

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	WWT Llanelli Saline Lagoons Restoration Project
HRA iteration/version	V1

1. Plan or Project Details

Information about the plan or project		
1	Date application received	18 July 2025
2	Applicant details	The Wildfowl and Wetlands Trust
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	The proposed works will repair damaged banks and diversify the depth profile of the saline lagoons at WWT Llanelli Wetland Centre to protect and increase the resilience of the lagoons during prolonged dry weather. All of the proposed works will be undertaken by a tracked 13 tonne excavator and a tracked dumper truck. Works are likely to last for a combined length of two weeks.

		The main works will take place from April to August from 2026. A 5 year licence is being sought to allow for potential project delays and the high possibility that they will need to carry out minor additional repairs in subsequent years while the lagoon banks are re-stabilising and saltmarsh habitat is developing.
5	Relevant legislation or statutory basis	Marine and Coastal Access Act (2009)
6	Location	WWT Llanelli Wetland Centre: Latitude Longitude 51.665360 -4.131390 51.664400 -4.131930 51.662980 -4.131430 51.662540 -4.130400 51.662560 -4.128750 51.664610 -4.126960 51.665200 -4.128880

		
7	Plan or project documents, including any application documents	DML2544 - Marine Licence Application 2025 DML2544 – WNMP DML2544 - WWT Llanelli Saline Lagoons project coordinates DML2544 - WFD Scoping Exercise for Saline Lagoons project DML2544 - Impact Assessment 1 - Saltmarsh Habitat 2025 DML2544 - Impact Assessment 2 - Protected Sites 2025 DML2544 - Impact Assessment 3 - Fish 2025 DML2544 - Google Earth Plan of Saline Lagoon proposed works with scale DML2544 - Google Earth plan showing full extent of project area and access route DML2544 – WFD Assessment DML2544 - HRA
8	Environmental Statement	N/A
9	Pre-application correspondence	DML2544 - Re_ Q25052 Marine licence query, WWT Llanelli DML2544 - Re_ Saline Lagoons repair project at WWT Llanelli Wetland Centre

10	NRW team responsible for preparing this HRA report, and lead officer	Marine Licencing Team – Marine Licencing Officer, Stephen Treby
11	Team or person responsible for approving the plan or project (competent authority role)	Marine Area Advice and Management Team

2. Determining the need for a Habitats Regulations Assessment

2.1 Is there any possibility that the plan or project could negatively affect any European sites?	YES
2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated?	NO
2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site, in a way that would undermine that feature's conservation objectives?	YES

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	NO
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OGN200) without conducting a project-specific LSE test?	
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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	Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd SAC - UK0020020 Carmarthen Bay SPA - UK9014091 Burry Inlet SPA and RAMSAR site
(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: Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd SAC			

1110 Sandbanks which are slightly covered by sea water all the time	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN OUT	There is no direct overlap between the proposed activities and the feature
1130 Estuaries	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN IN	SAC feature maps suggests there is overlap between the feature and the proposed activity. Impact pathways likely to have a significant effect are: -Introduction and spread of INNS -Habitat loss and accidental pollution due to the use of machinery. -Pollution due to machinery -Remobilisation of sediment bound contaminants -Increased nutrients
1140 Mudflats and sandflats not covered by seawater at low tide	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN IN	SAC feature maps suggests the feature is within close proximity of the proposed activity Impact pathways likely to have a significant effect are: -Introduction and spread of INNS -Habitat loss and accidental pollution due to the use of machinery. -Pollution due to machinery -Remobilisation of sediment bound contaminants -Increased nutrients
1160 Large shallow inlets and bays	conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN OUT	There is no direct overlap between the proposed activities and the feature
1310 Salicornia and other annuals colonizing mud and sand	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN OUT	There is no direct overlap between the proposed activities and the feature
1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>)	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN IN	SAC feature maps suggests there is overlap between the feature and the proposed activity Impact pathways likely to have a significant effect are: -Introduction and spread of INNS -Habitat loss and accidental pollution due to the use of machinery. -Pollution due to machinery

			-Remobilisation of sediment bound contaminants -Increased nutrients
1103 Twaite shad <i>Alosa fallax</i>	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN OUT	All works will occur at or above MHWS
1095 Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN OUT	All works will occur at or above MHWS
1099 River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN OUT	All works will occur at or above MHWS
1102 Allis shad <i>Alosa alosa</i>	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN OUT	All works will occur at or above MHWS
1355 Otter <i>Lutra lutra</i>	NRW conservation objectives: conservation-advice-for-carmarthen-bay-and-estuaries-sac.pdf	SCREEN IN	Otter are known to frequent areas close to or within the lagoon. A likely significant effect cannot be ruled out. Pathways include - Disturbance - Pollution due to machinery use
European site name: Carmarthen Bay SPA			
A065 Common Scoter <i>Melanitta nigra</i>	NRW conservation objectives: conservation-advice-for-carmarthen-bay-spa.pdf	SCREEN OUT	There is no direct overlap between the proposed activities and the site. In any case, works will occur outside of the overwintering period
European site name: Burry Inlet SPA and RAMSAR site			
Curlew <i>Numenius arquata</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Dunlin <i>Calidris alpina alpina</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Grey plover <i>Pluvialis squatarola</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period

Knot <i>Calidris canutus</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Oystercatcher <i>Haematopus ostralegus</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Pintail <i>Anas acuta</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Redshank <i>Tringa totanus</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Shelduck <i>Tadorna tadorna</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Shoveler <i>Anas clypeata</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Teal <i>Anas crecca</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Wigeon <i>Anas penelope</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period
Turnstone <i>Arenaria interpres</i>	NRW conservation objectives: conservation-advice-for-burry-inlet-spa.pdf	SCREEN OUT	Works will occur outside of the overwintering period

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	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.

Table 3.2.2 is 'SCREEN OUT'	
(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'	The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.
(c) If there are <u>no</u> features in Table 3.2.2 that are 'SCREEN IN' and <u>any</u> features that are 'IN COMB'	The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.

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

4.1 Assessment of plan or project as defined

Table 4.1 Appropriate assessment			
European site feature/s	Description of impacts	Assessment in view of conservation objectives	Can adverse effect on site integrity be ruled out? 'YES' or 'NO'
European site name: Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd SAC			
1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)	Introduction and spread of INNS	With regards to INNS the application documents state that any machinery used will not have been used in another waterbody.	YES
1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide	Habitat loss and accidental pollution due to the use of machinery.	The works will revert the lagoons to no more than their original depth with no materials brought onto or off of the site. Application documents state that vehicles will use existing hard access trackways wherever possible. Any vehicles used will have tracks and ground mats will be used in areas of soft or uneven ground.	NO

1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) 1355 Otter <i>Lutra lutra</i>		In line with the conservation objectives <u>there is the potential</u> that without additional mitigation measures the works may affect this feature.	
1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide 1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>)	Remobilisation of sediment bound contamination	Potential impacts to water quality from the mobilisation of sediment-bound contaminants is unlikely as the top 20cm of sediment is which will be reworked is expected to be recently deposited, there are no records of pollution events, estuary is dynamic and the lagoons are subject to wave action which churn and re-distribute the sediment frequently.	YES
1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide 1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>)	Increased nutrients	Improving the lagoons resilience to drying out and diversity of depth but not their overall size is unlikely to lead to an increase in numbers of waterfowl and faeces which could result in an increase in nutrients. Any birds using the lagoons would already be present within Carmarthen Bay SPA. As such increased nutrient loading from an increase in waterfowl would not be expected.	YES

1355 Otter <i>Lutra lutra</i>	Standard licence conditions mitigate for impact pathways related to pollution incidents via accidental leaks from the plant used. Disturbance	The overall duration of works are expected to be relatively short and last for a maximum of two weeks between April and August 2026. Works will be undertaken during daylight hours only and sediment will be excavated to a maximum depth of 0.2m. The total length of banks requiring repairs is less than 200m. The lagoons are naturally drained down in the summer and therefore as such otter are unlikely to be present during this time.	YES
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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: Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd 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'
1130 Estuaries	Habitat loss and accidental pollution	YES	Any licence granted for these works will include a condition requiring a CEMP (Construction Environmental Management Plan) which will specify	YES

1140 Mudflats and sandflats not covered by seawater at low tide	due to the use of machinery.		the mitigation measures proposed to avoid or reduce the impact of pollution linked to the proposed activities. The CEMP should also include measures to avoid and mitigate habitat loss	
1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>)			In addition, standard licence conditions state that: - Bunding, storage facilities and spill kits will be employed to contain and prevent the release of fuel, oils and chemicals associated with the plant, refuelling and construction equipment into the marine environment. - Plant, vehicles and machinery will not be refuelled on the foreshore. - The licence holder must ensure that pollution prevention best practice is adhered to at all times. Any incidents must be reported to the Licensing Authority as soon as possible.	
1355 Otter <i>Lutra lutra</i>				

