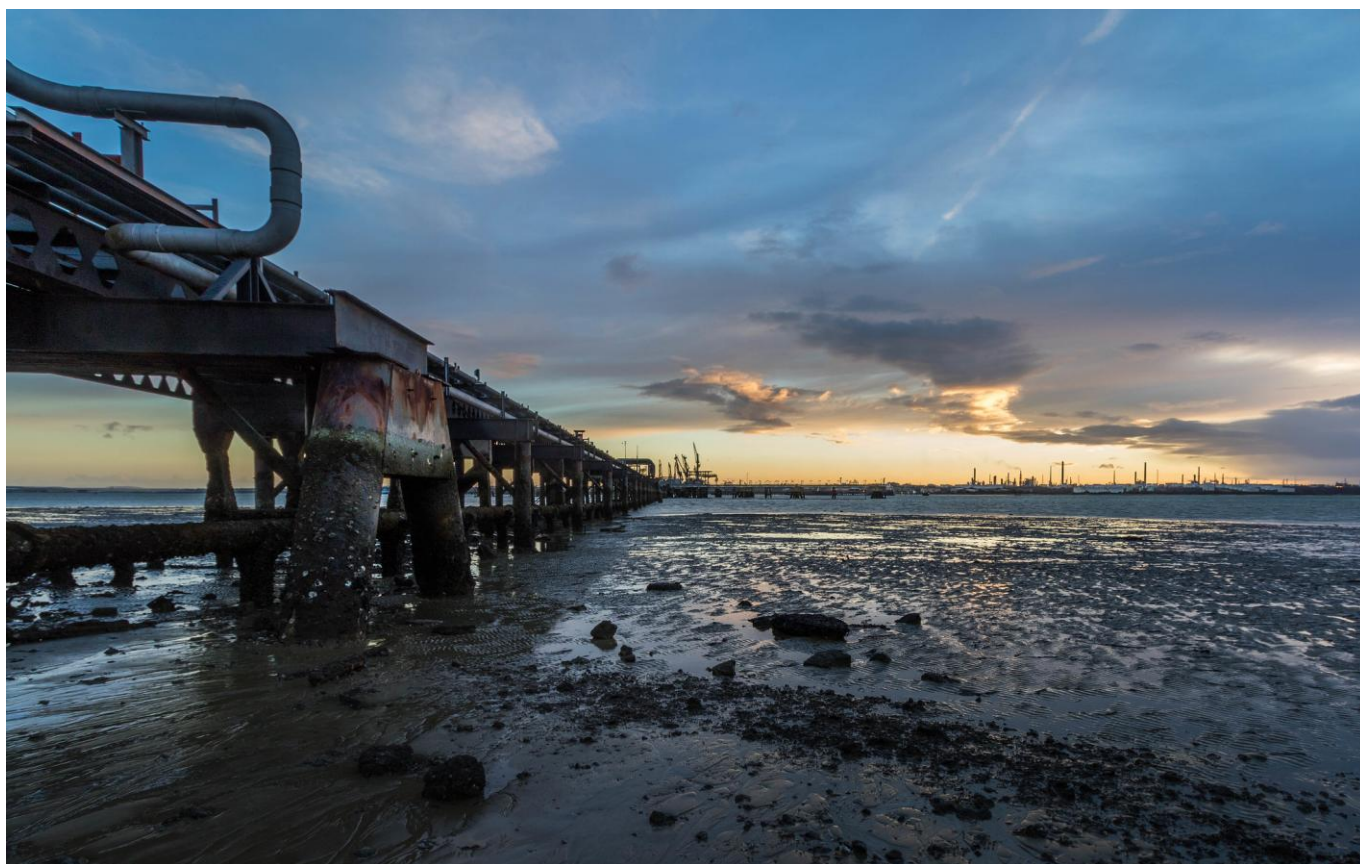




BP Oil UK

Hamble Jetty Repainting

Statement to Inform Appropriate Assessment

APRIL 2019

RSK

RSK General Notes

Project No.: 422445

Title: Hamble Jetty Repainting – Statement to Inform Appropriate Assessment

Client: BP Oil UK

Date: April 2019

Office: Helsby

Status: Draft

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Signature

Date

16 April 2019

Date

16 April 2019

Revision no.	Date	Revisions	Status
00	15 April 2019	n/a	Draft for internal review
01	16 April 2019	Per filed tech/quality review changes	Draft for client review

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Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK Environment Ltd.

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1 Introduction

1.1 Purpose of this Report

This document is a statement to inform an appropriate assessment in relation to the repainting of the jetty at BP's Hamble Oil Terminal. This assessment is required as part of the project's marine licence application due to its location within the Solent and Southampton Water Special Protection Area (SPA) and the Solent and Southampton Water Ramsar site. It is also adjacent to the Solent Maritime Special Area of Conservation (SAC) and within the Lee-on-the-Solent to Itchen Estuary Site of Special Scientific Interest, though this latter site is not subject to appropriate assessment. This document specifically considers potential effects of the project on these internationally important sites, taking into account any mitigation measures that may be employed.

RSK was commissioned by BP Oil UK to produce a document to inform the appropriate assessment. This is required as potential impacts on the Natura 2000 sites were identified during the initial phases of the project and in consultation with Natural England.

1.2 Scheme Description

The BP Oil UK Limited Fuel Storage Terminal in Hamble, Southampton is located on the left bank of Southampton Water. The jetty, originally built in 1983-1984, extends from the shoreline c.500 m into the estuary. The steel elements of the structure were last repainted in 1996 and this protective coating has now deteriorated to the point where it needs reapplication.

