

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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9. Appendix - Supporting information.....	Error! Bookmark not defined.

OGN 200 Form 1B

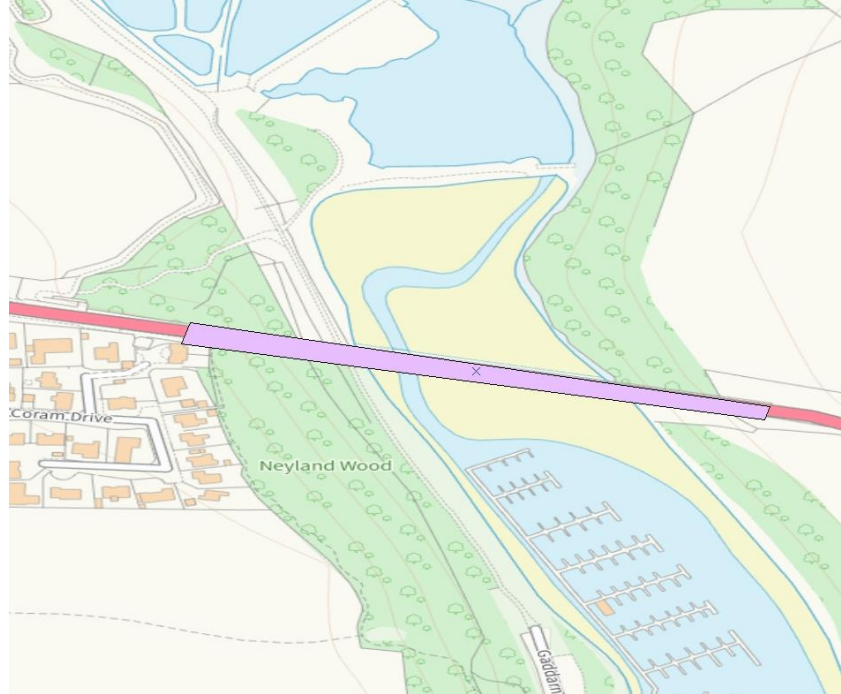
Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	CML2534 Westfield Pill Bridge Repairs
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	19 May 2025
2	Applicant details	Pembrokeshire County Council
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	Westfield Pill Bridge Repairs The Proposed Scheme comprises bridge repairs to the Westfield Pill road bridge in Neyland, Pembroke Dock. Refurbishment works are required to the road bridge including the repair and replacement of the expansion joints, and the repair and replacement of the parapet.

		This will include the removal of the existing expansion joints and parapet through localised concrete break outs. The existing bridge deck surface will be planed and the arisings and debris removed from Site. The expansion joints will be replaced like-for-like. The bridge deck, following the completion of the works, will be re-surfaced and re-waterproofed. All works will be undertaken from the bridge deck, without the need for any vegetation clearance. Works to the expansion joints will be undertaken at night under a full road closure. Works to the parapet and resurfacing will be undertaken during daytime shifts using road closures.										
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009										
6	Location	Westfield Pill Bridge <table><tr><td>Latitude</td><td>Longitude</td></tr><tr><td>51.716444</td><td>-4.9454597</td></tr><tr><td>51.716308</td><td>-4.9455233</td></tr><tr><td>51.715883</td><td>-4.9412967</td></tr><tr><td>51.715737</td><td>-4.9413741</td></tr></table>	Latitude	Longitude	51.716444	-4.9454597	51.716308	-4.9455233	51.715883	-4.9412967	51.715737	-4.9413741
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7	Plan or project documents, including any application documents	CML2534 - eng-marine-works-licence-application - Westfield Pill Bridge NRW Band 2 - 16 May 2025 CML2534 - PE17_001-ATK-SBR-SWMWRCES-DR-CB-000010 1 CML2534 - PE17_001-ATK-SBR-SWMWRCES-DR-CB-000011 - Expansion joint details CML2534 - A477 WFD Technical Note - 100325 - for issue to NRW CML2534 PCC Method Statement information - 16 June 2025 CML2534 - PE17_001-ATK-SBR-SWMWRCES-PT-CB-000001 - CG300 Structures Technical Approval Proforma CML2534 - PE17_001-ATK-SBR-SWMWRCES-PT-CB-000002 - CD377 Screening & Assessment, Westfield Pill Bridge CML2534 - Preliminary Ecological Appraisal Report_WestfieldPill_ForIssue CML2534 - Westfield Pill Bridge refurbishment - Welsh National Marine Plan assessment, March 2025 CML2534 WestfieldPill_HRA_Dec2024Update_ForIssue (002) CML2534 Updated Coordinates

