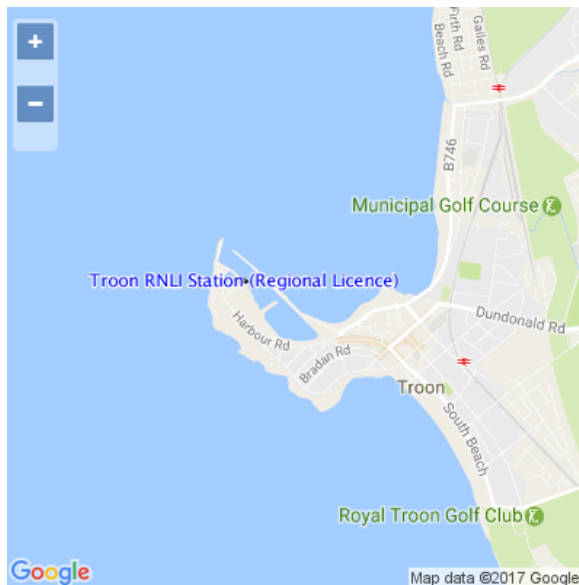


Site Plan



8. Troon RNLI Lifeboat Station

Location Plan



Site Plan



12. Campbeltown RNLI Lifeboat Station

Location Plan



Site Plan



16. Tobermory RNLI Lifeboat Station

Location Plan



Site Plan



19. Mallaig RNLI Lifeboat Station

Location Plan



Site Plan



27. Leverburgh RNLI Lifeboat Station

Location Plan



Site Plan



28. Lochinver RNLI Lifeboat Station

Location Plan



Site Plan



29. Thurso RNLI Lifeboat Station

Location Plan



Site Plan



30. Longhope RNLI Lifeboat Station

Location Plan

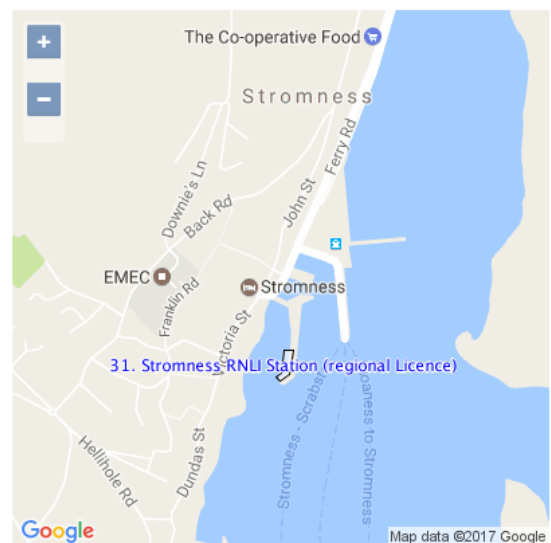


Site Plan



31. Stromness RNLI Lifeboat Station

Location Plan



Site Plan



32. Kirkwall RNLI Lifeboat Station

Location Plan



Site Plan



33. Wick RNLI Lifeboat Station

Location Plan

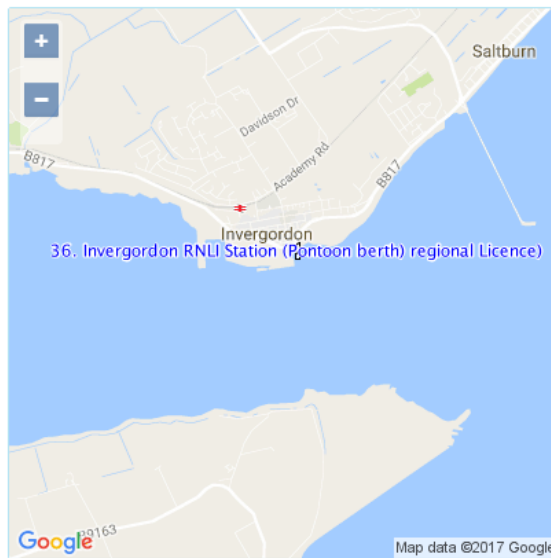


Site Plan



36. Invergordon RNLI Lifeboat Station (Pontoon Berth)

Location Plan



Site Plan



38. Buckie RNLI Lifeboat Station

Location Plan

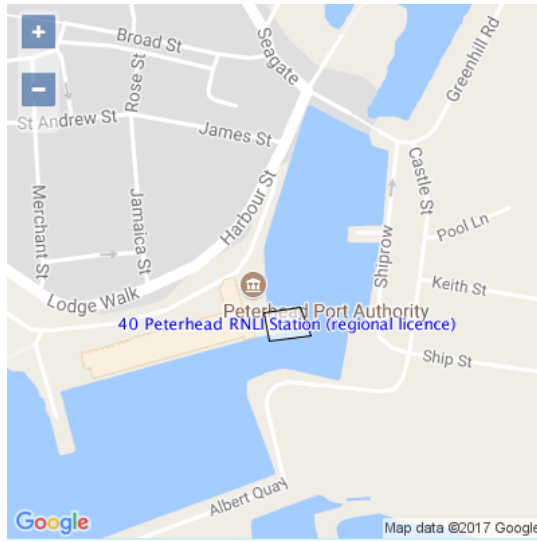


Site Plan



40. Peterhead RNLI Lifeboat Station

Location Plan



Site Plan



41. Aberdeen RNLI Lifeboat Station

Location Plan



Site Plan



43. Montrose RNLI Lifeboat Station

Location Plan

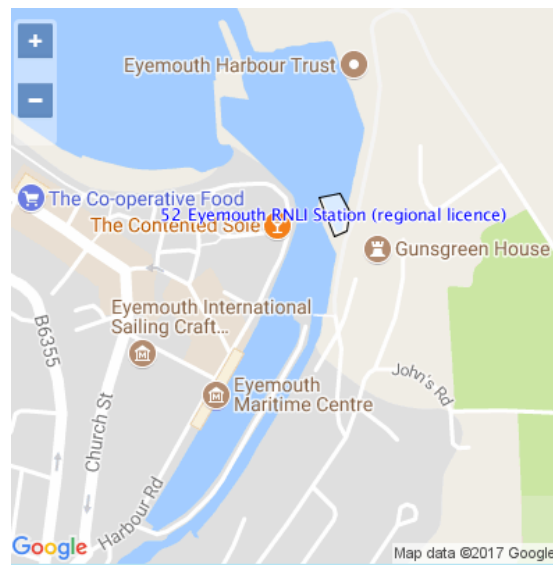


Site Plan



52. Eyemouth RNLI Lifeboat Station

Location Plan



Site Plan



RNLI Scotland Division – Regional Licence Application for Maintenance to Pontoon Berths

General Method Statement for Category 2 Works

Regional Method Statement - Scope of Activities

This Method Statement covers Category 2 Works and supports the Divisional Licence application:

Category 2 Works – Maintenance to Pontoon Berths

The RNLI operate many of its lifeboats from pontoon berths, where the lifeboat (ILB or ALB) is stationed alongside a pontoon. The pontoon is secured via tubular piles, anchors or guide piles attached to a quay wall or jetty. Access is normally by means of a conventional link-span walkway structure. The RNLI may only own and maintain the pontoon and walkway structure, and where this is the case the licensable activities described are those associated with the RNLI's owned assets.

