

Form

Record of a Habitats Regulations Assessment of a project

OGN 200 Form 1

Document owner: Protected Sites Team, EPP

Version History:

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

Next review date: April 2019

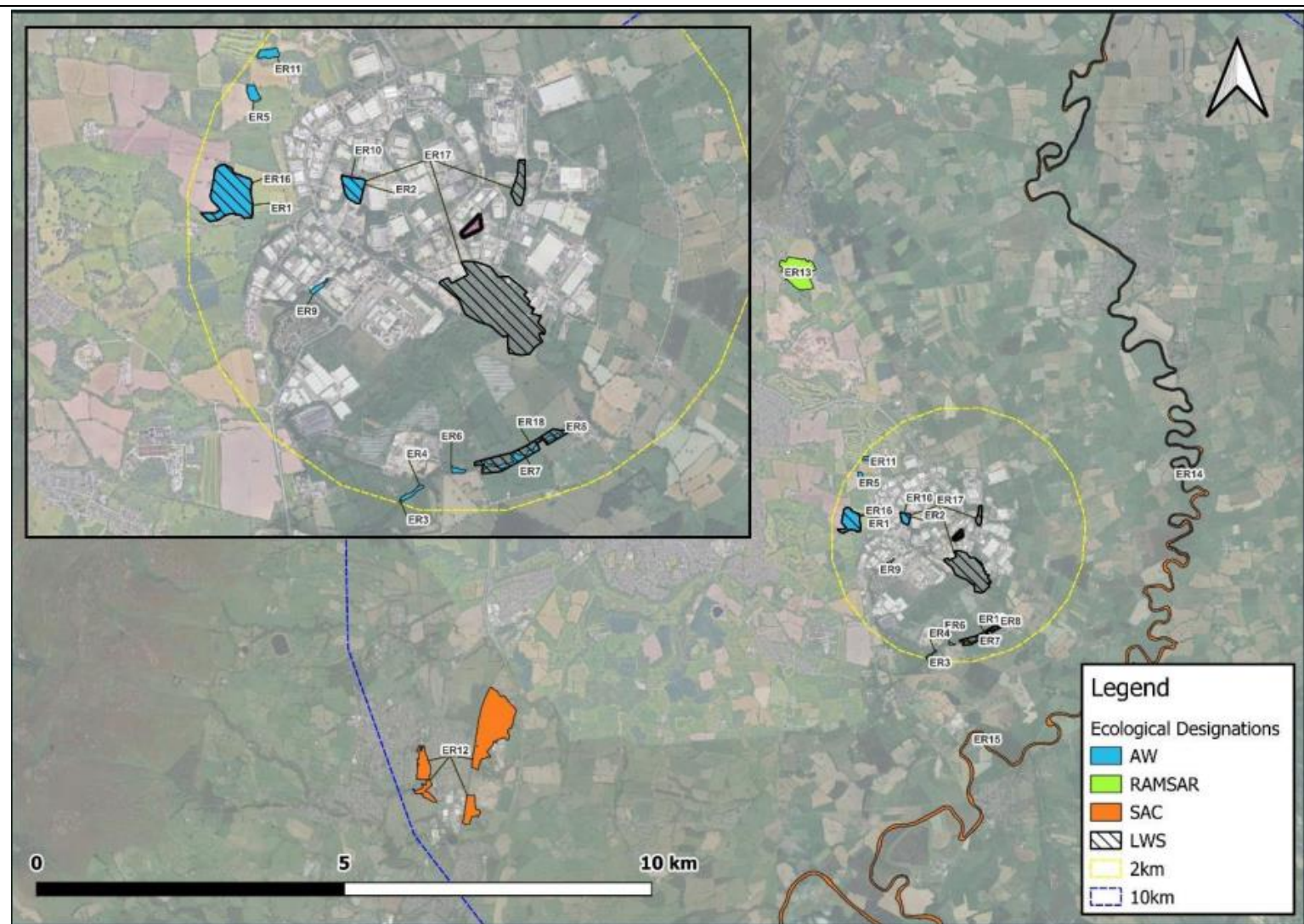
Record of a Habitats Regulations Assessment of a project