8	Environmental Statement	N/A
9	Pre-application correspondence	The applicant had correspondence with the marine licensing team regarding marine licence application CML2525 that was eventually returned.
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] West Wales Marine / Gorllewin Cymru Forol SAC [UK0030397] Cardigan Bay SAC – Bottlenose Dolphin [UK0012712] Pen Llyn a'r Sarnau SAC – Bottlenose Dolphin [UK0013117]
(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	The potential for the project to affect the following Natura 2000 sites was also initially considered, but can be ruled out without further consideration: North Anglesey Marine / Gogledd Môn Forol SAC [UK0030398] Bristol Channel approaches / Dynesfeydd Môr Hafren SAC [UK0030396] The above had initially been considered for Harbour porpoise as the activity falls within the Celtic & Irish Seas (Marine Mammal Management Unit). However, the impact upon harbour porpoise has already been considered in the assessment of the West Wales Marine SAC which the works are located within 4.5km of. As such, given these sites are located further away, further consideration

		does not need to be given as any impacts and mitigation regarding this feature have already been determined. Cardigan Bay SAC [UK0012712] – Grey Seal Pen Llyn a'r Sarnau SAC [UK0013117] – Grey Seal The above had initially been considered for Grey Seal as the activity falls within the Celtic & Irish Seas (Marine Mammal Management Unit). However, the impact upon grey seal has already been considered in the assessment of the Pembrokeshire Marine SAC which the works are located within. As such, given these sites are located further away, further consideration does not need to be given as any impacts and mitigation regarding this feature have already been determined.
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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: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is no potential for habitat loss, or smothering due to increased sedimentation. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on SAC features.

Sandbanks which are slightly covered by seawater all the time	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN OUT	The closest sandbanks are >10km away from the works and as such, no impact pathway exists.
Mudflats and sandflats not covered by seawater at low tide	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is no potential for habitat loss, or smothering due to increased sedimentation. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on SAC features.
Coastal Lagoons	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is no potential for habitat loss, or smothering due to increased sedimentation. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on SAC features.
Large shallow inlets and bays	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is no potential for habitat loss, or smothering due to increased sedimentation. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on SAC features.
Reefs	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is no potential for habitat loss, or smothering due to increased sedimentation. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on SAC features.
Submerged or partially submerged sea caves	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN OUT	The closest sea caves are >10km away from the works and as such, no impact pathway exists.

Atlantic salt meadows	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is no potential for habitat loss, or smothering due to increased sedimentation. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on SAC features.
Grey Seal <i>Halichoerus grypus</i>	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise or visual disturbance. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on this feature.
Otter <i>Lutra lutra</i>	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise disturbance. However, given that works will be conducted overnight, there is the potential for visual and light disturbance. A risk also exists for pollution given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on this feature.
Allis shad <i>Alosa alosa</i>	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise disturbance. However, given that works will be conducted overnight, there is the potential for visual and light disturbance. A risk also exists for pollution given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on this feature.
Twaite shad <i>Alosa fallax</i>	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise disturbance. However, given that works will be conducted overnight, there is the potential for visual and light disturbance. A risk also exists for pollution given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can

			adversely affect water quality and have a detrimental impact on this feature.
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise disturbance. However, given that works will be conducted overnight, there is the potential for visual and light disturbance. A risk also exists for pollution given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on this feature.
Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise disturbance. However, given that works will be conducted overnight, there is the potential for visual and light disturbance. A risk also exists for pollution given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on this feature.
Shore dock <i>Rumex rupestris</i>	NRW conservation objectives: Pembrokeshire Marine/Sir Benfro Forol SAC (2018)	SCREEN OUT	The closest sea caves are >10km away from the works and as such, no impact pathway exists.
West Wales Marine / Gorllewin Cymru Forol SAC			
Harbour Porpoise <i>Phocoena phocaena</i>	NRW conservation objectives: West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise or visual disturbance. A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on this feature.
Cardigan Bay SAC and Pen Llyn a'r Sarnau SAC			
Bottlenose Dolphin <i>Tursiops truncatus</i>	NRW conservation objectives: Contents (naturalresources.wales) Contents (naturalresources.wales) .	SCREEN IN	The Scheme is restricted to the bridge deck which is located over 30m above the Cleddau Ddu and as such, there is limited potential for noise or visual disturbance.

