OGN 200 Form 1B

Record of a Habitats Regulations Assessment

All staff using this form should be familiar with OGN200 and should have had appropriate training in HRA.

A separate version of this form is available with guidance notes on how to complete it. You should refer to those notes when using this form.

Plan or project name, brief description or application reference number	Marine Licence Application DEML2502 – Beach Nourishment at Traeth Crugan, Pwllheli

HRA iteration/version	n/a

1 Plan or Project Details

Information about the plan or project		
1	**Date application received**	7 January 2025
2	**Applicant details**	Cyngor Gwynedd
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**	Beach Nourishment Operation at Traeth Crugan, Pwllheli The proposed works consist of using dredged material from the mouth of Pwllheli Harbour which is currently stockpiled at Carreg yr Imbyll to nourish the beach and dune system at Traeth Crugan. The material will be transported to Traeth Crugan from Carreg yr Imbyll using vehicles. The marine licence application is for the deposit of material at Traeth Crugan. Gwynedd Council have detailed that the dredge activity at Pwllheli is carried out under the Pwllheli Harbour Act 1983 (as amended) and therefore is exempt from the need for Marine Licence in line with Section 75 of the Marine and Coastal Access Act. **This HRA therefore considers the licensable activities associated with the deposit of material at Traeth Crugan only. In line with Regulation 67(2) of the Habitat and Species Regulations does not consider the works falling outside the Deposit application, namely the dredge operation at Pwllheli. As the Dredge operations are being carried out under an exemption to the requirements for a marine licence, but should be appropriately assessed by another Competent Authority, namely Cyngor Gwynedd who carry out the works.**

5	**Relevant legislation or statutory basis**	Marine and Coastal Access Act 2009
6	**Location**	Beach Nourishment Operation at Traeth, Crugan Pwllheli
7	**Plan or project documents, including any application documents**	See document list
8	**Environmental Statement**	n/a
9	**Pre-application correspondence**	PA2404 – pre-application with NRW Marine Licencing Team Various correspondence provided of pre-application with NRW Marine Area Advice and Management Team
10	**NRW team responsible for preparing this HRA report, and lead officer**	Marine Licensing Team – Peter Morrison
11	**Team or person responsible for approving the plan or project (competent authority role)**	Marine Licensing Team

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	n/a

European site, in a way that would undermine that feature's conservation objectives?	

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

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**	Pen Llyn a'r Sarnau SAC Northern Cardigan Bay SPA
(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**	As detailed within *Habitat Regulation Assessment Document Reference CPF12539* submitted, the applicant initially considered the following sites Corsydd Llyn SAC Corsydd Mor a Llyn RAMSAR Clogwyni Pen Llyn SAC However due to the nature, scale of works and distance from the sites it was considered that these could be ruled out without further consideration.

		We agree that the above sites can be ruled out without further consideration.

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**
European site name: Pen Llyn a'r Sarnau SAC			
Reef	**RANGE** The overall distribution and extent of the habitat features within the site, and each of their main component parts is stable or increasing. For the **reef** feature these include: -Rocky intertidal reefs -Rocky subtidal reefs -Extensive boulder and cobble reefs – the sarnau -Biogenic reefs (horse mussel *Modiolus modiolus* reef / green crenella *Musculus discors* reef and Honeycomb worm *Sabellaria alveolata* reef -Carbonate reef formed by methane gas leaking from the seabed.	Screen in	There is a potential impact as a result of a pollution incident on reef features of the SAC which are located nearby. There is a potential impact pathway as a result of coastal squeeze. There is a potential impact as a result of sediment deposition impacting upon physical processes.
Large shallow inlets and bays	For the **intertidal mudflat and sandflat** feature these include: -*Mya arenaria* and polychaetes in muddy gravel -Eel grass *Zostera marina* beds. -Muddy gullies in the Mawddach estuary. For the ***Salicornia*** feature this includes:	Screen in	There is a potential impact as a result of a pollution incident on large shallow inlet and bay features of the SAC which are located adjacent to the proposal. There is a potential impact pathway as a result of loss or degradation of the habitat as a result of

	-Communities characterised by the species *Sarcocornia perennis.* For the **intertidal mudflats and sandflats** and **sandbanks** features this requires an overall stability or increase in the amount of the feature, taking into account the areas of long term stability and localised losses and additions arising from environmental processes. For **estuaries** this includes the stability of sandy sediments in proportion to the muddy sediments. Restoration and recovery As part of this objective it should be noted that; for the **estuaries** feature additional land which should form an integral part of the estuarine ecosystem should be restored **STRUCTURE AND FUNCTION** The physical, biological and chemical structure and functions necessary for the long-term maintenance and quality of the habitat are not degraded. Important elements include: -geology -sedimentology -geomorphology, -hydrography and meteorology -water and sediment chemistry -biological interactions. 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		nourishment/deposition and transportation activities. There is a potential impact pathway as a result of coastal squeeze. There is a potential impact as a result of sediment deposition impacting upon physical processes.
Sandbanks which are slightly covered by seawater at low tide		Screen Out	The feature is not identified near to the work site. Considering the nature and location of the works, any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.
Estuaries		Screen Out	The feature is not identified near to the work site. Considering the nature and location of the works, any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.
Coastal Lagoons		Screen Out	The feature is not identified near to the work site. Considering the nature and location of the works, any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.
Mudflats and sandflats not covered by seawater at low tide		Screen Out	The feature is not identified near to the work site. Considering the nature and location of the works, any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.

Atlantic salt meadows	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 Restoration and recovery As part of this objective it should be noted that; for the **estuaries** feature the structure and functions of the estuaries that have been damaged/degraded by the constraints of artificial structures such as flood banks, are restored. TYPICAL SPECIES The presence, abundance, condition and diversity of typical species are such that habitat quality is not degraded. Important elements include: -species richness -population structure and dynamics, -physiological heath, -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. Restoration and recovery As part of this objective it should be noted that; for the **reefs** feature the potential for expansion of the horse mussel *Modiolus modiolus* community off the north Llŷn coast is not inhibited.	Screen Out	The feature is not identified near to the work site. Considering the nature and location of the works, any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.
Salicornia and other annuals colonising mud and sand		Screen Out	The feature is not identified near to the work site. Considering the nature and location of the works, any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.
Submerged or partially submerged sea caves		Screen Out	The feature is not identified near to the work site. Considering the nature and location of the works, any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.

Grey Seal	**POPULATIONS** 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 : -for **bottlenose dolphin, otter and grey seal**; contaminant burdens derived from human activity are below levels that may cause physiological damage, or immune or reproductive suppression -**grey seal** populations should not be reduced as a consequence of human activity - Disturbance by human activity is below levels that suppress reproductive success, physiological health or long-term behaviour". **RANGE** The species population within the site is such that the natural range of the population is not being reduced or likely to be reduced for the foreseeable future. As part of this objective it should be noted that for **bottlenose dolphin, otter and grey seal** -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 **SUPPORTING HABITATS AND SPECIES** 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,	Screen out	No proposed works are being carried out in the water column, therefore due to the scale and nature of the works it is not considered that there is a likely impact pathway to this feature.
Bottlenose Dolphin		Screen out	No proposed works are being carried out in the water column, therefore due to the scale and nature of the works it is not considered that there is a likely impact pathway to this feature.
Otter		Screen in	The coastal habitat adjacent to the proposed work is identified within the applicants HRA (*Habitat Regulations Assessment dated 3 November 2024*) as an area used occasionally for foraging by otters. There is a potential impact as a result of a pollution incident which could result in degradation of supporting habitat and reduction in prey availability. As detailed within *Habitat Regulations Assessment dated 3 November 2024* submitted by the applicant there are no Cofnod records of otter resting sites or holts within or in the vicinity of the proposal. However it is likely that otters will use this area of the coastline for occasional foraging and commuting. There is therefore a potential impact as a result of disturbance and displacement as a result of the activity.

	-prey availability and quality. As part of this objective it should be noted that; -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.		
European site name: Northern Cardigan Bay SPA			
Red throated diver (*Gavia stellata*)	POPULATION • The size of the wintering population should be stable or increasing, allowing for natural variability, and sustainable in the long term (peak mean of 1,186 individuals (2000/01 – 2003/4). HABITAT AND PREY SPECIES • There should be sufficient habitat, of sufficient quality, to support the population in the long term. • Supporting habitats include the sarnau reefs.	Screen Out	The SPA is located 4.7km east of the proposal (transportation route) and 7km east of the material deposit site. Given the scale and nature of the works any potential impacts would likely be highly localised and therefore no impact pathway between the feature and proposal have been identified.

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	~~**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.**~~

in Table 3.2.2 is 'SCREEN OUT'	
(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.~~**

4. Appropriate assessment of the plan or project when considered alone

4.1 Assessment of plan or project as defined

Table 4.1 Appropriate assessment			
European site feature/s	**Description of impacts**	**Assessment in view of conservation objectives**	**Can adverse effect on site integrity be ruled out? 'YES' or 'NO'**
European site name: Pen Llyn a'r Sarnau SAC			
Large shallow inlets and bays Reef Otter	Potential Impact as a result of a pollution event	Impact on features as a result of a pollution event has been assessed by the applicant within *Habitat Regulations Assessment dated 3 November 2024 Table 8.* It concludes that it is possible that machinery used for the proposed works on site could be a source of pollution. The impacts are likely to be localised but as these features are present or nearby to the proposal there is a potential that a pollution incident could cause degradation of habitat features. It is also possible that contamination could lead to a reduction in prey availability for the local otter population. Without mitigation measures in place there remain risk to the features of the designated site and adverse effect cannot be ruled out. In addition, the deposit of sand could also be a source of pollution should the material be contaminated. Recent Sampling however taken in February 2024 of material at the stockpile location found no contaminants above Cefas Action Level 1 were present and concluded that the material was suitable for deposit.	No

Large shallow inlets and bays	Potential impact pathway as a result of loss or degradation of the habitat as a result of nourishment/deposition	The large shallow inlet and bay is adjacent to the proposed works area. As detailed within Beach Nourishment and Monitoring Strategy (June 2024) beach nourishment at Traeth Crugan has been undertaken since 2002. The deposit is proposed to take place at the same location as previous deposits. In addition as detailed within *Habitat Regulations Assessment dated 3 November 2024* there is a general foreshore drift from east to west with accumulation taking place at the mouth of Pwllheli harbour (which is the source of the stockpile/nourishment material). Therefore as the nourishment is using material from the areas of accretion to the east and taking it back into the system it is not considered to be affecting any wider areas of the coastline. There is not predicted to be an alteration of the habitat at the deposit sites. Therefore adverse affect as result of the deposition activity can be ruled out.	Yes

	Potential impact pathway as a result of loss or degradation of the habitat as a result of transportation of material along the beach	As part of the proposal the material will be transported approximately two and a half miles from Pwllheli Harbour to Traeth Crugan along the beach using dumper trucks. The transportation has the potential to damage habitat features of the large shallow inlet and bay feature through rutting, compaction and physical disturbance. Without mitigation adverse effect cannot be ruled out.	No
Large shallow inlets and bays Reef	There is a potential impact pathway as a result of coastal squeeze.	The works lie within Policy Unit 13.7 of the West of Wales SMP2. The policy is hold the line up until 2025 with managed realignment thereafter. The SMP2 HRA does not identify losses as a result of coastal squeeze within Policy Unit 13.7 in respect of the policies identified. As detailed on page 5 *Habitat Regulations Assessment dated 3 November 2024* The proposed beach nourishment works either side of the revetment is intended as a short term option while the long term strategy remains for Managed Realignment by 2055. Therefore works remain in line with the Shoreline Management Plans. The works propose to replenish the dune system at Traeth Crugan. No hard engineering structures (walls/revetments) are being proposed. Considering the above, the nature of the works in replenishing beach material to the dune system and the lifetime of the proposed activity (i.e. application for a marine licence to carry out nourishment for 10 years) it is not considered that the proposed work would contribute significantly to coastal squeeze.	Yes

Large shallow inlets and bays Reef	There is a potential impact as a result of sediment deposition impacting upon physical processes.	As detailed within *Habitat Regulations Assessment dated 3 November 2024* as there is a general foreshore drift from east to west with accumulation taking place at the mouth of Pwllheli harbour (which is the source of the stockpile/nourishment material). As the nourishment is using material from the areas of accretion to the east and taking it back into the system it is not considered to be affecting any wider areas of the coastline. In addition the works are maintaining the existing profile, as detailed within Beach Nourishment and Monitoring Strategy (June 2024) beach nourishment at Traeth Crugan has been undertaken since 2002. The deposit is proposed to take place at the same location as previous deposits. Therefore the works are unlikely to result in a significant change in physical processes to existing conditions. In considering the above and the scale and nature of the proposed activity the proposal is not predicted to impact physical processes and therefore adverse effect can be ruled out.	Yes
Otter	Potential impact as a result of disturbance and displacement as a result of the activity.	As detailed within *Habitat Regulations Assessment dated 3 November 2024* it is highly likely that otters will use the area of coastline for occasional foraging and commuting. However there are no records of otter resting site or holts in the vicinity of the works. Transportation and deposit of material may lead to visual and noise disturbance that may disturb and displace otters. However the works are temporary, predicted to take approximately 6 weeks per nourishment campaign. In addition during that time works will not take place continually, being confined to appropriate tidal conditions, and day light hours.	Yes

		Considering the temporary nature of the works as described above, and the availability of suitable habitats elsewhere for foraging, no adverse affect on this feature is predicted.	

4.2 Appropriate assessment of the plan or project taking into account additional conditions or restrictions imposed by the competent authority

Table 4.2 Appropriate assessment of the plan or project taking into account additional conditions or restrictions

European site name: Pen Llyn a'r Sarnau

European site Feature	**Adverse effect(s)**	**Can adverse effect(s) be mitigated by additional imposed conditions or restrictions? 'YES' or 'NO'**	**Additional imposed mitigation measure(s)**	**Can adverse effect on site integrity be ruled out? 'YES' or 'NO'**
Large shallow inlets and bays Reef Otter	Potential Impact as a result of a pollution event	Yes	*Habitat Regulations Assessment dated 3 November 2024* proposes the following*;* • A Construction Environment Management Plan (CEMP) is to be prepared which will detail what measures will be in place to protect the surrounding environment. Location of adjacent protected sites shall be clearly highlighted. • Pollution spill kits to be readily available on site within plant/machinery at all times, with staff suitably trained in how to deploy. • Contractor to have emergency incident response procedure in place in the case of a spillage.	Yes

			• Response to include accurate procedure to swiftly remove any contaminated sand/material from • site in the case of accidental spillage. • Contractor to adhere to pollution prevention best practice guidelines, including; - PPG1: Understanding your environmental responsibilities. - GGP5: Works and maintenance in or near water. - PPG6: Working at construction and demolition sites. - GPP21: Pollution response planning. - GPP22: Dealing with spills • Biodegradable lubricant and hydraulic oil to be used in plant machinery where possible. Biodegradable oils are less toxic than most synthetic oil but should still be stored to the same standards as other oils and prevented from entering the water environment • No refuelling of vehicles / plant to take place on the shore. • No material transportation, tipping or profiling works are to take place during high tide. Tidal conditions, including tide tables and tidal ranges are to be monitored by the contractor throughout. Under no circumstance shall vehicle/plant movement take place within the water column. • All vehicles are to use designated transportation lanes at all times, which will be restricted to the upper 20m of the beach. There shall be no access to mid – to lower shore where trafficking of vehicles may directly impact sensitive marine habitats. • Contractor to monitor tidal and weather conditions / forecasts and plan work accordingly	

			We consider that the above mitigation can be appropriately secured through Marine Licence conditions, which will include the production and adherence to a CEMP which will require approval prior to commencement of works.	
Large shallow inlets and bays	Potential impact pathway as a result of loss of degradation of the habitat as a result of transportation of material along the beach	Yes	As proposed within *Habitat Regulations Assessment dated 3 November 2024;* Designated lanes will be used to transport the material along the beach, and these lanes will be restricted to the upper 20m beach, ensuring no encroachment on sensitive marine habitats. We consider that the above mitigation can be appropriately secured through Marine Licence conditions, which will include the production and adherence to a CEMP which will require approval prior to commencement of works.	Yes

4.3 Concluding the appropriate assessment of the plan or project alone

Table 4.3 Conclusion of the appropriate assessment alone	
(a) If Table 4.1, or the right hand column of Table 4.2 if applicable, is 'YES' for all features	**It has been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of any European sites.**
(b) If there are any 'NO's in the right hand column of Table 4.2	~~**It has not been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of one or more European sites.**~~
(c) Are there are any residual effects of the plan or project (net of mitigation measures) which, though not adverse on their own, could be significant when considered in combination with the effects of other plans or projects?	Yes

5. In combination assessment

Table 5.1 Identification and assessment of in combination effects				
European site name: Pen Llyn a'r Sarnau 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?**
Potential Impact as a result of a pollution event	Large shallow inlets and bays Reef Otter	n/a	n/a	Yes
Potential impact as a result of disturbance and displacement as a result of the activity.	Otters	n/a	n/a	Yes
(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)	
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)	**x**
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)**	

Name: Peter Morrison **Position: Lead Specialist Officer (Marine Licensing)** **Date: 20 May 2025**	
Was this HRA conclusion an escalated decision? 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	17/04/2025	NRW A agree with the conclusion of the HRA that the project will not adverse effect the integrity of any Natura 200/Ramsar site. NRW A agree that the nourishment of the areas either side of the revetment with dredged material from the harbour is an appropriate short-term measure to protect the shoreline NRW Advise that the monitoring measures detailed within that continued monitoring as described in Section 5, p 29 of Traeth Crugan Beach renourishment and monitoring strategy June 2024 should be carried out and reported to NRW Advisory for review. The monitoring is proposed to monitor the effectiveness of the protection and to inform long term planning rather than the impact of the deposit operations itself on specific features of the designated sites. We consider that the conclusion of the HRA is therefore not subject to monitoring taking place. However, NRW will advise the Applicant to engage with NRW A on the result of the monitoring.

8. Countersignature

n/a

9. Appendix - Supporting information

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: Pete Morrison
FROM: Katie Reynolds

SUBJECT: Habitats Regulations Assessment of ***DEML2502 Dune nourishment operations at Traeth Crugan, Pwllheli***

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

We agree that the nourishment of the areas either side of the revetment with dredged material from the harbour is an appropriate short-term measure to protect the shoreline, but advise that continued monitoring as described in Section 5, p 29 of Traeth Crugan Beach renourishment and monitoring strategy June 2024 should be carried out and reported to NRW Advisory for review.

We agree with the conclusions of the HRA, 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.

Signed: *KReynolds*

Date: 17/04/2025