

Form

Record of a Habitats Regulations Assessment of a project

OGN 200 Form 1

Document owner: Protected Sites Team, EPP

Version History:

Document Version	Date Published	Summary of Changes
1.0	March 2016	Document created
1.1	30 November 2017	References to the 2010 Habitats Regulations updated to reflect new consolidated version of the regulations which entered into force on 30 th November 2017; References to KSP and National Services Directorates updated to EPP
1.2	28 June 2018	With marked up changes in light of ruling in CJEU case c-323/17 'People over Wind'.
1.3	27 June 2019	With marked up changes in light of ruling in CJEU case c-323/17 'People over Wind'. See Guidance here

Next review date: April 2019

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1. Project Details

1(a): Project details where an external party has applied to NRW for any form of authorisation	
Application reference number (if applicable)	PAN-017925 EPR/EP3935UC/V008
Date application received	04/05/2022 Duly Made 08/09/2022
Applicant details	Real Alloy Limited
Activity proposed	<i>Real Alloy limited have applied to vary the permit for their site Waunarlwydd Works located in Waunarlwydd industrial park.</i> <i>The three main changes to the site that the applicant are seeking permission for are as follows:</i> <i>• Addition of a shredder and bailer on site to process incoming materials/waste.</i> <i>• Increase the annual waste through put from 65,000 tonnes to 80,250 tonnes.</i> <i>• Increase the maximum quantity of salt slag stored on site from 15,000 tonnes per annum to 25,000 tonnes per annum</i> <i>There will be no new point source emissions to air or water and no changes in the emission limits. The site has two furnace, with one running 24 hours a day 7 days a week and the other limited to 5 days due to the annual throughput limit. The increase in annual waste throughput will allow both furnaces to run at full capacity for the whole year.</i> <i>The main impacts from the shredding activities and increase in salt slag are from potential fugitive emissions (notably of dust) and noise impacts from the new shredder and bailer located on site. The shredding and bailer activities will take place indoors. The salt slag is to be stored indoors.</i>
Relevant legislation	Environmental Permitting Regulation 2016 Industrial Emissions Directive
Location	NGR SS 60013 96185
Application documents	Internal located on DMS here , external located on public register here

	<i>(please note that there is a confidentiality notice for some of the documents which are not available (except for redactions) on the public register</i>
Environmental Statement	<i>N/A</i>
Pre-application correspondence	<i>N/A</i>
NRW team responsible for drafting this HRA report, and name of lead officer	<i>William Wallace Permitting Officer Installation and RSR</i>

2. Determining the need for a Habitats Regulations Assessment

2.1 Is the whole of the project directly connected with or necessary to the management of one or more Natura 2000 sites, for the purposes of conserving the habitats or species for which the Natura 2000 site(s) is/are designated?	No
2.2 Is there a possibility that the project could affect a different Natura 2000 site to the one(s) the project is intended to conserve?	No
2.3 Is it necessary to carry out an HRA?	Yes There is a potential impact pathway from the proposed shredder and increase in storage of salt slag to lead to fugitive emissions of dust and noise from the proposed activities that could affect the features of some of the designated sites. The variation will increase the annual waste tonnage from 65,000 to 80,250 to allow both furnaces to run 24 hours a day 7 days a week. Presently only one can run for the whole year and the other is limited to (on average) 5 days a week. As such there will be a potential increase in the maximum long term/annual emissions from the site. As the existing permit allows both furnaces run at full capacity for a set period of time, the proposed variation would not change the maximum short-term impacts. As such the assessment will only cover the long-term (annual) impacts and monthly or weekly impacts. A H1 risk assessment and air modelling carried out in 2009 and for the 2013 variation takes into account worst case scenario and had assessed the impacts with both furnaces running at full capacity all year. The applicant had sent and updated modelling to take into account the most recent guidance and emission limits. The permitted emissions from the site are oxides of nitrogen (NO_x expressed as NO₂), Sulphur dioxide (SO₂), very small amounts of hydrogen chloride (HCl), very small amounts of hydrogen fluoride (HF), particulate matter (PM₁₀ and PM_{2.5}) and

	Volatile organic compounds (VOCs expressed as benzene). Particulate matter is limited on the permit to 4500 kg/year and this will not change as a result of the variation. Only NO_x, SO₂ and HF have an environmental standard.
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3. Considering the likelihood of a significant effect (LSE)

3.1 Renewal of a permission on the same or more restrictive terms as the extant permission

Is this project a renewal of a current permission which complies with NRW approved criteria for ruling out significant effects of renewals (see section 6.2A of OGN 200) without conducting a project-specific LSE test?	No
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3.2 Likelihood of significant effects (LSE) test

3.2.1 Which Natura 2000 sites might be affected by the proposal?	Based on the project specification or information provided in the application, it is considered that the following Natura 2000 sites have features which could be affected by the project: - Burry Inlet - SPA (UK9015011) and Ramsar (UK14001) - 2.2 km to the west of the installation - Carmarthen Bay and Estuaries / Bae Caerfyrddin ac Aberoedd - SAC (UK0020020) - 2.2 km to the west of the installation - Gower Ash Woods / Coedydd Ynn Gwy (UK0030157) SAC – 7 km to the south of the installation - Gower Commons/Tiroedd Comin Gwyr - SAC (UK0012685) - 3 km to the south of the installation - Crymlyn Bog -SAC and Ramsar -8.6 km to the east of the installation - Limestone Coast of South West Wales (Arfordir Calchfaen De Orllewin Cymru) - SAC UK0014787 – 9.4 km to the south of the installation The potential for the project to affect the following Natura 2000 sites was also initially considered, but can be ruled out without further consideration: N/a	
3.2.2 Screening assessment		
	Assessment of likelihood of significant effect	
	I Relevant conservation objectives	II Potential impact pathway
Burry Inlet SPA, Ramsar		
pintail Anas acuta	RAMSAR UK14001 Citation EN001 (naturalresources.wales)	Disturbance (Noise) The new activity has the potential to impact the site due to the addition of a shredder and bailer at site, as new sources of noise at the site. However, the new activities unlikely that the noise from the proposed activity will lead to any increase
oystercatcher Haematopus ostralegus	SPA UK9015011 Register Entry EN001	

Curlew Numenius arquata	naturalresources.wales Contents (naturalresources.wales)	in disturbances at the designated site for the following reasons; • The new activities are not expected to lead to any significant increase in noise levels than what is currently produced on the existing site. • The proposed shredding and bailing activities are to be done indoors • The site is an existing installation and is located in a heavily industrialised area, located on the other side of Gowerton from the designated site. The proposed activities are unlikely to change the existing sound scape of the installation. Toxic contamination The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO_x, SO₂ and HF have a quantifiable environmental standard. The new shredding and bailing activities could cause fugitive emissions that could lead to toxic contamination. However, given the infrequent nature of these fugitive emissions it is unlikely this would lead to any significant damage to the designated site. Smothering The increase in annual throughput in emissions can lead to smothering through particulate matter and deposition of NO_x. The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation. The deposition of NO_x cannot be ruled out at this stage and as such is taken to appropriate assessment. The new shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate matter do not have a quantifiable environmental standard. The other possible impact pathway is through fugitive emissions to air of dust or increase in the amount of salt slag that is stored on site from 15,000 tonnes to 25,000 tonnes. However, given the infrequent nature of the fugitive emissions and
Dunlin Calidris alpina		
Grey plover Pluvialis squatarola		
Knot Calidris canutus		
Redshank Tringa totanus		
Shelduck Tadorna tadorna		
Shoveler Anas clypeata		
Teal Anas crecca		
Turnstone Arenaria interpres		
Wigeon Anas penelope		

		the shredding activities taking place indoors no likelihood that the shredder and increase in salt slag would cause any real impact to the designated site through this impact pathway. Acidification The increase in annual throughput would lead to an increase in long term emissions of acidic gas (NO_x, SO₂ and HF) and acidification through deposition of NO_x and SO₂. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Habitat Loss No impact pathway from the proposal that will lead to loss of habitat. Physical Damage No impact pathway from the proposal that will lead to physical damage to the features of the designated site.
Gower Ash Woods / Coedydd Ynn Gwy (SAC) (UK0030157)		
Tilio-Acerion forests of slopes, screes and ravines Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incane</i>, <i>Salicion albae</i>)	2013 02 05 Gower Ash Woods Coedydd Ynn Gwyr SAC management plan_Eng v16 Mar 2011 (naturalresources.wales)	Toxic contamination The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF. Only NO_x SO₂ and HF have a quantifiable environmental standard. However, the impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. The new shredding activities can lead to fugitive emissions that could lead to toxic contamination. However, given the infrequent nature of these fugitive emissions it is unlikely this would lead to any significant damage to the designated site. Smothering The increase in annual throughput in emissions can lead to smothering through particulate matter and deposition of NO_x. The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation.

		The deposition of NO_x cannot be ruled out at this stage and as such is taken to appropriate assessment. The new shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate matter do not have a quantifiable environmental standard. The other possible impact pathway is through fugitive emissions to air of dust or increase in the amount of salt slag that is stored on site from 15,000 tonnes to 25,000 tonnes. However given the infrequent nature of the fugitive emissions and the shredding activities taking place indoors no likelihood that the shredder and increase in salt slag would cause any real impact to the designated site through this impact pathway. Nutrient enrichment The increase in annual throughput could lead to an increase in long term emissions of NO_x which can lead to nutrient enrichment through deposition at the designated site. The impact of nitrogen deposition cannot be ruled out at this stage and have been taken to appropriate assessment. Acidification The increase in annual throughput would lead to an increase in long term emissions of acidic gas (NO_x, SO₂ and HF) and acidification through deposition of NO_x and SO₂. This could potentially impact the species through acidification of the habitat. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Physical Damage No impact pathway from the proposal that will lead to physical damage to the features of the designated site.
Carmarthen Bay and Estuaries (Bae Caerfyrddin ac Aberoedd)		
Large shallow inlets and bays	Carmarthen Bay and Estuaries	Toxic contamination
Sandbanks which are slightly covered by	Microsoft Word - Carmarthen Bay and Estuaries - Bae Caerfyrddin ac Aberoedd... (naturalresources.wales)	The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF. The impact of

seawater all the time		these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO _x , SO ₂ and HF have a quantifiable environmental standard.
Estuaries		
Mudflats and sandflats not covered by seawater at low tide		The new shredding activities can lead to fugitive emissions that could lead to toxic contamination. However, given the infrequent nature of these fugitive emissions it is unlikely this would lead to any significant damage to the designated site.
Atlantic salt meadows		Smothering The increase in annual throughput in emissions can lead to smothering through particulate matter and deposition of NO _x . The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation. The deposition of NO _x cannot be ruled out at this stage and as such is taken to appropriate assessment
Salicornia and other annuals colonising mud and sand		The new shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate matter do not have a quantifiable environmental standard. The other possible impact pathway is through fugitive emissions to air of dust or increase in the amount of salt slag that is stored on site from 15,000 tonnes to 25,000 tonnes. Given the infrequent nature of the fugitive emissions and the shredding activities taking place indoors no likelihood that the shredder and increase in salt slag would cause any real impact to the designated site through this impact pathway. Nutrient enrichment The increase in annual throughput would lead to an increase in long term emissions of NO _x which can lead to nutrient enrichment at the designated site. The impact of these gases cannot be ruled out at this stage and have been taken to appropriate assessment. Acidification These features are listed as not sensitive to acidity ⁱ . ⁱ Air pollution inventory system Select a Feature Air Pollution Information System (apis.ac.uk) Habitat Loss No impact pathway from the proposal that will lead to loss of habitat Physical Damage No impact pathway from the proposal that will lead to physical damage to the

		features of the designated site.
Otter <i>Lutra lutra</i>		Toxic contamination The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO_x SO₂ and HF have a quantifiable environmental standard. Disturbance (Noise) The new activity has the potential to impact the site due to the addition of a shredder and bailer at site, as new sources of noise at the site. However, the new activities unlikely that the noise from the proposed activity will lead to any increase in disturbances at the designated site for the following reasons: • The new activities are not expected to lead to any significant increase in noise levels than what is currently produced on the existing site. • The proposed shredding and bailing activities are to be done indoors • The site is an existing installation and is located in a heavily industrialised area, located on the other side of Gowerton from the designated site. The proposed activities are unlikely to change the existing sound scape of the installation. Nutrient enrichment The increase in annual throughput would lead to an increase in long term emissions of NO_x which can lead to nutrient enrichment at the designated site. The impact of these emissions can not be ruled out at this stage and have been taken to appropriate assessment. Habitat Loss No impact pathway from the proposal that will lead to loss of habitat Physical Damage No impact pathway from the proposal that will lead to physical damage to the features of the designated site. Turbidity No impact pathway Siltation

		No impact pathway Entrapment No impact pathway
Allis shad <i>Alosa alosa</i>		Toxic contamination There are no changes to discharge to surface water as a result of the variation.
Twaite shad <i>Alosa fallax</i>		Nutrient enrichment The increase in annual throughput would lead to an increase in long term emissions of NO_x which can lead to nutrient enrichment at the designated site. The impact of deposition can not be ruled out at this stage and have been taken to appropriate assessment.
River lamprey <i>Lampetra fluviatilis</i>		There will be no changes to water discharge as a result of the variation.
Sea lamprey <i>Petromyzon marinus</i>		Acidification The increase in annual throughput would lead to an increase in long term acidification through deposition of NO_x and SO₂. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. There will be no changes to water discharge as a result of the variation. Changes in salinity regime No Impact pathway from the proposal that will lead to a change in salinity. Changes in thermal regime No impact Pathway- there are no impact pathway from the proposal that would lead to a change in thermal. Habitat loss No impact pathway from the proposal that would lead to habitat loss Physical damage No impact pathway from the proposal that will lead to physical damage to the features of the designated site Smothering There are no changes to discharge to water as a result of the variation. Turbidity No impact pathway

		Siltation No impact pathway Entrapment No impact pathway
Gower Commons (SAC)		
Northern Atlantic wet heaths with Erica tetralix	2013 02 05 Gower Commons Tiroedd Comin Gwyr SAC management plan Eng (naturalresources.wales) ENTRY IN THE REGISTER OF EUROPEAN SITES FOR WALES	Toxic contamination The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NOX, SO2, volatile organic compounds, HCl and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NOx SO2 and HF have a quantifiable environmental standard. The other possible impact pathway is through fugitive emissions to air of dust or particulate matter from the shredding process and the increase in the amount of salt slag that is stored on site from 15,000 tonnes to 25,000 tonnes. The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation. Dust and particulate matter do not have a quantifiable environmental standard that can be assessed against. Given the infrequent nature of the fugitive emissions from the site and no other changes that would occur as a result of the variation there is no likelihood of impact to the designated site through this impact pathway. Nutrient enrichment The increase in annual throughput would lead to an increase in long term emissions of NOx which can lead to nutrient enrichment at the designated site. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Acidification The increase in annual throughput would lead to an increase in long term emissions of acidic gas (NOX, SO2 and HF). The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Smothering The increase in annual throughput in emissions can lead to smothering through particulate matter and deposition of NOx. The permit currently has an annual limit
European dry heaths		
Molinia meadows on calcareous, peaty or clayey-silt-laden soils		
Southern damselfly		
Marsh fritillary butterfly		

		for particulate matter of 4500 kg/year, which will not change as a result of this variation. The deposition of NOx can not be ruled out at this stage and as such is taken to appropriate assessment The new shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate matter do not have a quantifiable environmental standard. The other possible impact pathway is through fugitive emissions to air of dust or increase in the amount of salt slag that is stored on site from 15,000 tonnes to 25,000 tonnes. However given the infrequent nature of the fugitive emissions and the shredding activities taking place indoors no likelihood that the shredder and increase in salt slag would cause any real impact to the designated site through this impact pathway. Habitat Loss No impact pathway from the proposal that will lead to loss of habitat Physical Damage No impact pathway from the proposal that will lead to physical damage to the features of the designated site.
Limestone Coast of South West Wales (Arfordir Calchfaen De Orllewin Cymru) (SAC only)		
Vegetated sea cliffs of the Atlantic and Baltic coasts	Core Management plan LIMESTONE COAST OF SOUTH WEST WALES/ ARFORDIR CALCHFAEN DE ORLLEWIN CYMRU SAC Location of units Layout (naturalresources.wales)	No impact pathway Feature not located in the management unit area of the SAC that is located within the 10 km screen distance from the installation
Fixed dunes with herbaceous vegetation ("grey dunes")		As above
European dry heaths		As above
Semi-natural dry grass and scrublands on chalk or limestone		Toxic contamination The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NOx, SO₂, volatile organic compounds, HCl and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NOx SO₂ and HF have a quantifiable environmental standard.

		The other possible impact pathway is through fugitive emissions to air of dust or particulate matter from the shredding process and the increase in the amount of salt slag that is stored on site from 15,000 tonnes to 25,000 tonnes. The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation. Dust and particulate matter do not have a quantifiable environmental standard that can be assessed against. Given the infrequent nature of the fugitive emissions from the site and no other changes that would occur as a result of the variation there is no likelihood of impact to the designated site through this impact pathway. Nutrient enrichment The increase in annual throughput would lead to an increase in long term emissions of NO_x which can lead to nutrient enrichment at the designated site. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Acidification The increase in annual throughput would lead to an increase in long term emissions of acidic gas (NO_x, SO₂ and HF). The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Habitat Loss No impact pathway from the proposal that will lead to loss of habitat Physical Damage No impact pathway from the proposal that will lead to physical damage to the features of the designated site. Smothering The increase in annual throughput in emissions can lead to smothering through particulate matter and deposition of NO_x. The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation. The deposition of NO_x cannot be ruled out at this stage and as such is taken to appropriate assessment The new shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate
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		matter do not have a quantifiable environmental standard. The other possible impact pathway is through fugitive emissions to air of dust or increase in the amount of salt slag that is stored on site from 15,000 tonnes to 25,000 tonnes. However, given the infrequent nature of the fugitive emissions and the shredding activities taking place indoors no likelihood that the shredder and increase in salt slag would cause any real impact to the designated site through this impact pathway.
Caves not open to the public		No impact pathway
Submerged or partially submerged sea caves		No impact pathway Feature not located in the management unit area of the SAC that is located within the 10 km screen distance from the installation
Greater horseshoe bat <i>Rhinolophus ferrumequinum</i>		No impact pathway As above
Petalwort <i>Petalophyllum ralfsii</i>		No impact pathway As above
Early gentian <i>Gentianella anglica</i>		No impact pathway As above
Crymlyn Bogs (SAC and Ramar)		
1. <i>Calcareous fens with Cladium mariscus and species of the Caricion davallianae (EU habitat code 7210)</i>	Crymlyn Bog SAC Core Management Plan ENGLISH (naturalresources.wales)	Toxic contamination The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF as well as particulate matter. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO_x, SO₂ and HF have a quantifiable environmental standard. The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation.
2. Transition mires and quaking bogs (EU habitat code 7140)		
3. Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i>		

(AlnoPadion, Alnion incanae, Salicion albae) (EU habitat code 91E0)		The other possible impact pathway is through fugitive emissions to air of dust or particulate matter from the shredding process and the increase in the amount of salt slag that is stored one site from 15,000 tonnes to 25,000 tonnes. Dust and particulate matter do not have a quantifiable environmental standard that can be assessed against. Given the infrequent nature of the fugitive emissions from the site and no other changes that would occur as a result of the variation there is no likelihood of impact to the designated site through this impact pathway. Nutrient enrichment The increase in annual throughput would lead to an increase in long term emissions of NO_x which can lead to nutrient enrichment at the designated site. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Acidification The increase in annual throughput would lead to an increase in long term emissions of acidic gas (NO_x, SO₂ and HF). The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. Smothering The increase in annual throughput in emissions can lead to smothering through particulate matter and deposition of NO_x. The permit currently has an annual limit for particulate matter of 4500 kg/year, which will not change as a result of this variation. The deposition of NO_x cannot be ruled out at this stage and as such is taken to appropriate assessment The new shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate matter do not have a quantifiable environmental standard. The other possible impact pathway is through fugitive emissions to air of dust or increase in the amount of salt slag that is stored one site from 15,000 tonnes to 25,000 tonnes. However, given the infrequent nature of the fugitive emissions and the shredding activities taking place indoors no likelihood that the shredder and increase in salt slag would cause any real impact to the designated site through this impact pathway. Habitat Loss No impact pathway from the proposal that will lead to loss of habitat Physical Damage
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		No impact pathway from the proposal that will lead to physical damage
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3.2.3 Screening decision of the project 'alone'	
(a) If ALL rows in column II of Table 3.2.2 are GREEN	The project is not likely to have a significant effect on any Natura 2000 site, because there is no impact pathway from the project to any Natura 2000 features, and no further consideration under the Habitats Directive/Regulations is required in order to determine the application.
(b) If there are NO rows coloured RED in column II of Table 3.2.2, and there are ANY rows which are BLUE	The project is not likely to have a significant effect on any Natura 2000 sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.
(c) If ANY rows in Column II of Table 3.2.2 are RED	The project is likely have a significant effect on one or more Natura 2000 sites and therefore an appropriate assessment is required.

4.1 Assessment of project as currently defined

Natura 2000 site feature (from Table 3.2.2 – RED rows only)	Impact pathway(s) (from Table 3.2.2)	Description of impacts	Assessment in view of conservation objectives	Can adverse effect on site integrity be ruled out?
Burry Inlet SPA, Ramsar				
<i>pintail Anas acuta</i> <i>oystercatcher Haematopus ostralegus</i> <i>Curlew Numenius arquata</i> <i>Dunlin Calidris alpina</i> <i>Grey plover Pluvialis squatarola</i> <i>Knot Calidris canutus</i> <i>Redshank Tringa totanus</i> <i>Shelduck Tadorna tadorna</i> <i>Shoveler Anas</i>	Toxic Contamination	Increase in long term annual concentrations of toxic gases including oxides of nitrogen sulphur dioxide, volatile organic compound, hydrogen fluoride and hydrogen chloride as a result of the use of both furnaces at full capacity all year. Dust and particulate	The maximum predicted concentration of sulphur dioxide was predicted to be 0.06 µg/m³ or 0.6% of the critical level. As this is less than 1% of the critical level the emission screens out as insignificant. The maximum concentration of NOx also screens out as insignificant (less than 1% of the critical level) with the process contribution of 0.1 µg/m³ being 0.3% of the critical level. Weekly mean concentration of HF was 0.0086 µg/m³ which is 1.7% of the critical level. As weekly mean is regarded as short term and is less than 10% of the critical level, the emission screens out as insignificant. Dust and particulate matter do not have a quantifiable environmental standard that can be assessed against. As all of the substances screen out as insignificant (with process contribution being less than 1% of the long term critical level) we can conclude that the variation would not lead to any conceivable impacts to the designated features of this site through this impact pathway.	Yes

<i>clypeata</i> • <i>Teal Anas crecca</i> • <i>Turnstone Arenaria interpres</i> • <i>Wigeon Anas penelope</i>		matter, VOC and HCl do not have quantifiable ecological standards and therefore have not been assessed further.		
	Smothering	Increase in smothering from deposition of NOx and Particulate matter as a result of increase in annual throughput.	Dust and particulate matter do not have a quantifiable environmental standard. The annual limit for emissions of particulate matter in the permit will remain unchanged as a result of the variation. Deposition of N nitrogen from NOx was calculated as 0.014 kgN/Ha/Yr which is less than 0.07% of the critical load (20 KgN/Ha/Year)ⁱⁱ. As this is less than 1% of the critical load the deposition screens out as insignificant. ⁱⁱ<i>Air Pollution Inventory System (APIS) Site relevant critical loads tool</i>	Yes
	Acidification	The increase in annual throughput would lead to an increase in long term emissions of acidic gas (NOx, SO2 and HF) and acidification through deposition of NOx and SO2. The impact of these emissions cannot be ruled out at	The process contribution to acid deposition was calculated to be 0.001 keq/ha/yr for nitrogen acidity and 0.00710 keq/ha/yr for sulphur acidity Giving a total acidity of 0.0081 keq/ha/year, which is 0.8% of the total acid critical load. As this is less than 1% of the minimum acid critical load, we can conclude that the acidification from the emissions screen out as insignificant.	Yes

		this stage and have been taken to appropriate assessment.		
Gower Ash Woods / Coedydd Ynn Gwy (SAC)				
• Tilio-Acerion forests of slopes, screes and ravines • Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incane</i>, <i>Salicion albae</i>)	Toxic contamination	The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO_x, SO₂ and	The process contribution of emissions of gas with environmental standard (SO₂, NO_x and HF) at Gower ash wood are as follows: • The maximum concentration of SO₂, is 0.014 µg/m³ or (0.14% of the critical level). • For NO_x the process contribution is 0.025 µg/m³ which is less than 0.1% of the critical level • The maximum predicted concentration of HF is 0.002 µg/m³ or 0.4% of the critical level As the process contribution for the emissions are less than 1% of the long term critical level, the emissions screen out as insignificant and it can be concluded that there is no likelihood of damage to the site through this impact pathway	Yes

		HF have a quantifiable environmental standard.		
	Smothering	Increase in particulate matter and deposition of NO _x can lead to increase in smothering.	Dust and particulate matter do not have a quantifiable environmental standard however the annual limit for particulate matter remains unchanged as a result of the variation. See Nutrient enrichment (below) for smothering affects from NO _x Deposition	Yes
	Nutrient enrichment	The increase in annual throughput would lead to an increase in long term emissions of NO _x which can lead to nutrient enrichment at the designated site. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment.	The process contribution of nitrogen deposition is 0.007 KgN/ha/Yr which is 0.07% of the minimum critical load of 10 KgN/ha/Year. As the process contribution is less than 1% of the critical load the process contribution to deposition from the proposal screens out as insignificant and will not cause any impacts through this impact pathway.	Yes
	Acidification	The increase	The maximum predicted concentration of acidic gas (NO _x , SO ₂ and HF) screen out	Yes

		in annual throughput would lead to an increase in long term emissions of acidic gas (NO _x , SO ₂ , HCl and HF). The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment	at <1% of the critical level and therefore insignificant (see Toxic contamination for more details) The maximum calculated acidity from the site was less than 0.0005 keq/ha/year for nitrogen acidity and 0.0033 keq/ha/year for sulphur acidity, giving total acidity of 0.0038 keq/ha/year. Using the APIS screening tool for acidity the process contribution of total acidity is less than 1% of the minimum total acidityⁱⁱⁱ and as such screens out as insignificant. ⁱⁱⁱ Using acid critical load tool and values from APIS: APIS app Air Pollution Information System	
Carmarthen Bay and Estuaries (Bae Caerfyrddin ac Aberoedd)				
• Large shallow inlets and bays • Sandbanks which are slightly covered by seawater all the time • Estuaries • Mudflats and sandflats not covered by seawater at low tide • Atlantic salt meadows • Salicornia and other annuals colonising mud and sand • Otter Lutra lutra	Toxic contamination	The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile	The maximum predicted concentration of sulphur dioxide was predicted to be 0.06 µg/m³ or 0.6% of the critical level and therefore screens out as insignificant. The maximum concentration of NO_x also screen out as insignificant (less than 1% of the critical level) with the process contribution of 0.1 µg/m³ being 0.3% of the critical level. Weekly mean concentration of HF was 0.0086 µg/m³ which is 1.7% of the critical level. As weekly mean is regarded as short term and is less than 10% of the critical level, the emission screens out as insignificant. Dust and particulate matter do not have a quantifiable environmental standard that can be assessed against. As all of the substances screen out as insignificant (with process contribution being less than 1% of the long term critical level) we can conclude that the variation would not lead to any conceivable impacts to the designated features of this site through this impact pathway.	Yes

• Allis shad <i>Alosa alosa</i> • Twaite shad <i>Alosa fallax</i> • River lamprey <i>Lampetra fluviatilis</i> • Sea lamprey <i>Petromyzon marinus</i>		organic compounds, HCl and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO _x , SO ₂ and HF have a quantifiable environmental standard.		
	Smothering	Increase in emissions particulate matter and deposition of NO _x can lead to increase in smothering.	Dust and particulate matter do not have a quantifiable environmental standard however the annual limit for particulate matter remains unchanged. In addition given the infrequent nature of dust and the shredder and bailer being located indoors, it is unlikely to cause an impact through this pathway. See Nutrient enrichment (below) for smothering affects from NO_x Deposition. There is no change to water discharge from the site as a result of the proposal	Yes
• Large shallow inlets and bays • Sandbanks which are slightly covered by seawater all the time • Estuaries	Nutrient enrichment	The increase in annual throughput would lead to an increase in long term emissions of	Deposition of N nitrogen from NO_x was calculated as 0.014 kgN/Ha/Yr which is less than 0.07% of the critical load (20 KgN/Ha/Year)¹. As this is below 1% of the critical load the emission screens out as insignificant. No there is no change to water discharge from the site as a result of the proposal	Yes

• Mudflats and sandflats not covered by seawater at low tide • Atlantic salt meadows • Salicornia and other annuals colonising mud and sand • Allis shad <i>Alosa alosa</i> • Twait shad <i>Alosa fallax</i> • River lamprey <i>Lampetra fluviatilis</i> • Sea lamprey <i>Petromyzon marinus</i>		NO _x which can lead to nutrient enrichment at the designated site. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment.		
	Acidification	The increase in throughput of acidic gas and deposition can lead to increase acidification at the designated site	The process contribution to acid deposition was calculated to be 0.001 keq/ha/yr for nitrogen acidity and 0.00710 keq/ha/yr for sulphur acidity Giving a total acidity of 0.0081 keq/ha/year, which is 0.8% of the total acid critical^{iv} load and as such emissions of acidic gas screen out as insignificant. ^{iv}APIS did not have acid critical load values for the features of this site. In the absence of quantifiable values this we have used the most stringent acid critical load for Burry inlet SPA which covers the same area of Carmarthen bay and Estuaries that is closet to the installation. The minimum acid critical loads valued are Minimum nitrogen: 0.233 Keq/ha/year, maximum sulphur 0.81 Keq/ha/year and maximum nitrogen 1.033 Keq/ha/year	Yes
Gower Commons (SAC)				
• Northern Atlantic wet heaths with <i>Erica tetralix</i> • European dry heaths	Toxic contamination	The type of designated features of this site are sensitive to impact from	The maximum predicted concentration of sulphur dioxide was predicted to be 0.037 µg/m³ or 0.4% of the critical level and therefore screens out as insignificant. The maximum concentration of NO_x also screen out as insignificant (less than 1% of the critical level) with the process contribution of 0.063 µg/m³ being 0.2% of the critical level.	Yes

• Molinia meadows on calcareous, peaty or clayey-silt-laden soils • Southern damselfly • Marsh fritillary butterfly		toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO_x, SO₂ and HF have a quantifiable environmental standard.	Weekly mean concentration of HF was 0.0046 µg/m³ which is 0.9% of the critical level. As weekly mean is regarded as short term and is less than 10% of the critical level, the emission screens out as insignificant. Dust and particulate matter do not have a quantifiable environmental standard that can be assessed against. As all of the substances screen out as insignificant (with process contribution being less than 1% of the long term critical level) we can conclude that the variation would not lead to any conceivable impacts to the designated features of this site through this impact pathway.	
	Smothering	Increase in emissions particulate matter and deposition of NO_x can lead to increase in smothering.	Dust and particulate matter do not have a quantifiable environmental standard however the annual limit for particulate matter remains unchanged. See Nutrient enrichment (below) for smothering affects from NO_x Deposition.	Yes

	Nutrient enrichment	The increase in annual throughput would lead to an increase in long term emissions of NO _x which can lead to nutrient enrichment at the designated site. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment.	The process contribution of nitrogen deposition is 0.005 KgN/ha/Yr which is 0.05% of the minimum critical load of 10 kgN/ha/Year. As this is less than 1% of the critical load for the site, the emission screens out as insignificant.	Yes
	Acidification	The increase in throughput of acidic gas and deposition can lead to increase acidification at the designated site	The maximum predicted process contribution for acidity was 0.0075 keq/ha/year for sulphur acidity and 0.0004 keq/ha/year for nitrogen acidity giving total acidity of 0.0079 keq/ha/year. Using the APIS acid critical load tool this worked out as 1.5% of the minimum acid critical load (shown in table 1 and figure 1 below) and as such does not screen out. The predicted environmental concentration of total acidity (process contribution and background) was 0.28 keq/ha/year or 153.6% of the minimum acid critical load. As such the acidification did not screen out at the initial stage and has to be assessed further.	Yes

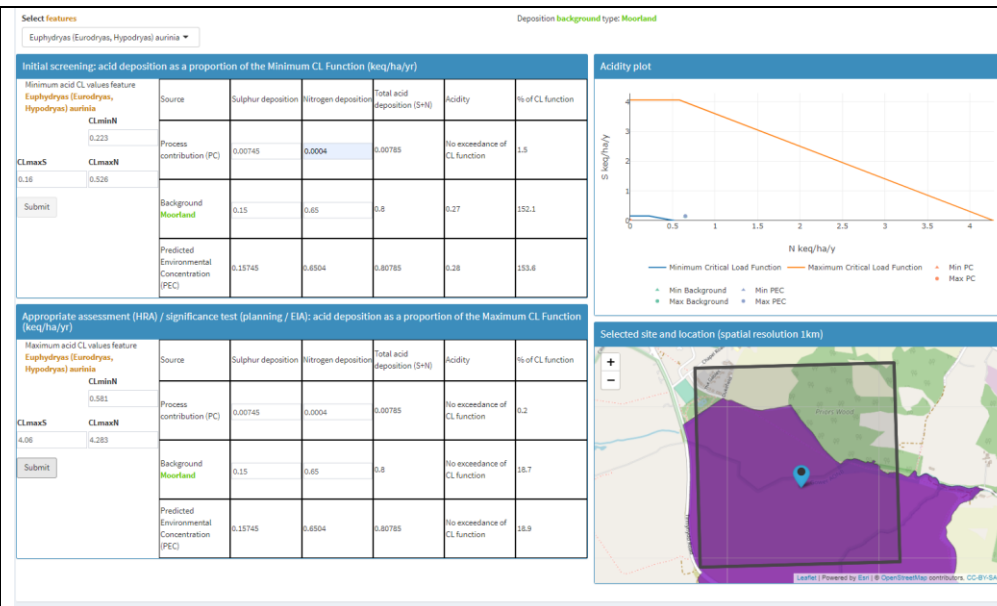


Figure 1: APIS Acidity plot from the installation using both the minimum and maximum critical load values for nitrogen, sulphur and total acidity

For appropriate assessment the process contribution was assessed against the maximum acid critical load (shown in the table below)

Table 1: minimum and maximum critical load values of nitrogen and sulphur acidity of the Gower Commons (source Air pollution inventory system (APIS))

	Minimum Critical load	Maximum Critical load
Minimum Nitrogen	0.233	0.581
Maximum Nitrogen	0.581	4.253
Maximum Sulphur	0.16	4.06

Using the APIS acid critical load tool for maximum acidity (figure 1), the process contribution of 0.0079 keq/ha/year, comes out as 0.2% of the maximum critical load of total acidity. Therefore, it can be concluded that the acidification from the proposal will not lead to any significant adverse impacts that would damage the features of this site.

Limestone Coast of South West Wales (Arfordir Calchfaen De Orllewin Cymru) (SAC)

Semi-natural dry grass and scrublands on chalk or limestone	Toxic contamination	The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF. The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO_x, SO₂ and HF have a quantifiable environmental standard.	The maximum predicted concentration of sulphur dioxide was predicted to be 0.011 µg/m³ or 0.1% of the critical level and therefore screens out as insignificant. The maximum concentration of NO_x also screen out as insignificant with the process contribution of 0.018 µg/m³ being 0.1% of the critical level. Weekly mean concentration of HF was 0.0013 µg/m³ which is 0.3% of the critical level. As weekly mean is regarded as short term and is less than 10% of the critical level, the emission screens out as insignificant Dust and particulate matter do not have a quantifiable environmental standard that can be assessed against. As all of the substances screen out as insignificant (with process contribution being less than 1% of the critical level) we can conclude that the variation would not lead to any conceivable impacts to the designated features of this site through this impact pathway.	Yes
	Nutrient enrichment	Increase in long term emissions of	The critical load of nitrogen was calculated at 0.00259 KgN/Ha/Yr which is 0.03% of the minimum critical load of the site. As such the emissions screen out as insignificant.	Yes

		oxides of nitrogen can lead to increase in nutrient enrichment at the designated site.		
	Acidification	Increase in long term emissions of acidic gas including HCL, HF, SO ₂ and NO _x can lead to increase in acidification at the site.	The predicted highest process contribution for acidic gases are for SO₂ 0.011 µg/m³ (0.1% of the critical level), for NO_x 0.063 µg/m³ (0.2% of the critical level) and for HF 0.0013 µg/m³ (0.3% of the critical level) as these substances are less than 1% of their critical levels the emissions screen out as insignificant. The acid deposition was calculated to be 0.0002 keq/ha/yr for nitrogen acidity and 0.0013 keq/ha/yr for sulphur acidity Giving a total acidity of 0.0015 keq/ha/year, which is 0.3% of the total acid critical load and as such emissions of acidic gas screen out as insignificant.	Yes
	Smothering	The new shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate matter do not have a quantifiable environmental standard. Given the	Dust and particulate matter do not have a quantifiable environmental standard however the annual limit for particulate matter remains unchanged. In addition, given the infrequent nature of dust and the shredder and bailer being located indoors, it is unlikely to cause an impact through this pathway. See Nutrient enrichment (below) for smothering affects from NO_x Deposition	Yes

		infrequent nature of the fugitive emissions from the site and no other changes that would occur as a result of the variation there is no likelihood of impact to the designated site through this impact pathway		
Crymlym Bogs (SAC and Ramar)				
1. <i>Calcareous fens with Cladium mariscus and species of the Caricion davallianae</i> (EU habitat code 7210) 2. Transition mires and quaking bogs (EU habitat code 7140) 3. Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (AlnoPadion, Alnion incanae, Salicion albae) (EU habitat code 91E0)	Toxic contamination	The type of designated features of this site are sensitive to impact from toxic contamination. The increase in annual throughput would lead to an increase in long term emissions of gas including NO_x, SO₂, volatile organic compounds, HCl and HF.	The maximum predicted concentration of sulphur dioxide was predicted to be 0.017 µg/m³ which is 0.2% of the critical level and therefore screens out as insignificant. The maximum concentration of NO_x also screen out as insignificant with the process contribution of 0.03 µg/m³ being less than 0.1% of the critical level. Weekly mean concentration of HF was 0.002 µg/m³ which is 0.4% of the critical level. As weekly mean is regarded as short term and is less than 10% of the critical level, the emission screens out as insignificant . As all of the substances screen out as insignificant (with process contribution being less than 1% of the critical level) we can conclude that the variation would not lead to any conceivable impacts to the designated features of this site through this impact pathway.	Yes

		The impact of these emissions cannot be ruled out at this stage and have been taken to appropriate assessment. However only NO_x, SO₂ and HF have a quantifiable environmental standard.		
	Nutrient enrichment	Increase in long term emissions of oxides of nitrogen can lead to increase in nutrient enrichment at the designated site.	The calculated nitrogen deposition at the bog was 0.004 KgN/Ha/Year which is 0.04% of the minimum critical load of 10 kgN/Ha/Year and therefore screens out as insignificant (process contribution being less than 1%). As such there is no risk of impact to the designated site through this pathway.	Yes
	Acidification	Increase in long term emissions of acidic gas including HCL, HF, SO₂ and NO_x and deposition that can lead to increase in acidification at the site.	The maximum calculated acidity from the site was less than 0.0003 keq/ha/year for nitrogen acidity and 0.0017 keq/ha/year for sulphur acidity, giving total acidity of 0.002 keq/ha/year. Using the APIS screening tool for acidity, the process contribution of total acidity is 0.3% of the minimum total acidity critical load (0.661 keq/ha/year) and as such screens out as insignificant.	Yes
	Smothering	The new	There is no increase in the annual limit to particulate matter on the permit and as	Yes

		shredding activity and the increase in salt slag could lead to an increase in fugitive emissions of dust which could lead to smothering. Dust and particulate matter do not have a quantifiable environmental standard.	such there will be no change to risk and impacts from particulate matter from the site. Given the infrequent nature of the fugitive emissions from the site and no other changes that would occur as a result of the variation there is no likelihood of impact to the designated site through this impact pathway Smothering from nitrogen deposition screens out as insignificant (see nutrient enrichment)	
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4.3 Concluding the appropriate assessment of the project alone

(a) If the right hand column of Table 4.1 and Table 4.2 (if applicable) is 'YES' for all features	It has been ascertained that the proposal, when considered alone, will not adversely affect the integrity of any Natura 2000 sites.
(b) If there are any 'NO's in the right hand column of Table 4.1 that have not been resolved to 'YES' through mitigation measures identified in Table 4.2	It has not been ascertained that the proposal, when considered alone, will not adversely affect the integrity of one or more Natura 2000 sites.
(c) Are there any residual effects of the	Yes

project (net of any mitigation measures identified) which, though insignificant on their own, could be significant if considered in combination with the effects of other plans or projects?	
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5 In combination assessment

5.1 Identifying possible in combination effects

BLUE impact pathway from Table 3.2 and/or Residual effect (from appropriate assessment in section 4)	Natura 2000 site feature(s) concerned	Other plans/projects with effects that might interact with the effects of the project to render its effects significant (if any)	Nature of the in-combination effect (if any)	Is there likely to be any significant in-combination effect, in view of the site's conservation objectives? <i>Insert 'YES' or 'NO' or 'DON'T KNOW'</i>
Toxic contamination Nutrient enrichment Acidification Smothering	Carmarthen Bay and Estuaries (SAC)	A search for relevant plans or projects which might interact with the effects of this projects to render its effects significant has been completed on 'MyMap' This search has focused on plans/projects within 10 km (or risk screening distance of 5 km for Medium Combustion Plants) of the closest point of the designated site, operational after 2019 as it is considered anything before then would already been considered in background. Screen 10 km from nearest point	PAN-018186 Waunarlyydd Generation Emissions of NO _x and SO ₂ from the generation. The generator limited to 880 hours per year (or 1500 hours per year with abatement). Worst case scenario shows process contribution of NO _x , SO ₂ are less than 1% of the critical levels and the nitrogen deposition and acidification are 0.1% or less than the critical load. Given that the process contribution of NO _x and SO ₂ for both Real alloys and Waunarlyydd generation are below 1% of the critical levels and the background concentration of NO _x and SO ₂ at the	No

		of SAC, Ramsar or SPA to any other project or 5 km for Medium combustion plants and specified generator.	designated sites (APIS 2018-2020) are far below the critical levels, there is no likelihood of damage through combination. Likewise given the process contribution towards nitrogen deposition and acidity from both proposals are 0.1% or less there is no possibility for in combination to cause any conceivable impact to the designated feature of the site. There are no known proposed sources of hydrogen fluoride within 10 km of the closest point of the designated site to the installation.	
Toxic contamination Smothering	Burry Inlet (SPA and Ramsar)	As above	As Above	No
Toxic contamination Nutrient enrichment Acidification Smothering	Gower Commons	As above	PAN-018186 Waunarlwydd Generation Emissions of NO _x and SO ₂ from the generation. The generator limited to 880 hours per year (or 1500 hours per year with abatement). Worst case scenario shows process contribution of NO _x , SO ₂ are less than 1% of the critical levels and the nitrogen deposition and acidification are 0.1% or less than the critical load. Given that the process contribution of NO _x and SO ₂ for both Real alloys and Waunarlwydd generation are below 1% of the critical levels and the background concentration of NO _x and SO ₂ at the designated sites (APIS 2018-2020) are far below the critical levels, there is no likelihood of damage through combination. Likewise given the process contribution towards nitrogen deposition both proposals are far below 1% there is no real possibility for in combination to cause any conceivable impact to the designated feature of the site.	No

			The process contribution towards acidification from the proposal was 0.2% of the maximum acid critical load. As such there is no likelihood of these two proposals acting in combination to cause any real impacts to the designated features of this site. There are no known proposed sources of hydrogen fluoride within 10 km of the closest point of the designated site to the installation.	
Toxic contamination Nutrient enrichment Acidification Smothering	Limestone Coast of South West Wales (Arfordir Calchfaen De Orllewin Cymru) (SAC)	As above	None	No
Toxic contamination Nutrient enrichment Acidification Smothering	Crymlyn Bogs (SAC and Ramar)	As above	None	No
(a) If the right hand column is 'NO' for all rows		The project, when considered in combination with other plans and projects, is either not likely to have a significant effect on, or will not adversely affect the integrity of any Natura 2000 site.		
(b) If any rows in the right hand column are 'YES' or 'DON'T KNOW'		The project is likely to have a significant effect in combination with other plans or projects.		

6. Conclusion

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HRA is not required because the whole of the project is directly connected with or necessary to the management of one or more Natura 2000/Ramsar sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the project is not likely to have a significant effect on any other Natura 2000/Ramsar sites. (As documented in section 2.1 and 2.2 of this form)	
HRA is not required because there is no conceivable impact pathway to any Natura 2000/Ramsar site (As documented in section 2.3 of this form)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out significant effects of a renewal without conducting a project-specific LSE test. Therefore it is considered not likely to have a significant effect on any Natura 2000/Ramsar sites, either alone or in-combination with other plans and projects. (As documented in section 3.1 of this form)	
The project has been screened for likelihood of significant effects and, taking account of the advice received from protected sites advisors, is considered not likely to have a significant effect on any Natura 2000/Ramsar site (As documented in section 3.2 of this form, or section 5 if applicable)	
In light of the conclusions of an appropriate assessment, and taking account of the advice received from protected sites advisors, it has been established that the project will not adversely affect the integrity of any Natura 2000/Ramsar site, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans and projects. (As documented in section 4 of this form, and section 5 if applicable)	X
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the project will not adversely affect the integrity of any Natura 2000/Ramsar site, as documented in section 4 of this form, and section 5 is applicable. Approval for the project <u>cannot</u> be given unless either: - the project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA report is prepared, or - the project satisfies the requirements of Article 6(4) of the Habitats Directive, an Article 6(4) Statement of Case is prepared (OGN 200 Form 3) and submitted for consideration by the appropriate authority, normally Welsh Ministers	

Signed: William Wallace

Name: William Wallace

Position: Permitting officer, Installation and RSR permitting.

Date: 16/01/2023

7. Consultation with protected sites advisor(s) and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Delete any rows that do not apply.

Relevant section of the HRA report	Date(s) of correspondence* and any meeting(s) with protected sites advisor(s)	Description of how the comments from protected sites advisors have been taken into account
2		
3		
4		
5		

**Attach copies of all written representations (Form 2) received from protected sites advisor(s)*

8. Conservation Technical Specialist's comments

This section should be completed in any cases where the protected sites advice and sign off of the HRA report (section 6) is within the same team. Otherwise this section should be deleted

I have reviewed the HRA documented in this form and confirm that I agree with its findings.

Additional comments (if any):

Signed: I.Graham

Name: Iona Graham

Position: Officer 2, Swansea Environment Team

Date: 06/02/2023