

Record of a Habitats Regulations Assessment of a project or spatially-specific plan

OGN 200 Form 1B (with structured tables for likely significant effect screening and appropriate assessment)

Document owner: Head of Business for Natural Resource Management

Version History:

Document Version	Date Published	Summary of Changes
2.0	21/10/2024	Following 2023/24 review of HRA OGNs

Next review date: October 2025

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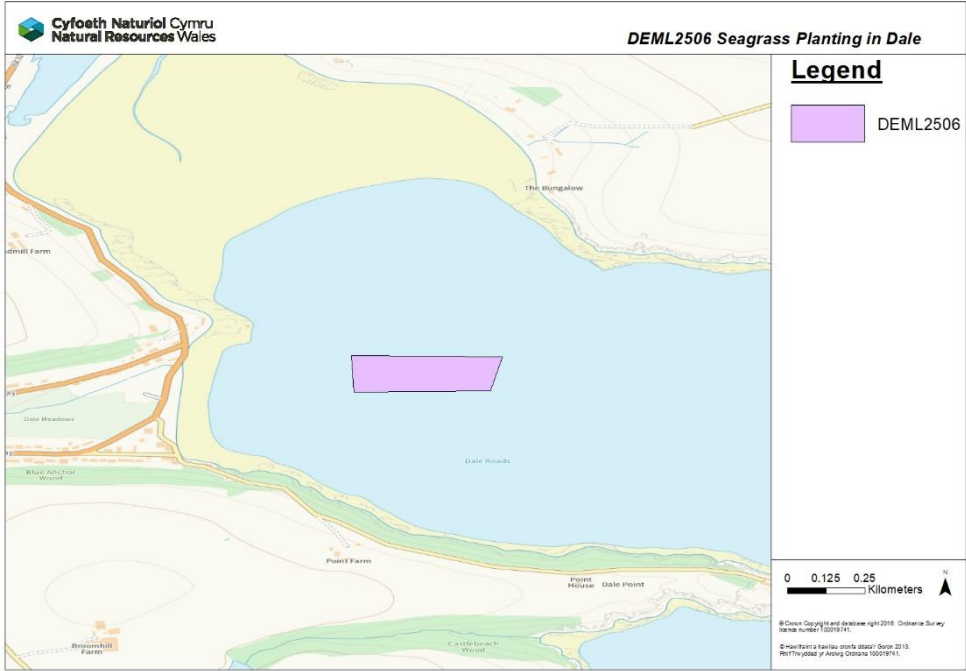
OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	Seagrass planting in Dale
HRA iteration/version	1

1. Plan or Project Details

Information about the plan or project		
1	Date application received	16 January 2025
2	Applicant details	Project Seagrass
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer	N/A
4	Activity/ies proposed	Build upon the work completed under licence CML1944 by continuing to seed the licensed area, thus supplementing the shoots that are now growing and ensuring the growth of a healthy and resilient meadow. Expansion of the original license area (CML1944) by 1 ha upon agreement with the Dale Stakeholder Group. This takes the area up to 3 ha.

		A series of planting methods will be used and are described in the supporting document entitled “DEML2506 - 2. Marine Licence Dale Continuation”.
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009
6	Location	Dale, Pembrokeshire  Latitude Longitude 51.7097976 -5.1636496 51.7088438 -5.1636310 51.709767 -5.1592790 51.708783 -5.1596260

7	Plan or project documents, including any application documents	DEML2506 - 1. Dale-marine-works-licence-application.docx DEML2506 - 2. Marine Licence Dale Continuation.docx DEML2506 - 3. Habitats Regulations Assessment.docx DEML2506 - 4. Water Framework Directive Assessment.docx DEML2506 - 5a. Biosecurity Assessment Management.docx DEML2506 - 5b. Biosecurity Assessment Management.docx DEML2506 - 6. Welsh National Marine Plan.xlsx
8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Jack Thompson, Marine Licensing Team
11	Team or person responsible for approving the plan or project (competent authority role)	As per row 10

2. Determining the need for a Habitats Regulations Assessment

2.1 Is there any possibility that the plan or project could negatively affect any European sites?	Yes
2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated?	No
2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site,	No

in a way that would undermine that feature's conservation objectives?	
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3. Considering the likelihood of a significant effect (LSE)

3.1 Renewal of a project authorisation on the same or more restrictive terms as an extant authorisation

Is this a renewal of an extant authorisation which complies with NRW approved criteria for ruling out significant effects of renewals (see Part 2 of OGN200) without conducting a project-specific LSE test?	No - Previous licence, CML1944, has expired.
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3.2 Likelihood of significant effects (LSE) test

3.2.1 Which European sites might be affected by the plan or project?

(a)	Based on the plan or project specification, or information provided in the application, it is considered that these European sites have features which could be negatively affected by the plan or project	Pembrokeshire Marine SAC West Wales Marine SAC
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	N/A

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment			
Designated site feature	Relevant conservation objectives	Screening conclusion – 'SCREEN OUT',	Explanation