			A risk does exist for pollution however given the potential for spillage of contaminants or waste/debris to enter the waterbody. This can adversely affect water quality and have a detrimental impact on this feature.
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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.

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: Pembrokeshire Marine/Sir Benfro Forol SAC			
Estuaries Mudflats and sandflats not covered by seawater at low tide Coastal Lagoons Large shallow inlets and bays Reefs Atlantic salt meadows	A risk of pollution exists given the potential for spillage of contaminants or waste/debris to enter the waterbody.	The conservation objectives seek to maintain the structure and function of habitat features and prevent degradation. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts. By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels will increase resulting in degradation of habitat.	No
Grey Seal <i>Halichoerus grypus</i>	A risk of pollution exists given the potential for spillage of contaminants or waste/debris to enter the waterbody.	The conservation objectives seek to maintain grey seal populations. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts.	No

		By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression.	
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>	A risk of pollution exists given the potential for spillage of contaminants or waste/debris to enter the waterbody. Light spill as a result of overnight working may result in disturbance.	The conservation objectives seek to maintain species populations. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts. By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression. Light spill has the potential to disturb species and act as a barrier to migration or foraging activity, thus detrimentally impacting populations.	No
European site name: West Wales Marine / Gorllewin Cymru Forol SAC			
Harbour Porpoise <i>Phocoena phocaena</i>	A risk of pollution exists given the potential for spillage of contaminants or waste/debris to enter the waterbody.	The conservation objectives seek to maintain harbour porpoise populations. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts. By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression.	No
European site name: Cardigan Bay SAC and Pen Llyn a'r Sarnau SAC			
Bottlenose Dolphin	A risk of pollution exists given the potential for spillage of contaminants or waste/debris to enter the waterbody.	The conservation objectives seek to maintain bottlenose dolphin populations. In order to do so,	No

<i>Tursiops truncatus</i>		contaminants derived from human activity must be minimised to prevent detrimental impacts. By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression.	
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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: Pembrokeshire Marine/Sir Benfro Forol SAC				
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'
Estuaries Mudflats and sandflats not covered by seawater at low tide Coastal Lagoons Large shallow inlets and bays	The conservation objectives seek to maintain the structure and function of habitat features and prevent degradation. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts.	YES	The applicant has stated that works will take place with strict adherence to the GPPs and CIRIA guidance on the control of water pollution from construction sites. These detail good practice advice for undertaking works that have the potential to cause water pollution and will be detailed in a management plan that will be provided to the team working on Site, prior to the commencement of work. Mobile plant refuelling will be carried out in accordance with the approved procedures and done away from watercourses and drainage routes from the bridge. The Site Supervisor and Main Contractor's Management and Environmental Team will be notified immediately of any spills. Plant	YES

Reefs Atlantic salt meadows	By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels will increase resulting in degradation of habitat.	leakage is to be cleaned up immediately using spill kits, which will be maintained in all site vehicles. Absorbent mats will be placed under generators to ensure any leaks of liquid are contained. All used spill kits will be disposed of in spill kit bins in the Main Contractor's compound, in line with COSHH requirements. Dust extraction attachment for the core driller is to be utilised during drilling operations in order to minimise the risk of water pollution caused by concrete dust and small pieces of concrete debris. Dust suppression for all construction works is to be implemented through the application of water during periods of dry weather. The quantity of water applied is to be carefully managed to prevent excess water from entering a watercourse. Temporary dust barriers will be utilised, if required, during carriageway planning works to provide increased dust and construction debris containment. All waste materials are to be disposed of using the correct skips in line with the relevant Control of Substances Hazardous to Health (COSHH) assessment and the site rules. No waste materials are to be allowed to enter water courses. A dam will be installed on the bridge, behind the drilling position, and extra care will be taken when grouting. Any leaks will be highlighted, and instant corrective action will be taken to stop any grout from reaching the watercourse below Machinery will be stored in an agreed site compound, outside the boundary of any designated site. Biodegradable fluid will be used in plant where possible. Appropriate interception measures will be used during any refuelling or plant maintenance Standard pollution prevention measures will also be added to the licence such as the use of bunded storage facilities and reporting of pollution incidents to the Licensing Authority. The following conditions will also be added to the licence regarding the use of concrete:	
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			<i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i> <i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment, suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i> <i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i> To ensure the mitigation proposed by the applicant is secured, the following condition will be added to the licence: <i>The Licence Holder must submit a construction environmental management plan, to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i> <i>The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.20.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i>	
Grey Seal <i>Halichoerus grypus</i>	The conservation objectives seek to maintain grey seal populations. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts.	YES	The applicant has stated that works will take place with strict adherence to the GPPs and CIRIA guidance on the control of water pollution from construction sites. These detail good practice advice for undertaking works that have the potential to cause water pollution and will be detailed in a management plan that will be provided to the team working on Site, prior to the commencement of work. Mobile plant refuelling will be carried out in accordance with the approved procedures and done away from watercourses and drainage routes from the bridge.	YES

