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 30th 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

Cyfoeth Naturiol Cymru
Natural Resources Wales

Record of a Habitats Regulations Assessment of a project

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Section

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-018725 EPR/TP3639BH/V010
Date application received	***21/07/2022 (application received)*** ***17/03/2023 (application Duly Made) (revised 14/12/2023)***
Applicant details	***CELSA Manufacturing UK Limited***
Activity proposed	Celsa Manufacturing UK Limited have applied to vary their installation permit (EPR/TP3639BH) for Tremorfa melt shop, which includes the Rover Way site, primarily for the addition of a new shredder that will process more than 75 tonnes per day and falls under Schedule 1 activity, Section 5.4 Part A(1) b iv of the Environmental Permitting Regulation (EPR) 2016. The additional changes to the permitted site as a result of the addition of the shredder are as follows: • Addition of a new abatement plant (filter bag house) and a new 18-meter heigh stack for particulate matter generated from the shredder. This is proposed to be listed as a new emission point to air in the permit (as emission point A11). • Installation of a new fixed scrap metal shear that will replace the currently permitted mobile plant. The new shear will also increase the maximum processing limit from 5000 tonnes per month to 7000 tonnes per month. • Integration of best available techniques (BAT) conclusions from the BAT reference document (BRef) for the waste treatment sector (2018). • Integration of a new end of life vehicle depollution station. One was previously permitted for the site but was never used. • Upgrade surfacing and roadways to hardstanding surfacing and installation of a new drainage system. The water runoff from the roads and car park will be segregated from the scrap yard. All water runoff from areas where waste is processed and stored is to be discharged to sewer (after treatment using filter membrane). The only discharge to ground water is from areas outside the main processing areas (road ways and carparks) • Movement of currently permitted slag handling equipment (listed in the permit as emission points A6-A10) 300 meters south of their current permitted location. The new location of the slag handling

	equipment will remain within the existing site boundary. • Additional Europeans waste codes (EWCs) to be listed in the permit for the metal shredder.
Relevant legislation	***Environmental permitting regulations 2016*** ***Industrial Emissions Directive 2010***
Location	**Address: Tremorfa Melt Shop, Tremorfa Works, Seawall Road, Tremorfa, Cardiff CF24 5TH** **National Grid Reference : ST 21200 76300**
Application documents	***Internal See DMS folder here. External see public register see here***
Environmental Statement	***N/A***
Pre-application correspondence	***Reference any pre-application correspondence between NRW (and/or legacy body if applicable) and the applicant or their agent. Otherwise 'N/A'***
NRW team responsible for drafting this HRA report, and name of lead officer	***William Wallace*** ***Permitting Officer, Installation and RSR permitting***

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**

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***

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: • ***Severn Estuary (Wales) SAC (UK0013030) / SPA (UK9015022) / Ramsar (UK11081) –adjacent to site boundary and approximately 200 meters from location of proposed changes. All features listed in the HRA are confirmed to be within 10 km of the site and all feature apart from Subtidal Sandbanks are located in the area closest to the installation.*** • ***Severn Estuary (England) (within 10 km screening distance from the proposal)*** • **Cardiff Beach Woods (UK0030109)** 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**
Severn Estuary (Wales) SAC (UK0013030)		
SAC interest feature 1: Estuaries 1.12: Estuarine & intertidal habitats	All conservation objectives are contained within the following document: The Severn Estuary European Marine Site comprising: The Severn Estuary SAC, The Severn Estuary SPA, The Severn Estuary Ramsar site	**Toxic Contamination** **Air Emission** The main impact to the site to the proposed site from emission to air are as follows • Fugitive emissions from dust. • Emissions to air of particulate matter that have a diameter size of ≤10 µm (PM_{10}) and ≤2.5 µm ($PM_{2.5}$) from new shredder. • Movement of slag handling equipment closer to the designated site.

	Natural England & the Countryside Council for Wales' advice given under Regulation 33(2)(a) of the Conservation (Natural Habitats, &c.) Regulations 1994, as amended dated June 2009 England: European Site Conservation Objectives for Severn Estuary SAC - UK0013030 (naturalengland.org.uk)	The only new channelled emissions from the proposed variation process will be from the new shredder which will have an 18-meter-high emission stack (A11) and an abatement plant. The abatement plant and emission limits area a requirement of best available techniques (BAT) for waste treatment and have an associated BAT- emission limit (BAT-AEL) of 5 mg/m^3. The applicant has provided an air impact assessment showing that under worst case scenario the highest concentration of PM_{10} and $PM_{2.5}$ occur within 100-200 meters of the emission point, between the emission point and the edge of the designated site, decreasing significantly with increase distance. The impact assessment showed that the concentration under worst case scenario at the closet point between the stack and designated site is 0.05 µg/m^3. Although there is no ecological standard for particulate matter the predicted concentration in the air quality report is small and is highly unlikely to cause damage to the habitat in this area of the designate site. The storage, handling and treatment of waste as well as vehicle movement at the site could potentially generate fugitive emissions of dust, which can also be worsened under certain metrological conditions notably high wind and/or dry weather conditions. The dust can impact the designate habitat features of the designated site through deposition of the dust onto the nearby habitat site and watercourse. The events of fugitive emissions of dust are minimised by the applicant through use of a dust management plan which outlines the appropriate techniques including dust suppression, inspection of stockpile, maintenance and cleaning of equipment . The current permit also has monitoring for dust deposition with the applicant proposing two more at the rover way site as part of the variation. Given the techniques in the dust management plan and the use of the monitors (both present and proposed) to monitor of emission of dust, the proposal is unlikely to lead to any increased risk of fugitive emissions of dust. The slag handling equipment was assessed in the previous variation (V009) which concluded that the emissions screened out as insignificant at the point source. Therefore, the emissions from the equipment will continue to screen out as an insignificant and the movement closer to the designated site is not going to lead to any real changes in impacts. Discharge to water As part of the variation the site will now have hardstanding surfacing in the area of the waste storage and where the new shredder and shear will be located. The site will also have a new drainage scheme for rainwater runoff. The new set up will replace the existing site that had an unsurfaced ground. Water discharge that occurs from the site will be from rainwater runoff. The applicant has

		proposed to segregate the rainwater runoff from areas with minimal or no contamination (site roads and carparks) from the areas where waste is stored and process. All water runoff from the area where waste is stored is treated as contaminated and has to be considered foul[1] and has to be discharge to sewer as a result. The as required by the best available techniques for waste treatment the following substances have been identified as likely to be present in the water runoff from treatment of metal waste sites; • Hydrocarbon • Arsenic • Mercury • Cadmium • Copper • Chromium • Lead • Zinc As this contains two priority elements (mercury and cadmium) the impacts are taken to appropriate assessment. [1] WRAP Cymru Sustainable Drainage Systems (SuDS) Advisory Note *June 2022* SuDS Advisory Note ENGLISH Final.pdf (wrapcymru.org.uk) **Nutrient Enrichment** **Air emissions** There are no new sources of emissions to air of NOx or ammonia from emission point A11. The existing emission points A6-A10 have NOx emissions from combustion but these were screened out as insignificant when they were added in the previous variation (v009). As such their movement closer to the designated site would not change their impact and the emissions would remain insignificant. Discharge water All water runoff from water is discharge to sewer, the only water discharge to ground being surface runoff from roadway. The site does not accept any nutrient containing waste and therefore there is no real impact pathway (from sewer or ground) through this mechanism. **Smothering** **Air emissions**

		The new shredder will result in emissions to air of particulate matter (PM_{10} and $PM_{2.5}$) as well as the associated activities could result in an increased risk of emissions of dust to atmosphere. There is a potential impact pathway as the areas of the proposed changes to the installation is located close to the designated site (200 meters), there is a potential impact pathway for the deposition of dust. Emissions of dust and PM_{10}/$PM_{2.5}$ may settle at the designated site. While PM_{10} and $PM_{2.5}$ do not have an environmental standard for ecological sites, the emissions were assessed against human health and had screened out as insignificant. The new shredder will have dust abatement (cyclone and a bag filter) as part of the bet available techniques (BAT) requirements. There will be monitoring requirements and emission limit of 5 mg/m^3 of particulate matter, although the applicant has stated that in reality the abatement would achieve emission levels below the emission limit of 5 mg/m^3 As part of the variation the site will also have hardstanding concrete surfacing which would replace the unsurfaced ground. This would reduce the likelihood of dust emissions from the ground in dry weather and generation of dust from road vehicles. The site has a dust management plan in place to prevent or reduce the impact of dust and has dust monitoring requirements including the proposal for two new dust monitors to be installed at the Rover Way site. Discharge to water The only discharge to water is from rainwater runoff to ground. All water runoff from the process area is filtered through ionic exchange before being discharge to sewer under trade effluent consent before further treatment at the waste water treatment works which would have its own limit (existing) limits for suspended solids. Therefore, there is no impact pathway from the proposal to affect the features through this mechanism. **Changes in Salinity Regime** No Impact pathway the discharge to ground water from surface run off is unlikely to be of quantity significant enough to cause a change in the salinity in this area of the designated site. **Changes in Thermal Regime** No impact pathway The discharge to ground water is from surface run off on the site. All water from areas of contamination is discharged to sewer The water is not heated or cooled and is not discharged in significant amounts to change the thermal regime of the receiving watercourse.

		Habitat Loss No impact pathway – The proposed changes are occurring 88-200 meters from the designated site and are occurring within the existing installation site boundary. **Physical Damage** N/A -proposed changes are occurring 88-200 meters from the designated site and are occurring within the existing installation site boundary. **Turbidity** Air Turbidity could also occur through the deposition of dust from fugitive emissions and emissions from the shredder and deposition of channelled emissions from air over the estuary. The site is located 200 meters close to the SAC/Ramsar site. The new shredder will result in emissions to air of particulate matter (PM10 and PM2.5) as well as the associated activities could result in an increased risk of emissions of dust to atmosphere. The new shredder will have dust abatement (cyclone and a bag filter) as part of the bet available techniques (BAT) requirements. There will be monitoring requirements and emission limit of 5 mg/m^3 of particulate matter, although the applicant has stated that in reality the abatement would achieve emission levels below the emission limit of 5 mg/m^3 As part of the variation the site will also have hardstanding concrete surfacing which would replace the unsurfaced ground. This would reduce the likelihood of dust emissions from the ground in dry weather and generation of dust from road vehicles. The site has a dust management plan in place to prevent or reduce the impact of dust and has dust monitoring requirements including the proposal for two new dust monitors to be installed at the Rover Way site. As such the variation is unlikely to increase the risk of turbidity from dust emissions over the site as it currently exists. Water The discharge of water runoff from the road or carpark is unlikely to be of a significant flow to cause disturbance soil which would result in turbidity of the water. All water run off from areas of contamination are discharge to sewer. The waste water treatment works already has a maximum limit for suspended solids so there would be no increase in suspended solids through water discharge. **Siltation**

		Same impact pathways as Turbidity [a] mineralsguidance_2016.pdf (iaqm.co.uk)
SAC interest feature 2: Subtidal Sandbanks 1.13: Submerged marine habitats		**Toxic Contamination** **Smothering** **Nutrient Enrichment** **Changes in Salinity Regime** **Changes in Thermal Regime** **Habitat Loss** **Physical Damage** **Turbidity** **Siltation** See above
SAC interest feature 3: Intertidal mudflats and Sandflats 1.12: Estuarine & intertidal habitats		**Toxic Contamination** **Smothering** **Nutrient Enrichment** **Changes in Salinity Regime** **Changes in Thermal Regime** **Habitat Loss** **Physical Damage** **Turbidity** **Siltation** See above
SAC interest feature 4: Atlantic salt meadow 1.12: Estuarine & intertidal habitats		**Toxic Contamination** **Smothering** **Nutrient Enrichment** **Changes in Salinity Regime** **Changes in Thermal Regime** **Habitat Loss** **Physical Damage** **Turbidity** **Siltation** See above
SAC interest feature 5: Reefs 1.12: Estuarine & intertidal habitats 1.13 Submerged marine habitats		
SAC interest feature 6: River lamprey 2.5 Anadramous fish		**Toxic Contamination** **Air-No impact pathway** Discharge to water As part of the variation the site will now have hardstanding surfacing in the area of the waste storage and where the new shredder and shear will be located. The site will also have a new drainage scheme for rainwater runoff. Prior to this the site had a hardstanding
SAC interest feature 7: Sea lamprey 2.5 Anadramous fish		
SAC interest feature 8:		

Twaite shad 2.5 Anadramous fish		but unsurfaced ground. Water discharge that occurs from the site will be from rainwater runoff. The applicant has proposed to segregate the rainwater runoff from areas with minimal or no contamination (site roads and carparks) from the areas where waste is stored and process. All water runoff from the area where waste is stored is treated as contaminated and has to be considered foul[1] and has to be discharge to sewer as a result. The as required by the best available techniques for waste treatment the following substances have been identified as likely to be present in the water runoff from treatment of metal waste sites; • Hydrocarbon • Arsenic • Mercury • Cadmium • Copper • Chromium • Lead • Zinc As this contains two priority elements (mercury and cadmium) the impacts are taken to appropriate assessment. [1] WRAP Cymru Sustainable Drainage Systems (SuDS) Advisory Note *June 2022* SuDS Advisory Note ENGLISH Final.pdf (wrapcymru.org.uk) **Smothering** Air Deposition of dust and particulate matter from air into water could increase the amount of suspended solids in the watercourse closet to the site. Air quality modelling shows that the main ground level concentration would occur on the land between the **Nutrient Enrichment** There are no proposed emissions of nutrient rich substances to either air or water **Changes in Salinity Regime** No Impact pathway the discharge to ground water from surface run off is unlikely to be of quantity significant enough to cause a change in the salinity in this area of the designated site **Changes in Thermal Regime**

		No impact pathway-the discharge to ground water is from surface run off on the site. The water is not heated or cooled and is not discharged in significant amounts to change the thermal regime of the receiving watercourse **Habitat Loss** No impact pathway – The proposed changes are occurring 88-200 meters from the designated site and are occurring within the existing installation site boundary. **Physical Damage** N/A -proposed changes are occurring 88-200 meters from the designated site and are occurring within the existing installation site boundary **Turbidity** Air Turbidity could also occur through the deposition of dust from fugitive emissions and emissions from the shredder and deposition of channelled emissions from air over the estuary. The site is located 200 meters close to the SAC/Ramsar site. The new shredder will result in emissions to air of particulate matter (PM10 and PM2.5) as well as the associated activities could result in an increased risk of emissions of dust to atmosphere. The new shredder will have dust abatement (cyclone and a bag filter) as part of the bet available techniques (BAT) requirements. There will be monitoring requirements and emission limit of 5 mg/m^3 of particulate matter, although the applicant has stated that in reality the abatement would achieve emission levels below the emission limit of 5 mg/m^3 As part of the variation the site will also have hardstanding concrete surfacing which would replace the unsurfaced ground. This would reduce the likelihood of dust emissions from the ground in dry weather and generation of dust from road vehicles. The site has a dust management plan in place to prevent or reduce the impact of dust and has dust monitoring requirements including the proposal for two new dust monitors to be installed at the Rover Way site. As such the variation is unlikely to increase the risk of turbidity from dust emissions over the site as it currently exists. Water The discharge of water runoff from the road or carpark is unlikely to be of a significant flow to cause disturbance soil which would result in turbidity of the water. All water run off from areas of contamination are discharge to sewer. The waste water treatment works already has a maximum limit for suspended solids so there would be no increase in suspended

		solids through water discharge. **Siltation** See Turbidity **Acidification** Air There are no new sources of acidic gas being emitted as a result of the variation. Emission of NOx from the slag handling equipment (assessed in a previous variation V009) screened out as insignificant at point source therefore their movement will not result in change to impact. Water No impact pathway. All rainwater from areas where waste is stored and process is treated and discharged to sewer and would be treated at the waste water treatment works. There are no proposed discharges of strongly acidic or alkaline liquids to sewer. The only discharge to ground is rainwater runoff from roads and car parks located outside where waste is processed. All acid batteries are stored indoors in a dedicated containers.
Severn Estuary SPA UK9015022		
SPA interest feature 1: Bewick's Swan 3.4 Birds of lowland wet grasslands 3.6 Birds of lowland freshwaters and their margins 3.7 Birds of farmland 3.8 Birds of coastal habitats	All conservation objectives are contained within the following document: The Severn Estuary European Marine Site comprising: The Severn Estuary SAC, The Severn Estuary SPA, The Severn Estuary Ramsar site	**Toxic Contamination** **Air** The bird spieces of the SPA site are likely to be directly impact through emissions to air. The main impact to the site to the proposed site from emission to air are as follows • Fugitive emissions from dust. • Emissions to air of particulate matter that have a diameter size of ≤10 µm (PM10) and ≤2.5 µm (PM2.5) from new shredder. • Movement of slag handling equipment closer to the designated site. The only new channelled emissions from the proposed variation process will be from the new shredder which will have an 18-meter-high emission stack (A11) and an abatement plant. The abatement plant and emission limits area a requirement of best available techniques for waste processing. The applicant has provided an air impact assessment showing that under worst case scenario the highest concentration of PM10 and PM2.5 occur within 100-200 meters of the emission point, between the emission point and the edge of the designated site, decreasing significantly with increase distance. The impact assessment showed that the concentration under worst case scenario at the closet point
SPA interest feature 2: European white-fronted goose 3.6 Birds of lowland freshwaters and their margins 3.7 Birds of farmland 3.8 Birds of coastal habitats 3.9 Birds of estuarine habitats	Natural England & the Countryside Council for Wales' advice given under Regulation 33(2)(a) of the Conservation (Natural Habitats, &c.) Regulations 1994, as amended. June 2009 *'Severn Estuary SAC, SPA and Ramsar site: Regulation 33 Advice from CCW and Natural England, June*	

SPA interest feature 3: Dunlin 3.4 Birds of lowland wet grasslands 3.7 Birds of farmland 3.8 Birds of coastal habitats 3.9 Birds of estuarine habitats	*2009'*	between the stack and designated site is 0.05 µg/m3. Although there is no ecological standard for particulate matter the predicted concentration in the air quality report is small and is highly unlikely to cause damage to the habitat in this area of the designate site. The storage, handling and treatment of waste as well as vehicle movement at the site could potentially generate fugitive emissions of dust, which can also be worsened under certain metrological conditions notably high wind and/or dry weather conditions. The dust can impact the designate habitat features of the designated site through deposition of the dust onto the nearby habitat site and watercourse. The events of fugitive emissions of dust are minimised by the applicant through use of a dust management plan which outlines the appropriate techniques including dust suppression, inspection of stockpile, maintenance and cleaning of equipment . The current permit also has monitoring for dust deposition with the applicant proposing two more at the rover way site as part of the variation. Given the techniques in the dust management plan and the use of the monitors (both present and proposed) to monitor of emission of dust, the proposal is unlikely to lead to any increase risk of fugitive emissions of dust. The slag handling equipment was assessed in the previous variation (V009) which concluded that the emissions screened out as insignificant at the point source. Therefore, the emissions from the equipment will continue to screen out as an insignificant and the movement closer to the designated site is not going to lead to any real changes in impacts. **Nutrient Enrichment** There are no new proposed sources of oxides of nitrogen or ammonia to air. The only potential change to emissions of NOx is the movement of the slag handling equipment 300 meters closer to the designated site. The H1 assessment for the previous variation (v009) showed that the emissions of NOx from the slag handling equipment screened out as insignificant at point source, therefore the emissions will remain insignificant at the designated site. **Smothering** See toxic contamination. **Acidification** No impact pathway **Changes in Salinity Regime** No impact pathway **Changes in Thermal Regime** No impact pathway **Habitat Loss**
SPA interest feature 4: Redshank 3.4 Birds of lowland wet grasslands 3.7 Birds of farmland 3.8 Birds of coastal habitats 3.9 Birds of estuarine habitats		
SPA interest feature 5: Shelduck 3.6 Birds of lowland freshwaters and their margins 3.8 Birds of coastal habitats 3.9 Birds of estuarine habitats		
SPA interest feature 6: Gadwall 3.6 Birds of lowland freshwaters and their margins		
SPA interest feature 7: Internationally important assemblage >20,000 waterfowl 3.6 Birds of lowland freshwaters and their margins 3.8 Birds of coastal habitats 3.9 Birds of estuarine habitats		

		No impact pathway- The proposed variation is occurring within the existing site boundary (88-200 meters from the edge of the site). **Physical Damage** No Impact pathway **Turbidity** No impact pathway **Siltation** No impact pathway **Entrapment** No impact pathway **Disturbance (Noise)** The introduction of a shredder will introduce a new source of noise from the site which could disturb overwintering birds in the area however the area is an already existing site in an industrialised area. The shredder would not lead to any significant changes to the existing noise soundscape in the area and the proposal will not change the working hours at site. Given the soundscape of the area (industrial site) and the fact that similar activities area carried out on site under the current permit the proposal is unlikely to increase the risk of noise impact over what is presently done on site and the wider area
Severn Estuary Ramsar (UK11081)		
Ramsar interest feature 1: Estuaries 1.12 Estuarine & intertidal habitats		See SAC interest feature 1 **Estuaries above**
Ramsar interest feature 2: Assemblage of migratory fish species 2.5 Anadramous fish		See SAC interest features 6, 7 & 8
Ramsar interest feature 3: Bewick 's Swan		See SPA interest feature 1
Ramsar interest feature 4: European white-fronted goose		See SPA interest feature 2
Ramsar interest feature 5: Dunlin		See SPA interest feature 3
Ramsar interest feature 6: Redshank		See SPA interest feature 4
Ramsar interest feature 7: Shelduck		See SPA interest feature 5
Ramsar interest feature 8: Gadwall		See SPA interest feature 6

Ramsar interest feature 9: Internationally important populations of waterfowl		See SPA interest feature 7
Severn Estuary (England) SAC (UK0013030)		
H1110 Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks	Natural England European Site Conservation Objectives for Severn Estuary/Môr Hafren Special Area of Conservation Site code: UK0013030	Toxic contamination Emissions to air - given the scale of the proposal and that the assessment of impact at much close distances (88-200 meters from the proposal) screening out as not likely to have any real impact on the site for air emissions, there is no likely impact pathway to affect the features of the designated site at this location. Water Given the scale of the discharge to sewer, the distance of 9.8 km between the installation and the SAC in England) and that all substances identified in the discharge screen out as insignificant at point source, it is unlikely that there would be any real impact to the habitats of this SAC through the proposal. **Smothering** No likely impact pathway- see toxic contamination **Nutrient Enrichment** No impact pathway **Changes in Salinity Regime** No impact pathway **Changes in Thermal Regime** No impact pathway **Habitat Loss** No impact pathway **Physical Damage** No impact pathway **Turbidity** No impact pathway **Siltation** No Impact pathway
H1130 Estuaries		As above
H1140 Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats		As above
H1170 Reefs		As above

H1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae); Atlantic salt meadows		As above
S1095 Sea lamprey *Petromyzon marinus*		Toxic contamination Emissions to air - given the scale of the proposal and that the assessment of impact at much close distances (88-200 meters from the proposal) not screening out as not likely to have any real impact on the site for air there is no likely impact pathway to affect the features of the designated site at this location. Water Given the scale of the discharge to sewer, the distance of 9.8 km between the installation and the SAC in England) and that all substances identified in the discharge screen out as insignificant at point source, it is unlikely that there would be any real impact to the habitats of this SAC through the proposal. **Smothering** No likely impact pathway- see toxic contamination **Nutrient Enrichment** No impact pathway **Changes in Salinity Regime** No impact pathway **Changes in Thermal Regime** No impact pathway **Habitat Loss** No impact pathway **Physical Damage** No impact pathway **Turbidity** No impact pathway **Siltation** No Impact pathway **Acidification**
S1099 River lamprey Lampetra fluviatilis		As above
S1103 Twaite shad Alosa fallax		As above
Cardiff Beech wood (UK0030109)		

Asperulo-Fagetum beech forests (EU Habitat Code 9130) ***Tilio-Acerion forests of slopes, screes and ravines (EU Habitat Code 9180)***	All objectives are contained in the following document: CORE MANAGEMENT PLAN INCLUDING CONSERVATION OBJECTIVES FOR CARDIFF BEECH WOODS SPECIAL AREA OF CONSERVATION (SAC)	Toxic contamination Air- No impact pathway. The only new emissions are from PM_{10}/$PM_{2.5}$ and fugitive emission of dust. Given that these emissions are deemed insignificant at much closer distances and the greatest impact of dust is within 100 meters[a] (Cardiff Beach wood is located 9800 meters), there is no likelihood a real risk of impact from emissions of particulate matter or fugitive emissions of dust to cause damage to the feature of this SAC. Water- No impact pathway the designated site is not hydrologically connected down river of the installation. Nutrient enrichment No impact pathway Acidification No impact pathway- no proposed changes to emission of acidic gases Physical Damage No Impact Pathway Habitat loss No impact pathway Smothering No impact pathway (see toxic contamination) [a] mineralsguidance_2016.pdf (iaqm.co.uk)

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?
Severn Estuary (Wales) SAC (UK0013030)				
• ***SAC interest feature 1: Estuaries*** • ***1.12: Estuarine & intertidal habitats*** • ***SAC interest feature 2: Subtidal Sandbanks*** • ***1.13: Submerged marine habitats*** • ***SAC interest feature 3:*** • ***Intertidal mudflats and***	Toxic contamination	The as required by the best available techniques for waste treatment the following substances have been identified as likely to be present in the water runoff from treatment of metal waste sites; • Hydrocarbon oils • Arsenic • Mercury • Cadmium • Copper • Chromium • Lead • Zinc The operator has also identified and assessed for iron. As this contains two priority hazardous pollutants (mercury and cadmium) the impacts are taken to appropriate assessment.	The conservation objectives for the designated all of the features is to maintain favourable conditions. For both the habitat features and the aquatic species listed in the conservation plan. the following favourable conditions which have been identified as relevant to being affected through the potential impact pathway as a result of the discharge of contaminated water to the seven estuary (via the sewer network) Estuaries (SAC feature 1) • The total extent of the estuary is maintained • The extent, variety and spatial distribution of estuarine habitat communities within the site is maintained • The physico-chemical characteristics of the water column support the ecological objectives described above • Toxic contaminants in water column and sediment are below levels which would	Yes

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- ***Sandflats***
- ***1.12: Estuarine & intertidal habitats***
- ***SAC interest feature 4:***
- ***Atlantic salt meadow***
- ***1.12: Estuarine & intertidal habitats***
- ***SAC interest feature 5:***
- ***Reefs***
- ***1.12: Estuarine & intertidal habitats***
- ***1.13 Submerged marine habitats***
- ***SAC interest feature 6:***
- ***River lamprey***
- ***2.5 Anadramous fish***
- ***SAC interest feature 7:***
- ***Sea lamprey***
- ***2.5***

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Table 1 BAT limits for indirect discharge for mechanical treatment of metal waste (taken from waste treatment BRef (here)

Substance	*Limit*
Hydrocarbon oil index (HOI)	*0.5-10 mg/l*
Arsenic	*0.01-0.05 mg/l*
Cadmium	*0.01-0.05 mg/l*
Chromium	*0.01-0.15 mg/l*
Copper	*0.05-0.5 mg/l*
Lead	*0.3 mg/l* (higher limit allowed for shredder but applicant has proposed a limit of 0.2 mg/l)*
Nickle	*0.05-0.5 mg/l*
Mercury	*0.5-5 µg/l*
Zinc	*0.1-1 mg/l*

The trade effluent consent also places a limit for iron (0.2 mg/l)

The water runoff is classified as trade effluent and will be discharge to sewer (after initial filtration) under a trade effluent consent.
The applicant has submitted a H1 assessment for the sewer discharge at 3.3 litres per second and 6 litres per second.

The applicant had assessed the discharge using the BAT associated emission level (BAT-AEL) for indirect discharge apart from lead where the trade effluent consent is to have 0.02

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pose a risk to the ecological objectives.

Subtidal Sandbanks (SAC feature 2)

- the extent and distribution of the individual subtidal sandbank communities within the site is maintained;
- the community composition5 of the subtidal sandbank feature within the site is maintained;

Mudflats and sandflats not covered by seawater at low tide (mudflats and sandflats) (SAC feature 3)

- the variety and extent of individual mudflats and sandflats communities within the site is maintained
- the distribution of individual mudflats and sandflats communities within the site is maintained;
- the community composition5 of the mudflats and sandflats feature within the site is maintained;

Atlantic salt meadow (SAC feature 4)

- the total extent of Atlantic salt meadow and associated transitional vegetation communities within the site is maintained
- the extent and distribution4 of the individual Atlantic salt meadow and associated transitional vegetation communities within the site is maintained;
- the relative abundance of the typical species of the Atlantic salt meadow and associated transitional vegetation communities is maintained;

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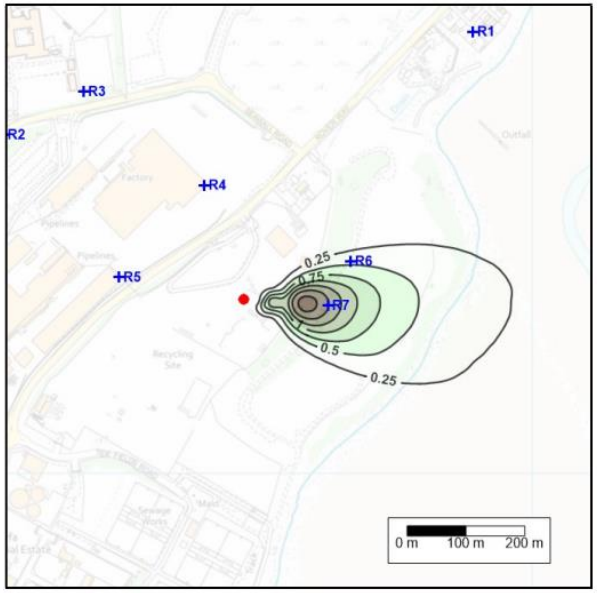
Anadramous fish • ***SAC interest feature 8:*** • ***Twaite shad*** • ***2.5 Anadramous fish*** ***(***		mg/l (as opposed to the highest BAT-AEL of 0.03 mg/l) The H1 assessment showed that at stage 1 (comparison of the pollutant concentration with the environment quality standard) only chromium and iron screened out. The applicant then assessed the Effective Volume Flux (being the relevant assessment for the discharge type and location). For all of the substances the effective volume flux was less than the allowable effective volume flux and therefore had screened out. As all substances have screened out as insignificant (at Test 5 stage) and will therefore the proposal will not cause any real impact to the designated site when considered alone. The applicant has performed the assessment against the guidance here. Copies of the PDF version of the H1 (using the EA H1 tool) are available on the public register. The H1 also showed that for mercury and cadmium the annual discharge (kg) is less than the significant loading and therefore the substances screen out as insignificant and the proposal will not have an impact pathway to the designated feature. The wastewater treatment works (WwTW) (AN0303701) already has its own permit limits and monitoring requirements for copper, zinc,	• the abundance of the notable species of the Atlantic salt meadow and associated transitional vegetation communities is maintained. Reefs (SAC Feature 5) • the community composition of the Sabellaria reef is maintained; Sea Lamprey, River Lamprey and Twaite Shad (SAC features 6-8) (the objectives below is for sea lamprey but is also applied to twaite shad and river lamprey) • The migratory passage of both adult and juvenile sea lamprey through the Severn Estuary between the Bristol Channel and any of their spawning rivers is not obstructed or impeded by physical barriers, changes in flows, or poor water quality; • Toxic contaminants in the water column and sediment are below levels which would pose a risk to the ecological objectives described above. The increase in discharge of pollutants could potentially lead to damage both aquatic species (sea lamprey, river lamprey and twaite shad) and the community features of the habitat sites through a potential decrease in water quality and increase in toxic containments (See table 1). However, as the H1 demonstrated that the substances including priority substances (mercury and cadmium) screen out as not significant it can be concluded that the proposal	

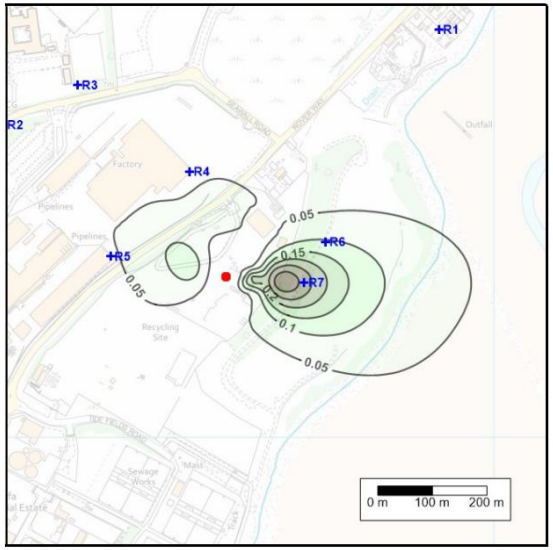
		cadmium, and nickel. The BAT-AEL and/or the trade effluent consent to ensure that the discharge does not cause problem with the WwTW. The operator has stated that they will have to meet the BAT-AEL for indirect discharge. The BAT-AEL will be applied to either the permit or on the trade effluent consent. The only discharge to ground water is from surface run off from roads and car park located outside the areas of process and contamination. Water is discharged via a cellular soakaway.	is unlikely to lead to any real significant decrease in water quality that would impact the features and will not hinder the conservation objectives. The water framework directive (WFD) assessment has been done and as the H1 had screened out we have concluded that no conceivable impact pathway in the WFD.	
Severn Estuary Ramsar (UK11081)				
• **Ramsar interest feature 1: Estuaries** 1.12 Estuarine & intertidal habitats • **Ramsar interest feature 2: Assemblage of migratory fish species** 2.5 Anadramous fish	As above	As above	**Ramsar interest feature 1: Estuaries –** Same as SAC feature 1 (Estuaries) above. **Ramsar interest feature 2**: Assemblage of migratory fish species – Same as SAC feature 6-8 (Twaite Shad, Sea Lamprey, River Lamprey) above.	Yes

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?**
Air Toxic Contamination Smothering	SAC features SAC interest feature 1: 1.12: Estuarine & intertidal habitats SAC interest feature 2: Subtidal Sandbanks 1.13: Submerged marine habitats SAC interest feature 3: Intertidal mudflats and Sandflats 1.12: Estuarine & intertidal habitats SAC interest feature 4: Atlantic salt meadow 1.12: Estuarine & intertidal habitats SAC interest feature 5: Reefs 1.12: Estuarine & intertidal habitats 1.13 Submerged marine habitats	For air we have only considered emissions after 01/01/2021 as the project under that would be captured in the background. Considering short distances that $PM_{2.5}$ and PM_{10} are in significant concentration (shown in the isopleths figures 1 and 2) as well as the air quality modelling for PM_{10} and $PM_{2.5m}$the only in combination would occur from other plan or projects would be from the development for "the mound" located between Celsa and the Severn estuary, planning Reference 21/02182/MJR (see Cardiff council portal here) The Given that dust/particulate matter settles at relatively short distances there is no	Air Redevelopment of the land may lead to emissions of dust from the site and given the close approximation of the development to the rover way an in combination could occur. The isopleth (see figures 1 and 2) for $PM_{2.5}$ and PM_{10} shows that concentration of particulate patter from the process is highest in the area of the planning proposal site. The new proposal would change the activities carried out on site. These activities could produce dust which could act in combination with the planning proposal which would produce dust emissions during the development of the mound.	No Given the close proximity of the mound to the location of the scrap yard and shredder its possible there may be an combination affect. That could impact a small area closet to the sites. The air quality impact assessment supplied by the applicant had shown that the However the operator already carries out similar (but smaller scale) activities on the site The new

	SAC interest feature 6: River lamprey 2.5 Anadramous fish SAC interest feature 7: Sea lamprey 2.5 Anadramous fish SAC interest feature 8: Twaite shad 2.5 Anadramous fish SPA interest feature 1: Bewick's Swan 2: European white-fronted goose 3: Dunlin 4: Redshank 5: Shelduck 6: Gadwall 7: Internationally important assemblage >20,000 waterfowl	other plan or proposal that would act in combination to cause damage to the designated site.	 *Figure 1: isopleth for ground level concentration for emission from $PM_{2.5}$ under worst case senerio (taken from sybmitted air quality impact assessment prepared by ADM limited)* However the site is already permitted to and has carries out similar but smaller scale activities in this area of the site. At present (as permitted) the land is compact but unsurfaced which can easily produce fugitive dust. The variation proposal includes a new hardstanding surface which would significantly reduce the likely hood of fugitive dust emissions from the surface and would be an improvement over the site as it currently is. The site also has a dust management plan and has existing monitoring requirements for dust monitoring in the permit. The applicant has also proposed additional monitors as part of the variation. Therefore the addition of the new shredder is unlikely to increase the risk of fugitive dust	hardstanding ground would significantly reduce the likelihood of fugitive dust emissions over. The proposal will have a dust management plan that will be used to mitigate the likelihood of dust and to investigate if excess dust occurs. The site is currently permitted for dust monitoring using Turnkey Optical Particle Analysis Systems with additional monitors being proposed as part of the variation. The fugitive dust impact assessment supplied by the applicant outlines that the dust levels are monitored against the deposition screen threshold of 200 $mg/m^2/day$. Given the site's existing activities, the insignificant increase risk of

			compared to the existing site that pre-dates the planning proposal 21/02182/MJR and the new compact surfacing would likely reduce the emissions of fugitive dust from the ground during high wind and from vehicle movement. The planning proposal would also only generate potential in combination during construction of the new site and in the long there would be no in combination affects from the shredder and associated processes  *Figure 2: isopleth for ground level concentration for emission from PM_{10} under worst case senerio (taken from the submitted air quality impact assessment prepared by ADM limited)* .	increase dust emissions over the existing activities and the monitoring measures in place the variation is unlikely to increase the likelihood of in combination with the planning proposal over the site as currently permitted.
Water Toxic Contamination	SAC features SAC interest feature 1: 1.12: Estuarine & intertidal habitats SAC interest feature 2:	Development for “the mound” located between Celsa and the Severn estuary Planning Reference 21/02182/MJR (see Cardiff	Discharge of contaminated water run off from the scrap yard to sewer (which includes Hydrocarbon oils, Arsenic, Mercury, Cadmium, Copper, Chromium, Lead, Zinc).	No Given the substances screened out as

	Subtidal Sandbanks 1.13: Submerged marine habitats SAC interest feature 3: Intertidal mudflats and Sandflats 1.12: Estuarine & intertidal habitats SAC interest feature 4: Atlantic salt meadow 1.12: Estuarine & intertidal habitats SAC interest feature 5: Reefs 1.12: Estuarine & intertidal habitats 1.13 Submerged marine habitats SAC interest feature 6: River lamprey 2.5 Anadramous fish SAC interest feature 7: Sea lamprey 2.5 Anadramous fish SAC interest feature 8: Twaite shad 2.5 Anadramous fish	council portal here)	The planning devolvement work could potentially release substances to surface water.	insignificant in the H1 assessment (including annual loading for mercury and cadmium) and that the WwTW where the sewer is discharged to has existing permitted limits there is no likelihood of impact through in combination
Disturbance (Noise)	SPA interest feature 1: Bewick's Swan 2: European white-fronted goose 3: Dunlin 4: Redshank 5: Shelduck 6: Gadwall 7: Internationally important assemblage	Development for "the mound" located between the installation (Rover Way site) and the Severn estuary Planning Reference 21/02182/MJR (see Cardiff council portal here)	The proposed development for an new industrial estate could lead to additional sources of noise, which could increase the noise produced on site. The area is already an industrial area and the CELSA's proposed activities are similar to the ones currently carried out onsite. The variation is unlikely to increase the risk of noise from the installation to the designated site.	No Given the existing soundscape of the area and existing activities carried out on site, the proposal us unlikely to increase the risk of disturbances over the site as existing.

	>20,000 waterfowl		The installation also has a noise management plan to reduce the noise for human receptors	
(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

~~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, and 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 not 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 cannot 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: W Wallace **Name: William Wallace** **Position: Senior Permitting Officer, Installation and RSR Permitting** **Date: 05/01/2024**	

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.

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		

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/do not agree* with its findings.
(*strike out as applicable)

Additional comments (if any):

Signed:

Name:

Position:

Date: