

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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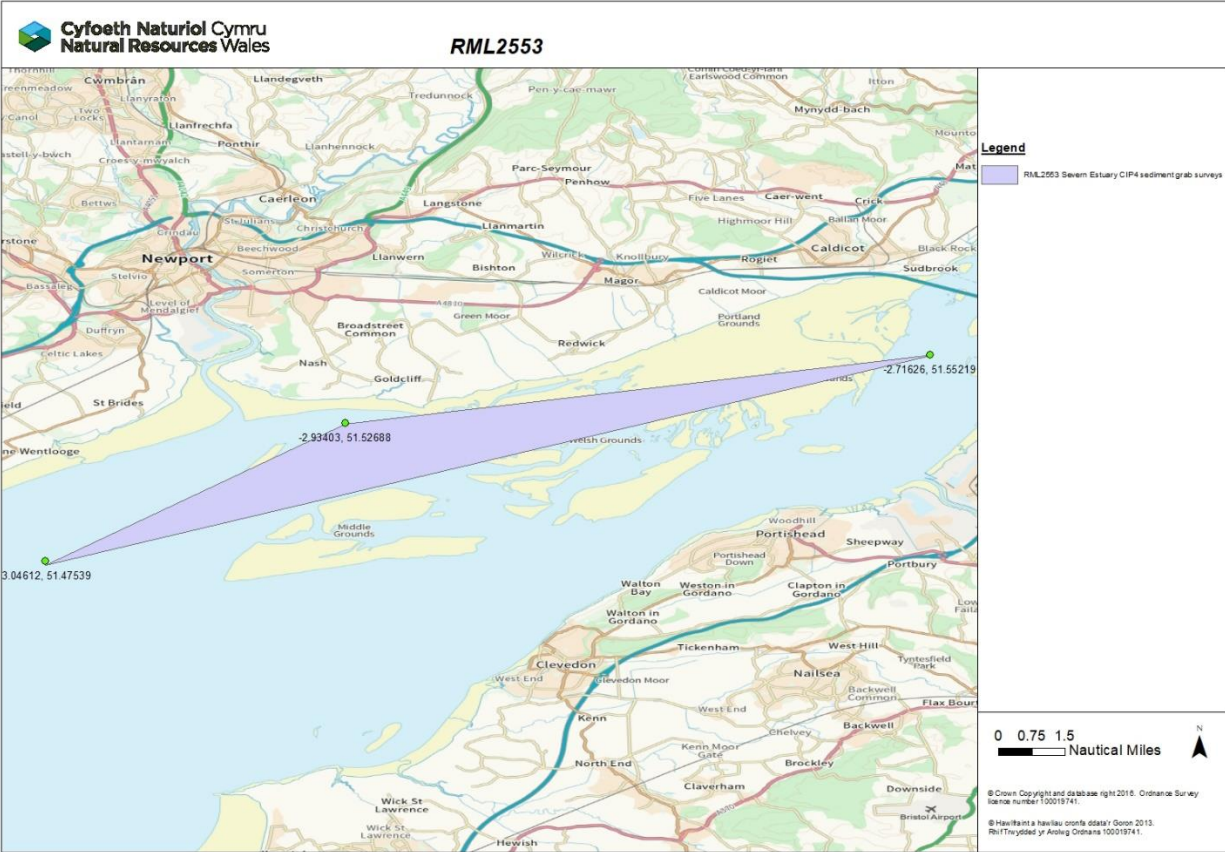
OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	RML2553 - Severn Estuary CIP4 Sediment Grab Surveys
HRA iteration/version	1.0

1. Plan or Project Details

Information about the plan or project Complete whichever rows in this table are relevant to the plan or project under consideration – depending on whether this HRA relates to an application by an external party, an NRW project or a plan. There should be no blank rows - if a row is not relevant to the plan/project under consideration put 'N/A'.		
1	Date application received	09/09/2025
2	Applicant details	Marc Hubble – APEM Ltd, Riverview, A17 Embankment Business Park, Vale Road, Heaton Mersey, Heald Green, Stockport, Cheshire, SK4 3GN
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	Benthic grab sampling at 3 locations (SWE 2, SWE 3 & SWE 4), over two surveys; Autumn 2025 & Winter 2025/26. Per sampling survey, the maximum volume of sediment to be sampled at each location is 12 litres (0.012m ³). Total maximum volume of sediment to be sampled is 72 litres (0.072m ³). Samples to be retained for analysis.