	By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression.	The Site Supervisor and Main Contractor's Management and Environmental Team will be notified immediately of any spills. Plant leakage is to be cleaned up immediately using spill kits, which will be maintained in all site vehicles. Absorbent mats will be placed under generators to ensure any leaks of liquid are contained. All used spill kits will be disposed of in spill kit bins in the Main Contractor's compound, in line with COSHH requirements. Dust extraction attachment for the core driller is to be utilised during drilling operations in order to minimise the risk of water pollution caused by concrete dust and small pieces of concrete debris. Dust suppression for all construction works is to be implemented through the application of water during periods of dry weather. The quantity of water applied is to be carefully managed to prevent excess water from entering a watercourse. Temporary dust barriers will be utilised, if required, during carriageway planning works to provide increased dust and construction debris containment. All waste materials are to be disposed of using the correct skips in line with the relevant Control of Substances Hazardous to Health (COSHH) assessment and the site rules. No waste materials are to be allowed to enter water courses. A dam will be installed on the bridge, behind the drilling position, and extra care will be taken when grouting. Any leaks will be highlighted, and instant corrective action will be taken to stop any grout from reaching the watercourse below Machinery will be stored in an agreed site compound, outside the boundary of any designated site. Biodegradable fluid will be used in plant where possible. Appropriate interception measures will be used during any refuelling or plant maintenance Standard pollution prevention measures will also be added to the licence such as the use of bunded storage facilities and reporting of pollution incidents to the Licensing Authority.	
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			The following conditions will also be added to the licence regarding the use of concrete: <i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i> <i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment, suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i> <i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i> To ensure the mitigation proposed by the applicant is secured, the following condition will be added to the licence: <i>The Licence Holder must submit a construction environmental management plan, to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i> <i>The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.20.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i>	
Otter <i>Lutra lutra</i> Allis shad <i>Alosa alosa</i>	The conservation objectives seek to maintain species populations. In order to do so, contaminants derived	YES	The applicant has stated that works will take place with strict adherence to the GPPs and CIRIA guidance on the control of water pollution from construction sites. These detail good practice advice for undertaking works that have the potential to cause water pollution and will be detailed in a management plan that will be provided to the team working on Site, prior to the commencement of work.	YES