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-023647
Date application received	<i>Duly Made 12/09/2024</i>
Applicant details	<i>Tradebe Healthcare National Limited</i>
Activity proposed	<p>Tradebe Healthcare Limited are applying to vary their EPR permit for the clinical waste incinerator in Wrexham. The DMS link for the application is here: EPR-WP3836ZF (sharepoint.com) The variation seeks to:</p> <p>Add a new parameter to the emission point X. This parameter is Ammonia (NH₃) for the use of selective non-catalytic reduction. This is a standard method which uses NH₃ to reduce the concentration of oxides of nitrogen being emitted. The applicant has carried out detailed air dispersion monitoring to assess the impact of NH₃ from the new point source emission, which has shown a potential impact from nutrient nitrogen deposition and acidification on the Johnstown Newt Sites (SAC), River Dee and Bala Lake (SAC) and Midland Meres & Mosses Phase 2 (Ramsar)</p> <p>The air quality modelling assessment has been completed based on an operating capacity of 8760 hours per year and the relevant emission limit value (ELV) for ammonia, 15mg/m³.</p>
Relevant legislation	<i>The Environmental Permitting (England and Wales) Regulations 2016. Industrial Emissions Directive.</i>
Location	NRG SJ 38600 49700 Wrexham Clinical Waste Treatment Facility (Incinerator) Marlborough Road Wrexham Industrial Estate Wrexham LL13 9RJ as per the map below:



Map from applicant:



Application documents	Internal DMS here: <u>EPR-WP3836ZF</u> Public Register here: <u>Public register - Customer Portal</u> (naturalresources.wales)
Environmental Statement	N/A

Pre-application correspondence	<i>N/A</i>
NRW team responsible for drafting this HRA report, and name of lead officer	Emma Smith – Permitting Officer RSR and Installations 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?	<i>NO</i>
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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?	<p>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:</p> <p>Special Areas of Conservation (SAC)</p> <ul style="list-style-type: none">• Johnstown Newt Sites UK0030173 (SAC) approximately 8km from the regulated facility• River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) UK0030252 10000 (SAC) Located approximately 3km from the regulated facility• River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (England) UK0030252 10000 (SAC) Located approximately 3km from the regulated facility <p>Ramsar Sites</p> <ul style="list-style-type: none">• Midland Meres & Mosses Phase 2 (Wales) UK11080 Located approximately 5km from the regulated facility <p>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.</p>
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3.2.2 Screening assessment

The screening assessment should indicate the possible pathways through which the project may impact upon relevant Natura 2000 site features. Each designated feature (taken from the official Natural 2000 designation documents) should be recorded in the left hand column below. If more than one Natura 2000 site is identified from section 3.2.1, deal with each Natura 2000 site separately.

The assessment should be made in view of the conservation objectives for the Natura 2000 site(s) concerned, as set out in either the current NRW Core Management Plan for a terrestrial Natura 2000 site, or in NRW's extant advice issued under Regulation 35 (or 37) of the Conservation of Habitats and Species Regulations 2010 (or 2017) for a marine Natura 2000 site.

Colour coding should be used in the 'impact pathway' column II as follows:

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

Examples of types of impact pathways that may be relevant:

- *Direct capture, damage or harm to a designated species feature*
- *Damage to a designated habitat feature (including through direct physical impact, pollution, changes in thermal regime, hydrodynamics, light, etc.)*
- *Damage to the habitat of designated species features (including through direct physical impact, pollution, changes in thermal regime, hydrodynamics, light, etc.)*
- *Damage to a designated habitat feature via removal of, or other detrimental impact on, typical species*
- *Removal of prey species of a designated species feature*
- *Damage to habitat of prey species*
- *Indirect effects on habitats and species*

Note that several impact pathways may be relevant to the same designated feature

	Assessment of likelihood of significant effect	
	I Relevant conservation objectives	II Potential impact pathway <i>For each row assign appropriate colour (as above) and give short explanation as required</i>

