

Dean & Reddyhoff Ltd

Deacons Marina

Proposed Access Bridge Relocation and Public Access Pontoon

Supporting Statement for Harbour Works Consent

Includes Method Statement, WaFD & WFD Assessments

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Lymington Technical Services Ltd

Revised September 2018

1. Background

Deacons Boatyard is a medium sized boatyard and marina situated on the western edge of the River Hamble just downstream of the A27 Bridge. The boatyard has been operating continuously since 1922.

The boatyard was purchased in 2017 by Dean & Reddyhoff Ltd who operate a number of marinas around the south coast.

Prior to the change in ownership the marina was dredged and re-built in 2012.

Drawing 10667/1 shows the proposed alterations to the current (30:09:11) Harbour Authority consent.

2. Proposal

The proposed works are shown on drawing 10667/1.

Public Access Pontoon –

This is a new free public facility for the launching of small craft and berthing of tenders. This is something that is a genuine public concern as access to the river for all is a key requirement.

The facility will enable small craft and tenders to be launched and then moored to the pontoon to assist safe embarkation. At the current time there are no such similar facilities at this end of the river.

It is intended that the pontoon will only be used to assist access to the river, it will not be used for the mooring of tenders and dinghies. The facility will be maintained and managed by Dean & Reddyhoff.

This addition already has LPA consent under application F/17/80845 (allowed on Appeal) and a Marine Licence from the MMO L2018/00208/1.

Bridge Access Relocation –

The existing access bridge to C, D & E Jetties is to be moved northwards so that entry is moved from the current location within an area of boat storage. This will improve the segregation between work areas and berth holder access.

This alteration has a Marine Licence from the MMO L2018/00208/1. An LPA planning application has been submitted.

3. MMO Assessment

The alterations to the existing layout have been designed and will be operated in accordance with the Yacht Harbour Association's Code of Practice (A Code of Practice for the Design, Construction of Coastal and Inland Marinas and Yacht Harbours). This is the current design guide for all developments of this type.

As part of the Marine Management Organisation application process various statutory consultees are asked for their views.

As these two proposals have been assessed within the MMO application it is helpful to include their comments.

Natural England – Letter Ref 237587, attached.

Environment Agency –

Dear Sir/Madam

COMPLETE THE ORIGINAL DESIGN (GRANTED IN 2012 BUT NOT FULLY COMPLETED) WITH SOME MODIFICATIONS TO THE ACCESS.

DEACONS MARINA, RIVER HAMBLE

Thank you for the consultation on the above application, please quote our reference on all correspondence.

Environment Agency Position

We have reviewed the Water Framework Directive Assessment provided for the works, together with the proposal for small-scale additions of a pontoon and re-positioning of the brow access.

We agree with the findings of the WFD assessment that the works are of small scale and that they are unlikely to impact water quality significantly.

We consider the activity to be low risk for water quality.

The supporting statement for the marine licence renewal and modifications details the addition of a landing pontoon. The statement does not include design details for the new pontoon.

The applicant should consider that Intertidal habitat is protected under the UK Biodiversity Action Plan and, as the lead authority for this habitat type, the Environment Agency is charged with achieving no net loss of intertidal. If the proposed works are likely to result in a loss of intertidal then the applicant must provide suitable mitigation to offset the loss; this can be achieved through either enhancement of existing habitat or creation of additional habitat. The Environment Agency would be happy to provide further guidance on this if necessary. If the proposal results in a net loss of intertidal and no suitable mitigation is provided then consent should not be granted. The UK Biodiversity Action Plan identifies species and habitats of 'principal' importance for the conservation of biological diversity nationally. These are listed for England under s41 of the Natural Environment and Rural Communities Act 2006.

In Habitats Directive designated waters the Environment Agency advises that underwater noise levels should not exceed 50dBht beyond half the width of the channel. In non-Habitats Directive designated sites the Environment Agency advises that underwater noise levels should not exceed 75dBht beyond half the width of the channel.

Piling operations often involve the production of high intensity noise that propagates through the bed of the estuary and the water column. At short range the noise intensity is sufficient to directly kill fish. At greater range hearing loss and/or a strong behavioural response can be elicited which may result in the fish never entering freshwater.

The risk of these effects largely depends on the location of the work, timing and type of piling carried out as well as the size of piles to be installed. Larger piles often require a larger driver and hence more noise is produced by the impact. To a certain extent this noise may be managed by the use of striking pads to extend the time-force curve of the impact. Bubble curtains can also be used but need to be several metres thick to be effective and do not moderate the sound travelling through the bed. Vibration piling is quieter and more advised for piling activities in estuaries which support migratory salmonids. We therefore welcome the use of vibro-piling techniques.

Maritime and Coastguard Agency – Navigational Safety Branch –

Dear MMO,

MLA/2018/00031 - Deacons Marina

Thank you for the opportunity to comment on the potential impact of the above proposed works on the safety of navigation.

The Marine Licence application and supporting documentation have been considered by Navigation Safety Branch. On this occasion, the Maritime and Coastguard Agency (MCA) has no objection to consent being granted provided all maritime safety legislation is followed and the conditions/advisories below are applied:

Conditions:

The Licencee must ensure that HM Coastguard, in this case nmoccontroller@hmcg.gov.uk, The National Maritime Operations Centre is made aware of the works prior to commencement.

The Licencee must notify the UK Hydrographic Office to permit the promulgation of maritime safety information and updating of nautical charts and publications through the national Notice to Mariners system.

In addition, the following advice should be provided to the applicant to facilitate the proposed works:

Advisories:

The Consent Holder should ensure suitable bunding, storage facilities are employed to prevent the release of fuel oils, lubricating fluids associated with the plant and equipment into the marine environment.

Any jack up barges / vessels utilised during the works/laying of the cable, when jacked up, should exhibit signals in accordance with the UK Standard Marking Schedule for Offshore Installations.

The site is within port limits and the applicant should gain the approval/agreement of the responsible local navigation authority or the Harbour Authority/Commissioners/Council. They may wish to issue local warnings to alert those navigating in the vicinity to the presence of the works, as deemed necessary.

If you require any further information please let me know.

Trinity House –

Dear Team,

Trinity House has no objections to the proposed application and confirm that the previous marking requirements still apply - i.e. 2 Fixed red lights, vert disposed, 2 metres apart with the lower light at least 2 metres above MHWS on the downstream extremity of Pontoon E and on the upstream extremity of Pontoon A as well as the centre of Pontoon C.

MMO Coastal Offices – document MLA 2018 00031 Deacons Marina Hamble.doc attached

RYA –

We have no objection to this proposal. However, we would comment that the reconfiguration of the pontoons may cause issues for those berthing at them due to the strong tides in this area as the current increases towards the middle of the river. We do not believe this would have an impact on any other recreational boaters on the river.

4. Design Details

The alterations to the existing layout have been designed and will be operated in accordance with the Yacht Harbour Association's Code of Practice (A Code of Practice for the Design, Construction of Coastal and Inland Marinas and Yacht Harbours). This is the current design guide for all developments of this type.

Public Access Pontoon – This consists of a 20m x 2m pontoon restrained at the seaward end by a single tubular steel pile and at the inshore end by a sliding bracket attached to the existing sheet pile wall.

Bridge Access Relocation – The existing brow, pontoons and piles will be removed and reinstalled at the new location.

The pontoons consist of fibre concrete cased floats supporting the metal framed walkways and fingers. The decking consists of a durable hardwood from a sustainable source. The finish is allowed to weather naturally.

The pontoons are held in place by tubular steel piles driven into the seabed as existing. The piles are painted with a marine friendly paint.

5. Method Statement

Public Access Pontoon - The pontoon will arrive on site by road and be craned off. It will then be lifted into the water. It will be floated into position and connected to the inshore bracket. A tubular steel pile will then be driven through the outer pile guide to provide restraint.

Bridge Access Relocation - A spud-legged crane barge will be used to remove the existing access over a high-water period (to minimise any impact on the intertidal habitat).

The landing pontoons will be floated into the new position and connected to the existing pontoons. They will be restrained with two tubular steel piles. The access brow will then be craned into position and fixed to the shore end connection.

All piling will be from a spud-legged crane barge using a vibro-hammer in accordance with accepted best practice. The piling works will be conducted in daylight hours to minimise noise impact with any percussion piling (if necessary) being restricted to between 1000-1600. In the unlikely event that percussion piling is necessary to reach design level then 'soft-start' procedures will be employed.

Piling works will also be conducted over the high-water periods to eliminate any possible impact on feeding wildfowl. Note that the works are adjacent to a busy main road bridge over the river.

It is expected that the Public access pontoon will be installed in one day and the bridge relocation over 10 days.

6. Navigation

Public Access Pontoon – This facility should improve safe entry onto the water and reduce the risk levels when launching from the existing slipway. The ability to moor a tender or small craft whilst boarding is an obvious advantage leading to a potential greater level of use. It is difficult to estimate the numbers, but existing use of the slipway is low (anecdotal evidence). Mooring of vessels for long periods will not be permitted.

In order to raise awareness of the potential issues with the A27 bridge and tidal flows it is proposed that a notice board be placed on the pontoon detailing the conditions of use and navigation advice. The wording of this to be in agreement with the RHHA as are the signs elsewhere on the marina.

Bridge Access Relocation – The position of the current access bridge does not permit through navigation and its relocation will make no change. In navigation terms there are no differences between the two locations. The reason for the relocation is solely to improve the segregation between work areas and berth holder access.

7. Waste Framework Directive

The works are located within a transitional/coastal water and therefore are not excluded under Article 2(3) WaFD.

No waste will be produced as part of these works.

8. Protected Areas

The site is within an existing area of high vessel activity and adjacent to a busy main road. It is not within or near a MCZ (whether designated, proposed or recommended).

SAC – Solent Maritime (UK0030059). The primary reasons for designation of this site are Estuaries, Spartina swards and Atlantic salt meadows. There are no Spartina swards or Atlantic salt meadows within the works area so there will be no negative impact on these habitats. In terms of the estuary the only possible impact will be the piling but this is far less intrusive (in terms of sediment suspension) than the regular maintenance dredging in the river. The works will have no measurable impact on the protected site.

pSPA – Solent and Dorset Coast. This proposed SPA is intended to protect the foraging areas utilised by the Sandwich Tern, Common Tern & Little Tern. The proposed boundaries in this area extend those of the Solent & Southampton Water SPA such that the application site is covered.

In construction terms the proposed works can only be conducted at high waters and are both within existing areas of high activity. In operational terms the only difference is potential increased human activity on the slipway, however this must be balanced against the existing impacts from the A27 Bridge use.

Nearby protected areas –

Local Nature Reserve (LNR) – Hackett’s Marsh (1009285). This area is a biological urban fringe reserve and is more than 500m downstream of the site. The reserve is unaffected by the proposed works.

Ramsar – Solent and Southampton Water (UK11063). This is also downstream of the works (overlays the LNR) and there will be no impact on the protected area.

SSSI – Lincegrove & Hackett’s Marshes (1080733). This also overlays the LNR and similarly the proposed works will have no impact.

SPA – Solent & Southampton Water (UK9011061). This overlays the above sites and is similarly unaffected by the proposal.

Shellfish Waters – Approaches to Southampton Water (36). This is nearly 3km downstream of the works area. There is no evidence of small scale vibro-piling having a negative impact on these shellfish waters. We have recently seen unrealistic timing conditions proposed (such as particular tidal states). These conditions have since been removed on the grounds of the small nature of the works and the plant proposed. The works will therefore have no negative impact on the shellfish waters.

Coastal Sensitive Areas – Eutrophic – Hamble Estuary (UKENCA123), nitrate sensitivity. The nature of the works is such that they can have no impact on the level of nitrates.

Best practice is being employed with the use of the most appropriate plant.

WFD Estuarine and Coastal Water Bodies Cycle 2 GB5207040202800 Southampton Water

WFD Habitats – higher sensitivity – saltmarsh (distant from proposed works)

WFD Habitats – lower sensitivity – intertidal soft sediment

9. Background to Water Framework Directive Assessment

The purpose of a Water Framework Directive (WFD) assessment is to determine whether the proposed works will compromise the attainment of a WFD objective or result in the deterioration of the current ecological status of the relevant waterbodies.

The EA have released (Dec 2016) a new version of ‘Clearing the Waters for All’ and this version is followed here.

The process consists of 3 stages –

Stage 1 – The Screening Stage

This stage is used to identify activities which need to be considered further (i.e. excludes those which do not require further assessment). Activities conducted between 2009-2014 are excluded as they would have been covered by the River Basin Management Plan (RBMP) evidence collection process. This typically applies to maintenance activities including dredging.

Stage 2 – The Scoping Stage

This stage identifies the potential risks to the following receptors:

- Hydromorphology
- Biology – fish habitats
- Biology – fish
- Water quality
- Protected areas

Stage 3 – Impact Assessment

This stage examines whether the activity will have a significant non-temporary effect on each receptor.

10. WFD Assessment

The assessment uses the new (Dec 2016) online EA tables which are reproduced in the following pages.

In order to improve clarity, the water body data from Catchment Data Explorer is reproduced below.

The Catchment Data Explorer provides data updated 08:08:18.

SOUTHAMPTON WATER

Overview

Download Water Body as [CSV](#) / [GeoJSON](#)

Overall classification for 2016
Moderate

Id	GB520704202800
Type	Transitional Water
Hydromorphological designation ⓘ	heavily modified
NGR ⓘ	SU4435507905
Surface area	3091.32 ha
Surface area	30.913 km2
Surveillance Water Body ⓘ	Yes

Classifications ⓘ

Cycle 2 classifications ⓘ

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Classification Item	2013	2014	2015	2016
▼ Overall Water Body	Moderate	Moderate	Moderate	Moderate
▼ Ecological	Moderate	Moderate	Moderate	Moderate
▼ Supporting elements (Surface Water)	Moderate	Moderate	Moderate	Moderate
Mitigation Measures Assessment	<u>Moderate or less</u>	Moderate or less	Moderate or less	Moderate or less
▼ Biological quality elements	Poor	Moderate	Good	Good
Angiosperms	Good	Good	Good	Good
Fish	Poor	Moderate	Good	Good
Invertebrates	Good	Good	Good	Good
Macroalgae	Good	Good	Good	Good
Phytoplankton	High	High	High	High

▼	Hydromorphological Supporting Elements	Supports Good	Supports Good	Supports Good	Supports Good
	Hydrological Regime	Supports Good	Supports Good	Supports Good	Supports Good
▼	Physico-chemical quality elements	Moderate	Moderate	Moderate	Moderate
	Dissolved Inorganic Nitrogen	Moderate	Moderate	Moderate	Moderate
	Dissolved oxygen	High	High	High	High
▼	Specific pollutants	High	High	High	High
	Triclosan	High	High	-	High
	2,4-dichlorophenol	High	High	High	High
	2,4-dichlorophenoxyacetic acid	High	High	High	High
	Arsenic	High	High	High	High
	Copper	High	High	High	High
	Diazinon	-	High	High	High
	Dimethoate	High	High	High	High
	Iron	High	High	High	High
	Linuron	High	High	High	High
	Mecoprop	High	High	High	High
	Permethrin	High	High	High	-
	Phenol	High	High	High	High
	Toluene	High	High	High	High
	Un-ionised ammonia	-	High	High	High
	Zinc	High	High	High	High
▼	Chemical	Fail	Fail	Fail	Fail
▼	Priority substances	Good	Good	Good	Good
	1,2-dichloroethane	Good	Good	Good	Good
	Atrazine	Good	Good	Good	Good
	Benzene	Good	Good	Good	Good
	Chlorpyrifos (Priority)	-	-	-	Good
	Chlorfenvinphos	Good	Good	Good	Good
	Diuron	-	-	-	Good
	Fluoranthene	Good	Good	-	Good
	Isoproturon	-	-	-	Good
	Lead and Its Compounds	Good	Good	Good	Good
	Napthalene	Good	Good	Good	Good
	Nickel and Its Compounds	Good	Good	Good	Good
	Pentachlorophenol	Good	Good	Good	Good
	Simazine	Good	Good	Good	Good
	Trichloromethane	Good	Good	Good	Good
▼	Other Pollutants	Good	Good	Good	Good
	Aldrin, Dieldrin, Endrin & Isodrin	Good	Good	Good	-
	Carbon Tetrachloride	Good	Good	Good	Good
	DDT Total	-	-	-	Good
	para - para DDT	Good	Good	Good	Good
	Tetrachloroethylene	Good	Good	Good	Good
	Trichloroethylene	Good	Good	-	-

▼	Priority hazardous substances	Fail	Fail	Fail	Fail
	Anthracene	-	-	-	Good
	Brominated diphenylether (BDPE) Calc	Fail	Fail	-	-
	Benzo (b) and (k) fluoranthene	-	-	-	Good
	Benzo (ghi) perylene and indeno (123-cd) pyrene	-	-	-	Good
	Benzo(a)pyrene	Fail	Fail	-	Good
	Cadmium and Its Compounds	Good	Good	Good	Good
	Di(2-ethylhexyl)phthalate (Priority hazardous)	Good	Good	-	Good
	Endosulfan	Good	Good	Good	-
	Hexachlorobenzene	Good	Good	Good	Good
	Hexachlorobutadiene	Good	Good	Good	Good
	Hexachlorocyclohexane	Good	Good	Good	-
	Mercury and Its Compounds	Good	Good	Good	Good
	Nonylphenol	Good	Good	Good	Good
	Tributyltin Compounds	Fail	Fail	Fail	Fail
	Trifluralin (Priority hazardous)	Good	Good	Good	Good

Cycle 1 classifications ⁱ [Show](#)

Upstream water bodies

Name ▲
Test (Lower)
Itchen
Monks Brook
Main River Hamble
Bartley Water
Langdown Stream
Tanner's Brook

Downstream water bodies

Name ▲
Solent

Investigations into classification status ⁱ

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Classification Element ▲	Cycle ▲	Year ▲	Status ▲	Outcome ▲
Fish	2	2013	Poor	
Tributyltin Compounds	2	2013	Fail	

Reasons for not achieving good status and reasons for deterioration ⁱ

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Reason Type	SWMI	Activity	Category	More	Classification Element
RNAG	Point source	Sewage discharge (continuous)	Water Industry	Details	Dissolved Inorganic Nitrogen
RNAG	Diffuse source	Poor nutrient management	Agriculture and rural land management	Details	Dissolved Inorganic Nitrogen
RNAG	Physical modification	Other (not in list, must add details in comments)	Local and Central Government	Details	Mitigation Measures Assessment
RNAG	Physical modification	Other (not in list, must add details in comments)	Local and Central Government	Details	Mitigation Measures Assessment
RNAG	Unknown (pending investigation)	Unknown (pending investigation)	Sector under investigation	Details	Brominated diphenylether (BDPE) Calc
RNAG	Point source	Sewage discharge (continuous)	Water Industry	Details	Tributyltin Compounds
RNAG	Point source	Trade/Industry discharge	Industry	Details	Tributyltin Compounds
RNAG	Diffuse source	Other (not in list, must add details in comments)	Navigation	Details	Tributyltin Compounds
RNAG	Diffuse source	Contaminated water body bed sediments	Industry	Details	Tributyltin Compounds

Objectives ⁱ

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Classification Item	Status	Year	Reasons
Overall Water Body	Moderate	2015	Unfavourable balance of costs and benefits Disproportionate burdens Cause of adverse impact unknown
Ecological	Moderate	2015	Unfavourable balance of costs and benefits Disproportionate burdens Cause of adverse impact unknown
Supporting elements (Surface Water)	Good	2027	Disproportionate burdens Cause of adverse impact unknown
Mitigation Measures Assessment	Good	2027	Disproportionate burdens Cause of adverse impact unknown
Biological quality elements	Good	2015	
Angiosperms	Good	2015	
Fish	Good	2015	
Invertebrates	Good	2015	
Macroalgae	Good	2015	
Phytoplankton	Good	2015	
Hydromorphological Supporting Elements	Supports Good	2015	
Hydrological Regime	Supports Good	2015	
Physico-chemical quality elements	Moderate	2015	Unfavourable balance of costs and benefits
Dissolved Inorganic Nitrogen	Moderate	2015	Unfavourable balance of costs and benefits
Dissolved oxygen	Good	2015	
Specific pollutants	High	2015	
2,4-dichlorophenol	High	2015	
2,4-dichlorophenoxyacetic acid	High	2015	
Arsenic	High	2015	
Copper	High	2015	
Diazinon	High	2015	
Dimethoate	High	2015	

Iron	High	2015	
Linuron	High	2015	
Mecoprop	High	2015	
Permethrin	High	2015	
Phenol	High	2015	
Toluene	High	2015	
Un-ionised ammonia	High	2015	
Zinc	High	2015	
Chemical	Good	2027	Disproportionate burdens
Priority substances	Good	2015	
1,2-dichloroethane	Good	2015	
Atrazine	Good	2015	
Benzene	Good	2015	
Chlorfenvinphos	Good	2015	
Lead and Its Compounds	Good	2015	
Napthalene	Good	2015	
Nickel and Its Compounds	Good	2015	
Pentachlorophenol	Good	2015	
Simazine	Good	2015	
Trichloromethane	Good	2015	

Other Pollutants	Good	2015	
Aldrin, Dieldrin, Endrin & Isodrin	Good	2015	
Carbon Tetrachloride	Good	2015	
para - para DDT	Good	2015	
Tetrachloroethylene	Good	2015	
Priority hazardous substances	Good	2027	Disproportionate burdens
Cadmium and Its Compounds	Good	2015	
Endosulfan	Good	2015	
Hexachlorobenzene	Good	2015	
Hexachlorobutadiene	Good	2015	
Hexachlorocyclohexane	Good	2015	
Mercury and Its Compounds	Good	2015	
Nonylphenol	Good	2015	
Tributyltin Compounds	Good	2027	Disproportionate burdens
Trifluralin (Priority hazardous)	Good	2015	

Protected areas ⁱ

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PA Name	ID	Directive	Type	More information
185	NVZ12SW011850	Nitrates Directive		
Solent & Southampton Water	UK9011061	Conservation of Wild Birds Directive	SPA	Natural England
Solent Maritime	UK0030059	Habitats and Species Directive	SAC	Natural England
SOUTHAMPTON WATER	UKSW35	Shellfish Water Directive		
River Itchen	UK0012599	Habitats and Species Directive	SAC	Natural England
River Hamble	UKENRI122	Urban Waste Water Treatment Directive		
Approaches to Southampton Water	UKSW36	Shellfish Water Directive		
Hamble Estuary	UKENCA123	Urban Waste Water Treatment Directive		
River Itchen (Hampshire)	UKENRI110	Urban Waste Water Treatment Directive		

10.1 Screening & Scoping Stage - WFD Tables for activities in estuarine and coastal waters

Works take place in or affect more than one water body, complete a template for each water body – *single water body*

Works include several different activities or stages as part of a larger project, complete a template for each activity as part of your overall WFD assessment – *single activity*

Activity	Description, notes or more information
Applicant name	<i>Dean & Reddyhoff Ltd</i>
Application reference number (where applicable)	<i>n/a</i>
Name of activity	<i>Deacons Boatyard Alterations</i>
Brief description of activity	<i>Alterations to access and installation of public access pontoon.</i>
Location of activity (central point XY coordinates or national grid reference)	<i>449150, 109670</i>
Footprint of activity (ha)	<i>200m² (0.02 ha)</i>
Timings of activity (including start and finish dates)	<i>Dependent upon Licence and plant availability. Works expected to take 6 weeks. This is not a continuous operation as vessels are constrained by tide. Work in daylight hours only.</i>
Extent of activity (for example size, scale frequency, expected volumes of output or discharge)	<i>Single event</i>
Use or release of chemicals (state which ones)	<i>No</i>

Water body ¹	Description, notes or more information
WFD water body name	<i>Southampton</i>
Water body ID	<i>GB5207040202800</i>
River basin district name	<i>South East</i>
Water body type (estuarine or coastal)	<i>Transitional Water (Estuarine from summary table)</i>
Water body total area (ha)	<i>3091.32</i>

Overall water body status (2016)	<i>Moderate</i>
Ecological status	<i>Moderate</i>
Chemical status	<i>Fail</i>
Target water body status and deadline	<i>Moderate by 2015</i>
Hydromorphology status of water body	<i>Supports Good by 2015</i>
Heavily modified water body and for what use	<i>Yes – Navigation – Ports & Harbours, Coastal protection, Flood protection</i>
Higher sensitivity habitats present	<i>Yes – saltmarsh distant from works</i>
Lower sensitivity habitats present	<i>Yes – subtidal & intertidal soft sediment</i>
Phytoplankton status	<i>High from summary table</i>
History of harmful algae	<i>No from summary table</i>
WFD protected areas within 2km	<i>Yes</i>

Specific risk to receptors -

Section 1: Hydromorphology

Consider if hydromorphology is at risk from your activity.

Use the water body summary table to find out the hydromorphology status of the water body, if it is classed as heavily modified and for what use.

Consider if your activity:	Yes	No	Hydromorphology risk issue(s)
Could impact on the hydromorphology (for example morphology or tidal patterns) of a water body at high status	Requires impact assessment	Impact assessment not required	<i>No</i>
Could significantly impact the hydromorphology of any water body	Requires impact assessment	Impact assessment not required	<i>No</i>
Is in a water body that is heavily modified for the same use as your activity	Requires impact assessment	Impact assessment not required	<i>Yes</i>

Record the findings for hydromorphology and go to section 2: biology.

Section 2: Biology

Habitats

Consider if habitats are at risk from your activity.

Use the water body summary table and Magic maps, or other sources of information if available, to find the location and size of these habitats.

Higher sensitivity habitats ²	Lower sensitivity habitats ³
chalk reef	cobbles, gravel and shingle
clam, cockle and oyster beds	intertidal soft sediments like sand and mud
intertidal seagrass	rocky shore
maerl	subtidal boulder fields
mussel beds, including blue and horse mussel	subtidal rocky reef
polychaete reef	subtidal soft sediments like sand and mud
saltmarsh	
subtidal kelp beds	
subtidal seagrass	

² Higher sensitivity habitats have a low resistance to, and recovery rate, from human pressures.

³ Lower sensitivity habitats have a medium to high resistance to, and recovery rate from, human pressures.

Consider if the footprint ⁴ of your activity is:	Yes	No	Biology habitats risk issue(s)
0.5km ² or larger	Yes to one or more – requires		No
1% or more of the water body's area			No

Within 500m of any higher sensitivity habitat	impact assessment	No to all – impact assessment not required	No
1% or more of any lower sensitivity habitat			No

⁴ Note that a footprint may also be a temperature or sediment plume. For dredging activity, a footprint is 1.5 times the dredge area.

Fish

Consider if fish are at risk from your activity, but only if your activity is in an estuary or could affect fish in or entering an estuary.

Consider if your activity:	Yes	No	Biology fish risk issue(s)
Is in an estuary and could affect fish in the estuary, outside the estuary but could delay or prevent fish entering it or could affect fish migrating through the estuary	Continue with questions	Go to next section	No
Could impact on normal fish behaviour like movement, migration or spawning (for example creating a physical barrier, noise, chemical change or a change in depth or flow)	Requires impact assessment	Impact assessment not required	No
Could cause entrainment or impingement of fish	Requires impact assessment	Impact assessment not required	No

Record the findings for biology habitats and fish and go to section 3: water quality.

Section 3: Water quality

Consider if water quality is at risk from your activity.

Use the water body summary table to find information on phytoplankton status and harmful algae.

Consider if your activity:	Yes	No	Water quality risk issue(s)

Could affect water clarity, temperature, salinity, oxygen levels, nutrients or microbial patterns continuously for longer than a spring neap tidal cycle (about 14 days)	Requires impact assessment	Impact assessment not required	<i>No – works are not continuous for more than 14 days</i>
Is in a water body with a phytoplankton status of moderate, poor or bad	Requires impact assessment	Impact assessment not required	<i>No</i>
Is in a water body with a history of harmful algae	Requires impact assessment	Impact assessment not required	<i>No</i>

Consider if water quality is at risk from your activity through the use, release or disturbance of chemicals.

If your activity uses or releases chemicals (for example through sediment disturbance or building works) consider if:	Yes	No	Water quality risk issue(s)
The chemicals are on the Environmental Quality Standards Directive (EQSD) list	Requires impact assessment	Impact assessment not required	<i>Yes</i>
It disturbs sediment with contaminants above Cefas Action Level 1	Requires impact assessment	Impact assessment not required	<i>Yes</i>

If your activity has a mixing zone (like a discharge pipeline or outfall) consider if:	Yes	No	Water quality risk issue(s)
The chemicals released are on the Environmental Quality Standards Directive (EQSD) list	Requires impact assessment ⁵	Impact assessment not required	<i>No</i>

⁵ Carry out your impact assessment using the Environment Agency's surface water pollution risk assessment guidance, part of Environmental Permitting Regulations guidance.

Record the findings for water quality go on to section 4: WFD protected areas.

Section 4: WFD protected areas

Consider if WFD protected areas are at risk from your activity. These include:

- special areas of conservation (SAC)
- special protection areas (SPA)
- shellfish waters
- bathing waters
- nutrient sensitive areas

Use Magic maps to find information on the location of protected areas in your water body (and adjacent water bodies) within 2km of your activity.

Consider if your activity is:	Yes	No	Protected areas risk issue(s)
Within 2km of any WFD protected area ⁶	Requires impact assessment	Impact assessment not required	Yes

⁶ Note that a regulator can extend the 2km boundary if your activity has an especially high environmental risk.

Record the findings for WFD protected areas and go to section 5: invasive non-native species.

Section 5: Invasive non-native species (INNS)

Consider if there is a risk your activity could introduce or spread INNS.

Risks of introducing or spreading INNS include:

- materials or equipment that have come from, had use in or travelled through other water bodies
- activities that help spread existing INNS, either within the immediate water body or other water bodies

Consider if your activity could:	Yes	No	INNS risk issue(s)
Introduce or spread INNS	Requires impact assessment	Impact assessment not required	No

Summary

Receptor	Potential risk to receptor?	Note the risk issue(s) for impact assessment

Hydromorphology	Yes	<i>Within an HMWB for same use</i>
Biology: habitats	Yes	<i>Soft sediment</i>
Biology: fish	No	
Water quality	Yes	<i>EQS Chemical list, Chemicals above AL1</i>
Protected areas	Yes	
Invasive non-native species	No	

11. WFD Impact Assessment & Mitigation

The assessment has identified potential risks to the following:

Hydromorphology -

The works relate to a minor rearrangement of an access and a single additional pontoon. This is within a well-established operational marina, there is no additional risk.

Biological habitats –

Intertidal sediment (low sensitivity for WFD but also a BAP habitat)- The alteration to the access removes one structure (with berths) which rests on intertidal mud and replaces it with one that will cover a smaller area of intertidal mud. The public access pontoon will rest on the mud at low water so cover some intertidal area.

The existing intertidal covered by the bridge access and berths is 120m².

The relocated bridge access will cover 45m² and the public pontoon 40m², a total of 85m².

The net result of this is an intertidal habitat gain of 35m².

Water quality –

The sediment sample analysis undertaken for the dredging in 2011 showed some chemicals above AL1. However, these were all only just above AL1 and considered suitable for sea disposal.

For the current works there will be no dredging and release of the chemicals into the water column would be below limits of detection.

The works will therefore have no impact on the water quality.

Protected areas –

The following area covers the site –

SAC – Solent Maritime (UK0030059). The primary reasons for designation of this site are Estuaries, Spartina swards and Atlantic salt meadows. There are no Spartina swards or Atlantic salt meadows within the works area so there will be no negative impact on these habitats. In terms of the estuary the only possible impact will be the piling but this is far less intrusive (in terms of sediment suspension) than the regular maintenance dredging in the river. The works will have no measurable impact on the protected site.

pSPA – Solent and Dorset Coast. This proposed SPA is intended to protect the foraging areas utilised by the Sandwich Tern, Common Tern & Little Tern. The proposed boundaries in this area extend those of the Solent & Southampton Water SPA such that the application site is covered.

In construction terms the proposed works can only be conducted at high waters and are both within existing areas of high activity. In operational terms the only difference is potential increased human activity on the slipway, however this must be balanced against the existing impacts from the A27 Bridge use.

The following areas are within 2km of the site –

Local Nature Reserve (LNR) – Hackett’s Marsh (1009285). This area is a biological urban fringe reserve and is some 500m downstream of the site. The reserve is unaffected by the proposed works.

Ramsar – Solent and Southampton Water (UK11063). This is also downstream of the works (overlays the LNR) and there will be no impact on the protected area.

SSSI – Lincegrove & Hackett’s Marshes (1080733). This also overlays the LNR and similarly the proposed works will have no impact.

SPA – Solent & Southampton Water (UK9011061). This overlays the above sites and is similarly unaffected by the proposal.

The works will therefore have no negative impact on the protected sites.

12. WFD Summary

The proposed works are relatively small in scale and very short in time. By following EA guidance, it is concluded that the proposal will not have a negative impact on the water body nor any protected area.

13. Assessment of Proposal

The proposed works consist of two components:

Public Access Pontoon – Whilst this sits on existing intertidal habitat this is offset by the positive impact of the relocated bridge. This positive impact has been accepted by both the MMO and

the LPA (accepted in the Officer's recommendation for approval and supported by the Appeal decision). The often-requested improvement for public access to the river is enabled by this feature. There is a potential for increased activity but this will be controlled as detailed earlier.

Bridge Access Relocation – this is simply a relocation and has a positive impact in reducing the any intertidal impact. There are no navigational implications.

The proposed method statement is compliant with all current best practice.

ASSOCIATED DOCUMENTS:

1. Drawing 10667/1
2. Natural England response to MMO
3. MMO Coastal Offices response to MMO