OGN 200 Form 1A

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	PAN-026789 WEPA UK limited (Bridgend paper mill) permit variation

HRA iteration/version	**1.0**

1. Plan or Project Details

Information about the plan or project		
1	**Date application received**	Duly Made 11/06/2025
2	**Applicant details**	WEPA UK Limited
3	**NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer**	Installation and RSR permitting William Wallace (Senior Permitting Officer)
4	**Activities proposed**	WEPA UK limited are varying their permit for Bridgend papermill (EPR/EP3738NG) to make the following changes • Addition to accept externally sourced wastepaper know as “broke” from other paper sites • Addition of two new boilers (9.23 MWth each) to replace the existing 38 MWth combined heat and power plant. The main impact pathway is the change in emissions to air as a result of the two new boilers (replacing the old CHP). The broke is to be processed the same as raw materials already accepted on site and is therefore not going to change any operation or discharges.
5	**Relevant legislation or statutory basis**	Environmental Permitting Regulations 2016 (as amended) Industrial Emissions Directive 2010 Medium Combustion Plant
6	**Location**	NGR: SS 87810 87140
7	**Plan or project documents, including any application documents**	Public Register Here: Public register - Customer Portal

8	**Environmental Statement**	N/A
9	**Pre-application correspondence**	N/A
10	**NRW team responsible for preparing this HRA report, and lead officer**	William Wallace, Senior Officer Installation Permitting
11	**Team or person responsible for approving the plan or project (competent authority role)**	

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?	No

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?	N/A

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**	**Blackmill Woodland (UK0030090)**

(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**	**Kenfig / Cynffig** This site was within 10 km of the installation however as the only impact pathway is through 2 x MCPs that have a total thermal input of 18.46 MWth, the risk screening distance of impact is 5 km and as such this SAC is outside the risk screening distance for the two MCPs.

3.2.2 Screening for likelihood of significant effect

TABLE 3.2.2 Screening assessment
European site name: Blackmill Woodland (UK0030090) (Special Area of Conservation)
The site is designated for the following feature **Old sessile oak woods with Ilex and Blechnum in the British Isles (code: 91A0)** The only part of the proposal that has an impact pathway is the addition of two new boilers (2 x 9.23 MWth) that are replacing the existing boiler (38MWth) that will result in a change of emissions to air. The two new boiler together are smaller than the old boiler and will have tighter emission limits of NOx to air Main impact pathway are as follows; **Toxic contamination -Screen out** The main impact pathway from the proposal through toxic contamination is through emissions of oxides of nitrogen to air. Air quality modelling from the applicant shows that highest process contribution for long term impacts of NOx is 0.02 µg/m^3 which is 0.07% of the critical level of 30 µg/m^3. The short term process contribution was calculated as 0.26 µg/m^3 which is 0.347% of the short term critical level of 75 µg/m^3. As the long term process contribution is significantly lower 1 % of the long term critical level and the short term process contribution is less than 10% of the short term critical level, the emissions screen out as insignificant and are unlikely to have any impact alone or in-combination to the designated feature of this site.

Nutrient enrichment -Screen out
Nutrient enrichment Impact could occur as a result of deposition of nitrogen from atmospheric emissions of NOx.

The applicant provided the figures deposition in the not duly made response letter (dated 2nd June 2025), section 2. The process contribution of nitrogen deposition was predicted to be 0.01 kgN/ha/year which is 0.1 % of the lower critical load of 10 kgN/ha/year. As the process contribution is significantly lower than 1% of the critical load, the emission screens out as insignificant and is unlikely to cause impact alone or in-combination.

Acidification -Screen out
Acidification could occur as a result of deposition of atmospheric NOx from atmospheric emissions of NOx.

Applicant provided the figures on acid deposition in the not duly made response letter (dated 2nd June 2025), section 2.

The output showed that acidification was less than 0.0005 kg eq/ha/year (figure rounded down to 0). Given the negligible acidification from NOx (below the screening threshold of 1% of the lower critical load), the impact screens out as in significant and will not cause any impact to the designated feature alone or in-combination.

Habitat loss -Screen out

No impact pathway as site is located 4 km from proposal

Physical damage -Screen out

No impact pathway as site is located 4 km from proposal

Smothering -Screen out
No new emissions of dust. For impacts from nitrogen deposition see Nutrient enrichment.

European site name: Glaswelltiroedd Cefn (UK0030113) (Special Area of Conservation)

The special area of conversation has the following feature:

1. Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) (EU Habitat Code: 6410)

2. Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia (EU Species Code: 1065)

There are also 4 SSSI designated features, however the site is more than the 2 km risk screening distance for SSSI features and as such these have not been assessed.

The only part of the proposal that has an impact pathway is the addition of two new boilers (2 x 9.23 MWth) that are replacing the existing boiler (38MWth) that will result in a change of emissions to air. The two new boiler together are smaller than the old boiler and will have tighter emission limits of NOx to air

Main impact pathway are as follows;

Toxic contamination -Screen out

The main impact pathway from the proposal through toxic contamination is through emissions of oxides of nitrogen to air. Air quality modelling from the applicant shows that highest process contribution for long term impacts of NOx is 0.01 µg/m^3 which is 0.03% of the critical level of 30 µg/m^3.

The short term process contribution was calculated as 0.37 µg/m^3 which is 0.5 % of the short term critical level of 75 µg/m^3.
As the long term process contribution is significantly lower 1 % of the long term critical level and the short term process contribution is less than 10% of the short term critical level, the emissions screen out as insignificant and are unlikely to have any impact alone or in-combination to the designated feature of this site.

Nutrient enrichment -Screen out
Nutrient enrichment Impact could occur as a result of deposition of nitrogen from atmospheric emissions of NOx.

The applicant provided the figures deposition in the not duly made response letter (dated 2nd June 2025), section 2. The process contribution of nitrogen deposition was predicted to be 0.005 kgN/ha/year (figure rounded down to 0) which is less than 0.1 % of the lower critical load of 5 kgN/ha/year. As the process contribution is significantly lower than 1% of the critical load, the emission screens out as insignificant and is unlikely to cause impact alone or in-combination.

Acidification -Screen out
Acidification could occur as a result of deposition of atmospheric NOx from atmospheric emissions of NOx.

Applicant provided the figures on acid deposition in the not duly made response letter (dated 2nd June 2025), section 2.

The output showed that acidification was less than 0.0005 kg eq/ha/year (figure rounded down to 0). Given the negligible acidification from NOx (below the screening threshold of 1% of the lower critical load), the impact screens out as in significant and will not cause any impact to the designated feature alone or in-combination.

Habitat loss -Screen out

No impact pathway as site is located 4 km from proposal

Physical damage -Screen out

No impact pathway as site is located 4 km from proposal

Smothering -Screen out
No new emissions of dust. For impacts from nitrogen deposition see Nutrient enrichment.

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'**~~	~~**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.**~~

~~and any features that are 'IN COMB'~~	

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, and 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 not 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 cannot 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: W Wallace **Name: William Wallace** **Position: Senior Officer, Installation and RSR permitting** **Date: 30/06/2025**	

Was this HRA conclusion an escalated decision? YES or 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
2		
3		
4		
5		

8. Countersignature

I have reviewed the HRA documented in this form and confirm that I agree/do not agree with the conclusion recorded in section 6. **Additional comments (if any):** **Signed:** **Name:** **Position:** **Date:**

9. Appendix: supporting information