

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

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

Document owner: Head of Business for Natural Resource Management

Version History:

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

Next review date: **October 2025**

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OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	RML2516 - Mona Landfall Geotechnical Survey
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	18 February 2025
2	Applicant details	Mona Offshore Wind Limited
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer	N/A

4	Activity/ies proposed	Up to 12 geotechnical survey investigation boreholes will be taken within the Mona cable route landfall area. Boreholes will be up to 40 m deep and will have a diameter of 102 mm. The total volume of sediment collected will be 3.78 m³. All boreholes will be backfilled with either bentonite pellets or cement/bentonite powder. Prior to backfilling, boreholes will be flushed with a biodegradable and water based flushing medium, whereby flush and any excess drill cuttings not sampled will be returned directly to the water column. It is proposed that the boreholes will be backfilled to 1-2m below the seabed level, with the final 1-2m being allowed to backfill naturally. Boreholes will be cased from the seabed to the jack-up vessel, thus all backfilling (and drilling) and associated equipment will be sealed within this outer casing, mitigating discharges to sea. Backfilling will stabilise the boreholes within the intertidal region to prevent any loss of drill fluids into the surrounding sediments if the boreholes were not to be backfilled. <u>Variation 1</u> A variation to Marine Licence RML2516 is being sought for four additional optional methods to backfill the remaining boreholes (up to nine boreholes remaining). These are intended to provide an effective seal for the artesian water features encountered during borehole acquisition. It should be noted that any of the four proposed methods may be used at each of the remaining nine borehole locations where required. This is in order to provide a number of options to create an effective seal should any one of the proposed borehole backfilling methodologies be unsuccessful. The four backfilling methodologies are: - Packer bladder - Stopper - Cement plugs - Pressurized grouting Details of each methodology can be found in the document entitled "RML2516v1 - Mona Geotechnical Nearshore Variation SID v3.0".
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009

6	Location	Mona Landfall Survey Area			
		Lat	Long	Lat_dd	Long_dd
		53° 17.757' N	003° 36.794' W	53.29594391	-3.61323273
		53° 17.721' N	003° 36.566' W	53.29535069	-3.60943691
		53° 17.39' N	003° 36.743' W	53.28983273	-3.61238934
		53° 17.388' N	003° 36.898' W	53.28980184	-3.61496649



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Plan or project documents, including any application documents

RML2516 - Application Form
 RML2516 - M_Landfall_MLA_overview_20250117
 RML2516 eng-marine-inns-biosecurity-ra-and-management-plan v2.1
 RML2516 - Mona Geotechnical Nearshore Supporting Information Document v2.0
 RML2516 - Mona Landfall HRA v2.0
 RML2516 - Mona Landfall WFD Assessment v2.0

		<u>Variation 1</u> RML2516v1 - Application Form 06.08.25 RML2516v1 - Appendix A - Packer Dimensions RML2516v1 - Appendix A - Inflatable Packer Specifications RML2516v1 - Mona Geotechnical Nearshore Variation SID v3.0
8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Jack Thompson – Marine Licensing Team
11	Team or person responsible for approving the plan or project (competent authority role)	As 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,	No

for the purposes of conserving the habitats or species for which the European site(s) is/are designated?	
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?	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	Liverpool Bay/Bae Lerpwl SPA [UK9020294] North Anglesey Marine/Gogledd Môn Forol SAC [UK0030398]
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	N/A

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment

Designated site feature	Relevant conservation objectives	Screening conclusion – ‘SCREEN OUT’, ‘SCREEN IN’ or ‘IN COMB’	Explanation
Liverpool Bay/Bae Lerpwl SPA			
Red-throated diver <i>Gavia stellata</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN IN	The applicant's assessment of effects against this conservation objective takes account of mitigation measures that have been adopted as part of the project. The applicant has stated that works will only be undertaken outside of the overwintering period (the overwintering period being November-March inclusive). This approach is consistent with construction works for the overarching Mona Offshore Wind Project. This avoids any disturbance exerted by vessel presence and transits on the populations of red-throated diver within Liverpool Bay, and prevents fluctuation in the abundance, density, or distribution of the species. In the absence of any mitigation measures, however, there is a potential to compromise this conservation objective. As such, there is a need to take this feature through to AA to ensure that the mitigation is secured. A jack up barge will be used to facilitate the works. The spud legs of the jack-up vessel are 0.76 m in diameter (0.453 m² area each) and therefore, for 12 boreholes, a total area of 21.74 m² of seabed would be disturbed. Surveys undertaken prior to the boreholes have identified sensitive habitats and the borehole locations will be chosen to avoid these. As

			such, No LSE is expected from sediment disturbance/habitat loss as a result of the jack up barge being used. The water column discharge of the bore completion fluid will lead to a temporary increase in total suspended solids concentration. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. As such, only temporary effects are predicted as a result and the water column will likely to return to baseline conditions within one to two tidal cycles. Therefore, No LSE is concluded. <u>Variation 1</u> Although the materials used to backfill the remaining boreholes may be different, they don't pose any additional environmental concerns. The bladder and stopper will be secured using bentonite pellets or cement/bentonite powder, the use of which was previously authorised under RML2516. If a cement cap is used, then there is a potential for grout to be used to secure the cap in place, or where necessary, pressurised grouting would be used in tandem with packer bladders. Grout is similar in nature to cement powder and therefore, no additional impacts are expected. Therefore, No LSE is concluded.
Little gull <i>Hydrocoloeus minutus</i>	NRW, Natural England and JNCC conservation objectives:	IN COMB	Little gull generally exhibit a low sensitivity to disturbance from shipping activity. Therefore, No LSE

(in non-breeding season)	liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)		of disturbance associated with vessel presence and borehole activities. A jack up barge will be used to facilitate the works. The spud legs of the jack-up vessel are 0.76 m in diameter (0.453 m² area each) and therefore, for 12 boreholes, a total area of 21.74 m² of seabed would be disturbed. Surveys undertaken prior to the boreholes have identified sensitive habitats and the borehole locations will be chosen to avoid these. As such, No LSE is expected from sediment disturbance/habitat loss as a result of the jack up barge being used. The water column discharge of the bore completion fluid will lead to a temporary increase in total suspended solids concentration. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. As such, only temporary effects are predicted as a result and the water column will likely to return to baseline conditions within one to two tidal cycles. Therefore, No LSE is concluded. <u>Variation 1</u> Although the materials used to backfill the remaining boreholes may be different, they don't pose any additional environmental concerns. The bladder and stopper will be secured using bentonite pellets or cement/bentonite powder, the use of which was previously authorised under RML2516.
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			If a cement cap is used, then there is a potential for grout to be used to secure the cap in place, or where necessary, pressurised grouting would be used in tandem with packer bladders. Grout is similar in nature to cement powder and therefore, no additional impacts are expected. Therefore, No LSE is concluded.
Common scoter <i>Melanitta nigra</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN IN	The applicant's assessment of effects against this conservation objective takes account of mitigation measures that have been adopted as part of the project. The applicant has stated that works will only be undertaken outside of the overwintering period (the overwintering period being November-March inclusive). This approach is consistent with construction works for the overarching Mona Offshore Wind Project. This avoids any disturbance exerted by vessel presence and transits on the populations of red-throated diver within Liverpool Bay, and prevents fluctuation in the abundance, density, or distribution of the species. In the absence of any mitigation measures, however, there is a potential to compromise this conservation objective. As such, there is a need to take this feature through to AA to ensure that the mitigation is secured. A jack up barge will be used to facilitate the works. The spud legs of the jack-up vessel are 0.76 m in diameter (0.453 m² area each) and therefore, for 12 boreholes, a total area of 21.74 m² of seabed would be disturbed. Surveys undertaken prior to the boreholes have identified sensitive habitats and the

			borehole locations will be chosen to avoid these. As such, No LSE is expected from sediment disturbance/habitat loss as a result of the jack up barge being used. The water column discharge of the bore completion fluid will lead to a temporary increase in total suspended solids concentration. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. As such, only temporary effects are predicted as a result and the water column will likely to return to baseline conditions within one to two tidal cycles. Therefore, No LSE is concluded. <u>Variation 1</u> Although the materials used to backfill the remaining boreholes may be different, they don't pose any additional environmental concerns. The bladder and stopper will be secured using bentonite pellets or cement/bentonite powder, the use of which was previously authorised under RML2516. If a cement cap is used, then there is a potential for grout to be used to secure the cap in place, or where necessary, pressurised grouting would be used in tandem with packer bladders. Grout is similar in nature to cement powder and therefore, no additional impacts are expected. Therefore, No LSE is concluded.
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Little tern <i>Sternula albifrons</i> (in breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	IN COMB	Common and little tern can be sensitive to disturbance at their breeding sites, but generally exhibit a low sensitivity to disturbance from shipping activity when foraging at sea. The SPA is designated for common and little terns as it provides important marine foraging areas for populations breeding within The Dee Estuary SPA and Mersey Narrows & North Wirral Foreshore SPA, but does not constitute important breeding habitat itself. Therefore, No LSE of disturbance associated with vessel presence and borehole activities. A jack up barge will be used to facilitate the works. The spud legs of the jack-up vessel are 0.76 m in diameter (0.453 m² area each) and therefore, for 12 boreholes, a total area of 21.74 m² of seabed would be disturbed. Surveys undertaken prior to the boreholes have identified sensitive habitats and the borehole locations will be chosen to avoid these. As such, No LSE is expected from sediment disturbance/habitat loss as a result of the jack up barge being used. The water column discharge of the bore completion fluid will lead to a temporary increase in total suspended solids concentration. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. As such, only temporary effects are predicted as a result and the water column will likely to return to baseline conditions
Common tern <i>Sterna hirundo</i> (in breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)		

			within one to two tidal cycles. Therefore, No LSE is concluded. <u>Variation 1</u> Although the materials used to backfill the remaining boreholes may be different, they don't pose any additional environmental concerns. The bladder and stopper will be secured using bentonite pellets or cement/bentonite powder, the use of which was previously authorised under RML2516. If a cement cap is used, then there is a potential for grout to be used to secure the cap in place, or where necessary, pressurised grouting would be used in tandem with packer bladders. Grout is similar in nature to cement powder and therefore, no additional impacts are expected. Therefore, No LSE is concluded.
Waterbird assemblage	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	SCREEN IN	The applicant's assessment of effects against this conservation objective takes account of mitigation measures that have been adopted as part of the project. The applicant has stated that works will only be undertaken outside of the overwintering period (the overwintering period being November-March inclusive). This approach is consistent with construction works for the overarching Mona Offshore Wind Project. This avoids any disturbance exerted by vessel presence and transits on the waterbird populations within Liverpool Bay, and prevents fluctuation in the abundance, density, or distribution of the species'.

			In the absence of any mitigation measures, however, there is a potential to compromise this conservation objective. As such, there is a need to take this feature through to AA to ensure that the mitigation is secured. A jack up barge will be used to facilitate the works. The spud legs of the jack-up vessel are 0.76 m in diameter (0.453 m² area each) and therefore, for 12 boreholes, a total area of 21.74 m² of seabed would be disturbed. Surveys undertaken prior to the boreholes have identified sensitive habitats and the borehole locations will be chosen to avoid these. As such, No LSE is expected from sediment disturbance/habitat loss as a result of the jack up barge being used. The water column discharge of the bore completion fluid will lead to a temporary increase in total suspended solids concentration. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. As such, only temporary effects are predicted as a result and the water column will likely to return to baseline conditions within one to two tidal cycles. Therefore, No LSE is concluded. <u>Variation 1</u> Although the materials used to backfill the remaining boreholes may be different, they don't pose any additional environmental concerns. The bladder and
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			stopper will be secured using bentonite pellets or cement/bentonite powder, the use of which was previously authorised under RML2516. If a cement cap is used, then there is a potential for grout to be used to secure the cap in place, or where necessary, pressurised grouting would be used in tandem with packer bladders. Grout is similar in nature to cement powder and therefore, no additional impacts are expected. Therefore, No LSE is concluded.
North Anglesey Marine SAC			
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives: North Anglesey Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	IN COMB	This site is approximately 41 km from the works area. Although harbour porpoise are a mobile species, and may travel in to the works area, it is unlikely. Underwater noise emitted from vessels is low intensity and below the onset thresholds for PTS and TTS for harbour porpoise (Götz et al., 2009). There is potential for disturbance or behavioral reactions due to vessel noise and presence; however, any effects will be transitory and localised, with avoidance distances of up to 9 km noted by Pigeault et al. (2024). Therefore, there will be no direct impact and disturbance will not restrict use of wider foraging areas. Therefore, No LSE is concluded for disturbance related to vessel noise and presence. Noise related to borehole surveys is comparable to vessel noise and source levels are below the onset threshold for PTS and TTS for harbour porpoise (Erbe et al., 2017). Avoidance and behavioural impacts , if