5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009
6	Location	Severn Estuary – see polygon of sampling sites in below map and in Appendix 1. SWE 2: Lat (51.47539), Long (-3.04612) SWE 3: Lat (51.52688), Long (-2.93403) SWE 4: Lat (51.55219), Long (-2.71626) 

7	Plan or project documents, including any application documents	RML2553 - Application Form RML2553 - P15623 - Severn Estuary - Method Statement - NRW Band 1 licence application - v2 Final RML2553 - MCA Correspondence RML2553 - RCAHMW and Heneb Correspondence RML2553 - Trinity House Correspondence RML2553 - P15623 License Map V3 RML2553 - Vessel route figure
8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Dylan Morgan – Marine Licensing Officer – 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, 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	Severn Estuary / Môr Hafren SAC - UK0013030 Severn Estuary / Môr Hafren SPA - UK9015022 Severn Estuary / Môr Hafren RAMSAR - UK11081
(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

European site name: Severn Estuary / Môr Hafren SAC			
1130 Estuaries	The Severn Estuary / Môr Hafren	IN COMB	All 3 sampling locations are all within this feature however, the maximum volume of sediment to be sampled at each location is 12 litres (0.012m³) each day. Across both survey periods, the maximum volume of sediment to be sampled is 72 litres (0.072 m³). As such, there will be no LSE.
1140 Mudflats and sandflats not covered by seawater at low tide	The Severn Estuary / Môr Hafren	IN COMB	Only one sampling location (SWE 3) is located within this feature. The maximum volume of sediment to be sampled per survey is 12 litres (0.012m³). Across both survey periods, the maximum volume of sediment to be sampled at SWE 3 will be 24 litres (0.024 m³). As such, there will be no LSE.
1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)	The Severn Estuary / Môr Hafren	SCREEN OUT	NO IMPACT PATHWAY PREDICTED There are no Atlantic salt meadows located in close proximity to the sampling locations and therefore, there is no impact pathway.
1110 Sandbanks which are slightly covered by sea water all the time	The Severn Estuary / Môr Hafren	IN COMB	Only one sampling location (SWE 4) is located within close proximity of this feature. The maximum volume of sediment to be sampled per survey is 12 litres (0.012m³). Across both survey periods, the maximum volume of sediment to be sampled at SWE 4 will be 24 litres (0.024 m³). As such, there will be no LSE.
1170 Reefs	The Severn Estuary / Môr Hafren	SCREEN OUT	NO IMPACT PATHWAY PREDICTED There are no recorded reefs located in close proximity to the sampling locations and therefore, there is no impact pathway.
1095 Sea lamprey <i>Petromyzon marinus</i>	The Severn Estuary / Môr Hafren	IN COMB	All 3 sampling locations are located within the Severn Estuary / Môr Hafren SAC and as such may impact the supporting habitats of Sea lamprey, River lamprey and Twaite shad. Due to the short term nature and scale of the works, it is unlikely that there will be any significant/detrimental impacts to these features.
1099 River lamprey <i>Lampetra fluviatilis</i>	The Severn Estuary / Môr Hafren		
1103 Twaite shad <i>Alosa fallax</i>	The Severn Estuary / Môr Hafren		
European site name: Severn Estuary / Môr Hafren SPA			

A037 Bewick's swan <i>Cygnus columbianus bewicki</i>	The Severn Estuary / Môr Hafren	SCREEN OUT	The 3 sampling locations (SWE2, SWE3 & SWE4) are located outside the boundary of the Severn Estuary / Môr Hafren SPA. As such, due to the small scale of the works and brief works duration, it is unlikely that there will be any significant/detrimental impacts that may affect these features. - SWE2 located approximately 3.26km from the Severn Estuary / Môr Hafren SPA. - SWE3 located approximately 0.63km from the Severn Estuary / Môr Hafren SPA. - SWE4 located approximately 1.1km from the Severn Estuary / Môr Hafren SPA.
A394 European white-fronted goose <i>Anser albifrons albifrons</i>	The Severn Estuary / Môr Hafren		
A672 Dunlin <i>Calidris alpina alpina</i>	The Severn Estuary / Môr Hafren		
A162 Redshank <i>Tringa totanus</i>	The Severn Estuary / Môr Hafren		
A048 Shelduck <i>Tadorna tadorna</i>	The Severn Estuary / Môr Hafren		
A051 Gadwall <i>Anas strepera</i>	The Severn Estuary / Môr Hafren		
European site name: Severn Estuary / Môr Hafren RAMSAR			
1. Estuaries	The Severn Estuary / Môr Hafren	SCREEN OUT	The 3 sampling locations (SWE2, SWE3 & SWE4) are located outside the boundary of the Severn Estuary / Môr Hafren RAMSAR site. As such, due to the small scale of the works and brief works duration, it is unlikely that there will be any significant/detrimental impacts that may affect these features. - SWE2 located approximately 3.1km from the Severn Estuary / Môr Hafren RAMSAR. - SWE3 located approximately 0.65km from the Severn Estuary / Môr Hafren RAMSAR. - SWE4 located approximately 1.1km from the Severn Estuary / Môr Hafren RAMSAR.
2. Assemblage of migratory fish species: Sea Lamprey River Lamprey Twaite Shad Allis Shad Salmon Sea Trout Eel	The Severn Estuary / Môr Hafren		
3. Bewick's Swan	The Severn Estuary / Môr Hafren		

4. European white-fronted goose	The Severn Estuary / Môr Hafren		
5. Dunlin	The Severn Estuary / Môr Hafren		
6. Redshank	The Severn Estuary / Môr Hafren		
7. Shelduck	The Severn Estuary / Môr Hafren		
8. Gadwall	The Severn Estuary / Môr Hafren		
9. Internationally important assemblage of waterfowl	The Severn Estuary / Môr Hafren		

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.

5. In combination assessment

Table 5.1 Identification and assessment of in combination effects				
European site name: Severn Estuary / Môr Hafren SAC				
'INCOMB' impacts from screening Table 3.2.2 and/or residual effect from appropriate assessment in section 4	European site feature(s) concerned	Other plans or projects with effects that might interact with the effects of the plan or project to render its effects significant/adverse (if any)	Nature of the in combination effect (if any) and assessment in view of conservation objectives	Can significant or adverse in combination effects be ruled out for all features?
Loss of habitat Disturbance Underwater noise Increased sedimentation INNS Contaminants	1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide (maritimae) 1110 Sandbanks which are slightly covered by sea water all the time 1095 Sea lamprey <i>Petromyzon marinus</i> 1099 River lamprey <i>Lampetra fluviatilis</i> 1103 Twaite shad <i>Alosa fallax</i>	MMML2367 - Aggregate Extraction at North Middle Ground (Area 455/459) and Bedwyn Sands MMML1516 – Bedwyn Sands	Given the small scale of the grab sampling works, it is very unlikely for there to be an in-combination effect. The maximum volume of sediment to be sampled at each location is 12 litres (0.012m³) each day. Across both survey periods, the maximum total volume of sediment to be sampled is 72 litres (0.072 m³). This is insignificant when compared to the total size of the Severn Estuary / Môr Hafren SAC. Given the minimal volumes being collected, even when considered in combination with the other sampling and dredge activities, it will not result in an in-combination effect. Both the noise and sedimentation arising from the grab sampling works will be localised and minor; and as such will not result in cumulative impacts. Furthermore, disturbance from vessel	YES

			movement is doubtful given that the Severn Estuary / Môr Hafren experiences considerable shipping activity. Given the above, the addition of the small survey vessel (12m) for approximately 2 sampling survey periods will not result in an in-combination effect. Biosecurity measures to be implemented throughout the survey to prevent the spread of invasive non-native species (INNS) and contaminants. The field team is trained in INNS identification and management, and will adhere to best practice protocols including the Check, Clean, Dry campaign. All equipment to be thoroughly cleaned, disinfected, and dried between survey sites. Any INNS encountered to be recorded and reported appropriately.	
(a) If the right hand column is 'YES' for all rows		The plan or project, when considered in combination with other plans and projects, is either not likely to have a significant effect on, or will not adversely affect the integrity of, any European site.		
(b) If any rows in the right hand column are 'NO'		The plan or project is likely to have a significant effect on, or an adverse effect on, European site/s in combination with other plans or projects.		

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	X
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)	
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: - 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: D.Morgan Name: Dylan Morgan Position: Marine Licensing Officer Date: 19/09/2025	
Was this HRA conclusion an escalated decision? YES or NO	NO

7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Relevant section of the HRA report	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
2		
3		
4		
5		

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

OGN 200 Form 3

This form should be completed by the team or individual providing the ANCB advice to the competent authority team

TO: Dylan Morgan – Marine Licensing Officer

FROM: Rachael Castle – Marine Advisory Officer

SUBJECT: Habitats Regulations Assessment of Severn Estuary CIP4 Sediment Grab Surveys (RML2553)

Thank you for consulting 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 is not likely to have a significant effect on the integrity of any European sites, and does not require an appropriate assessment.

Signed: *Rachael Sarah Castle*

Date: 24th September 2025

9. Appendix - Supporting information