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: <i>S. Treby</i> Name: Stephen Treby Position: Marine Licencing Officer Date: 18 August 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
3 & 4	Emails received 23 September 2025 & 13 October 2025 Teams Meeting of 30 September 2025	NRW TE requested further assessment which was provided on 08 October 2025 regarding the following: • Clarification regarding whether deepening the lagoons by a maximum of 0.2m would lead to a significant increase in contaminant remobilisation. • Clarification regarding whether improving the lagoons resilience to drying out and diversity of depth but not their overall size could lead to a significant increase in numbers of waterfowl.

8. Countersignature

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: Stephen Treby, Marine Licensing Team
FROM: Ryan Rees, Marine Area Advice and Management Team
SUBJECT: Habitats Regulations Assessment of DML2544 WWT Llanelli Saline Lagoons
Restoration Project, Carmarthenshire

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

We agree with the conclusion of the above mentioned HRA, with respect to the marine features of the Carmarthen Bay and Estuaries SAC, Carmarthen Bay SPA and Burry Inlet SPA and RAMSAR site.

We agree that the project has been taken to Appropriate Assessment, and it is established that that the project will not adversely affect the integrity of the above named Natura 2000/Ramsar site/s.

Signed: Ryan Rees

Date: 13/10/25

9.

Appendix - Supporting information

Update to proposed methods following initial NRW Advisory comments

Having discussed this with my colleagues in the WWT Conservation team we have agreed that we will limit the deepening of the saline lagoons to a maximum of 0.2m from the existing depth profile, and generally to between 0.0 and 0.2m. We believe that this amount of deepening will still significantly increase the lagoons resilience to drying out in future, whilst also providing sufficient material to repair and widen the eroded banks and create a new protective buffer area of saltmarsh habitat in the south west corner of the lagoons.

We believe that limiting the excavation to a maximum of 0.2m would keep the level of remobilisation of nutrients or contaminants in the sediment to well within the natural range that would be seen in this part of the Burry Inlet as a result of normal wave and tidal action.

This is evidenced by the dynamic changes that we see within the lagoons annually during our monitoring and maintenance work. For example, our routine monitoring shows that the salinity of the lagoons can vary dramatically through the year from 3.3 $\mu\text{S/cm}$ up to 45.4 $\mu\text{S/cm}$, whilst temperature varies between sub-zero up to 29.6°C. We can provide salinity, temperature and water depth data for the lagoons going back to 2012 if helpful.

The wave action during high tides churn the lagoon sediment and erode banks of the lagoons, and we see similar dynamic changes in the surrounding creeks, where siltation and scouring changes the depth and profile of creeks annually.

The lagoons have been in place since around 1989 and have changed in both depth and area since their creation. For example, in the last 10 years, Google Earth historical aerial mapping shows that the northern edge of the lagoons has retreated by around 2m, and that the dividing bund between the lagoons has narrowed by a similar amount, whilst a number of small islands have disappeared entirely.

The water colour within the lagoons is further evidence of the churning action of the water because we are typically unable to see the bed of the lagoons even in as little as 20cm of water due to suspended sediment. (We can take Secchi disc measurements from the lagoons if helpful although we do not routinely collect these.)

Mitigating actions we will take to minimise sediment mobilisation during and after works are as follows:

1. We will carry out excavation work when the lagoons are dry, to avoid mobilisation of sediment in the water column.
2. We will reprofile the spoil from excavation work in the south west corner of the lagoons (as shown on the provided aerial plans), with a slight taper from the top of the bank back into the lagoons. This means that any sediment remobilisation after works are completed will result in the sediment generally being carried back in to the lagoons as opposed to into the wider estuary.
3. The height of the outflow sluices on both lagoons is significantly above the deepest point in the lagoons, and therefore when the lagoons refill with water after works are completed, any mobilised sediment will typically be retained within the lagoons.
4. To minimise erosion of the re-located sediment, we will compact the excavated sediment as firmly as possible, and we will exclude cattle from the area for a minimum of 8 months to minimise poaching and encourage saltmarsh vegetation to develop.
5. We will carry out work during the summer, to ensure that there is time for sediment to settle before the autumn spring tides.