		'SCREEN IN' or 'IN COMB'	
European site name: Pembrokeshire Marine SAC			
Estuaries Sandbanks which are slightly covered by seawater all the time Mudflats and sandflats not covered by seawater at low tide Coastal Lagoons Large shallow inlets and bays Reefs Submerged or partially submerged sea caves Atlantic salt meadows	NRW conservation objectives: Contents	Screen out	• <u>Pollution</u>: All man-made materials deployed on the seabed will biodegrade within 6-18 months or will be removed. vessel(s) used for the proposed work are maintained regularly to ensure no leakage of fuel and oil takes place. Standard pollution prevention measures will also be included on the licence. Therefore, the proposed work is unlikely to lead to the release of contaminants that negatively impact harbour porpoise. No likely significant effects exist • <u>INNS</u>: A biosecurity risk assessment has been provided which proposes a series of mitigation measures to minimise the potential for the introduction of INNS. No likely significant effects exist

Shore dock <i>Rumex rupestris</i>			
Grey Seal <i>Halichoerus grypus</i> Otter <i>Lutra lutra</i> Allis shad <i>Alosa alosa</i> Twaite shad <i>Alosa fallax</i> River lamprey <i>Lampetra fluviatilis</i> Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: Contents	Screen out	• <u>Disturbance</u>: any disturbance due to underwater noise will be insignificant in magnitude, local in extent and short in duration. Therefore, the work is unlikely to affect these species through underwater noise. No likely significant effects exist • <u>Supporting habitat</u>: Seagrass will support fish populations. No likely significant effects exist • <u>Pollution</u>: All man-made materials deployed on the seabed will biodegrade within 6-18 months or will be removed. Vessel(s) used for the proposed work are maintained regularly to ensure no leakage of fuel and oil takes place. Standard pollution prevention measures will also be included on the licence. Therefore, the proposed work is unlikely to lead to the release of contaminants that negatively impact these species. No likely significant effects exist • <u>INNS</u>: A biosecurity risk assessment has been provided which proposes a series of mitigation measures to minimise the potential for the introduction of INNS. No likely significant effects exist
European site name: West Wales Marine SAC			
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives: West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	Screen out	• <u>Disturbance</u>: any disturbance due to underwater noise will be insignificant in magnitude, local in extent and short in duration. Therefore, the work is unlikely to affect harbour porpoise through underwater noise. No likely significant effects exist • <u>Supporting habitat</u>: Seagrass will support fish populations preyed upon by harbour porpoise. No likely significant effects exist

			• <u>Pollution</u>: All man-made materials deployed on the seabed will biodegrade within 6-18 months or will be removed. Vessel(s) used for the proposed work are maintained regularly to ensure no leakage of fuel and oil takes place. Therefore, the proposed work is unlikely to lead to the release of contaminants that negatively impact harbour porpoise. No likely significant effects exist • <u>INNS</u>: A biosecurity risk assessment has been provided which proposes a series of mitigation measures to minimise the potential for the introduction of INNS. No likely significant effects exist
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TABLE 3.2.3 Screening decision of the plan or project 'alone'	
(a) If the screening conclusion for <u>all</u> features for all sites in Table 3.2.2 is 'SCREEN OUT'	The plan or project is not likely to have a significant effect on any European site, and no further consideration under the Habitats Regulations is required in order to determine the approval/application.
(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'	The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.
(c) If there are <u>no</u> features in Table 3.2.2 that are 'SCREEN IN' and <u>any</u> features that are 'IN-COMB'	The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely 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 European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	X
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)	
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: - the plan or 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 is prepared, or - the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers (*SSSI consents cannot be given as derogations)	
Signed: 	
Name: Jack Thompson Position: Marine Licensing Officer	
Date: 27 February 2025	

Was this HRA conclusion an escalated decision? YES or NO	No
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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	08/04/2025	NRW A agree with conclusions of HRA. Have removed reference to spill kits and stated that standard pollution prevention conditions will be included in the licence.

Appropriate nature conservation body (ANCB) response to an internal HRA consultation

This form should be completed by the team or individual providing the ANCB advice to the competent authority team

TO: Jack Thompson – Marine Licensing Team
FROM: Bridget Randall-Smith - Marine Area Advice and Management Team
SUBJECT: Habitats Regulations Assessment of Seagrass Planting in Dale, Pembrokeshire (DEML2506)

Thank you for consulting the Marine Area Advice and Management Team on the above. Our comments are as follows:

NRW Advisory (A) agree with the overall conclusion of the HRA that this proposal is unlikely to present a significant risk to the integrity of the European sites and/or species from a marine perspective.

However, we also note that the HRA and WFD provided by MLT mention pollution prevention measures such as spill kits, however I cannot see any pollution prevention measures included by the Applicant in their methodology. We advise that, as per the original CML1944v1 licence conditions 8.5-8.9, adherence to GPP5 Guidance for Pollution Prevention is conditioned as part of the licence, as well as conditions relating to bunding and storage facilities of fuel, oils and chemicals, refuelling, and biosecurity practices to minimise spread of INNS.

Signed:

BJRandall-Smith

Bridget Randall-Smith
Senior Marine Advisory Officer
Marine Area Advice and Management Team

Date: 08/04/2025