Twaite shad <i>Alosa fallax</i> River lamprey <i>Lampetra fluviatilis</i> Sea lamprey <i>Petromyzon marinus</i>	from human activity must be minimised to prevent detrimental impacts. By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression. Light spill has the potential to disturb species and act as a barrier to migration or foraging activity, thus detrimentally impacting populations.	Mobile plant refuelling will be carried out in accordance with the approved procedures and done away from watercourses and drainage routes from the bridge. The Site Supervisor and Main Contractor's Management and Environmental Team will be notified immediately of any spills. Plant leakage is to be cleaned up immediately using spill kits, which will be maintained in all site vehicles. Absorbent mats will be placed under generators to ensure any leaks of liquid are contained. All used spill kits will be disposed of in spill kit bins in the Main Contractor's compound, in line with COSHH requirements. Dust extraction attachment for the core driller is to be utilised during drilling operations in order to minimise the risk of water pollution caused by concrete dust and small pieces of concrete debris. Dust suppression for all construction works is to be implemented through the application of water during periods of dry weather. The quantity of water applied is to be carefully managed to prevent excess water from entering a watercourse. Temporary dust barriers will be utilised, if required, during carriageway planning works to provide increased dust and construction debris containment. All waste materials are to be disposed of using the correct skips in line with the relevant Control of Substances Hazardous to Health (COSHH) assessment and the site rules. No waste materials are to be allowed to enter water courses. A dam will be installed on the bridge, behind the drilling position, and extra care will be taken when grouting. Any leaks will be highlighted, and instant corrective action will be taken to stop any grout from reaching the watercourse below Machinery will be stored in an agreed site compound, outside the boundary of any designated site. Biodegradable fluid will be used in plant where possible. Appropriate interception measures will be used during any refuelling or plant maintenance	
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			Standard pollution prevention measures will also be added to the licence such as the use of bunded storage facilities and reporting of pollution incidents to the Licensing Authority. The following conditions will also be added to the licence regarding the use of concrete: <i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i> <i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment, suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i> <i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i> An appropriately qualified and experienced Ecological Clerk of Works (ECoW) will be employed throughout the works to advise on ecological constraints. The ECoW will give a site induction to all site operatives, indicating the ecological sensitivities of the site. To prevent light spill during night time working, the following measures will be implemented: • For any work that does take place in hours of darkness, lighting will be limited and directional. • Hoods will be used to focus necessary illumination onto the carriageway, within the confines of the bridge, and avoid any spill beyond that. To ensure the mitigation proposed by the applicant is secured, the following condition will be added to the licence:	
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			<i>The Licence Holder must submit a construction environmental management plan, to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i> <i>The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.20.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i>	
European site name: West Wales Marine / Gorllewin Cymru Forol SAC				
Harbour Porpoise <i>Phocoena phocaena</i>	The conservation objectives seek to maintain harbour porpoise populations. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts. By introducing pollutants through spillage or via waste/debris entering the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression.	YES	The applicant has stated that works will take place with strict adherence to the GPPs and CIRIA guidance on the control of water pollution from construction sites. These detail good practice advice for undertaking works that have the potential to cause water pollution and will be detailed in a management plan that will be provided to the team working on Site, prior to the commencement of work. Mobile plant refuelling will be carried out in accordance with the approved procedures and done away from watercourses and drainage routes from the bridge. The Site Supervisor and Main Contractor's Management and Environmental Team will be notified immediately of any spills. Plant leakage is to be cleaned up immediately using spill kits, which will be maintained in all site vehicles. Absorbent mats will be placed under generators to ensure any leaks of liquid are contained. All used spill kits will be disposed of in spill kit bins in the Main Contractor's compound, in line with COSHH requirements. Dust extraction attachment for the core driller is to be utilised during drilling operations in order to minimise the risk of water pollution caused by concrete dust and small pieces of concrete debris. Dust suppression for all construction works is to be implemented through the application of water during periods of dry weather. The quantity of	YES

			water applied is to be carefully managed to prevent excess water from entering a watercourse. Temporary dust barriers will be utilised, if required, during carriageway planning works to provide increased dust and construction debris containment. All waste materials are to be disposed of using the correct skips in line with the relevant Control of Substances Hazardous to Health (COSHH) assessment and the site rules. No waste materials are to be allowed to enter water courses. A dam will be installed on the bridge, behind the drilling position, and extra care will be taken when grouting. Any leaks will be highlighted, and instant corrective action will be taken to stop any grout from reaching the watercourse below Machinery will be stored in an agreed site compound, outside the boundary of any designated site. Biodegradable fluid will be used in plant where possible. Appropriate interception measures will be used during any refuelling or plant maintenance Standard pollution prevention measures will also be added to the licence such as the use of bunded storage facilities and reporting of pollution incidents to the Licensing Authority. The following conditions will also be added to the licence regarding the use of concrete: <i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i> <i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment, suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i>	
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			<i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i> An appropriately qualified and experienced Ecological Clerk of Works (ECoW) will be employed throughout the works to advise on ecological constraints. The ECoW will give a site induction to all site operatives, indicating the ecological sensitivities of the site. To ensure the mitigation proposed by the applicant is secured, the following condition will be added to the licence: <i>The Licence Holder must submit a construction environmental management plan, to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i> <i>The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.20.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i>	
European site name: Cardigan Bay SAC and Pen Llyn a'r Sarnau SAC				
Bottlenose Dolphin <i>Tursiops truncatus</i>	The conservation objectives seek to maintain bottlenose dolphin populations. In order to do so, contaminants derived from human activity must be minimised to prevent detrimental impacts. By introducing pollutants through spillage or via waste/debris entering	YES	The applicant has stated that works will take place with strict adherence to the GPPs and CIRIA guidance on the control of water pollution from construction sites. These detail good practice advice for undertaking works that have the potential to cause water pollution and will be detailed in a management plan that will be provided to the team working on Site, prior to the commencement of work. Mobile plant refuelling will be carried out in accordance with the approved procedures and done away from watercourses and drainage routes from the bridge. The Site Supervisor and Main Contractor's Management and Environmental Team will be notified immediately of any spills. Plant leakage is to be cleaned up immediately using spill kits, which will be maintained in all site vehicles.	YES

	the waterbody, the contaminant levels may lead to fatalities or cause physiological damage or immune or reproductive suppression.		Absorbent mats will be placed under generators to ensure any leaks of liquid are contained. All used spill kits will be disposed of in spill kit bins in the Main Contractor's compound, in line with COSHH requirements. Dust extraction attachment for the core driller is to be utilised during drilling operations in order to minimise the risk of water pollution caused by concrete dust and small pieces of concrete debris. Dust suppression for all construction works is to be implemented through the application of water during periods of dry weather. The quantity of water applied is to be carefully managed to prevent excess water from entering a watercourse. Temporary dust barriers will be utilised, if required, during carriageway planning works to provide increased dust and construction debris containment. All waste materials are to be disposed of using the correct skips in line with the relevant Control of Substances Hazardous to Health (COSHH) assessment and the site rules. No waste materials are to be allowed to enter water courses. A dam will be installed on the bridge, behind the drilling position, and extra care will be taken when grouting. Any leaks will be highlighted, and instant corrective action will be taken to stop any grout from reaching the watercourse below Machinery will be stored in an agreed site compound, outside the boundary of any designated site. Biodegradable fluid will be used in plant where possible. Appropriate interception measures will be used during any refuelling or plant maintenance Standard pollution prevention measures will also be added to the licence such as the use of bunded storage facilities and reporting of pollution incidents to the Licensing Authority. The following conditions will also be added to the licence regarding the use of concrete:	
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			<i>The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least 10 metres from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.</i> <i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment, suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i> <i>The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.</i> An appropriately qualified and experienced Ecological Clerk of Works (ECoW) will be employed throughout the works to advise on ecological constraints. The ECoW will give a site induction to all site operatives, indicating the ecological sensitivities of the site. To ensure the mitigation proposed by the applicant is secured, the following condition will be added to the licence: <i>The Licence Holder must submit a construction environmental management plan, to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.</i> <i>The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.20.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by, the Licensing Authority prior to any changes being enacted.</i>	
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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?	NO

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)	
Signed: 	
Name: Jack Thompson	Position: Senior Marine Licensing Officer
Date:	

Was this HRA conclusion an escalated decision? YES or NO	NO
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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
4	25 July 2025	Agree with the conclusions of the HRA, but have asked for the provision of a CEMP to secure this mitigation. Have added this to the HRA as mitigation and will add a condition to 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 Management and Advice Team **SUBJECT:** Habitats Regulations Assessment of CML2534 Westfield Pill Bridge Repairs (Band 2)

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

In principle can agree with the conclusion of the HRA with respect to the marine features of the:

- Pembrokeshire Marine SAC
- West Wales Marine SAC
- Cardigan Bay SAC – Bottlenose Dolphin
- Pen Llyn a'r Sarnau SAC – Bottlenose Dolphin

We agree that the project has been taken to appropriate assessment and welcome the mitigation measures listed in the Marine Licensing's HRA for pollution prevention, dust control and light spill. However, the Applicant's method statement (dated 16th June 2025) does not fully detail these measures and as a contractor is yet to be confirmed we advise that these measures are secured via a Construction Environmental Management Plan (CEMP). We advise that a CEMP is conditioned as part of the Licence requiring NRW approval prior to any works commencing.

We agree with the inclusion of Licence Conditions in Marine Licensing's HRA for use of concrete and suitability of materials for the marine environment. We'd additionally advise including standard conditions for pollution prevention measures (e.g. GPP5) and biosecurity measures to prevent the spread of invasive species.

Signed: *BJRandall-Smith*

Bridget Randall-Smith

Senior Marine Advisory Officer

Marine Area Advice and Management Team

Date: 25/07/2025