<i>Johnstown Newt Sites SAC (UK0030173)</i>			

<p>Great crested newt <i>Triturus cristatus</i> 2.10 <i>amphibia</i></p>	<p>CORE MANAGEMENT PLAN INCLUDING CONSERVATION OBJECTIVES FOR Johnstown Newt Sites Special Area of Conservation (SAC) EU SAC Code UK0030173 Version: Final Date: 25 January 2008 Approved by: Tim Jones 3/3/08)</p> <p>Microsoft Word - Johnstown Newt Site Management Plan April 2008 English .doc (naturalresources.wales)</p>	<p>Toxic Contamination</p> <p>The only new parameter being released to air from the proposal is ammonia (NH₃). This is more appropriately assessed as part of the Nutrient Enrichment impact pathway below.</p> <p>No impact pathway</p> <p>Nutrient enrichment</p> <p>Air pollutants associated with nutrient enrichment are assessed for designated habitats within a protected site, rather than the protected species living within the site. This is because it is the vegetation that is sensitive to change as a result of the presence of these pollutants. The Johnstown Newt Sites SAC does not contain any designated habitat. The only designated feature is the Great Crested Newt, for which no Critical Loads are set on APIS because the species is not sensitive to aerial pollution. No further assessment is required.</p> <p>No impact pathway</p> <p>Acidification</p> <p>Air pollutants associated with acidification are assessed for designated habitats within a protected site, rather than the protected species living within the site. This is because it is the vegetation that is sensitive to change as a result of the presence of these pollutants. The Johnstown Newt Sites SAC does not contain any designated habitat. The only designated feature is the Great Crested Newt, for which no Critical Loads are set on APIS because the species is not sensitive to aerial pollution. No further assessment is required.</p> <p>No impact pathway</p> <p>Habitat loss</p>
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		<p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost. Also no habitat is designated as part of this particular SAC.</p> <p>No impact pathway. Physical damage</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost.</p> <p>No impact pathway</p> <p>Smothering The existing emission limits for Particulate Matter are not changing as a result of this variation. Therefore there is no smothering impact pathway that can reasonably be assessed.</p> <p>No impact pathway</p> <p>Turbidity No discharge to water as a result of this variation application.</p> <p>No Impact Pathway</p> <p>Siltation No discharge to water as a result of this variation application.</p> <p>No Impact Pathway</p>
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Disturbance (noise)

The SAC is located approximately 8km away from the installation. As such, we consider noise from this existing installation will not be audible to the Great Crested Newts over this distance. The installation is situated on an industrial estate and there are no significant sources of additional noise associated with the proposed SNCR system.

No impact pathway.

River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid (Wales & England) SAC

Watercourses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* Vegetation
1.3 Riverine habitats & running waters

[CORE MANAGEMENT PLAN INCLUDING CONSERVATION OBJECTIVES FOR River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC](#)

[CONSERVATION OBJECTIVES FOR N2K SITES](#)

Toxic contamination

There are no discharges to surface water associated with this variation application. The only new parameter being released to air from the proposal is ammonia (NH₃). This is more appropriately assessed as part of the Nutrient Enrichment impact pathway below.

No impact pathway

Nutrient enrichment

NH₃ Critical Level

The maximum modelled PC for ammonia at the SAC is <0.1 µg/m³. This equates to a maximum of 0.3% of the most precautionary annual mean critical level of 1 µg/m³, used when lichens and bryophytes are assumed to be present. This precautionary approach has been used by the applicant. However, as lichens and bryophytes are not a feature of the SAC in this instance, we consider that 3 µg/m³ is the appropriate NH₃ Critical Level for Watercourses of plain to montane levels with *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation. These plant communities are not particularly sensitive to deposition from airborne NH₃, as it is washed away by the continuous river flows. This therefore screens out as insignificant, because it is <1% of the annual CLe.

N deposition Critical Loads

There is no critical load set on APIS for *Ranunculus fluitantis* and *Callitriche-Batrachion* Vegetation. Given that the features are water based, they have a low sensitivity to nitrogen deposition from atmospheric ammonia. As such, further consideration of nitrogen deposition is not required.

No impact pathway

		<p>Acidification APIS does not have an acid critical load value (from airborne pollutants) for the Ranunculus fluitans and Callitriche-Batrachium Vegetation. Given that the features are water based, they have a low sensitivity to acid deposition. As such, further consideration of acid deposition is not required.</p> <p>No impact pathway</p>
		<p>Changes in salinity regime No impact pathway- no discharge to water.</p>
		<p>Changes in thermal regime No impact pathway- no discharge to water.</p>

		<p>Habitat loss</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost</p> <p>No impact pathway.</p>
		<p>Physical damage</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost.</p> <p>No impact pathway</p>
		<p>Turbidity</p> <p>No impact pathway- no discharge to water.</p>