The aim of the work is to reapply the deteriorated paint systems on the steel piles and structural steel elements (beams, pile support bents and bracings) of the jetty. This work will prevent corrosion and maintain the integrity of the jetty structure.

The work consists of:

- Provision of safe access to the structures
- Removal of the deteriorated paint, corrosion products and any marine growth in that area
- Substrate surface preparation
- Application of the new paint system
- Inspection, testing and assessment
- Collection and removal of all removed paint, debris and other waste materials
- Dismantling and removal of any temporary working platforms or equipment that have been set up to provide access to the structures

The key parts of this are described in more detail in section 3.

1.3 Ecological Context

The jetty is part of a fuel storage facility, which is laid mostly to hard standing and fuel tanks. Adjacent to the storage facility is Hamble Common, a 22 ha area of coastal heath. The jetty extends from the storage area into Southampton Water, a tidal estuary with an artificially deepened channel to enable ship movements. The jetty passes through the shoreline and intertidal area which are within the Solent and Southampton Water SPA and Ramsar sites and the Lee-on-the-Solent to Itchen Estuary Site of Special Scientific Interest (SSSI). To the south east of the jetty is the mouth of the River Hamble, where the river drains into Southampton Water. The lower parts of the River Hamble are within the Solent Maritime SAC. The SAC is around 300 m from the jetty at their closest points.

The wider surrounding area includes residential properties, industrial sites and several tidal estuaries

2 Protected Sites Potentially Affected

There are two Natura 2000 statutory designated sites of nature conservation importance within 2 km of the proposed site – the Solent and Southampton Water SPA and the Solent Maritime SAC. For the purposes of this assessment (i.e. considering the area to be potentially affected), the SPA, the Solent and Southampton Water Ramsar site and the Lee-on-the-Solent to Itchen Estuary SSSI all have the same boundaries. Approximately 50% of the jetty is within these sites. The jetty is c.300 m from the boundary of the Solent Maritime SAC at its nearest point. The extents of all these protected sites are shown in Figure 1 (a separate PDF file, accompanying this document).

2.1 Solent and Southampton Water Ramsar Site

Solent and Southampton Water has been designated as a Ramsar site because it meets the following Ramsar criteria¹.

Criterion 1:

A wetland should be considered internationally important if it contains a representative, rare, or unique example of a natural or near-natural wetland type found within the appropriate biogeographic region.

The site is one of the few major sheltered channels between a substantial island and mainland in European waters, exhibiting an unusual strong double tidal flow and has long periods of slack water at high and low tide. It includes many wetland habitats characteristic of the biogeographic region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs.

Criterion 2:

A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities.

The site supports an important assemblage of rare plants and invertebrates. At least 33 British Red Data Book invertebrates and at least eight British Red Data Book plants are represented on site.

The higher plants *Orobanche purpurea* and *Spartina maritima* are considered vulnerable and endangered, respectively, in the GB Red Book.

The Mediterranean gull (*Larus melanocephalus*) is included in CITES Appendix I

Criterion 5:

A wetland should be considered internationally important if it regularly supports 20,000 or more waterbirds.

Species with peak counts in winter:

51,343 waterfowl (5 year peak mean 1998/99-2002/2003)

¹ taken from Ramsar website https://www.ramsar.org/sites/default/files/documents/library/ramsarsites_criteria_eng.pdf
<https://rsis.ramsar.org/RISapp/files/RISrep/GB965RIS.pdf>

Criterion 6:

A wetland should be considered internationally important if it regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.

Qualifying species/populations (as identified at designation):

- Black-tailed godwit, *Limosa limosa islandica*,
- Dark-bellied brent goose, *Branta bernicla bernicla*,
- Eurasian teal, *Anas crecca*.

2.2 Solent and Southampton Water SPA

During the breeding season:

Solent and Southampton Water qualifies as an SPA under Article 4.1 of the birds directive (79/409/EEC) owing to it regularly supporting internationally important numbers of the following species²:

- Common tern (*Sterna hirundo*), 267 pairs representing at least 2.2% of the breeding population in Great Britain (5-year peak mean, 1993-1997)
- Little tern (*Sterna albifrons*), 49 pairs representing at least 2.0% of the breeding population in Great Britain (5-year peak mean, 1993-1997)
- Mediterranean gull (*Larus melanocephalus*), 2 pairs representing at least 20.0% of the breeding population in Great Britain (5-year peak mean, 1994-1998)
- Roseate tern (*Sterna dougallii*), 2 pairs representing at least 3.3% of the breeding population in Great Britain (5-year peak mean, 1993-1997)
- Sandwich tern (*Sterna sandvicensis*), 231 pairs representing at least 1.7% of the breeding population in Great Britain (5-year peak mean, 1993-1997)

Over winter:

This site qualifies under Article 4.2 of the birds directive by supporting populations of European importance of the following migratory species:

- Black-tailed godwit (*Limosa limosa islandica*), 1125 individuals representing at least 1.6% of the wintering Iceland - breeding population (5-year peak mean, 1992/3-1996/7)
- Dark-bellied brent goose (*Branta bernicla bernicla*), 7506 individuals representing at least 2.5% of the wintering Western Siberia/Western Europe population (5-year peak mean, 1992/3-1996/7)
- Ringed plover (*Charadrius hiaticula*), 552 individuals representing at least 1.1% of the wintering Europe/Northern Africa - wintering population (5-year peak mean, 1992/3-1996/7)
- Teal (*Anas crecca*), 4400 individuals representing at least 1.1% of the wintering Northwestern Europe population (5-year peak mean, 1992/3-1996/7)

² Taken from JNCC website <http://jncc.defra.gov.uk/default.aspx?page=2037>

The area also qualifies under Article 4.2 of the directive by regularly supporting at least 20,000 waterfowl.

2.3 Solent Maritime SAC

Solent Maritime has been designated as an SAC on the basis that it supports the following habitats and species of European importance³.

Annex I habitats that are a primary reason for the selection for this site:

- Estuaries
- Spartina swards
- Atlantic salt meadows

Annex I habitats present as a qualifying feature, but not a primary reason for selection:

- Sandbanks which are slightly covered by sea water all the time
- Mudflats and sandflats not covered by seawater at low tide
- Coastal lagoons
- Annual vegetation of drift lines
- Perennial vegetation of stony banks
- Salicornia and other annuals colonizing mud and sand
- Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")

Annex II species that are a primary reason for the selection for this site:

None

Annex II species that are present as a qualifying feature, but not a primary reason for site selection:

- Desmoulin's Whorl Snail (*Vertigo moulinsiana*)

2.4 Lee-on-the-Solent to Itchen Estuary SSSI

The Lee-on-the-Solent to Itchen Estuary SSSI is not a Natura 2000 site and is therefore not subject to appropriate assessment as defined by the relevant directives, but it is included here for completeness in the context of a need for assessment of all the protected sites for a marine licence application.

The site has been designated as a SSSI on the basis that it supports the following habitats and species.

- Mudflats
- Vegetated shingle
- Saltmarsh

³ taken from JNCC website

<http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0030059>

- Reedbed
- Marshy grassland
- Deciduous woodland
- Valley gravels
- Bracklesham beds
- Internationally important for over-wintering dark-bellied geese and nationally important for eight species of wildfowl and waders.
- Outstanding assemblage of nationally scarce coastal plant.

3 Proposed Method of Working

3.1 Site Establishment

The contractor will establish a compound including welfare facilities, toilets, materials storage and laydown, waste skips and a site office. This area will be within the boundary of the main oil terminal, not on the foreshore.

All paints, solvents and other chemicals will be stored in designated areas that are isolated from surface water drains, open water and within a container or bund to contain any spillage. The paint store will be vented. The contractor will be required to demonstrate familiarity with the environmental risks of the paints, solvents or other chemicals used with reference to the material data sheets, which they will need to provide to BP.

Bunding will be installed to contain and prevent the release of fuel, oils, and chemicals associated with plant, refuelling and construction equipment, into the environment. Secondary containment will be used with a capacity of no less than 110% of the container's storage capacity.

3.2 Access

Suspended scaffolding will be the means of access to the great majority of the jetty structures. There will therefore be no seabed disturbance from the installation, use and removal of these facilities.

All access to the jetty area will be through Hamble Oil Terminal. There will not be a need for vehicular access through the intertidal zone, nor through any heritage-designated asset.

3.3 Surface Preparation

The first stage of surface preparation is preliminary treatment. In this stage, suitable organic solvents, emulsion degreasing agents or equivalents as specified in clauses 6.2.3 to 6.2.5 of BS EN ISO 12944-4:2017 will be used to remove contaminants (such as residues of oil, grease, marking inks, dirt, salts, cutting oil, etc) in preparation for subsequent descaling treatments. Then the stripping method specified in clause 6.2.6 of BS EN ISO 12944-4: 2017 will be used for removal of existing paint on the structures.

Secondary treatment will be through:

- **Ultra-high-pressure water jetting (hydroblasting)** – in accordance with BS EN ISO 8501-4:2006.

All prepared surfaces will be subject to testing using parameters and criteria defined by the standards to ensure that the paint will coat the surface in a proper, durable manner. The thickness of the steel pile walls will also be tested.

Containment of the removed material and testing of the filtered water (in the case of hydroblasting) are discussed in Section 5.2

3.4 Paint Application, Inspection and Testing

The general finished colour is to be grey. The precise type of paint to be used is to be proposed by the contractor and agreed with BP, but it is to conform to BS EN ISO 12944:2017 with conformity certificates and performance test results as prescribed by that standard to be provided by the contractor. The paint system will comply with category CX and Im4 for very high durability in accordance with BS EN ISO 12944-9:2018 for splash and intertidal zones.

The method of application will consider the paint manufacturer's instructions and recommendations. A combination of brush, roller and airless spray techniques is likely to be used depending on the substrate. All application methods and application conditions will be in accordance with BS EN ISO 12944-7:2017.

The finished surfaces will be inspected and tested using a variety of methods: visual, thickness tests and voltage tests to ensure that the coatings will perform as intended. Comprehensive records will be produced and maintained.

3.5 Schedule

The work will commence in spring 2026. The work will progress from the jetty foot outwards through the first seven sections of the approach trestle. The fire monitoring tower and the crane structure on the jetty head have been included in the Phase 1 scope of work as these afford simpler access and are not as subject to the weather and tides, therefore enable the crews to avoid any lengthy downtime periods.

The daily programme of work will vary significantly depending on the tides. The core hours will be 0730-1800 Mon-Fri or a very similar window. However, to achieve the schedule, some work outside these hours including at weekends may be necessary.

The time between surface preparation and primer application must be less than four hours to limit exposure of unprotected metal surface. These activities will always be done closely together.

In the interests of public amenity and the avoidance of nuisance noise impacts, we have proposed limitations of the noisiest work (that involving the blasting pumps/compressors) to Eastleigh Borough Council (EBC) of:

- 0800-1800 Mon-Fri
- 0800-1600 Sat and Sun but no such work between 1200 and 1600 within 100 m of the jetty root
- No such work on bank holidays

At the time of writing, we are yet to receive a response from EBC.

4 Potential Impacts on the Protected Sites

4.1 Methodology

A desk-based assessment was undertaken covering an area with radius of 2 km from the proposed works, focussing on the habitats and species which are listed as 'primary reasons' or 'qualifying features' in the designation of the sites. Information was collated from the organisations and websites listed below:

- Multi-Agency Geographic Information on the Countryside (MAGIC) website (www.magic.gov.uk);
- The Joint Nature Conservation Committee (JNCC) website (www.jncc.gov.uk); and
- The Ramsar website (www.ramsar.org).

4.2 Potential Impacts – Solent and Southampton Water SPA and Ramsar Site

The proposed work at the jetty crosses part of the SPA and the Ramsar site. However, there will be no direct habitat loss, as works will be confined to the jetty structure itself. Given that there will be no habitat loss, works are therefore unlikely to give rise to impacts other than the disturbance of birds.

4.2.1 Breeding Birds

Common tern (*Sterna hirundo*), little tern (*Sterna albifrons*), Mediterranean gull (*Larus melanocephalus*), roseate tern (*Sterna dougallii*) and Sandwich tern (*Sterna sandvicensis*) are listed as qualifying breeding species of the SPA. However, there is no appreciable chance of nesting close to the work site as the works will be confined to the jetty only. Therefore, there will be no impact on breeding birds for which the SPA/Ramsar site is designated.

Potential impacts of the works therefore relate to wintering and passage birds only for which the sites have been designated.

4.2.2 Wintering Birds

The Solent and Southampton Water SPA is designated under Article 4.1 for wintering Black-tailed godwit (*Limosa limosa islandica*), dark-bellied brent goose (*Branta bernicla bernicla*), ringed plover (*Charadrius hiaticula*) and teal (*Anas crecca*). Under Article 4.2, the site is designated for overwintering species by regularly supporting at least 20,000 waterfowl as detailed in Section 2.1.

While works will be limited to the jetty, there would – in the absence of mitigation – be potential for significant disturbance to wintering species, firstly in the form of visual disturbance caused by the presence of workers, and secondly in the form of noise disturbance caused principally by the surface preparation methods (high-pressure jetting).

4.2.3 Pollution and Water Quality

If pollutants were to be released by spillage or arisings from blasting or jetting and allowed to enter the marine environment they would affect water quality. The potential impact of the release of substances includes adverse effects on the water quality of the Solent and in turn the flora and fauna. Owing both to the character of the activities and their small scale, these impacts are likely to be amenable to mitigation.

No non-marine qualifying features of the Ramsar site such as rare vascular plants, e.g. Yarrow broomrape (*Orobanche purpurea*) stand to be affected by the works.

4.2.4 Noise

At the time of the last repainting of the jetty in 1996, a noise impact assessment was carried out. It focussed on the noisiest activity associated with the work, that being the operation of compressor for water blasting. The assessment found that noise was not perceived to be significant at a distance of greater than 100 m from the activity. At 300 m, the noise was 'faintly audible' and at a distance of 400 m the compressor was inaudible.

4.3 Potential Impacts – Solent Maritime SAC

As works are confined to the jetty which is c.300 m from the SAC at its closest, the potential for impact on the qualifying features of the SAC is confined to scenarios where remote pollution from work enters the marine environment. Given the likely dispersion of pollutants at the distances involved, and the amenability of the source of impact to mitigation by control measures described in Section 5, the potential for impact is small.

No non-marine qualifying features of the SAC such as drift-line vegetation or shifting dune vegetation stand to be affected by the works.

4.4 Potential Impacts – Lee-on-the-Solent to Itchen Estuary SSSI

As works are confined to the jetty the potential for impact on the qualifying features of the SSSI are confined to scenarios where remote pollution enters the marine environment and disturbance to wintering birds. Given the amenability of the source of impact to mitigation by control measures described in Section 5, the potential for impact is small.

No non-marine qualifying features of the SSSI such as marshy grassland, reedbeds and woodland stand to be affected by the works.

5 Mitigation

5.1 Timing – Bird Mitigation

To minimise impacts on wintering birds, no activities which are likely to cause disturbance to them will be undertaken between 15 October and 15 March. Activities to be restricted are high-pressure water jetting and spray painting. This restriction prevents noise disturbance to wintering species during the key winter months.

Activities generating no significant noise disturbance may continue (e.g. brush application of protective coating, dismantling of scaffolding).

5.2 Pollution Control

5.2.1 Containment of the Removed Coatings and Abrasive Material

For ultra high pressure water jetting

The containment method for the ultra-high-pressure water jetting comprises several layers of filter sheet enclosing the work area and finely filtering the removed solid material from the pumped fresh water. The water that passes through the filtration sheets will be discharged to the estuary. The solid material collected on the filter sheets will be bagged at least daily, taken to shore and disposed of.

A sampling and analysis programme will be implemented for the water discharge. It will include:

- Testing of the receiving water body prior to work commencing, to set baseline levels of the parameters most at risk of changing.
- Testing of the filtered water that has been used for the water jetting.
- Testing of the receiving water.

The precise details of this programme, in terms of parameters to be analysed, frequency and methods of sampling and analysis, are being finalised at the time of writing.

5.2.2 General

The measures outlined below are sufficient to mitigate the potential impacts of pollution within the Natura 2000 sites, from the proposed works. These measures should mean that there will be no impacts on the protected sites.

- An environmental management plan will be produced setting out environmental procedures prior to works commencing. Site contractors will be briefed on the potential environmental risks from the work and the mitigation measures to be followed to ensure that the protected sites are not adversely affected.
- All paints, solvents and other chemicals will be stored in designated areas that are isolated from surface water drains, open water and within a container or bund to contain any spillage. The contractor will be required to demonstrate familiarity with the environmental risks of the paints, solvents or other chemicals used with reference to the material data sheets, which they will need to provide to BP.

- Bunding will be installed to contain and prevent the release of fuel, oils, and chemicals associated with plant, refuelling and construction equipment, into the marine environment. Secondary containment will be used with a capacity of no less than 110% of the container's storage capacity.
- Bowsers will be maintained in a secure and clean manner. Oils and lubricants will be stored in sealed containers on drip trays inside steel containers within the site. Spill kits and disposal bins will be kept in these areas for use should a spill occur. Drip trays will be used beneath plant when it is stationary for prolonged periods. The drip trays will be emptied regularly, especially after rain, and their contents will be stored and disposed of as a waste oil product.
- Refuelling and maintenance of plant will be carried out in designated areas by competent operatives. Plant will be refuelled directly from the bower to the item of plant using a trigger-type delivery nozzle (no fuel cans or fuel drums will be used). Care will be taken not to overfill fuel tanks and an adequate supply of absorbent material will be available at all times. Fuel transfer pumps will be isolated after use, and any used absorbent material will be stored in the appropriate bin for disposal off site. All spills will immediately be reported to the site supervisor.
- All items of plant will be inspected daily, and any faults or damage will be reported immediately to the site supervisor. All hydraulic hoses will be inspected daily and all damaged or worn hoses will be reported to the site supervisor who will arrange for them to be replaced. In the event of a hose bursting, the damaged hose will be isolated as soon as possible. Any spilt oil will be reported to the site supervisor; it will be cleaned up using absorbent materials, even if it is biodegradable.
- Any fuel, oil or chemical spill will be notified to the MMO Marine Pollution Response Team within 12 hours.
- All coatings and treatments will be suitable for use in the marine environment. Priority substances and polluting chemicals listed under the Environmental Quality Standards Directive (EQSD) will not be utilised.
- All equipment, temporary structures, waste and/or debris associated with the work will be removed within 6 weeks of completion.
- The harbour authority, ABP Southampton, will be notified at least 7 days prior to the commencement of the licensed activities. A separate application for harbour works consent is being made.

6 Conclusion

Several elements of the work could in principle and in the absence of mitigation affect qualifying features of the Natura 2000 sites. The reasons for concluding that no qualifying features will be significantly affected are as follows.

- *For all qualifying features in respect of impacts from pollution.* The containment of works and diverse control measures set out in methods statements will prevent significant effects from otherwise possible pollution incidents, especially given but not relying on the likely dispersion of any substances at the distances between qualifying features and the jetty.
- *For all other features involving breeding birds.* There are no habitats close to the jetty that could support the qualifying species that make up the breeding assemblage of the SPA.
- *For potential noise-disturbance impacts on wintering and passage birds.* There will be seasonal restrictions banning all works capable of causing noise disturbance to winter or passage birds between 15 October and 15 March. This will prevent any noise impacts on individually qualifying species or qualifying assemblages of species.
- *For potential visual-disturbance impacts on wintering and passage birds.* Containment of works with sheeting for other purposes will provide visual screening, and where none is required other similar screening will be provided. This will prevent significant visual disturbance of any qualifying species or qualifying assemblages of species.

Given the restrictions on work proposed and the containment of works, it is not considered that the activities will result in any significant effects on any Natura 2000 site or other designated site.

Appendix A – Natura 2000 Sites

Solent and Southampton Water SAC/Ramsar

Site description

The Solent and Southampton Water are located on the south English coast. The area covered extends from Hurst Spit to Hill Head along the south coast of Hampshire, and from Yarmouth to Whitecliff Bay along the north coast of the Isle of Wight. The site comprises a series of estuaries and harbours with extensive mud-flats and saltmarshes together with adjacent coastal habitats including saline lagoons, shingle beaches, reedbeds, damp woodland and grazing marsh. The mud-flats support beds of *Enteromorpha spp.* and *Zostera spp.* and have a rich invertebrate fauna that forms the food resource for the estuarine birds. In summer, the site is of importance for breeding seabirds, including gulls and four species of terns. In winter, the SPA holds a large and diverse assemblage of waterbirds, including geese, ducks and waders. Dark-bellied Brent Goose *Branta b. bernicla* also feed in surrounding areas of agricultural land outside the SPA.

Qualifying species

This site qualifies under Article 4.1 of the birds directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the directive:

During the breeding season

- Common tern *Sterna hirundo*, 267 pairs representing at least 2.2% of the breeding population in Great Britain (5 year peak mean, 1993-1997)
- Little tern *Sterna albifrons*, 49 pairs representing at least 2.0% of the breeding population in Great Britain (5 year peak mean, 1993-1997)
- Mediterranean gull *Larus melanocephalus*, 2 pairs representing at least 20.0% of the breeding population in Great Britain (5 year peak mean, 1994-1998)
- Roseate tern *Sterna dougallii*, 2 pairs representing at least 3.3% of the breeding population in Great Britain (5 year peak mean, 1993-1997)
- Sandwich tern *Sterna sandvicensis*, 231 pairs representing at least 1.7% of the breeding population in Great Britain (5 year peak mean, 1993-1997)

This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

Over winter

- Black-tailed godwit *Limosa limosa islandica*, 1125 individuals representing at least 1.6% of the wintering Iceland - breeding population (5 year peak mean, 1992/3-1996/7)
- Dark-bellied brent goose *Branta bernicla bernicla*, 7506 individuals representing at least 2.5% of the wintering Western Siberia/Western Europe population (5 year peak mean, 1992/3-1996/7)
- Ringed plover *Charadrius hiaticula*, 552 individuals representing at least 1.1% of the wintering Europe/Northern Africa - wintering population (5 year peak mean, 1992/3-1996/7)
- Teal *Anas crecca*, 4400 individuals representing at least 1.1% of the wintering Northwestern Europe population (5 year peak mean, 1992/3-1996/7)

Assemblage qualification: A wetland of international importance.

The area qualifies under Article 4.2 of the birds directive by regularly supporting at least 20,000 waterfowl.

Over winter, the area regularly supports 53,948 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: gadwall *Anas strepera*, teal *Anas crecca*, ringed plover *Charadrius hiaticula*, black-tailed godwit *Limosa limosa islandica*, little grebe *Tachybaptus ruficollis*, great crested grebe *Podiceps cristatus*, cormorant *Phalacrocorax carbo*, dark-bellied brent goose *Branta bernicla bernicla*, wigeon *Anas penelope*, redshank *Tringa totanus*, pintail *Anas acuta*, shoveler *Anas clypeata*, red-breasted merganser *Mergus serrator*, grey plover *Pluvialis squatarola*, lapwing *Vanellus vanellus*, dunlin *Calidris alpina alpina*, curlew *Numenius arquata*, shelduck *Tadorna tadorna*.

Solent Maritime SAC

General Site Character

Marine areas, sea inlets (14%). Tidal rivers, estuaries, mud flats, sand flats, lagoons (including saltwork basins) (59%). Salt marshes, salt pastures, salt steppes (23%). Coastal sand dunes, sand beaches, machair (0.5%). Shingle, sea cliffs, islets (3%). Broad-leaved deciduous woodland (0.5%)

Annex I habitats that are a primary reason for selection of this site

1130 Estuaries

The Solent encompasses a major estuarine system on the south coast of England with four coastal plain estuaries (Yar, Medina, King's Quay Shore, Hamble) and four bar-built estuaries (Newtown Harbour, Beaulieu, Langstone Harbour, Chichester Harbour). The site is the only one in the series to contain more than one physiographic sub-type of estuary and is the only cluster site. The Solent and its inlets are unique in Britain and Europe for their hydrographic regime of four tides each day, and for the complexity of the marine and estuarine habitats present within the area. Sediment habitats within the estuaries include extensive estuarine flats, often with intertidal areas supporting eelgrass *Zostera spp.* and green algae, sand and shingle spits, and natural shoreline transitions. The mudflats range from low and variable salinity in the upper reaches of the estuaries to very sheltered almost fully marine muds in Chichester and Langstone Harbours. Unusual features include the presence of very rare sponges in the Yar estuary and a sandy 'reef' of the polychaete *Sabellaria spinulosa* on the steep eastern side of the entrance to Chichester Harbour.

1320 *Spartina* swards (*Spartinion maritimae*)

Solent Maritime is the only site for smooth cord-grass *Spartina alterniflora* in the UK and is one of only two sites where significant amounts of small cord-grass *S. maritima* are found. It is also one of the few remaining sites for Townsend's cord-grass *S. x townsendii* and holds extensive areas of common cord-grass *Spartina anglica*, all four taxa thus occurring here in close proximity. It has additional historical and scientific interest as the site where *S. alterniflora* was first recorded in the UK (1829) and where *S. x townsendii* and, later, *S. anglica* first occurred.

1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

The Solent contains the second-largest aggregation of Atlantic salt meadows in south and south-west England. Solent Maritime is a composite site composed of a large number of separate

areas of saltmarsh. In contrast to the Severn estuary, the salt meadows at this site are notable as being representative of the ungrazed type and support a different range of communities dominated by sea-purslane *Atriplex portulacoides*, common sea-lavender *Limonium vulgare* and thrift *Armeria maritima*. As a whole the site is less truncated by man-made features than other parts of the south coast and shows rare and unusual transitions to freshwater reedswamp and alluvial woodland as well as coastal grassland. Typical Atlantic salt meadow is still widespread in this site, despite a long history of colonisation by cord-grass *Spartina spp.*

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

1110 Sandbanks which are slightly covered by sea water all the time

1140 Mudflats and sandflats not covered by seawater at low tide

1150 Coastal lagoons

1210 Annual vegetation of drift lines

1220 Perennial vegetation of stony banks

1310 Salicornia and other annuals colonizing mud and sand

2120 Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")

Annex II species that are a primary reason for selection of this site

Not applicable

Annex II species present as a qualifying feature, but not a primary reason for site selection

1016 Desmoulin's whorl snail *Vertigo moulinsiana*.

Appendix B – Summary Statement to Inform Appropriate Assessment

Solent and Southampton Water SPA/Ramsar

Project Name	Hamble jetty repainting
Natura 2000 Site under Consideration	Solent and Southampton Water SPA/Ramsar (UK9011061)
Date	Author
10/04/19	Tom Smith
<i>Brief description of the project or plan</i>	Repainting of a jetty at the BP Hamble oil terminal. Works will include removing the current paint coating and marine growth on the jetty and repainting the jetty. This is to refresh the work previously carried out in 1996.
<i>Brief description of the Natura 2000 site</i>	The Solent and Southampton Water are located on the south English coast and the Isle of Wight. The site comprises a series of estuaries and harbours with extensive mud-flats and saltmarshes together with adjacent coastal habitats including saline lagoons, shingle beaches, reedbeds, damp woodland and grazing marsh. The diverse habitats support internationally important numbers of wintering waterfowl, important breeding gull and tern populations, and an important assemblage of rare invertebrates and plants.
Assessment criteria	
<i>Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site.</i>	The aim of the proposed works is to repaint the deteriorated paint systems on the steel piles and structural steel elements (beams, pile support bents and bracings) of the jetty. This work would serve to reduce corrosion and extend the lifetime of the jetty structure. To repaint the jetty, the deteriorated paint on the steel piles, structural steel bracing elements and steel bent beams of the approach trestle and link bridges, will be removed and new paint will be applied to restore effective corrosion protection on all surfaces. Works have the potential to impact bird populations through disturbance and there is also the potential for pollution incidents.
Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 site by virtue of:	
<i>Size and scale;</i>	The repainting works will take place on an existing jetty, c.500 m in length. Works will be carried out in small sections, with any scaffolding or access equipment either attached or in close proximity to the jetty.
<i>Land-take</i>	This project will not involve any land take.
<i>Distance from the Natura 2000 site or key features of the site</i>	Approximately half of the jetty is within the SPA/Ramsar site.

<i>Resource requirements (water abstraction etc.)</i>	No resource requirements are needed from within the SPA.
<i>Emissions (disposal to land, water or air)</i>	During works, emissions are anticipated from machinery and vehicles that are expected to have a minor impact on local air quality. Filtered fresh water from ultra high pressure water jetting will be discharged to the estuary. This is expected to be as clean as the fresh water input to the blasting process. A programme of sampling and analysis will assure this. All waste materials will be collected and disposed of appropriately.
<i>Excavation requirements</i>	No excavations are required for the works.
<i>Transportation requirements</i>	Access to the site for construction traffic will be from the existing road network. Access to the working areas will be along the existing jetty or by boat.
<i>Duration of construction, operation, decommissioning, etc</i>	Works will commence following approval and are anticipated to take 2 years to complete, in summer windows. If necessary the work will continue into a third year. Operation of the facility will continue at the current rate.
<i>Other</i>	-
Describe any likely changes to the site arising as a result of:	
<i>Reduction of habitat area:</i>	There is no additional land take or permanent construction.
<i>Disturbance to key species</i>	During works there is the potential for disturbance to bird species especially during high pressure jetting due to increased noise.
<i>Habitat or species fragmentation</i>	None
<i>Reduction in species density</i>	None
<i>Changes in key indicators of conservation value (water quality etc.)</i>	None expected
<i>Climate change</i>	None
Describe any likely impacts on the Natura 2000 site as a whole in terms of:	
<i>Interference with the key relationships that define the structure of the site</i>	None
<i>Interference with key relationships that define the function of the site</i>	None
Provide indicators of significance as a result of the identification of effects set out above in terms of:	
<i>Loss</i>	No impacts anticipated
<i>Fragmentation</i>	No impacts anticipated

<i>Disruption</i>	Noisy activities such as high pressure water jetting will not be permitted between 15 October to 15 March to minimise disruption during key wintering bird season.
<i>Disturbance</i>	Noisy activities such as high pressure water jetting will not be permitted between 15 October to 15 March to minimise disruption during key wintering bird season.
<i>Change to key elements of the site (e.g. water quality etc.).</i>	No impacts anticipated.
<i>Describe from the above those elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is not known.</i>	The mitigation through timing of works outside of key wintering times will minimise potential disturbance of birds.

Solent and Dorset Coast Special Protection Area

Project Name	Hamble jetty repainting
Site under Consideration	SOLENT AND DORSET COAST SPA (UK9020330)
<i>Brief description of the project or plan</i>	Repainting of a jetty at the BP Hamble oil terminal. Works will include removing the current paint coating and marine growth on the jetty and repainting the jetty. This is to refresh the work previously carried out in 1996.
<i>Brief description of the site</i>	The Solent and Dorset Coast SPA is located along the coasts of Dorset, Hampshire, Isle of Wight and West Sussex. There are varied habitats including salt marshes, wet meadows, drier grassland, heath, sand dune, woodland, and scrub. The area also support Sandwich, common, and little tern habitats.
Assessment criteria	
<i>Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Special Protection Area.</i>	The aim of the proposed works is to repaint the deteriorated paint systems on the steel piles and structural steel elements (beams, pile support bents and bracings) of the jetty. This work would serve to reduce corrosion and extend the lifetime of the jetty structure. To repaint the jetty, the deteriorated paint on the steel piles, structural steel bracing elements and steel bent beams of the approach trestle and link bridges, will be removed and new paint will be applied to restore effective corrosion protection on all surfaces. Works have the potential to impact bird populations through disturbance and there is also the potential for pollution incidents.
Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the SPA by virtue of:	
<i>Size and scale;</i>	The repainting works will take place on an existing jetty, c.500 m in length. Works will be carried out in small sections, with any scaffolding attached or in close proximity to the jetty.
<i>Land-take</i>	This project will not involve any land take.
<i>Distance from the Natura 2000 site or key features of the site</i>	Approximately half of the jetty is within the SPA.
<i>Resource requirements (water abstraction etc.)</i>	No resource requirements are needed from within the SPA.

<i>Emissions (disposal to land, water or air)</i>	During works, emissions are anticipated from machinery and vehicles that are expected to have a minor impact on local air quality. Filtered fresh water from ultra high pressure water jetting will be discharged to the estuary. This is expected to be as clean as the fresh water input to the blasting process. A programme of sampling and analysis will assure this. All waste materials will be collected and disposed of appropriately.
<i>Excavation requirements</i>	No excavations are required for the works.
<i>Transportation requirements</i>	Access to the site for construction traffic will be from the existing road network. Access to the working areas will be along the existing jetty or by boat.
<i>Duration of construction, operation, decommissioning, etc</i>	Works will commence following approval and are anticipated to take 5 years to complete, in summer windows. If necessary the work will continue until the jetty painting is complete. Operation of the facility will continue at the current rate.
<i>Other</i>	-
Describe any likely changes to the site arising as a result of:	
<i>Reduction of habitat area:</i>	There is no additional land take or permanent construction.
<i>Disturbance to key species</i>	During works there is the potential for disturbance to bird species especially during high pressure jetting due to increased noise.
<i>Habitat or species fragmentation</i>	None
<i>Reduction in species density</i>	None
<i>Changes in key indicators of conservation value (water quality etc.)</i>	None expected
<i>Climate change</i>	None
Describe any likely impacts on the SPA site as a whole in terms of:	
<i>Interference with the key relationships that define the structure of the site</i>	None
<i>Interference with key relationships that define the function of the site</i>	None
Provide indicators of significance as a result of the identification of effects set out above in terms of:	
<i>Loss</i>	No impacts anticipated
<i>Fragmentation</i>	No impacts anticipated

<i>Disruption</i>	Noisy activities such as high pressure jet washing will not be permitted between 15 October to 15 March to minimise disruption during key wintering bird season.
<i>Disturbance</i>	Noisy activities such as high pressure jet washing will not be permitted between 15 October to 15 March to minimise disruption during key wintering bird season.
<i>Change to key elements of the site (e.g. water quality etc.).</i>	No impacts anticipated.
<i>Describe from the above those elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is not known.</i>	The mitigation through timing of works outside of key wintering times will minimise potential disturbance of birds.

Solent Maritime SAC

Project Name	Hamble jetty repainting
Natura 2000 Site under Consideration	Solent Maritime SAC (UK0030059)
Date	Author
12/04/2019	Tom Smith
<i>Brief description of the project or plan</i>	Repainting of a jetty at the BP Hamble oil terminal. Works will include removing the current paint coating and marine growth on the jetty and repainting the jetty. This is to refresh the work previously carried out in 1996.
<i>Brief description of the Natura 2000 site</i>	The Solent encompasses a major estuarine system on the south coast of England. The Solent and its inlets are unique in Britain and Europe for their double tides, as well as for the complexity of the marine and estuarine habitats present within the area. Habitats include estuarine flats, intertidal areas, sand and shingle spits, natural shoreline transitions, mudflats and sandflats. Notable species include Desmoulin's whorl snail <i>Vertigo moulinsiana</i>, small cord-grass <i>Spartina maritima</i> and eelgrass <i>Zostera spp</i>
Assessment criteria	
<i>Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site.</i>	The aim of the proposed works is to repaint the deteriorated paint systems on the steel piles and structural steel elements (beams, pile support bents and bracings) of the jetty. This work would serve to reduce corrosion and extend the lifetime of the jetty structure. To repaint the jetty, the deteriorated paint on the steel piles, structural steel bracing elements and steel bent beams of the approach trestle and link bridges, will be removed and new paint will be applied to restore effective corrosion protection on all surfaces. Works have the potential to impact the site should a pollution incident occur.
Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 site by virtue of:	
<i>Size and scale;</i>	The repainting works will take place on an existing jetty, c.500m in length. Works will be carried out in small sections, with any scaffolding or access equipment either attached or in close proximity to the jetty.
<i>Land-take</i>	This project will not involve any land take.
<i>Distance from the Natura 2000 site or key features of the site</i>	The jetty is approximately 300 m from the boundary of the SAC at its closest point.
<i>Resource requirements (water abstraction etc.)</i>	No resource requirements are needed from within the SAC.

<i>Emissions (disposal to land, water or air)</i>	During works, emissions are anticipated from machinery and vehicles that are expected to have a minor impact on local air quality. No emissions to water. All waste materials will be collected and disposed of appropriately.
<i>Excavation requirements</i>	No excavation required for the project.
<i>Transportation requirements</i>	Access to the site for construction traffic will be from the existing road network. Access to the working areas will be along the existing jetty or by boat.
<i>Duration of construction, operation, decommissioning, etc</i>	Works will commence following approval and are anticipated to take 2 years to complete, in summer windows. The work will continue into a third year if necessary. Operation of the facility will continue at the current rate.
<i>Other</i>	-
Describe any likely changes to the site arising as a result of:	
<i>Reduction of habitat area:</i>	There will be no reduction in habitat area in the SAC.
<i>Disturbance to key species</i>	None
<i>habitat or species fragmentation</i>	None
<i>Reduction in species density</i>	None
<i>Changes in key indicators of conservation value (water quality etc.)</i>	None expected
<i>Climate change</i>	None
Describe any likely impacts on the Natura 2000 site as a whole in terms of:	
<i>Interference with the key relationships that define the structure of the site</i>	None
<i>Interference with key relationships that define the function of the site</i>	None
Provide indicators of significance as a result of the identification of effects set out above in terms of:	
<i>Loss</i>	No impacts anticipated
<i>Fragmentation</i>	No impacts anticipated
<i>Disruption</i>	No impacts anticipated
<i>Disturbance</i>	No impacts anticipated

<i>Change to key elements of the site (e.g. water quality etc.).</i>	Potential for temporary changes in water quality due to pollution incident. A detailed Environmental Management Plan and Method Statement will be provided setting out methods to prevent pollution from work activity.
<i>Describe from the above those elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts is not known.</i>	None

Appendix C Noise Assessment

Relevant noise assessment attached to application.

Appendix D – References

JNCC - Joint Nature Conservation Committee. Available from <<http://www.jncc.defra.gov.uk>> [accessed March 2019].

Ramsar. Available from <<http://www.ramsar.org>> [accessed March 2019]

374527-02-P2 'Steelwork Paint System Scope of Works & Technical Specification BP Hamble Oil Terminal', Mott MacDonald, 2019.

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