OGN 200 Form 1B

Record of a Habitats Regulations Assessment

All staff using this form should be familiar with OGN200 and should have had appropriate training in HRA.

A separate version of this form is available with guidance notes on how to complete it. You should refer to those notes when using this form.

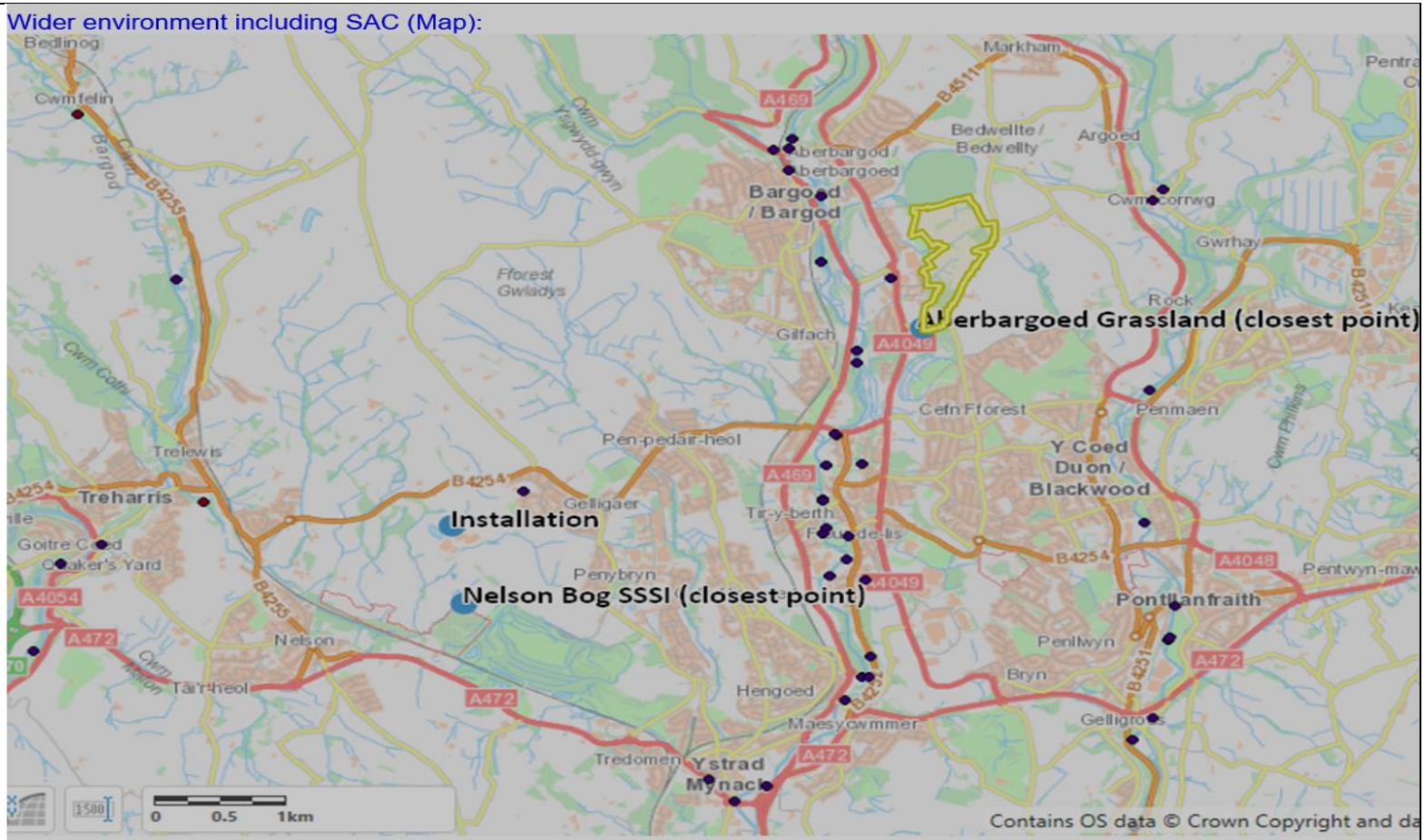
Plan or project name, brief description or application reference number	PAN-025512

HRA iteration/version	**1.0**

1 Plan or Project Details

Information about the plan or project		
1	**Date application received**	Duly Made 04/11/2025
2	**Applicant details**	Bryn Power 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**	The operator has held an Environmental Permit for the facility since 2016 and is applying to add one new combined heat and power engine (CHP) of 2.66MWTh to the installation. Biogas will be the fuel. This will result in one new emission point to air. The following European site is within 10km of the facility: • Aberbargoed Grasslands Special Area of Conservation SAC UK0030071 and Site of Special Scientific Interest (SSSI) located approximately 5km away from the installation. The SSSI features include Marshy grassland and Dry neutral grassland, which have been designated as 'Sym' – "are of importance in a unit but are not the main drivers of management or focus of monitoring. These features will benefit from management for the key feature(s) identified in the unit" Therefore they have not been assessed further here. Nelson Bog SSSI ID = 791 approximately 320m away from the installation boundary. See separate document Appendix 4 The applicant has completed detailed air dispersion modelling to assess the impact of the new emission point to air and the assessment also includes all other existing and relevant emissions to air at the site. The new air emission

		point will be A12. This report has been audited by our air quality and noise team who state “Our checks indicate that we are in general agreement with the consultant’s provided predicted concentrations for both human and ecological receptors” The pollutants emitted of concern for habitats are oxides of nitrogen (NOx) and sulphur dioxide leading to potential long term and short term NOx and long term sulphur dioxide airborne impacts, potential long term nutrient nitrogen deposition and potential long term acidity deposition impacts. The detailed air dispersion modelling includes existing and new point source emissions to air and has been completed at 8670 operational hours a year (maximum hours) and at the relevant maximum emission limits (ELV) This provides a conservative assessment as in reality the new CHP will operate for far fewer hours per year and will likely emit NOx at a much lower rate than the ELV.
5	**Relevant legislation or statutory basis**	Environmental Permitting (England and Wales) Regulations 2016 Industrial Emissions Directive 2010 (IED) Medium Combustion Plant Directive (MCP)
6	**Location**	Gelliargwellt Farm Anaerobic Digester Facility, Gelliargwellt Farm, Gelligaer, Hengoed, CF82 8FY ST 12387 96675 Please see map below showing the installation and the location in relation to the SSSI and SAC:

		Wider environment including SAC (Map):  © Crown Copyright and database right 2019. Ordnance Survey licence number 100019741.
7	**Plan or project documents, including any application documents**	DMS Folder Link, Public Register link to application: Public register - Customer Portal

8	**Environmental Statement**	N/A
9	**Pre-application correspondence**	N/A
10	**NRW team responsible for preparing this HRA report, and lead officer**	Emma Smith Senior Permitting Officer Installations and RSR Permitting, Permitting Service
11	**Team or person responsible for approving the plan or project (competent authority role)**	As above

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	NO

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*

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**	Aberbargoed Grassland SAC UK0030071
(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 There are no other European sites within 10km of the installation.

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment			
Designated site feature Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia (EU Species Code: 1065) 2.2 Vascular plants lower plants and invertebrates of wet habitats	**Relevant conservation objectives** Core Management Plan for Aberbargoed Grasslands SAC including Conservation Objectives. Microsoft Word - Aberbargoed Grasslands Core SAC plan jan08.doc	**Screening conclusion – SCREEN OUT', 'SCREEN IN' or 'IN COMB'**	**Explanation** **Toxic contamination** There is an impact pathway due to emissions of NOx(oxides of nitrogen) and sulphur dioxide (SO_2), therefore significant effects cannot be ruled out. **Nutrient enrichment** There is an impact pathway due to emissions of NOx(oxides of nitrogen) therefore significant effects cannot be ruled out. **Acidification** There is an impact pathway due to emissions of NOx (oxides of nitrogen) and sulphur dioxide (SO_2), therefore significant effects cannot be ruled out. **Habitat Loss** No impact pathway as there is no work being carried out on the SAC itself **Physical damage by IPC/PPC Processes** No impact pathway as there is no work being carried out on the SAC itself **Smothering** There is an impact in principle due to emissions of dust, however the installation is located a sufficient distance away from the SAC, approximately 5km to expect no likely significant effect. This is in accordance with the document "Guidance on the

			Assessment of Mineral Dust Impacts for Planning" by the Institute of air quality management. **Turbidity** No impact pathway as there is no change to the water discharge **Siltation** No impact pathway as there is no change to the water discharge
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) (EU Habitat Code: 6410) **1.1** Fens & wet habitats			**Toxic contamination** There is an impact pathway due to emissions of NOx (oxides of nitrogen) and sulphur dioxide (SO2), therefore significant effects cannot be ruled out. **Nutrient enrichment** There is an impact pathway due to emissions of NOx (oxides of nitrogen) therefore significant effects cannot be ruled out. **Changes in salinity regime** No impact pathway as there is no change to the water discharge **Changes in thermal regime** No impact pathway as there is no change to the water discharge **Habitat loss**

			No impact pathway as there is no work being carried out on the SAC itself **Physical damage by IPC/PPC Processes** No impact pathway as there is no work being carried out on the SAC itself **Smothering** There is an impact in principle due to emissions of dust, however the installation is located a sufficient distance away from the SAC, approximately 5km to expect no likely significant effect. . This is in accordance with the document "Guidance on the Assessment of Mineral Dust Impacts for Planning" by the Institute of air quality management. **Turbidity** No impact pathway as there is no change to the water discharge **Siltation** No impact pathway as there is no change to the water discharge

TABLE 3.2.3 Screening decision of the plan or project 'alone'

~~(a) If the screening conclusion for all 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 any 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 no features in Table 3.2.2 that are 'SCREEN IN' and any 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: Aberbargoid Grasslands SAC			
Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia (EU Species Code: 1065) **2.2** Vascular plants lower plants and invertebrates of wet habitats Molinia meadows on calcareous, peaty or clayey-silt-laden soils	**Toxic contamination** **Nutrient enrichment** **Acidification**	**Toxic contamination** NOx emissions There is emissions of oxides of nitrogen and sulphur dioxide. The applicant has completed detailed air dispersion modelling for these emissions. A long term critical level of 30ug/m^3 NOx (annual) and short-term critical level of 75ug/m^3 Nox (24 hourly) has been assumed for the Aberbargoed Grasslands SAC. The maximum long term process contribution (PC) at receptor point 17, located within the SAC is 0.05ug/m^3 and < 1% (0.2%) of the long term critical level. Therefore the impacts from airborne Nox can be screened out as insignificant.	**YES**

(Molinion caeruleae) (EU Habitat Code: 6410) **1.1** Fens & wet habitats		The maximum short-term PC at receptor 17, located in the SAC is 0.632ug/m^3 and <10%(0.84%) of the short-term critical level, therefore impacts from airborne NOx emissions can be screened out as insignificant. <u>Sulphur Dioxide emissions</u> A long term critical level of 20 µgm^3 (annual) has been assumed for the Aberbargoed Grasslands SAC. The maximum long term process contribution (PC) at receptor point 17, located within the SAC is 0.03ug/m^3 and <1% (0.15%) of the long term critical level. Therefore impacts from the airborne sulphur dioxide emissions can be screened out as insignificant. However designated site feature "Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) (EU Habitat Code: 6410)" is sensitive to Bryophytes. Therefore we need to use the long term critical level of 10 µg m^3 The long term process contribution (PC) is then double, 0.06 ug/m^3 and still <1% (0.3%) of the long term critical level. **Nutrient enrichment** A nutrient nitrogen critical load of 15kgN/ha/yr has been assumed for "Fen, marsh and swamp" for Aberbargoed Grasslands SAC. The maximum nitrogen deposition process contribution is	

		0.00480kgN/ha/yr and is < 1% (0.03%) of the minimum critical load value. Therefore impacts from nitrogen deposition can be screened out as insignificant and there is no likely significant effect. Using the lower critical load of 6kgN/ha/yr for "Lowland to montane, dry to mesic grassland usually dominated by Nardus stricta" the maximum nitrogen deposition process contribution is < 1% (0.08%) of the minimum critical load value. Therefore impacts from nitrogen deposition can be screened out as insignificant and there is no likely significant effect. **Acidification** An acid deposition minimal critical load value of 0.642 keq/ha/yr (Min N) 0.922 kg/ha/yr(Max N) has been assessed for the "Northern Atlantic wet heaths with Erica tetralix" at Aberbargoed Grasslands SAC. The maximum total acid deposition process contribution is 0.0034keg/ha/yr and <1% (0.5) of the lowest critical load value. Therefore acid deposition impacts can be considered insignificant.	

~~Table 4.2 Appropriate assessment of the plan or project taking into account additional conditions or restrictions~~				
~~European site name:~~				
~~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'~~

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, and 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)	**Y**
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 not 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 cannot 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: **Emma Smith**	

Name: **Emma Smith** **Position: Senior Permitting Officer** **Date: 02/02/2026**	
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. Countersignature

I have reviewed the HRA documented in this form and confirm that I agree*/do not agree* with the conclusion recorded in section 6. (*delete as applicable)

Additional comments (if any):

Signed:

Name:

Position:

Date: