



**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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Record of a Habitats Regulations Assessment of a project

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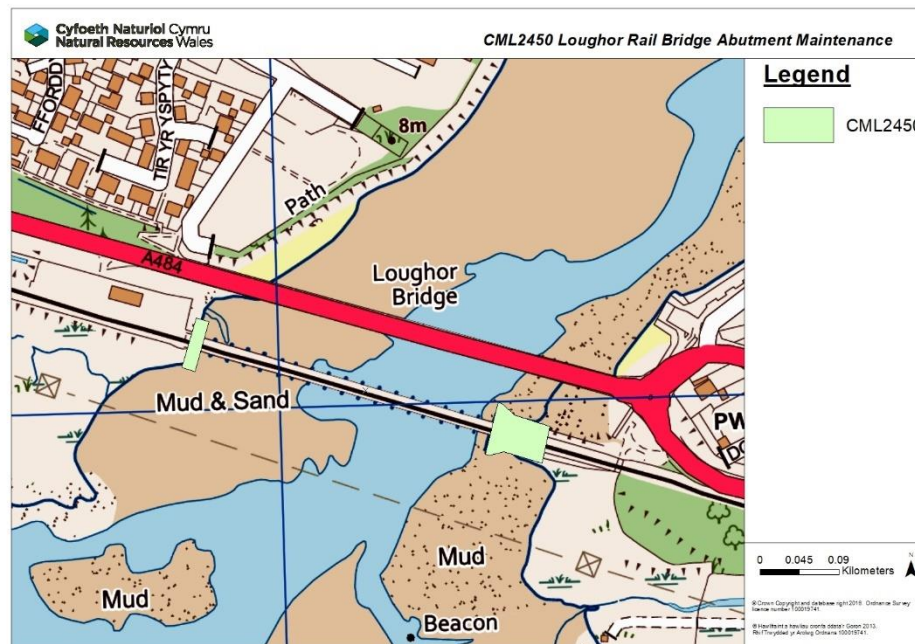
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1. Project Details

1(a): Project details where an external party has applied to NRW for any form of authorisation					
Application reference number (if applicable)	CML2450				
Date application received	27 June 2024				
Applicant details	Dyer & Butler Ltd				
Activity proposed	Loughor Rail Bridge Abutment Maintenance				
Relevant legislation	Marine and Coastal Access Act 2009				
Location	The abutments are located along both shorelines of the Loughor Estuary, entering the Burry Inlet below both the Loughor Road & Rail Bridges.				
	West Abutments				
	X (Easting)	Y (Northing)	Grid Reference	Latitude	Longitude
	255941.9	198066.3	SS5594198066	51.66286	-4.08427
	255950.6	198063.6	SS5595098063	51.66283	-4.08414
	255939.6	198028.7	SS5593998028	51.66252	-4.08428
	255930.3	198031.5	SS5593098031	51.66254	-4.08442
	East Abutments				
	X (Easting)	Y (Northing)	Grid Reference	Latitude	Longitude
	256164.6	197991.8	SS5616497991	51.66224	-4.08102
	256189.2	197982.7	SS5618997982	51.66217	-4.08065
	256183.7	197956.3	SS5618397956	51.66193	-4.08073
	256156.4	197965.5	SS5615697965	51.66201	-4.08112
	256146.1	197963.7	SS5614697963	51.66198	-4.08127

256143.1	197964.6	SS5614397964	51.66199	-4.08131
256153.9	198000.8	SS5615398000	51.66232	-4.08118
256156.4	197999.9	SS5615697999	51.66231	-4.08114
256164.6	197991.8	SS5616497991	51.66224	-4.08102



Application documents

CML2450 - marine-works-application-form-updated - Loughor Bridge Abutments
 CML2450 - Approval to act on behalf of Statutory Body Network Rail - CERDS 2024
 CML2450 - Appendix A - Loughor Bridge Abutments - Biosecurity Management Plan & Risk Assessment - 2024 - Rev 1
 CML2450 - Appendix B - SWPP - TBS - Masonry & Brickwork Repairs
 CML2450 - Loughor Rail Bridge Abutments - EV000942-AA-HRA-2024 – 1
 CML2450 - Loughor Rail Bridge Abutments - EV000942-WFD-2024-1
 CML2450 - Loughor Rail Abutments - WNMP SIGNPOST DOCUMENT
 CML2450 - 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

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 and Estuaries SAC Burry Inlet RAMSAR Burry Inlet SPA 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		
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 and Estuaries 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	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	quality of the habitat are not degraded. Important elements include; 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	This feature is located >10km away from the works site and as such, given the nature and scale of the works, no pathway exists.
Atlantic salt meadows		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		Potential contamination of the estuary from spillage of hydrocarbons during refuelling of equipment or due to equipment failure.

	<u>TYPICAL SPECIES</u> The presence, abundance, condition and diversity of typical species is such that habitat quality is not degraded. Important elements include: - species richness's - 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. 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	Otter populations are known to be present along the Loughor Estuary, although no holts have been noted to date within proximity to the structure. A pathway therefore exists for noise and visual disturbance.
Shad <i>Alosa</i> spp		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

	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.	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.
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 <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;	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	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.	
Burry Inlet RAMSAR		
Conservation objective for the Burry Inlet Ramsar	The Burry Inlet SPA and Ramsar will be considered to be in a favourable conservation status when each of the following conditions are met: (i) the number of migratory and over-wintering birds of international importance, i.e. knot <i>Calidris canutus</i>, oystercatcher <i>Haematopus ostralegus</i>, pintail <i>Anas acuta</i>, and redshank <i>Tringa tetanus</i>, as expressed by rolling 5-year peaks, is at or above the respective 1985/86-1989/90 peaks;	All works will be undertaken from the embankment of the estuary at low tide and will not impede the estuary. 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. Some noise will be generated from the works however, given that no large scale plant will be used, 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).

	(ii) the number of migratory and over-wintering assemblage waterfowl, including curlew Numenius arquata, dunlin Calidris alpina alpina, grey plover Pluvialis squatarola, shelduck Tadorna tadorna, shoveler Anas clypeata, teal Anas crecca, turnstone Arenaria interpres, and wigeon Anas penelope, as expressed by rolling 5-year peaks, is at or above the 1985/86-1989/90 peak; (iii) the extent and quality of supporting habitats is at 1998-2000 values (see Box 1.1), ; (iv) the abundance of prey and diversity of prey species is at or above 1999/2000 values, and at levels meeting the requirements of the number of birds present within the site (see Box 1.2); (v) unrestricted bird sightlines of at least 200 m exist in every direction around both roosting sites and feeding areas; (vi) the migratory and over-wintering birds of international importance and of assemblage waterfowl are allowed to inhabit their feeding grounds and resting areas with minimum disturbance, and are allowed to move unhindered between them.	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.
Burry Inlet SPA		
Curlew	To achieve favourable conservation status all the following, subject to natural processes, need to be fulfilled and maintained in the long-term. If these objectives are not met restoration measures will be needed	All works will be undertaken from the embankment of the estuary at low tide and will not impede the estuary. 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. Some noise will be generated from the works however, given that no large scale plant will be used, this should not lead to significant disturbance. Furthermore, the bridge forms
Dunlin		
Grey plover		
Knot		
Oystercatcher		
Pintail		

Redshank	to achieve favourable conservation status. (i) The numbers of all SPA bird species are stable or increasing. (ii) The abundance and distribution of suitable prey are sufficient and appropriate to support the numbers of all SPA bird species. (iii) All SPA birds are allowed to inhabit their feeding grounds and resting areas with minimum disturbance, and are allowed to move unhindered between them. (iv) All states of the Conservation Objectives for the supporting habitats and species, subject to natural processes, are fulfilled and maintained in the long-term. Supporting habitats for bird species of the Burry Inlet SPA include: Estuaries Mudflats and sandflats not covered by seawater at low tide Atlantic salt meadows <i>Salicornia</i> and other annuals colonising mud and sand 'Large shallow inlets and bays' are the supporting habitat for the common scoter of the Carmarthen Bay SPA. (v) The management and control of activities or operations likely to be of significant effect to the oystercatchers, is appropriate for maintaining the feature at FCS and is secure in the long-term.	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.
Shelduck		
Shoveler		
Teal		
Turnstone		
Wigeon		

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. 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 and Estuaries SAC				

Estuaries Mudflats and sandflats not covered by seawater at low tide Atlantic salt meadows Salicornia and other annals colonising mud and sand	Contamination of the estuary and habitat loss/disturbance.	Spillage and masonry repairs have the potential to cause contamination of the estuary. Loss of habitat through contamination.	Potential for disturbance and loss of habitat through spillages and masonry repairs.	No
Otter	Noise and visual disturbance	Potential noise and visual disturbance during the works.	Noise and visual disturbance has the potential to reduce the size, structure, production, and condition of the species within the site. It also has the potential to reduce presence, abundance, condition and diversity of habitats to support the species.	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
Burry Inlet and Carmarthen Bay SPA				
Conservation objective for the Burry Inlet Ramsar	Noise and visual disturbance	Potential noise and visual disturbance during the construction phase of the works.	Noise and visual disturbance has the potential to reduce the abundance and distribution of the feature.	No
Burry Inlet RAMSAR				

Curlew	Noise and visual disturbance	Potential noise and visual disturbance during the construction phase of the works.	Noise and visual disturbance has the potential to reduce the abundance and distribution of the feature.	No
Dunlin	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.	
Grey plover				
Knot				
Oystercatcher				
Pintail				
Redshank				
Shelduck				
Shoveler				
Teal				
Turnstone				
Wigeon				

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?
Carmarthen Bay and Estuaries SAC				
Estuaries		Yes		Yes

Mudflats and sandflats not covered by seawater at low tide Atlantic salt meadows Salicornia and other annals colonising mud and sand	Contamination of the estuary and loss of 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. 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.	Yes
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			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. The following condition will be added to the licence to ensure that the mitigation proposed is adhered to: The Licence Holder must ensure that any actions outlined in <i>CML2450 - Loughor Rail Bridge Abutments - EV000942-AA-HRA-2024 – 2</i> dated 09 October 2024 are implemented. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.	
Otter	Noise/Visual disturbance and loss of habitat	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.	Yes

			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. Salmon and other species of the 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, directional lighting measures will be implemented to limit disturbance. Task specific lighting will be used, and the use of flood lights will be prohibited. Steps should be undertaken to ensure that otters, mammals and birds do not become trapped within working and storage areas. Best practice will be used in terms of the construction methodology to limit noise i.e., modern well silenced plant, use of manual tools to rake out masonry during repointing. The following condition will be added to the licence to ensure that the mitigaton proposed is adhered to: The Licence Holder must ensure that any actions outlined in <i>CML2450 - Loughor Rail Bridge Abutments - EV000942-AA-HRA-2024 – 2</i> dated 09 October 2024 are implemented. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.	
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Shad Alosa spp River lamprey	Contamination of the estuary	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 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.	Yes
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			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. The following condition will be added to the licence to ensure that the mitigation proposed is adhered to: The Licence Holder must ensure that any actions outlined in <i>CML2450 - Loughor Rail Bridge Abutments - EV000942-AA-HRA-2024 – 2</i> dated 09 October 2024 are implemented. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.	
Burry Inlet and Carmarthen Bay SPA				
Conservation objective for	Noise/Visual disturbance	Yes	Maintenance work will result in a period of noise and visual disturbances. However, noise levels are unlikely to exceed those	Yes

the Burry Inlet Ramsar		currently generated by trains and road traffic currently utilising the rail network. Some works will be fitted around available line blocks, which will change from week to week and may night shifts. However, the vast majority of works will be undertaken during the day, at low tide conditions. Some supporting works during high tide may occur within the boundary of the rail corridor. Such as mobilisation or demobilisation of rope access equipment or offloading of material to be closer to working locations. 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. Toolbox talks will be provided by the Environmental Clerk of Works prior to works commencing. This will identify potential impacts and direct localised mitigation where required. The following condition will be added to the licence to ensure that the mitigation proposed is adhered to: The Licence Holder must ensure that any actions outlined in <i>CML2450 - Loughor Rail Bridge Abutments - EV000942-AA-HRA-2024 – 2</i> dated	
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			09 October 2024 are implemented. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.	
Burry Inlet RAMSAR				
Curlew Dunlin Grey plover Knot Oystercatcher Pintail Redshank Shelduck Shoveler Teal Turnstone Wigeon	Noise/Visual disturbance	Yes	Works will be undertaken during the day, at low tide conditions. The works will not present a barrier to the permanent flowing portion of the estuary. During high tide, it will be possible for fish to migrate along vast majority of the estuary without coming into proximity to any tasks being undertaken at that particular moment and therefore, there will be no impact on food availability for the bird species. Works within the estuary during low tide at bed level will be localised and low impact and will not involve any deep excavation or dredging so increased sedimentation will be minimal. Best practice will be used in terms of the construction methodology to limit noise i.e., modern well silenced plant, use of manual tools to rake out masonry during repointing, working on the wall and embankments during low tide. Maintenance work will result in a period of noise and visual disturbances. However, noise levels are unlikely to exceed those currently generated by trains utilising the rail network. Some supporting works during high tide may occur within the boundary of the rail corridor. Such as mobilisation or demobilisation of rope access equipment or offloading of material to be closer to working locations. 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.	Yes

			Material will be laid down within the rail corridor as to further reduce the potential for disturbance. 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. Toolbox talks will be provided by the Environmental Clerk of Works prior to works commencing. This will identify potential impacts and direct localised mitigation where required. The following condition will be added to the licence to ensure that the mitigation proposed is adhered to: The Licence Holder must ensure that any actions outlined in <i>CML2450 - Loughor Rail Bridge Abutments - EV000942-AA-HRA-2024 – 2</i> dated 09 October 2024 are implemented. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.	
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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: 29 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
6	24September 2024	NRW A agree with conclusions of HRA.

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

TO: Jack Thompson, Marine Licensing Team

FROM: Stephen Treby, Marine Area Advice & Management Team

SUBJECT: Loughor Rail Bridge Abutment Maintenance - CML2450

Thank you for consulting the Marine Area Advice and Management team on the above project and sending us a copy of the draft Form 1 HRA report dated 29 August 2024. Our comments are as follows:

The Marine Area Advice and Management Team agree with the conclusion of the HRA that the proposal will not adversely affect the integrity of Carmarthen Bay and Estuaries SAC, Burry Inlet RAMSAR or Burry Inlet SPA.

Signed:



Date: 24 September 2024