		<p>Siltation No impact pathway- no discharge to water</p>
<p><i>Luronium natans</i> 2.1 Vascular plants of aquatic habitats Floating Water Plantain</p>		<p>Toxic Contamination</p> <p>Floating Water Plantain only occurs in management units 7847 (Bala Lake), 7849 (Tryweryn - Dee to Mynach) and 7850 (Dee – Alwen confluence to Bala Sluice Gates). These are well beyond the 10km screening distance, so no assessment is required.</p> <p>No impact pathway</p> <p>Nutrient Enrichment See comments for Toxic Contamination above. Feature does not occur within 10km of installation search point.No impact pathway</p> <p>Acidification See comments for Toxic Contamination above. Feature does not occur within 10km of installation search point.</p> <p>No impact pathway</p>

		Changes in salinity regime
		No impact pathway- no discharge to water.
		Changes in thermal regime
		No impact pathway- no discharge to water.
		Habitat loss
		All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost No impact pathway
		Physical damage
		All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost.
		No impact pathway
		Turbidity
		No impact pathway- no discharge to water.

		<p>Siltation</p> <p>No impact pathway- no discharge to water</p>	
<p>Atlantic salmon <i>Salmo salar</i>, Sea lamprey <i>Petromyzon marinus</i>, River Lamprey <i>Lampetra fluviatilis</i></p> <p>2.5 anadromous fish</p>		<p>Toxic contamination No impact pathway – there are no discharges to water associated with this variation. Aquatic features are not sensitive to airborne concentrations of ammonia.</p> <p>Nutrient enrichment No Impact Pathway There are no changes to emissions to water associated with this variation. All emissions of process waters are released to sewer.</p> <p>Anadromous fish are an in-water/riverine feature and not sensitive to airborne NO₂. As such, no Critical Level or Load is applicable and fish species are not considered to be at risk from aerial emissions associated with the installation.</p> <p>Acidification No impact pathway. River systems, estuaries and the sea are considered to have low sensitivity to acidification from aerial sources, so further consideration of acid deposition is not required.</p> <p>Anadromous fish are an in-water/riverine feature and not sensitive to airborne acid gases such as sulphur dioxide. As such, no Critical Level or Load is available on APIS and fish species are not considered to be at risk from aerial emissions associated with the installation.</p> <p>Changes in salinity regime No impact pathway - no discharge to water</p> <p>Changes in thermal regime No impact pathway - no discharge to water</p>	

		<p>Habitat loss</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost</p> <p>No impact pathway</p> <p>Physical damage by EPR processes</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost.</p> <p>No impact pathway</p> <p>Turbidity No impact pathway - no discharge to water</p> <p>Siltation No impact pathway - no discharge to water</p> <p>Entrapment No impact pathway – no change to discharges to water as a result of this variation.</p>	
<p>4. 2.6 Non-migratory Fish and Invertebrates of Rivers (Brook Lamprey <i>Lampetra planeri</i>, Bullhead, <i>Cottus gobi</i>)</p>		<p>As per comments for 2.5 Anadromous Fish above. All impacts and conclusions are the same. The only additional impact which must be considered for 2.6 non-migratory fish and invertebrates of rivers is:</p> <p>Smothering No impact pathway - Non-migratory fish and Invertebrates of Rivers are in-water/riverine features and not sensitive to airborne pollution. Therefore, fish species are not considered to be at risk from aerial emissions associated with the installation. Any Particulate Matter deposited in a river is washed away by the flowing water.</p>	

