

2025

SGM Waste Management



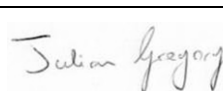
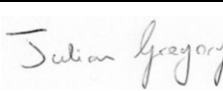
Habitat Regulations Assessment (HRA)



**ECOVIGOUR**  
Integrated Environmental Management





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## CONTENTS

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1. Introduction .....	4
1.1 Assessment Background .....	4
1.2 Proposed Operations at the Facility.....	4
2. Legislative Context .....	5
2.1 Overview .....	5
3. Methodology .....	6
3.1 Overview .....	6
4. Description of The Proposed Activities.....	7
4.1 Site Context.....	7
5. HRA Methodology Objectives.....	8
6. Designated Sites within Proximity to Site .....	9
6.2 Gwent Levels Rhymney and Peterstone (SSSI) .....	10
6.3 The Severn Estuary European Protected Sites - Môr Hafren SAC - (SSSI, SAC, SPA, RAMSAR).....	11
7. Assessment of Potential Impacts Resulting from Specific Activities and Proposed Mitigation Measures – SGM Waste .....	17
8.1 Annex I Habitats – Impacts & Mitigation .....	17
8.2 Annex II Species – Impacts & Mitigation.....	20
8. Potential In-Combination Effects .....	22
9.1 Overview.....	22
9. Known Projects Within The Wider Area .....	22
10. HRA Conclusion .....	23
11. Appendix A – Supporting Documentation .....	24





## FIGURES

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Figure 1: Approx. Project Area .....	7
Figure 2: Clearance during 2016-2017 .....	7
Figure 3: Designated sites in wider context to Site Location. ....	9
Figure 4: Original CCW citation map of SSSI> .....	10
Figure 5: Indicative flightlines with proximity to project – Pintail .....	13
Figure 6: Indicative flightlines with proximity to project – Teal. ....	13
Figure 7: Indicative flightlines with proximity to project – Curlew.....	14
Figure 8: Indicative flightlines with proximity to project – Redshank. ....	14
Figure 9: Sewbrec SPA Bird Species Records. ....	15

## TABLES

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Table 1: Annex I & II Features .....	11
Table 2: Description of bird species making up the RAMSAR/SSSI composition of the Severn Estuary. (Red- Nationally important numbers, Blue – Internationally important numbers, Yellow – Annex 1 species).....	11
Table 3: Data BTO data (analysed 13th August 2015) – Designated Season: Non-breeding.....	12
Table 4: Sewbrec Data Compared to BTO Severn Estuary Year 5 Avg. ....	15





## 1. INTRODUCTION

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### 1.1 ASSESSMENT BACKGROUND

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- 1.1.1 This document provides information to support an Appropriate Assessment under The Conservation of Habitats and Species Regulations 2017 (hereafter referred to as the 'Habitats Regulations') for the operation of a Waste Transfer Facility, with Treatment, for Inert, Domestic, Commercial and Industrial Wastes
- 1.1.2 The site is located within the Gwent Levels Rhymney and Peterstone SSSI; but the site itself does not form part of the SSSI. The site has previously been used for agriculture, most recently, as a horse livery business. This section of land is adjacent to the Tarwick Reen (8m west of the site) and Rhosog Fawr Reen (southern site boundary). Both the Rhosog Fawr Reen and Tarwick Reen systems feed into the Severn Estuary SSSI / SAC /RAMSAR Site.
- 1.1.3 Therefore, the main statutory designated sites which require consideration under the Habitats Regulations have been identified as:
- ◆ Severn Estuary - Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) & RAMSAR Site.
  - ◆ Gwent Levels (Rhymney and Peterstone) – Site of Special Scientific Interest (SSSI)
- 1.1.4 There are several other designated sites within proximity to the project which are discussed further below in the following sections.
- 1.1.5 EcoVigour Ltd have been commissioned to produce these documents on behalf of SGM Waste Management.
- 1.1.6 Under the requirements of the European Council Directive 92/43/EEC 'The Habitats Directive', it is necessary to consider whether projects or plans may have significant effects upon areas of nature conservation importance designated/classified under the Directives. This requirement is translated into UK law through the 'Habitats Regulations'.

### 1.2 PROPOSED OPERATIONS AT THE FACILITY

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- 1.2.1 It is proposed to construct the Waste Management Facility as two separate areas, one for the sorting and processing of Domestic, Commercial and Industrial (DCI) skip wastes, which will be undertaken within a Materials Recovery Facility building, with isolated drainage. The second area will be for the storage and treatment of inert construction and demolition wastes.
- 1.2.2 Treatment of these wastes will consist of screening and blending, in preparation for ongoing treatment at other facilities as required. Inert wastes will consist predominantly of aggregates received as part of the DCI skip waste stream, with no intention to accept bulk soils at the facility.