		any, will be temporary, and disturbance will subside once harbour porpoise have transited away from the area. Therefore, No LSE is concluded for disturbance from noise related to borehole surveys. Vessel collision is a potential risk however, harbour porpoise are known to avoid vessels (Benhemma et al., 2023; Pigeault et al., 2024) and are thus considered low risk in terms of collisions. Thus, No LSE is concluded for vessel collisions. The borehole survey works will cover a small spatial extent (i.e. 102 mm diameter × 12 boreholes) and involve removal of a small quantity of material (3.78 m³) over a short-term period. Impacts to habitats and prey species are expected to be minor and the area accounts for a small proportion of foraging habitat available to harbour porpoise. The water column discharge of the bore completion fluid will lead to a temporary increase in total suspended solids concentration. Any discharge of bore completion fluid is expected to be temporary, all other discharges will be sealed within the borehole casing, and lastly, the upper 1-2m of the boreholes will be allowed to backfill naturally, allowing recolonisation of benthic habitat. As such, only temporary effects are predicted as a result and the water column will likely to return to baseline conditions within one to two tidal cycles. Therefore, No LSE is concluded for changes to habitats or prey availability. <u>Variation 1</u>
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			Although the materials used to backfill the remaining boreholes may be different, they don't pose any additional environmental concerns. The bladder and stopper will be secured using bentonite pellets or cement/bentonite powder, the use of which was previously authorised under RML2516. If a cement cap is used, then there is a potential for grout to be used to secure the cap in place, or where necessary, pressurised grouting would be used in tandem with packer bladders. Grout is similar in nature to cement powder and therefore, no additional impacts are expected. Therefore, No LSE is concluded.
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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: Liverpool Bay SPA			
Red-Throated Diver	The applicant has stated that works will only be undertaken outside of the overwintering period (the overwintering period being November-March inclusive). This approach is consistent with construction works for the overarching Mona Offshore Wind Project. This avoids any disturbance exerted by vessel presence and transits on bird populations within Liverpool Bay, and prevents fluctuation in the abundance, density, or distribution of the species'. To ensure mitigation is secured, a timing restriction will be placed on the licence to ensure that works are not carried out during the winter period, in-line with the method statement provided.	By avoiding works over the winter period, any disturbance exerted by vessel presence and transits on bird populations within Liverpool Bay is prevented, and fluctuation in the abundance, density, or distribution of the species' is avoided.	YES
Common Scoter			
Waterbird Assemblage			

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: Liverpool Bay SPA				
'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?
Disturbance due to vessel presence	Little Gull	<u>RML2446 - Benthic sampling for educational purposes across North Wales</u> This licence expires on 29 July 2025 so there will be limited time for cumulative impacts. In total, 4.66m³ of sediment will be extracted under this licence. The licensed area is extensive, stretching from the Dee Estuary to the Llyn Peninsula so opportunities for cumulative impacts are minimal. Furthermore, the volume of sediment removed is very small and as such, no in-combination impacts are expected. <u>CML2331 – MaresConnect Seabed Survey</u>	There will be no in-combination effects.	YES
	Little Tern			
	Common Tern			

		The following activities will be undertaken under this licence: Vibrocore samples – 0.16m³ per sample, up to 150 samples Grab samples – 0.1m³ per grab, up to 30 sampling stations Boxcores – 0.0072m³ per sample, up to 35 samples Boreholes – 0.25m³ per sample, up to 10 boreholes The area for these surveys is extensive, stretching from Abergele towards Ireland. As with RML2446, the opportunity for cumulative impacts is minimal. Furthermore, the volume of sediment being removed under RML2516 is small (10.26m³) and as such, no in-combination impacts are expected.		
European site name: North Anglesey Marine SAC				
Disturbance due to vessel presence and underwater noise	Harbour porpoise	<u>RML2446 - Benthic sampling for educational purposes across North Wales</u> This licence expires on 29 July 2025 so there will be limited time for cumulative impacts. In total, 4.66m³ of sediment will be extracted under this licence.	There will be no in-combination effects.	YES

		The licensed area is extensive, stretching from the Dee Estuary to the Llyn Peninsula so opportunities for cumulative impacts are minimal. Furthermore, the volume of sediment removed is very small and as such, no in-combination impacts are expected. <u>CML2331 – MaresConnect Seabed Survey</u> The following activities will be undertaken under this licence: Vibrocore samples – 0.16m³ per sample, up to 150 samples Grab samples – 0.1m³ per grab, up to 30 sampling stations Boxcores – 0.0072m³ per sample, up to 35 samples Boreholes – 0.25m³ per sample, up to 10 boreholes The area for these surveys is extensive, stretching from Abergele towards Ireland. As with RML2446, the opportunity for cumulative impacts is minimal. Furthermore, the volume of sediment being removed under RML2516 is small (10.26m³) and as such, no in-combination impacts are expected.		
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(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)	
Signed: 	
Name: Jack Thompson Position: Marine Licensing Officer	
Date: 14 August 2025	

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
6	03 September 2025	NRW A agree with the conclusions of the HRA.

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

OGN 200 Form 3

TO: Jack Thompson, Marine Licensing Officer

FROM: Delyth Rowlands, Marine Area Advice and Management Team

SUBJECT: Habitats Regulations Assessment of RML2516v1 Mona Landfall Geotechnical Survey Complex Variation.

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

We agree with the conclusions of the HRA that the project will not adversely affect the integrity of any European sites either alone or in-combination with other plans or projects.

Signed: *Delyth Wyn Rowlands*

Date: 3rd September 2025