

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	Milford Haven Marine Survey
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	10 March 2025
2	Applicant details	Dragon LNG Limited
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	<p>Following the completion of a Drop Down Video (DDV) survey, stations deemed suitable for benthic grab recovery, e.g. presence of soft sediments, will be targeted for grab sampling.</p> <p>Single seabed samples will be taken at each station with a standard 0.1m² day grab deployed from the survey vessel. Samples will be taken from as close as possible to the target station coordinates, and where possible within 10m of the target location. Three</p>

		attempts will be made to retrieve a sample of at least 5L in volume at each station. If small samples less than 5L in volume are recovered during the attempts, these will be kept to one side and processed if a suitably large sample cannot be obtained.																																												
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009																																												
6	Location	<div>Milford Haven</div> <table><tr><th>Station Number</th><th>Grab Sample Type</th><th>Latitude</th><th>Longitude</th></tr><tr><td>1</td><td>Benthic</td><td>51.702546</td><td>-5.01042</td></tr><tr><td>2</td><td>Benthic, PSA, and Contaminants</td><td>51.701773</td><td>-5.011165</td></tr><tr><td>3</td><td>Benthic, PSA, and Contaminants</td><td>51.702049</td><td>-5.008945</td></tr><tr><td>4</td><td>Benthic</td><td>51.701329</td><td>-5.009497</td></tr><tr><td>5</td><td>Benthic</td><td>51.701594</td><td>-5.007091</td></tr><tr><td>6</td><td>Benthic, PSA, and Contaminants</td><td>51.700694</td><td>-5.007364</td></tr><tr><td>7</td><td>Benthic</td><td>51.700925</td><td>-5.00568</td></tr><tr><td>8</td><td>Benthic, PSA, and Contaminants</td><td>51.7014</td><td>-5.004517</td></tr><tr><td>9</td><td>Benthic</td><td>51.700978</td><td>-5.002375</td></tr><tr><td>10</td><td>Benthic, PSA, and Contaminants</td><td>51.700696</td><td>-4.999642</td></tr></table>	Station Number	Grab Sample Type	Latitude	Longitude	1	Benthic	51.702546	-5.01042	2	Benthic, PSA, and Contaminants	51.701773	-5.011165	3	Benthic, PSA, and Contaminants	51.702049	-5.008945	4	Benthic	51.701329	-5.009497	5	Benthic	51.701594	-5.007091	6	Benthic, PSA, and Contaminants	51.700694	-5.007364	7	Benthic	51.700925	-5.00568	8	Benthic, PSA, and Contaminants	51.7014	-5.004517	9	Benthic	51.700978	-5.002375	10	Benthic, PSA, and Contaminants	51.700696	-4.999642
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		<div data-bbox="831 231 1930 1002" data-label="Figure"> <p>The figure is a map titled 'RML2523 Milford Haven Marine Survey'. It shows a coastal area with a blue sea and a yellow shoreline. Several red dots are plotted in the sea, representing survey points. The map includes a legend with a red dot labeled 'RML2523'. A scale bar indicates distances of 0, 0.075, and 0.15 Kilometers. A north arrow is also present. The map is credited to 'Cyfoeth Naturiol Cymru Natural Resources Wales'.</p> </div>
7	Plan or project documents, including any application documents	<p>RML2523 - Application Form RML2523 - Red line boundary RML2523 - Eco Marine Milford Haven 2025 Survey Plan - Final 1.0 RML2523 – SurveyArea RML2523 - DragonLNG Milford Haven Marine Survey heneb RML2523 - Royal Commission on the Ancient and Historical Monuments of Wales RML2523 - Trinity house DRG LNG RML2523 DragonLNG Milford Haven Marine Survey MCGA</p>

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, in a way that would undermine that feature's conservation objectives?	N/A

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
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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/Sir Benfro Forol SAC [UK0013116]
(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	<ul style="list-style-type: none"> North Anglesey Marine / Gogledd Môn Forol SAC Bristol Channel Approaches / Dynesfeydd Môr Hafren SAC West Wales Marine / Gorllewin Cymru Forol SAC <p>The above have been initially considered for Harbour porpoise as the activity falls within the Celtic & Irish Seas (Marine Mammal Management Unit). However, due to the location, scale, and nature of the activity any detrimental impact to the species has been ruled out and the sites have not been taken through to the screening assessment.</p> <ul style="list-style-type: none"> Cardigan Bay/Bae Ceredigion SAC Pen Llŷn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC <p>The above have been initially considered for Bottlenose Dolphin and Grey seal as the activity falls within the appropriate Marine Mammal Management Unit. However, due to the location, scale, and nature of the activity any detrimental impact to bottlenose dolphin has been ruled out. As for grey seal, the impacts upon this receptor have been assessed as part of the Pembrokeshire Marine SAC given that the works are located</p>

		within this protected site and grey seal are a listed feature. As such, the sites have not been taken through to the screening assessment.
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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’, ‘SCREEN IN’ or ‘IN COMB’	Explanation
Pembrokeshire Marine/Sir Benfro Forol SAC			
Estuaries	NRW conservation objectives: Contents	IN COMB	The sample locations are all within this feature however, each day grab is only 0.1m ² and as such, there will be no LSE.
Sandbanks which are slightly covered by seawater all the time	NRW conservation objectives: Contents	SCREEN OUT	There are no sandbanks located in close proximity to the sample location and therefore, there is no impact pathway.
Mudflats and sandflats not covered by seawater at low tide	NRW conservation objectives: Contents	IN COMB	One of the sample locations is within this feature however, the day grab is only 0.1m ² and as such, there will be no LSE.
Coastal Lagoons	NRW conservation objectives: Contents	SCREEN OUT	There are no sandbanks located in close proximity to the sample location and therefore, there is no impact pathway.
Large shallow inlets and bays	NRW conservation objectives: Contents	IN COMB	The sample locations are all within this feature however, each day grab is only 0.1m ² and as such, there will be no LSE.
Reefs	NRW conservation objectives: Contents	SCREEN OUT	Records suggest that there may be areas of reef within the sample area however, prior to sampling, DDV surveys will be undertaken to identify suitable habitats for surveying. As such, the reef features will be avoided and there will be no LSE.

			Increased sedimentation from the samples is likely to be localised and minimal and as such, there is no risk of smothering.
Submerged or partially submerged sea caves	NRW conservation objectives: Contents	SCREEN OUT	The closest sea cave feature is >7km away from the nearest sample location and therefore, there is no impact pathway.
Atlantic salt meadows	NRW conservation objectives: Contents	SCREEN OUT	The closest Atlantic salt meadow feature is >2.5m away from the nearest sample location and therefore, there is no impact pathway.
Grey Seal <i>Halichoerus grypus</i>	NRW conservation objectives: Contents	IN COMB	Due to the short term nature and scale of the works, it is unlikely that there will be any detrimental impact to these features.
Otter <i>Lutra lutra</i>	NRW conservation objectives: Contents	IN COMB	
Allis shad <i>Alosa alosa</i>	NRW conservation objectives: Contents	IN COMB	
Twaite shad <i>Alosa fallax</i>	NRW conservation objectives: Contents	IN COMB	
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: Contents	IN COMB	
Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: Contents	IN COMB	Due to the short term nature and scale of the works, it is unlikely that there will be any detrimental impact to these features.
Shore dock <i>Rumex rupestris</i>	NRW conservation objectives: Contents	SCREEN OUT	Shore dock typically grows on rocky, sandy and raised beaches, shore platforms and the lower slopes of cliffs, and rarely in dune slacks. Given that no works will be taking place intertidally, there is no impact pathway.

TABLE 3.2.3 Screening decision of the plan or project 'alone'	
(a) If the screening conclusion for all 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.

<p>(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'</p>	<p>The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.</p>
<p>(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'</p>	<p>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.</p>


5. In combination assessment

Table 5.1 Identification and assessment of in combination effects				
European site name: Pembrokeshire Marine SAC				
'INCOMB' impacts from screening Table 3.2.2 and/or residual effect from appropriate assessment in section 4	European site feature(s) concerned	Other plans or projects with effects that might interact with the effects of the plan or project to render its effects significant/adverse (if any)	Nature of the in combination effect (if any) and assessment in view of conservation objectives	Can significant or adverse in combination effects be ruled out for all features?
Loss of habitat Increased sedimentation Underwater noise Disturbance	Estuaries Mudflats and sandflats not covered by seawater at low tide Large shallow inlets and bays 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	RML2509 – Grab Sampling at Milford Haven Inner and Outer, Fishguard Bay and Caernarfon Bay RML2503 - Grab Sampling Survey programme 2025-2027 DML2166 - Milford Haven Port Authority Dredge and Disposal	<p>Given the small scale and nature of the project, it is very unlikely for there to be an in-combination effect.</p> <p>The area of each grab sample is 0.1m² and the volume of each sample is 5l (0.005m³) which is insignificant when compared to the total size of the SAC. Given the minor volumes being collected, even when viewed in combination with the other sampling and dredge activities, it will not result in an in-combination effect.</p> <p>Both the noise and sedimentation arising from the grab samples will be localised and minimal and will not result in a cumulative impact.</p> <p>Furthermore, disturbance from vessel movement is unlikely given that Milford Haven experiences significant shipping activity. The addition of a small survey vessel (10m) for approximately 4 days will not result in an in-combination effect.</p>	YES

	<i>Lampetra fluviatilis</i> Sea lamprey <i>Petromyzon marinus</i>			
(a) If the right hand column is 'YES' for all rows		The plan or 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 European site.		
(b) If any rows in the right hand column are 'NO'		The plan or project is likely to have a significant effect on, or an adverse effect on, European site/s in combination with other plans or projects.		

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: <ul style="list-style-type: none"> 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: Senior Marine Licensing Officer
Date: 04 April 2025		
Was this HRA conclusion an escalated decision? YES or NO		No

7. Consultation with the ANCB 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	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
6	16/04/2025	NRW A agree with conclusions of HRA.

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: Ryan Rees, Marine Area Advice and Management Team
SUBJECT: Habitats Regulations Assessment of RML2523

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

We agree with the conclusion of the above mentioned HRA, with respect to the Pembrokeshire Marine SAC.

We agree that the project has been screened for likelihood of significant effects and taking in advice received from protected site advisors that given the scale, nature and location of the works, it is considered not likely to have a significant effect on the Pembrokeshire Marine SAC.

Signed: Ryan Rees

Date: 16/04/25