

# 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:**

<b>Document Version</b>	<b>Date Published</b>	<b>Summary of Changes</b>
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

<b>Plan or project name, brief description or application reference number</b>	DragonLNG Jetty Repairs
<b>HRA iteration/version</b>	N/A

### 1. Plan or Project Details

Information about the plan or project		
<b>1</b>	<b>Date application received</b>	Received: 06 November 2025 Duly Made: 18 November 2025
<b>2</b>	<b>Applicant details</b>	Dragon LNG Limited
<b>3</b>	<b>NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer</b>	N/A
<b>4</b>	<b>Activity/ies proposed</b>	<p>DragonLNG is looking to undertake repairs for their jetty at Milford Haven in Pembrokeshire. The jetty was constructed in the 1960s, built of steel piles, with a concrete roadway on top. Recent observations have identified potential issues with the integrity of the concrete roadway.</p> <p>In response, DragonLNG is looking to undertake an inspection of the jetty and carry out any</p>

		subsequent repairs. The inspection and repair works would be undertaken during the low shipping period (May to September) and are expected to last up to four years from 2027 to 2030.
5	<b>Relevant legislation or statutory basis</b>	Marine and Coastal Access Act 2009
6	<b>Location</b>	<p>DragonLNG Jetty, Milford Haven</p>  <p>The map shows an aerial view of the DragonLNG Jetty in Milford Haven. A purple shaded area highlights the location of CML2566, which is situated in the water near the jetty structure. The map includes a legend, a scale bar (0 to 0.1 Kilometers), and a north arrow. Text on the map includes 'Cyfoeth Naturiol Cymru Natural Resources Wales' and 'CML2566 DragonLNG Jetty Repairs'.</p>

7	<b>Plan or project documents, including any application documents</b>	CML2566 - DragonLNG Jetty repairs ML application form 1F CML2566 - Updated Coordinates CML2566 - PC7468-HAS-XX-XX-DR-GS-0001_LocationPlan ML CML2566 - eng-marine-inns-biosecurity-ra-and-management-plan CML2566 - PC7468-RHD-XX-XX-RP-EV-0001-Jetty Improvement Marine Licence WERCA CML2566 - PC7468-RHD-XX-XX-RP-EV-0002-Jetty Improvement Marine Licence HRA CML2566 - welsh-national-marine-plan-signposting-en-only
8	<b>Environmental Statement</b>	N/A
9	<b>Pre-application correspondence</b>	N/A
10	<b>NRW team responsible for preparing this HRA report, and lead officer</b>	Jack Thompson – Marine Licensing Team
11	<b>Team or person responsible for approving the plan or project (competent authority role)</b>	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	No

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?	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 <a href="#">OGN200</a> ) 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	<ul style="list-style-type: none"> <li>• Pembrokeshire Marine/Sir Benfro Forol SAC – Grey seal</li> <li>• West Wales Marine / Gorllewin Cymru Forol SAC – Harbour porpoise</li> <li>• Cardigan Bay / Bae Ceredigion SAC - Bottlenose dolphin</li> </ul>
(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	<ul style="list-style-type: none"> <li>• North Anglesey Marine / Gogledd Môn Forol SAC</li> <li>• Bristol Channel Approaches / Dynesfeydd Môr Hafren SAC</li> </ul> <p>The above have been initially considered for <b>harbour porpoise</b> as the activity falls within the Celtic &amp; Irish Seas (Marine Mammal Management Unit). However, the impacts upon this receptor have</p>

been assessed as part of the West Wales Marine SAC given that the works are located closest to this protected site and **harbour porpoise** are a listed feature. As such, the sites have not been taken through to the screening assessment.

- Pen Llŷn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC

The above have been initially considered for **bottlenose dolphin** as the activity falls within the Celtic & Irish Seas (Marine Mammal Management Unit). However, the impacts upon this receptor have been assessed as part of the Cardigan Bay SAC given that the works are located closest to this protected site and **bottlenose dolphin** are a listed feature. As such, the sites have not been taken through to the screening assessment.

- Cardigan Bay/Bae Ceredigion SAC
- Pen Llŷn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC

The above have been initially considered for **grey seal** as the activity falls within the appropriate Marine Mammal Management Unit. However, the impacts upon this receptor have been assessed as part of the Pembrokeshire Marine SAC given that the works are located within this protected site and **grey seal** are a listed feature. As such, the sites have not been taken through to the screening assessment.

- Cleddau rivers SAC (11.2 km) – no impact predicted on migratory fish features as they pass through the Pembrokeshire Marine SAC

### 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
<b>Pembrokeshire Marine/Sir Benfro Forol SAC</b>			
<b>Estuaries</b>  <b>Sandbanks which are slightly covered by seawater all the time</b>  <b>Mudflats and sandflats not covered by seawater at low tide</b>  <b>Coastal Lagoons</b>  <b>Large shallow inlets and bays</b>  <b>Reefs</b>  <b>Submerged or partially submerged sea caves</b>  <b>Atlantic salt meadows</b>	NRW conservation objectives: <a href="#">Contents</a>	<b>SCREEN OUT</b>	<b>Habitat loss and sediment disturbance:</b> All activities will take place above the water’s surface and within the jetty’s footprint. As such, there will be no direct interaction with the seabed and therefore, there will be no sediment disturbance or habitat loss.  No LSE.
		<b>SCREEN IN</b>	<b>Introduction and spread of INNS:</b> A LSE exists as there will be vessels, materials and machinery associated with the project which could be a vector for the introduction and spread of INNS.
		<b>SCREEN IN</b>	<b>Pollution:</b> A LSE exists through the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.

<p><b>Otter</b> <i>Lutra lutra</i></p>	<p>NRW conservation objectives: <a href="#">Contents</a></p>	<p><b>SCREEN OUT</b></p>	<p><b>Disturbance:</b> All activities will take place above the water's surface and within the jetty's footprint. As such, there will be no direct interaction with the seabed. Vessels may be used to facilitate the works, but aside from this, there will be no interaction with the water column. A potential for visual disturbance exists however, anthropogenic presence arising from the work is in keeping with the nature of the site, which is a busy, industrial area.</p> <p>As such, no LSE is expected.</p>
<p><b>Grey Seal</b> <i>Halichoerus grypus</i></p> <p><b>Allis shad</b> <i>Alosa alosa</i></p> <p><b>Twaite shad</b> <i>Alosa fallax</i></p> <p><b>River lamprey</b> <i>Lampetra fluviatilis</i></p> <p><b>Sea lamprey</b> <i>Petromyzon marinus</i></p>	<p>NRW conservation objectives: <a href="#">Contents</a></p>	<p><b>SCREEN OUT</b></p>	<p><b>Disturbance:</b> All activities will take place above the water's surface and within the jetty's footprint. As such, there will be no direct interaction with the seabed. Vessels may be used to facilitate the works, but aside from this, there will be no interaction with the water column. As such, disturbance is unlikely.</p> <p>No LSE is expected.</p>
		<p><b>SCREEN IN</b></p>	<p><b>Pollution:</b> A LSE exists through the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.</p>
<p><b>Shore dock</b> <i>Rumex rupestris</i></p>	<p>NRW conservation objectives: <a href="#">Contents</a></p>	<p><b>SCREEN OUT</b></p>	<p><b>No impact pathway:</b> Shore dock typically grows on rocky, sandy and raised beaches, shore platforms and the lower slopes of cliffs. Given that works will be undertaken within the footprint of the jetty, there is no impact pathway.</p>
<p><b>West Wales Marine SAC</b></p>			
<p><b>Harbour porpoise</b> <i>Phocoena phocoena</i></p>	<p>NRW conservation objectives:</p>	<p><b>SCREEN OUT</b></p>	<p><b>Disturbance:</b> All activities will take place above the water's surface and within the jetty's footprint. As such, there will be no direct interaction with the seabed. Vessels may be used to facilitate the</p>

	<a href="#">West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)</a>		works, but aside from this, there will be no interaction with the water column. As such, disturbance is unlikely.  No LSE is expected.
		<b>SCREEN IN</b>	<b>Pollution:</b> A LSE exists through the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.
<b>Cardigan Bay/Bae Ceredigion SAC</b>			
<b>Bottlenose dolphin</b> <i>Tursiops truncatus</i>	NRW conservation objectives <b>Cardigan Bay:</b>  <a href="#">Contents (naturalresources.wales)</a>	<b>SCREEN OUT</b>	<b>Disturbance:</b> All activities will take place above the water's surface and within the jetty's footprint. As such, there will be no direct interaction with the seabed. Vessels may be used to facilitate the works, but aside from this, there will be no interaction with the water column. As such, disturbance is unlikely.  No LSE is expected.
		<b>SCREEN IN</b>	<b>Pollution:</b> A LSE exists through the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.

<b>TABLE 3.2.3 Screening decision of the plan or project 'alone'</b>	
<b>(a) If the screening conclusion for <u>all</u> features for all sites in Table 3.2.2 is 'SCREEN OUT'</b>	<b>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>

(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  Sandbanks which are slightly covered by seawater all the time  Mudflats and sandflats not covered by	Introduction and spread of INNS	The use of vessels, machinery, and material associated with the project may facilitate the introduction or spread of INNS. These could act as a vector for the introduction and spread of INNS via fouling on vessel hulls or through ballast water.	<b>NO</b>

<p>seawater at low tide</p> <p>Coastal Lagoons</p> <p>Large shallow inlets and bays</p> <p>Reefs</p> <p>Submerged or partially submerged sea caves</p> <p>Atlantic salt meadows</p>			
<p>Estuaries</p> <p>Sandbanks which are slightly covered by seawater all the time</p> <p>Mudflats and sandflats not covered by seawater at low tide</p> <p>Coastal Lagoons</p> <p>Large shallow inlets and bays</p> <p>Reefs</p>	<p>Pollution</p>	<p>There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.</p>	<p><b>NO</b></p>

<p>Submerged or partially submerged sea caves</p> <p>Atlantic salt meadows</p> <p>Otter <i>Lutra lutra</i></p> <p>Grey Seal <i>Halichoerus grypus</i></p> <p>Allis shad <i>Alosa alosa</i></p> <p>Twaite shad <i>Alosa fallax</i></p> <p>River lamprey <i>Lampetra fluviatilis</i></p> <p>Sea lamprey <i>Petromyzon marinus</i></p>			
<b>West Wales Marine SAC</b>			
<p>Harbour porpoise <i>Phocoena phocoena</i></p>	Pollution	There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.	<b>NO</b>
<b>Cardigan Bay/Bae Ceredigion SAC</b>			
<p>Bottlenose dolphin <i>Tursiops truncatus</i></p>	Pollution	There is the potential for materials (e.g. concrete) to fall into the water from the works above and contaminants to enter the marine environment through accidental spills from machinery, vehicles and vessels, as well as the introduction of liquid concrete during pumping.	<b>NO</b>

## 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'
<b>Estuaries</b>  <b>Sandbanks which are slightly covered by seawater all the time</b>  <b>Mudflats and sandflats not covered by seawater at low tide</b>  <b>Coastal Lagoons</b>  <b>Large shallow inlets and bays</b>  <b>Reefs</b>	Introduction and spread of INNS	YES	<p>Although a biosecurity risk assessment has been provided, vessel information is currently unknown and therefore, the detail provided is limited. As such, the control of spread and introduction of INNS to the site can be mitigated by the requirement of a <b>Biosecurity Risk Assessment</b> post consent which will reduce the uncertainty surrounding the source and nature of the vessels utilised for the proposed works.</p> <p><i>“The Licence Holder must submit a biosecurity risk assessment to the Licensing Authority for written approval at least <b>6 weeks</b> prior to commencement of the Licensed Activities. No Works may be undertaken prior to written approval from the Licensing Authority.”</i></p>	YES


<p><b>Submerged or partially submerged sea caves</b></p> <p><b>Atlantic salt meadows</b></p>				
<p><b>Estuaries</b></p> <p><b>Sandbanks which are slightly covered by seawater all the time</b></p> <p><b>Mudflats and sandflats not covered by seawater at low tide</b></p> <p><b>Coastal Lagoons</b></p> <p><b>Large shallow inlets and bays</b></p> <p><b>Reefs</b></p> <p><b>Submerged or partially submerged sea caves</b></p> <p><b>Atlantic salt meadows</b></p> <p><b>Otter <i>Lutra lutra</i></b></p> <p><b>Grey Seal</b></p>	<p>Pollution</p>	<p>YES</p>	<p>The applicant has proposed a series of mitigation measures to prevent risk of pollution.</p> <p>Water misting systems and wet cutting techniques will be used to suppress dust during concrete removal. Additionally, vacuum systems would be used in confined or sensitive areas.</p> <p>All equipment will be inspected prior to mobilisation. Spill kits will be stationed at every work zone with drip trays placed under stationary machinery. Refuelling will be conducted away from the water where feasible, and secondary containment is proposed for fuel and chemical storage.</p> <p>Silt curtains or floating booms will be deployed around work areas where there is a risk of material entering the water. It is proposed to install attachment trays or netting under the repair zones to capture any falling debris or slurry.</p> <p>Standard pollution prevention conditions such as no refuelling on the foreshore, use of marine-safe coatings, use of bunded storage facilities etc. will be added to the licence.</p> <p>The applicant noted that a Construction Environmental Management Plan (CEMP) will be undertaken upon identification of a contractor for the works. The following condition will therefore be added to the licence to ensure this is submitted prior to commencement:</p> <p><i>The Licence Holder must submit a construction environment 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></p> <p>Conditions related to the use of concrete will also be included:</p>	<p>YES</p>

<p><b>Halichoeurus grypus</b></p> <p><b>Allis shad</b> <b>Alosa alosa</b></p> <p><b>Twaite shad</b> <b>Alosa fallax</b></p> <p><b>River lamprey</b> <b>Lampetra fluviatilis</b></p> <p><b>Sea lamprey</b> <b>Petromyzon marinus</b></p>			<p><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></p> <p><i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment (e.g. bridges, retaining walls, etc.), suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i></p> <p><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></p>	
<b>West Wales Marine SAC</b>				
<p><b>Harbour porpoise</b> <b>Phocoena phocoena</b></p>	<p>Pollution</p>	<p>YES</p>	<p>The applicant has proposed a series of mitigation measures to prevent risk of pollution.</p> <p>Water misting systems and wet cutting techniques will be used to suppress dust during concrete removal. Additionally, vacuum systems would be used in confined or sensitive areas.</p> <p>All equipment will be inspected prior to mobilisation. Spill kits will be stationed at every work zone with drip trays placed under stationary machinery. Refuelling will be conducted away from the water where feasible, and secondary containment is proposed for fuel and chemical storage.</p> <p>Silt curtains or floating booms will be deployed around work areas where there is a risk of material entering the water. It is proposed to install attachment trays or netting under the repair zones to capture any falling debris or slurry.</p> <p>Standard pollution prevention conditions such as no refuelling on the foreshore, use of marine-safe coatings, use of bunded storage facilities etc. will be added to the licence.</p>	<p><b>YES</b></p>

			<p>The applicant noted that a Construction Environmental Management Plan (CEMP) will be undertaken upon identification of a contractor for the works. The following condition will therefore be added to the licence to ensure this is submitted prior to commencement:</p> <p><i>The Licence Holder must submit a construction environment 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></p> <p>Conditions related to the use of concrete will also be included:</p> <p><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></p> <p><i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment (e.g. bridges, retaining walls, etc.), suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i></p> <p><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></p>	
<b>Cardigan Bay/Bae Ceredigion SAC</b>				
<b>Bottlenose dolphin</b> <i>Tursiops truncatus</i>	Pollution	YES	<p>The applicant has proposed a series of mitigation measures to prevent risk of pollution.</p> <p>Water misting systems and wet cutting techniques will be used to suppress dust during concrete removal. Additionally, vacuum systems would be used in confined or sensitive areas.</p> <p>All equipment will be inspected prior to mobilisation. Spill kits will be stationed at every work zone with drip trays placed under stationary</p>	<b>YES</b>

			<p>machinery. Refuelling will be conducted away from the water where feasible, and secondary containment is proposed for fuel and chemical storage.</p> <p>Silt curtains or floating booms will be deployed around work areas where there is a risk of material entering the water. It is proposed to install attachment trays or netting under the repair zones to capture any falling debris or slurry.</p> <p>Standard pollution prevention conditions such as no refuelling on the foreshore, use of marine-safe coatings, use of bunded storage facilities etc. will be added to the licence.</p> <p>The applicant noted that a Construction Environmental Management Plan (CEMP) will be undertaken upon identification of a contractor for the works. The following condition will therefore be added to the licence to ensure this is submitted prior to commencement:</p> <p><i>The Licence Holder must submit a construction environment 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></p> <p>Conditions related to the use of concrete will also be included:</p> <p><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></p> <p><i>The Licence Holder must ensure that if concrete is to be sprayed in the vicinity of the marine environment (e.g. bridges, retaining walls, etc.), suitable pollution prevention measures are taken to prevent rebounded or windblown concrete from entering the water environment.</i></p> <p><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></p>	
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## 6. Conclusion

<p>HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)</p>	
<p>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)</p>	
<p>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)</p>	
<p>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)</p>	
<p>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)</p>	<p><b>X</b></p>
<p>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:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> </ul> <p>(*SSSI consents cannot be given as derogations)</p>	
<p>Signed:</p> <div style="text-align: center; margin-left: 100px;">  </div> <p>Name: Jack Thompson <span style="float: right;">Position: Senior Marine Licensing Officer</span></p> <p>Date: 08 December 2025</p>	

**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.**

<b>Relevant section of the HRA report</b>	<b>Correspondence and/or meetings with the ANCB</b>	<b>Description of how the comments from the ANCB have been taken into account</b>
4	23 December 2025	All points raised by NRW Advisory had been captured in section 4 of the HRA, as part of the appropriate assessment, prior to consultation, bar the need for a CEMP which has subsequently been added as a condition for mitigation to prevent environmental pollution.

## 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 Dragon LNG Jetty Repairs (CML2566)

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

NRW Advisory (A) agree with the conclusion of the above mentioned HRA that the proposed works will not adversely affect the integrity of the following European sites:

- Pembrokeshire Marine/Sir Benfro Forol SAC
- West Wales Marine / Gorllewin Cymru Forol SAC – Harbour porpoise
- Cardigan Bay / Bae Ceredigion SAC - Bottlenose dolphin

This is providing that the mitigation included in the Application form for Dust Control; Leaks and spills; and Containment measures, are adhered to. NRW (A) additionally advise including the following conditions in the Marine Licence:

- As the vessel is yet to be chosen, we advise conditioning for an updated biosecurity risk assessment and management plan to be submitted and approved prior to work commencing once the vessel and contractor has been selected.
- We additionally advise including standard conditions for biosecurity to minimise the risk of spread of invasive non-native species i.e. a "cleanliness of Equipment" condition.
- NRW (A) advise standard conditions for pollution prevention including, "Refuelling of Plant and Equipment"; "Pollution Prevention"; "Spillage of Pollutants"; and "Prevention of Disposal of Man-made Debris".
- We also advise including the standard conditions for the use and render of concrete to minimise risk of damage to the marine environment by wet concrete contamination, as well as, conditions for the suitability of coatings and concrete for the marine environment, and that the maximum cure time is allowed for concrete.
- NRW (A) welcome the details provided regarding the construction methodology and proposed mitigation. We note that the Applicants' Water Environment Regulations Compliance Assessment (WERCA) also mentions that a Construction

Environmental Management Plan (CEMP) will be undertaken upon identification of a contractor for the works. NRW (A) advise that this CEMP be conditioned as part of the licence requiring approval prior to any works commencing.

Signed: Bridget Randall-Smith - Marine Area Management and Advice Team

Date: 22/12/2025