Generally, works comprise:

- Maintenance, refurbishment, replacement of fittings or minor alterations (lights, anodes, telemetry, power & water supplies, fenders, hand-railing, pile brackets, storage cabinets, fuel pipes, etc.)
- Pontoon refurbishment / upgrade works (re-coating of corrosion protection, minor fabrication and other improvement works for operational or health & safety purposes) including for the removal and re-installation of the pontoon and link-span where needed
- Re-coating of piles (and their cleaning)
- Maintenance or minor alterations of pile fittings (mooring equipment, navigation lights, etc.)
- Maintenance, refurbishment, replacement of structure and fittings to link-span and approach structures (brows, gangways, bank-seats, and similar structures) including re-coating of corrosion protection, minor fabrication and other improvement works, and including for the removal and re-installation where needed, and for painting of link-span and approach structures (partial re-coating), including the lifting out and re-installation where works are to be carried out ashore
- Repair works to associated quay walls (concrete / sheet piles / masonry) and associated timber/steel fittings or structure, and fenders (timber or synthetic)
- Installation of new pontoon fittings (for operational or H&S requirements)
- Scaffolding and access towers operations associated with maintenance activities above
- Minor Airlifting below pontoon(s) or base of piles
- Cleaning works for the purposes of inspections or maintenance works
- Works to pontoon anchors (including replacement of components and lifting of anchors and their replacement)
- Diving activities associated with the above and minor airlifting (as needed for inspections)

The lifeboat launching and retrieval generates wear on the pontoon berths requiring maintenance to ensure operational effectiveness and the safety of crew members. The

pontoon berth is also subject to environmental degradation due to the aggressive marine environment.