<p>8. European otter <i>Lutra lutra</i> 2.9 Mammals of riverine habitats</p>		<p>Toxic Contamination</p> <p>The only new parameter being released to air from the proposal is ammonia (NH₃). This is more appropriately assessed as part of the Nutrient Enrichment impact pathway below.</p> <p>No impact pathway</p> <p>Nutrient enrichment No impact pathway – Otters and their prey are not sensitive to aerial sources of NO_x & NH₃. Concentrations of these gases are also not likely to be high enough to cause any damage to vegetation used by the otters for resting and breeding sites. Therefore, we consider that there is unlikely to be any reduction in the quality or extent of otter habitat associated with this variation.</p> <p><u>N Deposition Critical Load</u> No Impact Pathway APIS has confirmed that there is no CLo for N deposition for Otter. Therefore, this aspect has screened out from further assessment.</p> <p>Acidification No Impact Pathway Otters and their prey are not sensitive to aerial sources of acid gases, such as sulphur dioxide. Concentrations of acid gases are also unlikely to be high enough to cause any damage to vegetation used by the otters for resting and breeding sites. Therefore, we consider that there is unlikely to be any reduction in the quality or extent of otter habitat associated with this variation.</p> <p><u>Acid Deposition Critical Load</u></p> <p>APIS has confirmed that there is no CLo for acid deposition for Otter. Therefore, this aspect has screened out from further assessment.</p> <p>Changes in salinity regime</p>
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		<p>No impact pathway - no discharge to water</p> <p>Changes in thermal regime No impact pathway - no discharge to water</p> <p>Habitat loss</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost</p> <p>No impact pathway</p> <p>Physical damage from EPR Processes</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost</p> <p>No impact pathway</p> <p>Entrapment No impact pathway - – no change to discharges to water as a result of this variation.</p> <p>Disturbance (noise)</p> <p>The core management plan states that Otters are sensitive to human disturbance and especially sudden changes in activity (e.g.disturbance by dogs). Also, female otters are particularly sensitive to disturbance when they have cubs. However, in terms of noise, otters habituate and grow accustomed to continuous noise (such as industrial noise). The general noise source associated with Tradebe has been present since the factory started operation and we consider that noise impacts will not change significantly as a result of this variation.</p>
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		No impact pathway
Midland Meres & Mosses Phase 2 (Wales) UK11080 (Ramsar)		
1.2 Bogs and Wet Habitats – Active Raised Bogs	<p>CORE MANAGEMENT PLAN INCLUDING CONSERVATION OBJECTIVES FOR Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses Special Area of Conservation (SAC)</p> <p>Final version</p> <p>Approved 13 March 2008</p>	<p>Toxic Contamination</p> <p>The only new parameter being released to air from the proposal is ammonia (NH₃). This is more appropriately assessed as part of the Nutrient Enrichment impact pathway below.</p> <p>No impact pathway</p> <p>Nutrient Enrichment</p> <p><u>Ammonia Annual Critical Level</u></p> <p>The maximum predicted PC is 0.3% of the annual mean CLe of 1 µg/m³, which is appropriate for sites where lichens and bryophytes may be present. As the predicted PC is <1% of the CLe, this screens out as insignificant.</p> <p><u>Nitrogen Deposition Critical Load</u></p> <p>APIS has confirmed that the appropriate CLo range for Mires is 5 – 15 Kg N/ha/yr. The maximum predicted PC is approximately 0.4% of the lower CLo. As the predicted PC is <1% of the lower CLo, this screens out as insignificant.</p> <p>Acidification</p> <p><u>Acid Deposition Critical Load</u></p> <p>For the purposes of assessing the predicted impact of acid deposition, it is necessary to compare the PC against the relevant minimum CLo and whether the predicted PC exceeds that function. APIS has confirmed that the minimum CLo range for mires (bogs) is</p> <p>MinCLminN: 0.321 MinCLMaxS: 0.198 MinCLMaxN: 0.519</p> <p>The maximum predicted PC is 0.005 KeqN/ha/yr. The APIS website gives the following total maximum deposition values for bog habitat at Vicarage Moss</p>

		<p>(SSSI) which has the same boundary as the Ramsar, which we have used as background: N deposition 1.47 keq/ha/yr and S deposition 0.17 keq/ha/yr. The background, min CLo figures and predicted PC were then inputted into the Critical Load Function Tool on APIS to check whether the Predicted PC falls within the “safe envelope” between min and max CLo. The Critical Load Function Tool stated that the predicted PC is 1.9% of the CL function and confirmed that no exceedance of the CL function will occur. It can be concluded that significant effects from the project alone can be ruled out.</p>
		<p>Changes in thermal regime</p> <p>No impact pathway- no direct discharge to habitat.</p>
		<p>Habitat Loss</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically lost</p>
		<p>No impact pathway</p>
		<p>Physical Damage by EPR processes</p> <p>All existing and proposed plant associated with this variation is wholly within the curtilage of the existing Tradebe installation boundary. None of the plant is situated on a protected site, therefore no potential exists for habitat to be physically damaged.</p>
		<p>No impact pathway</p>
		<p>Smothering</p> <p>The existing emission limits for Particulate Matter are not changing as a result of this variation. Therefore there is no smothering impact pathway that can reasonably be assessed.</p>
		<p>No impact pathway</p>

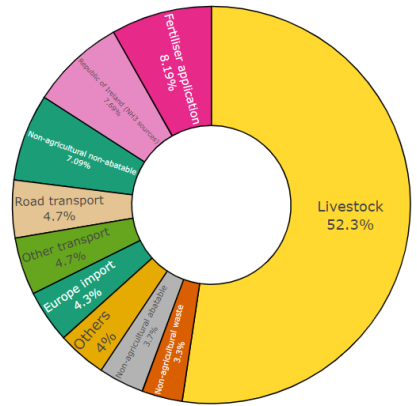
3.2.3 Screening decision of the project 'alone'

<p>(a) If ALL rows in column II of Table 3.2.2 are GREEN</p>	<p>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.</p> <p><i><u>Strike out rows (b) and (c) below, delete sections 4 and 5 of the form and complete sections 6 and 7 (and section 8 if applicable).</u></i></p>
<p>(b) If there are NO rows coloured RED in column II of Table 3.2.2, and there are ANY rows which are BLUE</p>	<p>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.</p> <p><i><u>Strike out row (a) above and row (c) below, delete section 4 of the form and go to Section 5.</u></i></p>
<p>(c) If ANY rows in Column II of Table 3.2.2 are RED</p>	<p>The project is likely have a significant effect on one or more Natura 2000 sites and therefore an appropriate assessment is required.</p> <p><i><u>Strike out rows (a) and (b) above, and go to section 4 of the form. If there also are any BLUE rows, list them in Table 5.1 below (we'll come back to them in the in-combination assessment)</u></i></p>

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) <i>If none, put 'N/A'</i>	Nature of the in-combination effect (if any)	Is there likely to be any significant in-combination effect, in view of the site's conservation objectives? <i>Insert 'YES' or 'NO' or 'DON'T KNOW'</i>
<i>River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid (Wales & England) SAC</i>				
Nutrient Enrichment: NH ₃ annual CLe	1.3 Riverine habitats & running waters Watercourses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> Vegetation	N/A	In this particular case, we consider that an in combination assessment would not realistically achieve any improved environmental outcome for the SAC. There are currently no applications on the installations permitting queue which propose the emission of atmospheric ammonia. Also the Apis website shows that the main local contributor to Nitrogen deposition in the SAC is livestock at 52.3%. In comparison, the contribution from industrial sources is 3.7%, as per the chart below:	NO

			<div>Local contributions to Nitrogen deposition (KgN/ha/yr) from sources (UK)</div> <div><table><tr><th>Source</th><th>Percentage</th></tr><tr><td>Livestock</td><td>52.3%</td></tr><tr><td>Fertiliser application</td><td>8.1%</td></tr><tr><td>Residue of land 2013 - 2014</td><td>7.2%</td></tr><tr><td>Non-agricultural non-atmospheric</td><td>7.0%</td></tr><tr><td>Road transport</td><td>4.7%</td></tr><tr><td>Other transport</td><td>4.7%</td></tr><tr><td>Europe import</td><td>4.3%</td></tr><tr><td>Others</td><td>4.0%</td></tr><tr><td>Non-agricultural atmospheric</td><td>3.7%</td></tr><tr><td>Non-agricultural waste</td><td>2.3%</td></tr></table></div> <div><p>The applicant is an existing permitted installation that has applied to install Selective Non-Catalytic Reduction to abate NOx releases to air. When viewed in context, the installation of SNCR is considered an overall improvement as it will reduce the amount of oxides of nitrogen being emitted from the installation, which will also help to reduce nitrogen deposition. The ammonia slip resulting from the dosing reagent is therefore an acceptable trade-off from the use of this technology. Ammonia releases will be controlled by a new emission limit in the permit of 15 µg/m³, which represents best available techniques for existing incinerators with SNCR.</p><p>Finally, given the source attribution data in APIS, we consider that livestock</p></div>	Source	Percentage	Livestock	52.3%	Fertiliser application	8.1%	Residue of land 2013 - 2014	7.2%	Non-agricultural non-atmospheric	7.0%	Road transport	4.7%	Other transport	4.7%	Europe import	4.3%	Others	4.0%	Non-agricultural atmospheric	3.7%	Non-agricultural waste	2.3%	
Source	Percentage																									
Livestock	52.3%																									
Fertiliser application	8.1%																									
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Other transport	4.7%																									
Europe import	4.3%																									
Others	4.0%																									
Non-agricultural atmospheric	3.7%																									
Non-agricultural waste	2.3%																									

			emissions are what require the most focus in order to achieve improvements in the conservation status of this feature.	
Midland Meres & Mosses Phase 2 (Wales) UK11080 (Ramsar)				
Nutrient Enrichment: NH ₃ annual CLe Nitrogen Deposition CLo Acidification Acid deposition CLo	1.2 Bogs and Wet Habitats Active Raised Bogs	N/A	<p>In this particular case, we consider that an in combination assessment would not realistically achieve any improved environmental outcome for the Ramsar site. There are currently no applications on the installations permitting queue which propose the emission of atmospheric ammonia in the vicinity of the installation and the feature is not within the prevailing wind direction of the installation.</p> <p>Also, the APIS website shows that the main local contributor to Nitrogen deposition in the SAC is livestock at 49.5%. In comparison, the contribution from industrial sources is 5.3%. It is also noted from MyMap for Permitting that an intensive farm is approximately 600 metres away from the affected part of the Ramsar Site (Also known as Vicarage Moss SSSI).</p> <p>The management plan for Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SAC, which includes the Ramsar active raised bog feature, states that the feature is "unfavourable: recovering".</p> <p>The applicant is an existing permitted installation that has applied to install</p>	NO

			<p>Selective Non-Catalytic Reduction to abate NOx releases to air. When viewed in context, the installation of SNCR is considered an overall improvement as it will reduce the amount of oxides of nitrogen being emitted from the installation, which will also help to reduce nitrogen deposition and acidification. The ammonia slip resulting from the dosing reagent is therefore an acceptable trade-off from the use of this technology. Ammonia releases will be controlled by a new emission limit in the permit of 15 µg/m³, which represents best available techniques for existing incinerators with SNCR.</p>	
<p>(a) If the right hand column is 'NO' for all rows</p>		<p>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.</p> <p><i>Strikeout option (b) below, delete section 5.2 and <u>complete sections 6 and 7, and section 8 if applicable.</u></i></p>		
<p>(b) If any rows in the right hand column are 'YES' or 'DON'T KNOW'</p>		<p>The project is likely to have a significant effect in combination with other plans or projects.</p> <p><i>Strikeout option (a) above and go to section 5.2</i></p>		

6. Conclusion

Where the conclusion is in accordance with the protected sites advice, this section should be completed by the team or individual responsible for carrying out and recording the HRA. This will normally be the same as the team/individual responsible for determining the permission or otherwise approving the project, unless responsibility for preparing the HRA has been delegated to another team (e.g. EAT or one of the NRM teams).

Where the HRA has been subject to an escalation process, due to significant unresolved differences of view between the protected sites advisors and the team preparing the HRA, this section of the form should be completed by the relevant Leadership Manager (see sections 6.3/7.3 of OGN 200). Any additional documents or correspondence forming part of the escalation process should be appended to this form, or reported in section 7.

Select which of the following conclusions applies by placing an X the right hand column. Only ONE option can apply. Sign and date the bottom of the table.

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)	

<p>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)</p>	X
<p>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.</p> <p>Approval for the project <u>cannot</u> be given unless either:</p> <ul style="list-style-type: none"> 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 	
<p>Signed: Emma Smith</p> <p>Name: Emma Smith</p> <p>Position: Permitting Officer Installations and RSR</p> <p>Date: 23/12/2024</p>	

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

Delete any rows that do not apply.

Relevant section of the HRA report	Date(s) of correspondence* and any meeting(s) with protected sites advisor(s)	Description of how the comments from protected sites advisors have been taken into account
2		
3		
4		
5	18/12/24 Heather Galliford and Richard May	In-combination effects assessment not required

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

8. Conservation Technical Specialist's comments

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

I have reviewed the HRA documented in this form and confirm that I agree/do not agree* with its findings.
(*strike out as applicable)

Additional comments (if any):

No comments made. See email 08/01/2024 Emma Smith 09/01/2024

Signed:

Name:

Position:

Date: