



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Form

Record of a Habitats Regulations Assessment of a project

March 2016

OGN 200 Form 1

Document owner: Protected Sites Team, KSP

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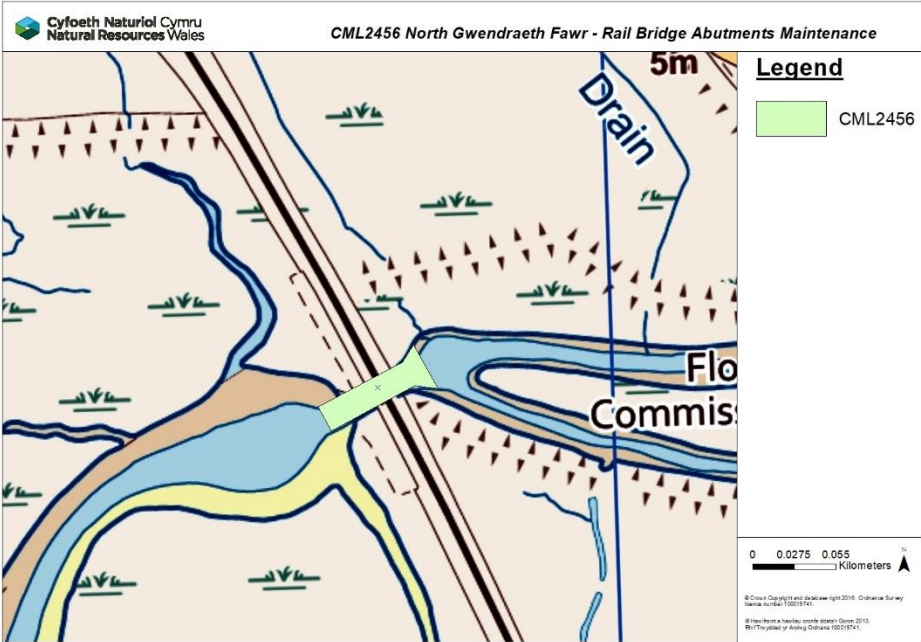
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1. Project Details

1(a): Project details where an external party has applied to NRW for any form of authorisation	
Application reference number (if applicable)	CML2456
Date application received	23 July 2024
Applicant details	Dyer and Butler Ltd
Activity proposed	North Gwendraeth Fawr - Rail Bridge Abutments Maintenance
Relevant legislation	Marine and Coastal Access Act 2009
Location	North Gwendraeth Fawr Rail Bridge Latitude 51.72611 51.726104 51.726263 51.726199 51.726036 51.725948 Longitude -4.3047192 -4.3045886 -4.304727 -4.3047961 -4.3052947 -4.3052178

	 Cyfoeth Naturiol Cymru Natural Resources Wales CML2456 North Gwendraeth Fawr - Rail Bridge Abutments Maintenance 5m Drain Flo Commis Legend CML2456 0 0.0275 0.055 Kilometers © Crown Copyright and database right 2018. Ordnance Survey Mapbox (© Mapbox, Inc.) © OpenStreetMap contributors, CC-BY, Imagery © Mapbox
Application documents	CML2456 - marine-works-application-form-updated - North Gwendraeth Fawr CML2456 - Appendix A - North Gwendraeth Fawr - Biosecurity Management Plan & Risk Assessment - 2024 - Rev 2 CML2456 - Appendix C - Approval to act on behalf of Statutory Body Network Rail - CERDS 2024 CML2456 - Appendix C - 2648 - Monitor Remit CML2456 - Appendix C - Wales SWM2 233 1023 19042022 Underwater CARRS ID 1671030 CML2456 - North Gwendraeth Fawr - Rail Bridge Abutments - EV000942-WFD-2024-1 CML2456 - North Gwendraeth Fawr - Rail Bridge Abutments - EV000996-AA-HRA-2024 – 2 CML2456 - North Gwendraeth Fawr - WNMP SIGNPOST DOCUMENT CML2456 - Coordinates Conversion
Environmental Statement	N/A
Pre-application correspondence	N/A

NRW team responsible for drafting this HRA report, and name of lead officer	Jack Thompson – Marine Licensing Team
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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?	N/A
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
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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: Carmarthen Bay SAC The potential for the project to affect the following Natura 2000 sites was also initially considered, but can be ruled out without further consideration: Camarthen Bay SPA – the SPA is ~5km away from the works site and therefore, given the scale of the works, there is no impact pathway.	
3.2.2 Screening assessment		
There is no impact pathway from the proposal to the designated feature There is an impact pathway in principle, but significant effects from the proposal when considered alone can be ruled out There is an impact pathway and significant effects cannot be ruled out		
	Assessment of likelihood of significant effect	
	I Relevant conservation objectives	II Potential impact pathway
Carmarthen Bay SAC		
Sandbanks which are slightly covered by seawater all the time	<u>RANGE</u> The overall distribution and extent of the habitat features within the site, and each of their main component parts is stable or increasing. <u>STRUCTURE AND FUNCTION</u> The physical biological and chemical structure and functions necessary for the long-term maintenance and quality of the habitat are not	This feature is not located within close proximity to the works site and as such, no pathway exists.
Estuaries		There is a risk of pollution arising from spillage during refuelling of equipment or due to equipment failure. Furthermore, during the repointing works, a risk of concrete spillage exists.
Mudflats and sandflats not covered by seawater at low tide		There is a risk of pollution arising from spillage during refuelling of equipment or due to equipment failure. Furthermore, during the repointing works, a risk of concrete spillage exists.
Large shallow inlets and bays		This feature is located ~5km away from the works site and as such, given the nature and scale of the works, no pathway exists.

Atlantic salt meadows	degraded. Important elements include;	There is a risk of pollution arising from spillage during refuelling of equipment or due to equipment failure. Furthermore, during the repointing works, a risk of concrete spillage exists.
Salicornia and other annals colonising mud and sand	geology, sedimentology, geomorphology, hydrography and meteorology, water and sediment chemistry, biological interactions. 40 CARMARTHEN BAY REGULATION 33 ADVICE FEBRUARY 2009 This includes a need for nutrient levels in the water column and sediments to be: at or below existing statutory guideline concentrations within ranges that are not potentially detrimental to the long term maintenance of the features species populations, their abundance and range. Contaminant levels in the water column and sediments derived from human activity to be: at or below existing statutory guideline concentrations below levels that would potentially result in increase in contaminant concentrations within sediments or biota below levels potentially detrimental to the long-term maintenance of the features species populations, their abundance or range. For Atlantic saltmeadows this includes the morphology of the saltmarsh creeks and pans TYPICAL SPECIES	This feature is located ~3.5km away from the works site and as such, given the nature and scale of the works, no pathway exists.

	The presence, abundance, condition and diversity of typical species is such that habitat quality is not degraded. Important elements include: - species richness, - population structure and dynamics, - physiological health, - reproductive capacity - recruitment, - mobility - range As part of this objective it should be noted that: populations of typical species subject to existing commercial fisheries need to be at an abundance equal to or greater than that required to achieve maximum sustainable yield and secure in the long term the management and control of activities or operations likely to adversely affect the habitat feature, is appropriate for maintaining it in favourable condition and is secure in the long term.	
Otter	<u>POPULATIONS</u> The population is maintaining itself on a long-term basis as a viable component of its natural habitat.	Otter populations are known to be present along the Gwendreath. Previous otter surveys undertaken by EcoVigour in 2022 found paw prints within exposed intertidal mud. No holts were identified during those surveys, and recent walkovers have not yielded new data. A pathway therefore exists for noise and visual disturbance.
Shad <i>Alosa</i> spp	Important elements are population size, structure, production, and condition of the species within the site. As part of this objective it should be noted that: Contaminant burdens derived from human activity are below levels that	All works will be undertaken from the embankment of the estuary at low tide and will not impede migratory routes. No vehicles or vessels are required for the works with only hand tools being used. No deep excavation or dredging is required and therefore any increased sedimentation from the works will be minimal. Although noise will be generated from the works, given that they will be conducted at low tide, this should not lead to significant disturbance. Furthermore, the bridge forms a section of a busy rail line and therefore any noise/vibration generated from the works will fall below this level. However, best practice measures will be adopted to minimise the noise produced (modern, well silenced equipment, use of manual tools etc).

	may cause physiological damage, or immune or reproductive suppression <u>RANGE</u> The species population within the site is such that the natural range of the population is not being reduced or likely to be reduced for the foreseeable future. As part of this objective it should be noted that Their range within the SAC and adjacent inter-connected areas is not constrained or hindered There are appropriate and sufficient food resources within the SAC and beyond The sites and amount of supporting habitat used by these species are accessible and their extent and quality is stable or increasing	There is a risk of pollution arising from spillage during refuelling of equipment or due to equipment failure. Furthermore, during the repointing works, a risk of concrete spillage exists.
River lamprey	As part of this objective it should be noted that Their range within the SAC and adjacent inter-connected areas is not constrained or hindered There are appropriate and sufficient food resources within the SAC and beyond The sites and amount of supporting habitat used by these species are accessible and their extent and quality is stable or increasing	All works will be undertaken from the embankment of the estuary at low tide and will not impede migratory routes. No vehicles or vessels are required for the works with only hand tools being used. No deep excavation or dredging is required and therefore any increased sedimentation from the works will be minimal. Although noise will be generated from the works, given that they will be conducted at low tide, this should not lead to significant disturbance. Furthermore, the bridge forms a section of a busy rail line and therefore any noise/vibration generated from the works will fall below this level. However, best practice measures will be adopted to minimise the noise produced (modern, well silenced equipment, use of manual tools etc). There is a risk of pollution arising from spillage during refuelling of equipment or due to equipment failure. Furthermore, during the repointing works, a risk of concrete spillage exists.
Sea lamprey	<u>SUPPORTING HABITATS AND SPECIES</u> The presence, abundance, condition and diversity of habitats and species required to support this species is such that the distribution, abundance and populations dynamics of the species within the site and population beyond the site is stable or increasing. Important considerations include; distribution, extent, structure, function and quality of habitat, prey availability and quality. As part of this objective it should be noted that;	This feature is not located within close proximity to the works site and as such, no pathway exists.

	The abundance of prey species subject to existing commercial fisheries needs to be equal to or greater than that required to achieve maximum sustainable yield and secure in the long term. The management and control of activities or operations likely to adversely affect the species feature, is appropriate for maintaining it in favourable condition and is secure in the long term. Contamination of potential prey species should be below concentrations potentially harmful to their physiological health. Disturbance by human activity is below levels that suppress reproductive success, physiological health or long-term behaviour For otter there are sufficient sources within the SAC and beyond of high quality freshwater for drinking and bathing.	
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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	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.

Table 3.2.2, and there are ANY rows which are BLUE	
(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. Appropriate assessment of the project when considered alone

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?
Carmarthen Bay SAC				
Estuaries	Pollution risk from fuel or concrete spillage.	Reduction in water quality. Substances toxic to flora/fauna.	Spillages in to the estuary can lead to a reduction in water quality and the substances leaked may have detrimental impacts upon the flora/fauna within the habitat. This therefore undermines the conservation objectives which seek to ensure the physical, biological and chemical structure and functions necessary for the long-term maintenance and quality of the habitat are not degraded.	No
Mudflats and sandflats not covered by seawater at low tide	Pollution risk from fuel or concrete spillage.	Reduction in water quality. Substances toxic to flora/fauna.	Spillages on to the mudflat/sandflat can lead to a reduction in water quality and the substances leaked may have detrimental impacts upon the flora/fauna within the habitat.	No

			This therefore undermines the conservation objectives which seek to ensure the physical, biological and chemical structure and functions necessary for the long-term maintenance and quality of the habitat are not degraded.	
Atlantic salt meadows	Pollution risk from fuel or concrete spillage.	Reduction in water quality. Substances toxic to flora/fauna.	Spillages on to the salt meadow can lead to a reduction in water quality and the substances leaked may have detrimental impacts upon the flora/fauna within the habitat. This therefore undermines the conservation objectives which seek to ensure the physical, biological and chemical structure and functions necessary for the long-term maintenance and quality of the habitat are not degraded.	No
Otter	Noise and visual disturbance.	Continued disturbance could lead to the displacement of otter.	The objectives seek to maintain and support otter populations however, continued noise and visual disturbance could lead to a reduction in population numbers as they are displaced.	No
Shad Alosa spp River lamprey	Contamination of the estuary through spillage.	Spillage and masonry repairs have the potential to cause contamination of the estuary.	Contamination has the potential to reduce the size, structure, production, and condition of the species within the site.	No

4.2 Assessment of the project taking into account additional mitigating measures, conditions or restrictions

Natura 2000 Feature (from Table 4.1 – ‘NO’ rows only)	Description of adverse effect(s)	Can adverse effect(s) be mitigated?	Description of mitigation measures, and how they would be applied (e.g. contractual obligations, consent conditions)	Can adverse effect on site integrity be ruled out?
Estuaries		Yes		Yes

Mudflats and sandflats not covered by seawater at low tide	Spillages can lead to a reduction in water quality and the substances leaked may have detrimental impacts upon the flora/fauna within the habitat.		All works set up and audited on a regular basis by the Environmental Clerk of Works (ECoW). A refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals.	
Atlantic salt meadows	This therefore undermines the conservation objectives which seek to ensure the physical, biological and chemical structure and functions necessary for the long-term maintenance and quality of the habitat are not degraded.		NR have a spillage plan and specialised contractor in place to respond to and clean up spills. The Contractor will develop and implement an Emergency Awareness and Response Plan. GPP5 Guidance for Pollution Prevention - Works and maintenance in or near water, will be referenced. These will include: ◆ GPP 5 - Works and maintenance in or near water ◆ GPP 7 - Safe storage – The safe operation of refuelling facilities, ◆ GPP 21 - Pollution incident response planning, ◆ GPP 22 - Dealing with spills This will describe how spills will be contained and cleaned up. The emergency plan will appoint an Incident Coordinator, define roles and responsibilities during an incident, detail response procedures and contain an inventory of response equipment to be maintained on site. As much as practically possible, the mixing of mortar material will be undertaken within the rail corridor (track side). If there is no safe distance between the running rail and the works location, mixing will occur at beach/ground level. No mixing equipment, plant or machines will be used without a supply of spill kits, plant nappies and pre-works checks. All mixing to occur on ground level adjacent to the abutments, with the use of tarp or other impermeable membranes laid on the ground to prevent any overspill coming into contact with the estuarine habitat. Spill kits, drip trays and plant nappies will be placed below and near the 110v generators during operation.	

			Plastic screening will be placed on the base of the wall to capture material broken off from the defences during masonry repairs where possible. Every practical effort will be made to collect all loose broken mortar material arising from the wall repairs and remove them from the designated site environment. Grout filled bags, or soluform bags will be used to infill the scour. All hand tools for vegetation clearance will be checked prior to use and stored in secure areas and on spill mats when not in use. Equipment will be fuelled at the layby areas prior to use or along existing access tracks a minimum of 50m away from any watercourse. No refilling is permitted within or adjacent to the Salt Marsh habitats. Access to the abutments themselves will be on foot only, with no vehicles entering the estuarine environment. In relation to vehicle access, the vast majority of movement will occur along the existing agricultural lane from the northeast. The southern access is foot access only. In relation to any sections of saltmarsh habitat in close proximity to the works area, any required access will be limited to approximately 3-5 metres wide, which will be demarcated by the ECoW, during the initial project phase.	
Otter	The objectives seek to maintain and support otter populations however, continued noise and visual disturbance could lead to a reduction in population numbers as they are displaced.	Yes	Toolbox talks (TBTs) will be provided by the Environmental Clerk of Works prior to works commencing. These will inform site personnel how to identify the Annex II Species, potential impacts and produce direct localised mitigation where required. No otter holts have been noted to date within proximity to the structure and are unlikely to be found during works on the seaward facing wall sections. Maintenance works will be undertaken during the day, at low tide conditions. No equipment will be left in such a manner that an animal could become snared and trapped within the working area. Should an Otter be encountered during works, personnel will temporarily stand down until the animal has vacated the immediate area under its own volition.	Yes

			The contractor will abide by the Gwynedd Marine Code of Conduct. Salmon and other species of the fish assemblage, which are a prey of Otter will not be prevented from travelling up the estuary during the project. Although there will be an elevated human presence around the defences, it is unlikely that this will present a significant determinantal impact to salmon and other species of fish migrating to spawn during the coming winter months. If night working is required to offload material, directional lighting measures will be implemented to limit disturbance. Task specific lighting will be used, and the use of flood lights will be prohibited. Material will be laid down within the rail corridor as to further reduce the potential for disturbance. Best practice will be used in terms of the construction methodology to limit noise disturbance (modern well silenced plant, use of manual tools to rake out masonry during repointing). Paddle mixture equipment will use low noise electric motors to mix the required material. The 11v generator will only run when required and will be placed in such a way that noise emissions are intercepted by structures such as walls, or barriers, to deaden noise further.	
Shad Alosa spp River lamprey	Spillages can lead to a reduction in water quality and the substances leaked may have detrimental impacts upon the flora/fauna within the habitat. This therefore undermines the conservation objectives which seek to ensure that populations are maintained.	Yes	All works set up and audited on a regular basis by the Environmental Clerk of Works (ECoW). A refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals. NR have a spillage plan and specialised contractor in place to respond to and clean up spills. The Contractor will develop and implement an Emergency Awareness and Response Plan. GPP5 Guidance for Pollution Prevention - Works and maintenance in or near water, will be referenced. These will include: • GPP 5 - Works and maintenance in or near water • GPP 7 - Safe storage – The safe operation of refuelling facilities, • GPP 21 - Pollution incident response planning, • GPP 22 - Dealing with spills	Yes

			This will describe how spills will be contained and cleaned up. The emergency plan will appoint an Incident Coordinator, define roles and responsibilities during an incident, detail response procedures and contain an inventory of response equipment to be maintained on site. As much as practically possible, the mixing of mortar material will be undertaken within the rail corridor (track side). If there is no safe distance between the running rail and the works location, mixing will occur at beach/ground level. No mixing equipment, plant or machines will be used without a supply of spill kits, plant nappies and pre-works checks. All mixing to occur on ground level adjacent to the abutments, with the use of tarp or other impermeable membranes laid on the ground to prevent any overspill coming into contact with the estuarine habitat. Spill kits, drip trays and plant nappies will be placed below and near the 110v generators during operation. Plastic screening will be placed on the base of the wall to capture material broken off from the defences during masonry repairs where possible. Every practical effort will be made to collect all loose broken mortar material arising from the wall repairs and remove them from the designated site environment. All hand tools for vegetation clearance will be checked prior to use and stored in secure areas and on spill mats when not in use. Equipment will be fuelled at the layby areas prior to use or along existing access. No refiling is permitted within or adjacent to the Salt Marsh habitats. Works will be undertaken during the day, at low tide conditions. Access to the abutments themselves will be on foot only, with no vehicles entering the estuarine environment. In relation to vehicle access, the vast majority of movement will occur along the existing agricultural lane from the northeast. The southern access is foot access only.	
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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 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?	No

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, <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:  Name: Jack Thompson Position: Marine Licensing Officer	

Date: 22 August 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
4 and 6	19 September 2024 14 October 2024	NRW A agreed with conclusions of HRA, but asked whether a condition could be included to ensure access corridor maintained a width of 3-5m to prevent damage to saltmarsh. Asked applicant if method statement could be updated to reflect this working practice. Applicant subsequently provided an updated method statement which included the 3-5m restriction on access corridors. They also confirmed that no vehicles would be in close proximity to the abutments – access would be on foot. HRA has been updated to included these mitigation measures and NRW A agree with the conclusions of the assessment.

Form

Protected sites advisor response to an internal consultation on the Habitats Regulations Assessment of a project

OGN 200 Form 2

Document owner: Protected Sites Team, EPP

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1.0	March 2016	Document created
1.1	30 November 2017	Minor changes only

Next review date: April 2018

Protected sites advisor response to an internal consultation on the Habitats Regulations Assessment of a project

TO: Jack Thompson

FROM: Bridget Randall-Smith, Marine Area Advice & Management team

SUBJECT: Habitats Regulation Assessment of North Gwendraeth Fawr - Rail Bridge Abutments Maintenance

Thank you for consulting Marine Area Advice and Management team on the above project and sending us a copy of the draft Form 1 HRA report dated 22nd August 2024. Our comments are as follows:

Marine Advisory agree with the appropriate assessment and overall conclusion of the HRA that the works will have negligible impact on marine features of nearby designated sites. However, consideration could be given to adding a licence condition to restrict the access route to a specific work corridor (e.g. 3-5m) to minimise risk of damage to the saltmarsh.

Signed:

BJ Randall-Smith

Bridget Randall-Smith - Senior Marine Advisory Officer

Date:
19th September 2024

Form

Protected sites advisor response to an internal consultation on the Habitats Regulations Assessment of a project

OGN 200 Form 2

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Protected sites advisor response to an internal consultation on the Habitats Regulations Assessment of a project

TO: Jack Thompson

FROM: Bridget Randall-Smith, Marine Area Advice & Management team

SUBJECT: Habitats Regulation Assessment of North Gwendraeth Fawr - Rail Bridge Abutments Maintenance

Thank you for consulting Marine Area Advice and Management team on the above project and sending us a copy of the draft Form 1 HRA report dated October 2024. Our comments are as follows:

NRW Advisory (A) agree with the overall conclusion of the HRA that, in light of the appropriate assessment, the works will not adversely affect the integrity of the Carmarthen Bay SAC. NRW (A) welcome the addition of a work corridor to reduce risk to surrounding saltmarsh.

Signed:

BJ Randall-Smith

Bridget Randall-Smith - Senior Marine Advisory Officer

Date:
14th October 2024