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
Removal / replacement of pontoon(s) for refurbishment	Every 10 – 15 years and reactive	The pontoons may require repairs for safety reasons or to arrest corrosion. This would involve dismantling and towage to a quayside location for lifting out, then reinstallation upon completion of maintenance works.
Works to pontoons in situ (painting, fabrication works and works to fixtures & fittings)	Required every 5 – 8 years and reactive	Required for any damage or deterioration that occurs that threatens the safe launch and recovery of the lifeboat
Works to adjacent quay walls or jetty structure (including fenders or pile guides)	Typically required every 5 – 8 years and reactive	Required for any damage or deterioration that could impact on the serviceability of the pontoon. Works include masonry repairs to quay walls, fender replacement, minor maintenance or repairs to timber, steel or concrete elements of structure.
Pile Replacement	Reactive (very infrequent)	No piling will take place unless a method statement submitted a minimum of 2 months prior to the intended works has been approved by Marine Scotland following consultation with Scottish Natural Heritage
Painting of piles	Required every 10 – 15 years and reactive	Pontoon piles and bank-seat piles suffer abrasion and wear and these require regular re-coating to prevent corrosion
Works to minor fixtures, fittings and services	Required every 3 – 5 years and reactive	Maintenance, repair, minor alteration and upgrade works are needed to comply with current best practice and regulations (H&S and services)
Painting/repairs to steel bank-seat structure	Required every 10 – 15 years and reactive	The steel structure sits within the highly corrosive splash zone and requires regular maintenance to prevent loss of steel
Removal / replacement & repairs to steel link-span structure	Required every 3 – 5 years and reactive	To facilitate works to the pontoons or to carry out work on link-span ashore
Maintenance, repair or renewal of hand-railing	Reactive but likely every 5 – 8 years	To respond to damage or corrosion

or other fittings		
Diving inspections	Every 3 years or reactive	Required for asset management
Minor airlifting	Every 5 – 7 years and reactive	For inspection purposes or where pontoons ground

As noted above, the timing of maintenance activities is both scheduled and reactive. The works are likely to be limited in scope and generally carried out within a short programme of 1 - 2 weeks, but sometimes completed within a single day's visit.

The pontoon berth generally remains fully operational during in situ maintenance activities and therefore all works are carried out with small hand tools, with 2-4 person teams, and with limited materials. The lifeboat pontoon, approach pontoons, link-span and bank-seat structures are all subject to in situ repairs and maintenance, but for major works the pontoons, etc. would be removed from site (floated to a quayside for craneage out of the water for road transport to land based site) and then reinstallation upon completion of maintenance works.

Generally, access for materials, equipment, etc. for 'in situ' works is from an adjacent road and thence directly to the pontoon via the link-span and approach pontoons, or by workboat launched from an adjacent slipway or quayside.

Minor scaffolding may be deployed for works to the quayside or bankside, erected on or over the foreshore or sea bed for the purpose of maintenance access.

Generally, replacement is on a 'like for like' basis and carried out in small batches to avoid conflict with launching.

The works to the pontoons in situ is generally limited to minor works to fixtures and fittings but may involve the application or repair of specialist marine coatings. Access is from landside directly to the pontoon via the pedestrian route, but small workboats or safety boats may be deployed. Access onto the foreshore to carry out works to the bank-seat structure when exposed at low water and may also involve temporary scaffolding access. Paint debris will be caught and removed from site where possible. Where the pontoon(s) and/or link-span is removed the activity is confined to the dismantling, lifting and towage of the elements.

Painting will be undertaken by brush or roller applied epoxy based marine coatings (International Paints or Leigh's Paints).

Small marine grade concrete repairs are carried out with proprietary repair products designed for the marine environment and with fast set times and manually batched on site. Larger repairs are not envisaged within the activities of this licence.

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 Method Statement.

Table 2 - Station specific Information – Annex to Method Statement

Lifeboat Station and Works	Predicted Scale of Activity and Frequency	Additional Comments
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Girvan – works to deck of timber jetty and refuelling pipeline	As noted in table 1	There is some anti-slip coatings applied to the adjacent jetty that the RNLI maintain and replace from time to time, and also minor deck replacement (timber). There is also a fuel pipeline from the jetty to the pontoon and maintenance works to the pipeline would require access from the jetty (from above) or by workboat
Leverburgh – works to access structure and pontoon	As noted in table 1	The pontoon and approach pontoons comprise a HDPE proprietary modular system (Aqua-Dock) with anchored mooring system. Note the access pontoons partially dry and some access to the pontoons may be made directly from the foreshore
Eyemouth – works to secondary pontoon	As noted in table 1	The ALB is moored alongside a conventional steel pontoon, and alongside the main steel pontoon is a secondary ILB pontoon comprising a HDPE proprietary modular system (Aqua-Dock) with conventional mooring system

ILLUSTRATIVE PHOTOGRAPHS OF LIFEBOAT STATIONS FOR SCOTTISH REGIONAL LICENCE

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



Picture 1 – View of Buckie Lifeboat Station Boathouse (Licensable activity 4a) and Pontoon (Licensable activity 2)



Picture 2 – Girvan Pontoon Berth (Licensable activity 2)

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 39). 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 36). 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 30).

As the proposed activities are low impact and exclude dredging and piling activities (without submission of an additional method statement 2 months before), 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, and the maintenance of lifeguard units to support the lifeguarding service provided at certain public beaches.

WATER FRAMEWORK DIRECTIVE (2000/60/EC) ASSESSMENT

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 pontoon berths.

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.

WATER FRAMEWORK DIRECTIVE (2000/60/EC) ASSESSMENT

3.2. The intention of this assessment is to set out whether the RNLI low impact 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 water bodies.

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

WATER FRAMEWORK DIRECTIVE (2000/60/EC) ASSESSMENT

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

6. Findings of assessment

- 6.1. 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 REGULATION ASSESSMENT

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 Portpatrick to Eyemouth.

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 (see 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 2 km)
4	Portpatrick Lifeboat Station	DG9 8AN	None
7	Girvan Lifeboat Station	KA26 9AG	Girvan to Ballantree Coast Section SSSI
8	Troon Lifeboat Station	KA10 6DZ	None
12	Campbeltown Lifeboat Station	PA28 6ED	None
16	Tobermory Lifeboat Station	PA75 6NU	Inner Hebrides and the Minches SAC
19	Mallaig Lifeboat Station	PH41 4QD	None
27	Leverburgh Lifeboat Station	HS5 3UF	West Coast of the Outer Hebrides SPA South Lewis, Harris and North Uist National Scenic Area
28	Lochinver Lifeboat Station	IV27 4JY	None
29	Thurso Lifeboat Station	KW14 7UJ	North Caithness Cliffs SPA Holdborn Head SSSI Pennylands SSSI
30	Longhope Lifeboat Station	KW16 3AA	None
31	Stromness Lifeboat Station	KW15 1LE	Stromness Heaths and Coast SSSI
32	Kirkwall Lifeboat	KW1 5HA	None

	Station (current birth)		
33	Wick Lifeboat Station	ZE2 9NB	East Caithness Cliffs SPA East Caithness Cliffs SAC Castle of Old Wick to Craig Hammel SSSI Long Berry Coast SSSI Lower Wick River SSSI
36	Invergordon Lifeboat Station	IV1 3YQ	Cromarty Firth SPA Cromarty Firth Ramsar Site Cromarty Firth SSSI
38	Buckie Lifeboat Station	AB56 1TX	Moray Firth pSPA
40	Peterhead Lifeboat Station	AB42 1DZ	Buchan Ness to Collieston Coast SPA
41	Aberdeen Lifeboat Station	AB11 5DF	River Dee SPA Nigg Bay SSSI
43	Montrose Lifeboat Station	DD10 8BD	Montrose Basin SPA Montrose Basin Ramsar Site Montrose Basin SSSI Rickle Craig – Scurdie Ness SSSI
52	Eyemouth Lifeboat Station	TD14 5AD	Berwickshire and Northumberland Coast SAC Berwickshire Coast (Intertidal) SSSI Burnmouth Coast SSSI

APPENDIX 1- Relevant SNH Advice relating to pontoons and their maintenance

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.

We note that the licence would **exclude** navigational dredging activity. In addition, all piling works would be covered by additional Method Statement submitted 2 months prior to any piling. In our view it would be useful if this type of work were considered as part individual licences as and when required. The two issues most likely to require detailed consideration of possible impacts on qualifying features of designated sites are noise and sediment management (from piling and dredging activities), particularly in relation to mobile qualifying interest species such as cetaceans, birds and migratory fish. Piling noise could have effects at a greater distance than the 2.5km buffer. If these activities are treated separately from the maintenance licence, consideration of the maintenance licence will be simplified. It also makes it more likely Marine Scotland will be provided with sufficient information to allow them to conclude a Habitats regulations assessment (HRA) when one is required for piling activity.

Typically, smaller, inshore piling works generate much lower noise levels than the large offshore piling proposals we've seen elsewhere so, in general, impacts can be mitigated through standard mitigation measures which we'd expect to see in Method Statements. Any future proposals for piling operation should make a clear commitment to the principles in the JNCC Piling protocol for cetaceans -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/50006/jncc-pprotocol.pdf

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 being proposed. Discussion below therefore covers some of the issues which may be excluded from the proposal (piling) and therefore wouldn't need further consideration until individual piling licences were considered.

Girvan – Girvan to Ballantree Coast section is quite a long way south from the station with a town between. Site is geological, therefore no connectivity with the site.

Tobermory is 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).

Eyemouth – Inside of harbour is excluded from the designated sites – may need thinking about connectivity to seal qualifying interest if noisy activity such as piling is included.

Thurso – not included on existing list but may need to consider the River Thurso SAC (salmon connectivity along shoreline to river) if noisy activity such as piling is included. Holborn Head and Pennylands SSSIs have geological qualifying features and is sufficiently removed to have no connectivity. SPA is for breeding seabirds, but any connectivity may be able to be overcome when checking through the activities.

Longhope, Stromness and Kirkwall – need to consider Pentland Firth and Scapa Flow proposed SPA (wintering divers and grebes, but also migratory seabird and seaduck). However main piers and harbours are excluded from the SPA, so connectivity is 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.

For many of the East Coast stations it is necessary to consider activity likely to cause underwater noise against the Moray Firth SAC for bottlenose dolphin. This is because the population is wide ranging outside the site and can be disturbed or injured by piling noise. It is therefore more practical to consider piling applications at a time when methodologies and mitigation proposals are known on an individual basis.

Wick – Include Moray Firth SAC to consider issues noted above. Long Berry Coast is geological and distant, so no connectivity. Lower Wick River SSSI connectivity unlikely as qualifying interest is fen. East Caithness cliffs SPA (and MPA) is for breeding seabirds but any connectivity is unlikely.

Invergordon – boundary of Cromarty Firth SSSI very close to lifeboat station – features include habitats such as mudflats, sandflats and saltmarsh, and a number of named non-breeding bird species. Include Moray Firth SAC to consider noise issues. Cromarty Firth SPA includes breeding and non-breeding birds, but boundary is further away and connectivity is unlikely.

Buckie – should consider Moray Firth SAC for activities/issues noted above in bold.

Peterhead - should consider Moray Firth SAC for activities/issues noted above in bold. Buchan Ness to Collieston Coast sufficiently distant that connectivity not likely. Site is for breeding seabirds.

Aberdeen – Nigg Bay SSSI is a small geological site unlikely to be affected. Should consider Moray Firth SAC for activities/issues noted above in bold. River Dee SAC possible connectivity for salmon in relation to piling and dredging activities. Also need to include proposed Ythan Estuary, Sands of Forvie and Meikle Loch SPA in consideration but likely to be sufficiently distant for there to be no connectivity.

Montrose - Should consider Moray Firth SAC for activities/issues noted above in bold. Rickle Craig-Scurdie Ness SSSI has biological features (saltmarsh, maritime cliff, molluscs) and geological. However, connectivity at the distance involved is unlikely. Montrose Basin SPA is some distance and connectivity unlikely.

SSSI features are non-breeding birds, but also include breeding eider, saltmarsh, transition saltmarsh, mudflat, and geological feature. No connectivity.

River South Esk SAC and migrating salmonids enter the river via Montrose harbour area in the estuary and therefore there is connectivity that requires further thought, particularly for noise and sediment impacts (primarily any dredging and piling).

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

noise impact - Installation and all piling works would be covered by additional Method Statement submitted 2 months prior to any piling – We advise this is best dealt with through separate individual application. In MPA terms, underwater noise may be an issue in regard to the proposed MPAs for mobile species (Sea of Hebrides, NE Lewis, Southern Trench) so would mainly be relevant for Stornoway, Buckie, Banff and Fraserburgh. All piling should have a clear commitment to the JNCC Piling protocol for cetaceans -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/50006/jncc-pprotocol.pdf

disposal of dredgings - It is proposed that the licence would **exclude** navigational dredging activity.

APPENDIX 2: Marine Scotland Form - Marine Licence Application for Pontoons

Marine Licence Application for Pontoons

Version 1.0

Marine (Scotland) Act 2010

Acronyms

Please note the following acronyms referred to in this application form:

MHWS	Mean High Water Springs
MPA	Marine Protected Area
MS-LOT	Marine Scotland – Licensing Operations Team
SAC	Special Area of Conservation
SNH	Scottish Natural Heritage
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
WGS84	World Geodetic System 1984

Explanatory Notes

The following numbered paragraphs correspond to the questions on the application form and are intended to assist in completing the form. These explanatory notes are specific to this application and so you are advised to read these in conjunction with the Marine Scotland Guidance for Marine Licence Applicants document.

1. Applicant Details

The person making the application who will be named as the licensee.

2. Agent Details

Any person acting under contract (or other agreement) on behalf of any party listed as the applicant and having responsibility for the control, management or physical deposit or removal of any substance(s) or object(s).

3. Payment

Indicate payment method. Cheques must be made payable to: The Scottish Government.

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.

4. Application Type

Indicate if the application is for a new pontoon site or an existing pontoon site. Provide the existing or previous consent/licence number and expiry date if applicable.

5. Pontoon(s) Details

- Indicate the type of deposit, either permanent, temporary or seasonal. If **temporary** or **seasonal**, please provide plan of how and when pontoon section(s) are proposed to be deposited and removed in the method statement.
- Indicate the number of pontoon sections that make up the full structure.
- Complete the table to indicate the dimensions of each pontoon section making up the entire structure.
- Complete the table to indicate any other substance(s) or object(s) to be deposited below MHWS, including quantity and dimensions (e.g steel mooring chain, No. 6 at 50 metres length each).
- Indicate the total length of the pontoon, including any access bridge, seawards of the tidal limit of MHWS. The total length should include all sections of the pontoon that make up the entire structure.
- Provide the proposed start date for installation of the pontoon(s). The start date will not be backdated, since to commence a project for which a licence has not been obtained will constitute an offence, which may result in appropriate legal action. A licence is normally valid for 6 years. **Target duration for determination of a marine licence application is 14 weeks.**
- Provide the cost of the works seawards of the tidal limit of MHWS. This estimate should only cover

work taking place below the tidal level of MHWS and must take into consideration the cost of materials, labour fees etc.

- (h) Describe the location of the proposed works. Include a list of the latitude and longitude co-ordinates (WGS84) for the boundary points of the pontoon(s) including all moorings associated (if applicable). WGS84 is the World Geodetic System 1984 and the reference co-ordinate system used for marine licence applications. Co-ordinates taken from GPS equipment should be set to WGS84. Coordinates taken from recent admiralty charts will be on a WGS84 compatible datum. Ordnance survey maps do not use WGS84.

Example: For positions read from charts the format should be as in the example: 55°55.555'N 002°22.222'W (WGS84). The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If seconds are used then the format should be as in the example: 55°55'44"N 2°22'11"W (WGS84).

It is important that the correct positions, in the correct format, are included with this application, as any errors will result in the application being refused or delayed.

To supplement your application, please provide a suitably scaled extract of an Ordnance Survey Map (1:2,500 scale but not more than 1:10,000) or Admiralty Chart which must be marked to indicate:

- the pontoon position(s) in relation to the surrounding area;
- latitude and longitude co-ordinates defining the location of the works;
- the level of MHWS;
- any adjacent SAC, SPA, SSSI, MPA, Ramsar or similar conservation area boundary.

Drawings and plans will be consulted upon. If they are subject to copyright, **It is the responsibility of the applicant to obtain necessary approvals to reproduce the documents and to submit suitably annotated copies with the application.**

- (i) Indicate if the pontoon is located within the jurisdiction of a statutory harbour authority and provide details of the statutory harbour authority where relevant.
- (j) Provide a full method statement, including plan of how, when and where pontoon section(s) are proposed to be deposited and removed.
- (k) Provide assessment of the potential impacts the works may have, including interference with other uses of the sea. Please include details of areas of concern e.g designated conservation areas, such as a SAC, SPA, SSSI, MPA or Ramsar site and shellfish harvesting areas. Further guidance on designated conservation areas can be obtained from SNH at this website: <http://gateway.snh.gov.uk/sitelink/index.jsp> and guidance on shellfish harvesting areas can be obtained from <http://www.foodstandards.gov.scot/> with regards to the Shellfish Waters Directive (2006/113/EC) which has parameters set to protect the water quality in which edible shellfish are grown.

Applicants should also be aware of the need to pay due regard to coastal and marine archaeological matters and attention is drawn to Historic Scotland's Operational Policy Paper HP6, "Conserving the Underwater Heritage".

Lochs Creran, Alsh, Duich and Long are designated as Special Areas of Conservation (SAC) under the Habitats Directive (Council Directive 92/43/EEC). Loch Creran has been selected for its bedrock and biogenic reefs of the tube worm *Serpula vermicularis* and the horse mussel, *Modiolus modiolus* and Lochs Alsh, Duich and Long for their sublittoral rock (marine) reefs. All are very sensitive to physical damage from anchors and the placement of moorings and in order to assist their protection reference should be made to the special moorings pack which can be downloaded from the following link: <http://www.scotland.gov.uk/Topics/marine/Licensing/marine/Applications>

Where there are potential impacts from the works, please provide details of proposed mitigation in response to potential impacts.

6. Scotland's National Marine Plan

Scotland's National Marine Plan has been prepared in accordance with the EU Directive 2014/89/EU, which came into force in July 2014. The Directive introduces a framework for maritime spatial planning and aims to promote the sustainable development of marine areas and the sustainable use of marine resources. It also sets out a number of minimum requirements all of which have been addressed in this plan. In doing so, and in accordance with article 5(3) of the Directive, Marine Scotland have considered a wide range of sectoral uses and activities and have determined how these different objectives are reflected and weighted in the marine plan. Land-sea interactions have also been taken into account as part of the marine planning process. Any applicant for a marine licence should consider their proposals with reference to Scotland's National Marine Plan. A copy of Scotland's National Marine Plan can be found at: <http://www.gov.scot/Publications/2015/03/6517/0>

Indicate whether you have considered the project with reference to Scotland's National Marine Plan and provide details of considerations made with reference to the policies, including but not limited to General Policy 7 (GEN 7), that have been considered. If you have not considered the project with reference to Scotland's National Marine Plan please provide an explanation.

7. Pre-Application Consultation

Certain activities will be subject to public pre-application consultation. Activities affected will be large projects with the potential for significant impacts on the environment, local communities and other legitimate uses of the sea. The new requirement will allow those local communities, environmental groups and other interested parties to comment on a proposed development in its early stages – before an application for a marine licence is submitted. Further information can be obtained from: <http://www.scotland.gov.scot/Resource/0043/00439649.pdf>

Please provide pre-application consultation report with your application.

8. Consultation (other than carried out under pre-application consultation)

Provide details of all bodies consulted and give details of any consents issued including date of issue.

9. Associated Works

Indicate whether the application is associated with any other marine projects (e.g. land reclamation, marine/harbour construction works, dredging and sea disposal etc). If this is the case, provide reference/licence number for the related marine projects.

Marine Licence Application for Pontoons

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.

[Redacted]

Signature

Date

22nd August 2019

Name in BLOCK LETTERS

NEIL HARRIS

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 ☒
- Project Drawings ☒
- Maps/Charts ☒
- Co-ordinates of the boundary points of the area of harbour jurisdiction (if you are a statutory harbour authority) ☒
- Method Statement ☒
- Additional information e.g. photographs, consultation correspondence (if applicable) ☒
- Pre-application Report (if applicable) ☐ N/A
- Payment (if paying by cheque) ☐ (PAYMENT BY INVOICE)

1. Applicant Details

Title: Initials: Surname:

Trading Title (if appropriate): ROYAL NATIONAL LIFEBOAT INSTITUTION

Address: Unit 3, Ruthvenfield Grove, Perth, Perthshire PH1 3GL

Name of contact (if different): Mr Adam Littlejohn

Telephone No. (inc. dialing code): 07774 104742

Email: Adam_Littlejohn@rnli.org.uk

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): NEIL HARRIS CONSULTING

Address: HUTTONS
5/A YEALM ROAD
NEWTON FERRERS, DEVON, PL8 1BT

Name of contact (if different):

Telephone No. (inc. dialing code): 07786 981423

Email: nah.consult@icloud.com

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 pontoon site or an existing pontoon site:

New Site ☐ Existing Site ☒

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

Consent/Licence Number	Expiry Date

5. Pontoon Details

(a) Type of deposit

Permanent ☒ Temporary ☐ Seasonal ☐

If **TEMPORARY** or **SEASONAL**, please provide plan of how and when pontoon section(s) are proposed to be deposited and removed in method statement in section 4 (j).

(b) Number of pontoon sections:

See Appendix 3

(c) Dimensions of pontoon sections:

Pontoon Section	Type of Deposit (e.g steel, plastic etc.)	Length (metres)	Width (metres)
	See Appendix 3 of Application Document		

(d) Any other substance(s) or object(s) to be deposited below MHWS (e.g mooring chain):

Deposit (e.g steel mooring chain)	Quantity and Dimensions (e.g No. 6 at 50 metres each)
See appendix 3 of Application Document	

(e) Total length of pontoon, including any access bridge, seawards of the tidal limit of MHWS:

See Appendix 3 metres

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

Grant of licence

(g) Cost of the works seawards of the tidal limit of MHWS:

£ £50,000 - ≤ £2 million

(h) Location:

[See page 4 of the Application Document for a map indicating the location of the sites, page 8 for a list of the coordinates and pages 11-29 for site location plans].

Latitude and Longitude co-ordinates (WGS84) defining the extent of the pontoon including all moorings (continue on Appendix 01 Additional Co-ordinates form if necessary):

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

(i) Is the pontoon located within the jurisdiction of a statutory harbour authority?

YES ☒ NO ☐

If YES, please specify statutory harbour authority:

[See page 5 where the jurisdiction of the SHAs are indicated as applicable]

(j) Method statement including schedule of work (continue on separate sheet if necessary). If **TEMPORARY** or **SEASONAL**, please provide plan of how, when are where pontoon section(s) are proposed to be deposited and removed.

All permanent

[See pages 30-33 for the method statements for the proposed maintenance activities].

(k) 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 for 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 with reference to the policies, including but not limited to General Policy 7 (GEN 7), that have been considered:

[See page 35 of the Application Document].

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

7. Pre-Application Consultation

Is the application subject to pre-application consultation, under The Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013?

YES ☐ NO ☒

If YES, please indicate the date of the public notice for the pre-application consultation event and the type of consultation event held (a copy of the public notice must be supplied with this application):

Event Type	Date

8. Consultation

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

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

9. Associated Works

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

Regional Marine Licence for Construction Projects (Tobermory, Invergordon, Buckie, Montrose) (06643/19/0)
Regional Marine Licence for Moorings (Portpatrick, Tobermory, Leverburgh, Peterhead) (06644/19/0)
REGIONAL MARINE LICENCE FOR BEACH RE-PROFILING (06645/19/0)

APPENDIX 3: Pontoon Details Table

RNLI Site Ref	Name of Station	Postcode	Number of pontoon sections	Pontoon Section	Type of Deposit (e.g. steel, plastic etc.)	Length (metres)	Width (metres)	Any other substance(s) or object(s) to be deposited below MHWS (e.g. mooring chain)	Quantity and dimensions (e.g. No.6 at 50 metres each)	Total length of pontoon, including any access bridge, seawards of the tidal limit of MHWS
4	Portpatrick	DG9 8AN	1	1	Steel box pontoon	26m	2.5m	Pontoon held on two steel tubular mooring piles, with further two steel tubular piles used as boat mooring + mooring chain	4No. piles	37m with link-span
7	Girvan	KA26 9AG	1	1	Steel box pontoon	18m	2.8m	Pontoon held on two steel tubular mooring piles + mooring chain	2No. piles	18m with link-span
8	Troon	KA10 6DX	1	1	Steel box pontoon	24m	2.5m	Pontoon held on two steel tubular mooring piles + mooring chain + steel gantry support to link-span	2No. piles	24m with link-span
12	Campbeltown	PA28 6ED	1	1	Steel box pontoon	16m	2.5m	Pontoon held on steel guides on pier + mooring chains	2No. steel guides	24m with gangway
16	Tobermory	PA75 6NU	1	1	Steel box pontoon	20m	3m	Pontoon held on mooring chains/anchors + mooring piles for boat + link-span	2No. piles	22m with piles
19	Mallaig	PH41 4QD	3	1 2 3	Marina type pontoon Marina type pontoon Marina type pontoon	22m 7m 22m	2m 2m 5m	Pontoons arrangement to form a 'pen' + linkspan + mooring piles	2No. piles	22m with piles and link-span
27	Leverburgh	HS5 3UF	1	1	Plastic floating modular box pontoon	40m	1.5m	Pontoon secured with mooring anchors and chain + lifeboat also moored alongside with anchor mooring and chain	Pontoon moorings at 10m c/c + 2No. boat moorings	45m with boat moorings
28	Lochinver	IV27 4JY	1	1	steel box pontoon	24m	3m	Pontoon held on two steel tubular mooring piles + mooring chain	2No. piles	48m with link-span
29	Thurso	KW14 7UJ	1	1	steel box pontoon	24m	3.5m	Pontoon held on steel guides on pier + mooring chains	2No. steel guides	29m with gangway
30	Longhope	KW16 3PG	1	1	steel box pontoon	22m	2.5m	Pontoon held on steel guides on pier + mooring chains	2No. steel guides	28m with gangway
31	Stromness	KW16 3AA	1	1	steel box pontoon	22m	2.5m	Pontoon held on steel guides on pier + mooring chains	2No. steel guides	28m with gangway

32	Kirkwall	KW15 1LE	1	1	steel box pontoon	24m	3m	Pontoon held on steel guides on pier + mooring chains	2No. steel guides	28m with gangway
33	Wick	KW1 5HA	1	1	steel box pontoon	24m	3m	Pontoon held on steel guides on pier + mooring chains	2No. steel guides	28m with gangway
36	Invergordon	IV18 0HD	2	1 2	steel box pontoon steel box pontoon	17.5m 17.5m	3m 3m	Pontoon held on steel guides on pier + mooring chains	4No. steel guides	54m with gangway
38	Buckie	AB56 1TX	1	1	steel box pontoon	17m	2.8m	Pontoon held on steel tubular piles + mooring chains	2No. steel piles	28m with gangway
40	Peterhead	AB42 1DZ	1	1	steel box pontoon	20m	4m	Pontoon held on steel tubular piles + mooring chains	2No. steel piles	26m with gangway
41	Aberdeen	AB11 5DF	2	1 2	steel box pontoon steel box pontoon	30m 30m	3m 3m	Pontoon held on steel guides on pier + mooring chains	6No. steel guides	66m with gangway
43	Montrose	DD10 8BD	1	1	steel box pontoon	24m	3m	Pontoon held on steel tubular piles + linkspan	2No. steel piles	28m with link-span
52	Eyemouth	TD14 5AD	2	1 2	steel box pontoon Plastic floating modular pontoon box	20m 6m	3m 3.6m	Steel pontoon held on steel guides on pier, and plastic pontoon held with mooring lines to steel pontoon and pier	3No. steel guides	26m with link-span and steel and plastic pontoon