## 2. LEGISLATIVE CONTEXT

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### 2.1 OVERVIEW

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- 2.1.1 The Habitats Directive, transposed into UK legislation through the Conservation of Species and Habitat Regulations (2017) (Article 6 of European Council Directive 92/43/EEC), any plan or project not directly connected with, or necessary to, the management of a European designated site but likely to have a significant effect, either alone or in combination with other plans or projects, shall be subject to an appropriate assessment of its implications for the site in view of the site's conservation objectives.
- 2.1.2 If the Appropriate Assessment concludes that the proposed works may have an adverse effect on the integrity of a European Site, or that such an effect cannot be ruled out (in line with the recognised precautionary principle), avoidance and mitigation measures to avoid such an effect must be considered.
- 2.1.3 If it cannot be concluded that the proposed works will not have an adverse effect upon the integrity of the site(s), further measures and assessments would be required. Potentially in the form of compensation.



### 3. METHODOLOGY

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#### 3.1 OVERVIEW

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- 3.1.1 This assessment has been produced in-line with Habitats Regulations guidance published by the JNCC (2010), English Nature (now Natural England) (2001) and the Countryside Council for Wales (now Natural Resources Wales) (2008).
- 3.1.2 The SGM Waste Management site is located immediately adjacent to the Gwent Levels Rhymney and Peterstone SSSI. The Severn Estuary SSSI, SAC, SPA and RAMSAR site is the nearest statutory designated site beyond this, located 285m to the south.
- 3.1.3 Non-European sites such as the South Wales B-Lines, NRW Priority Lowland Wetlands, Adopted Wildlife Sites, Wildlife Trust reserves and NRW Priority Coastal Saltmarshes border along multiple sections of the works site and its surrounding area. The site is situated within the South Wales B-Lines, Saltmarsh Priority Area and Wentlooge Levels Grazing Marsh (Priority Lowland Wetland). Further considerations will therefore be required for all phases of the expansion works.
- 3.1.4 However, this HRA will focus on the potential likely significant effects of the operation of the facility, on the Severn Estuary SSSI, SAC, SPA and RAMSAR sites.
- 3.1.5 Information on these designated sites was obtained from the following sources:
- ◆ The Severn Estuary/Môr Hafren European Marine Site Regulation 33 Advice document (Natural England/CCW, 2009);
  - ◆ Ecology site surveys undertaken at the SGM Waste site in December 2024
  - ◆ Data acquired via the Southeast Wales Biological Records Centre (SEWBReC);
  - ◆ Other readily available online sources including the Natural Resources Wales Data Map Wales system;
  - ◆ NRW Designated Sites Portal
  - ◆ BTO Surveyor Portal



## 4. DESCRIPTION OF THE PROPOSED ACTIVITIES

### 4.1 SITE CONTEXT

- 4.1.1 The site is located approximately 2km to the southeast of Trowbridge, Rumney. The survey area comprises an area of previously developed land, bordered by rural grassland habitat on all sides. Tarwick Reen is situated within 20m of the sites western boundary.
- 4.1.2 The reen systems across the Gwent Levels are of known importance for their rich, diverse plant communities and species, many of which cannot be found in any other Levels systems. They are also of significant importance due to their high biodiversity of aquatic invertebrates, some of which are nationally rare or notable.
- 4.1.3 The Severn Estuary is a Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) and RAMSAR site, particularly notable for the wintering bird populations and waterfowl it supports.



**Figure 1: Approx. Project Area.**



## 5. HRA METHODOLOGY OBJECTIVES

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- 5.1.1 Habitats Regulation Assessment is an assessment of the potential effects of a proposed project / maintenance activity on a European site(s) (alone and/or in combination with other plans and projects). The Habitats Regulations promotes a hierarchy of avoidance, mitigation and compensatory measures. First, the project should aim to avoid significant adverse effects by identifying potential measures to avoid these effects.
- 5.1.2 Where adverse effects remain, mitigation measures should be applied to a point where these effects are no longer significant. If sufficient mitigation measures cannot be applied, the project should not be taken forward in its current form. In such a scenario, the project will require an assessment to identify alternative solutions that deliver the project in a form that avoids any significant adverse effects.
- 5.1.3 Where significant adverse effects remain, compensatory measures will be required if the project is to proceed. However, the application of such measures will only be permitted if no alternative solutions exist, and the project is required for imperative reasons of overriding public interest (the 'IROPI' test).



## 6. DESIGNATED SITES WITHIN PROXIMITY TO SITE

6.1.1 There are several statutory designated sites within proximity to the sites location.

### 6.1.2 Site of Special Scientific Interest:

- ◆ Gwent Levels Rhymney and Peterstone (SSSI)
- ◆ Severn Estuary (SSSI)

### 6.1.3 Special Area of Conservation:

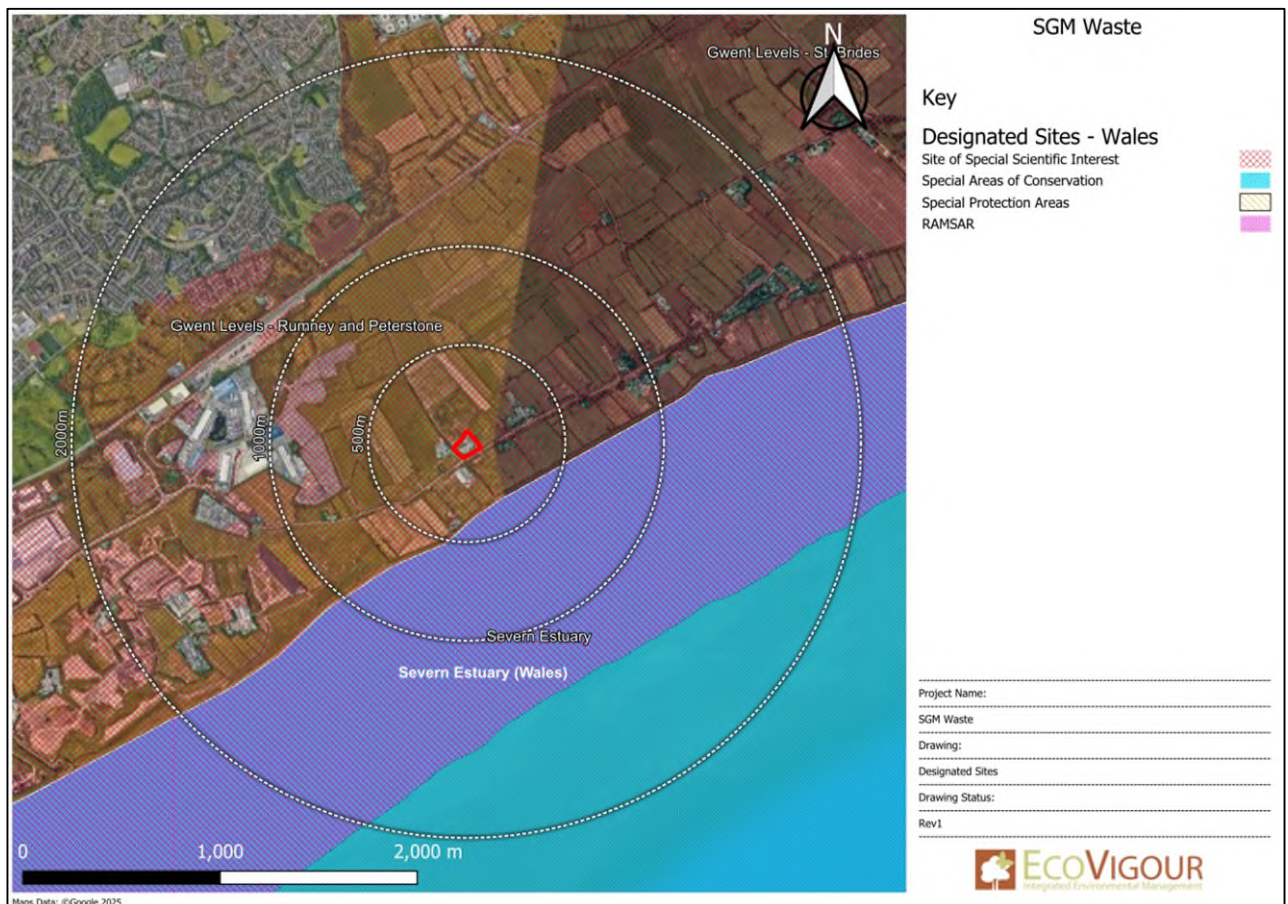
- ◆ Severn Estuary (SAC)

### 6.1.4 RAMSAR:

- ◆ Severn Estuary RAMSAR

### 6.1.5 Special Protection Area

- ◆ Severn Estuary (SPA)



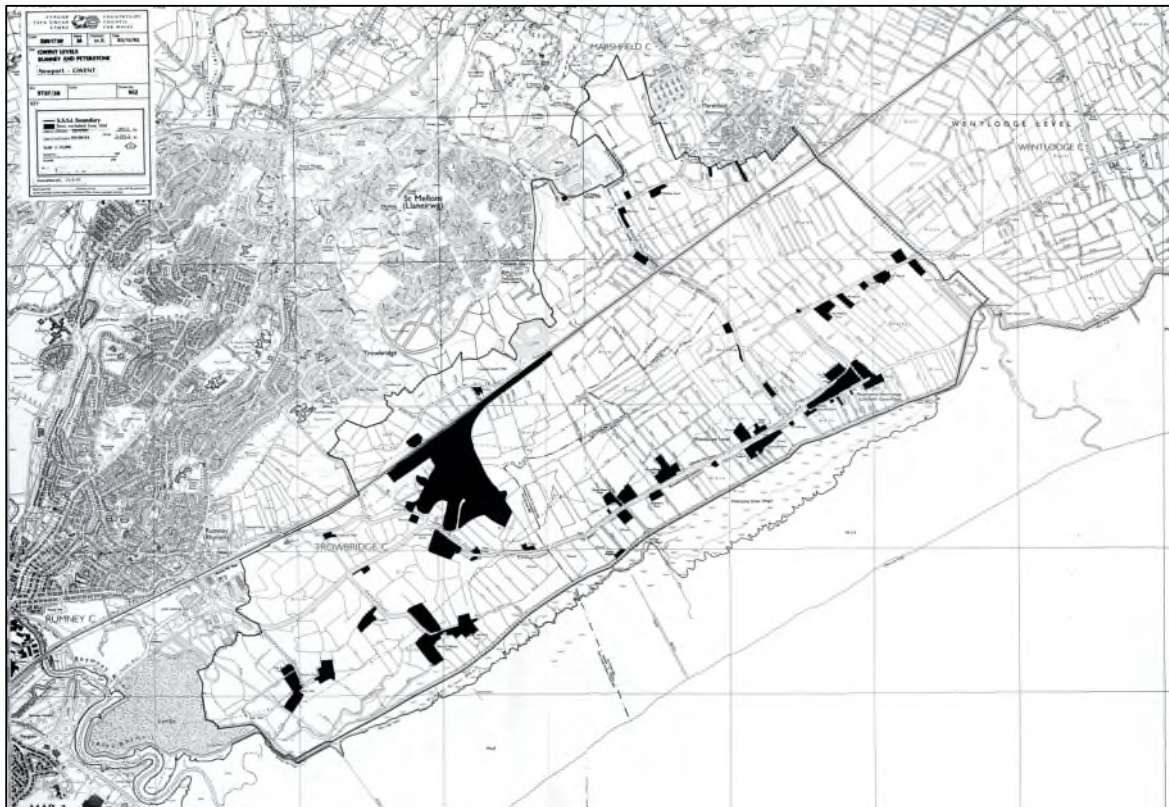
**Figure 3: Designated sites in wider context to Site Location.**

6.1.6 In terms of direct proximity, the site is surrounded by the Gwent Levels Rhymney and Peterstone SSSI, while the Severn Estuary Designated sites are located approximately 350m to the south. The latter will be described within a combines section, given the overlap designations of the same name, with co-dependent habitat and species features.



## 6.2 GWENT LEVELS RHYMNEY AND PETERSTONE (SSSI)

- 6.2.1 The Gwent Levels constitute the lowlands between Cardiff and Chepstow, which are managed and drained by an ordered network of ditches/reens. They are an example of one of the most extensive areas of reclaimed wet pasture in the United Kingdom and is the largest area of its kind in Wales.
- 6.2.2 Rumney and Peterstone SSSI is one of a series of SSSI's within the area between Chepstow and Cardiff known as the Gwent Levels. In addition, the Severn Estuary SSSI is contiguous with the southern boundary of this area.
- 6.2.3 Locally this wetland habitat provides a diverse and essential area for invertebrates and dependent fauna and flora.



*Figure 4: Original CCW citation map of SSSI>*

- 6.2.4 The, there has been significant development of the preceding decades since the original Countryside Council for Wales (CCW)'s original site citation and designation assessment.



### 6.3 THE SEVERN ESTUARY EUROPEAN PROTECTED SITES - MÔR HAFREN SAC - (SSSI, SAC, SPA, RAMSAR)

7.1.1 The Severn Estuary European sites are located immediately alongside the Severn Estuary (see Figure 1&2). The estuary is designated as a SSSI, SAC, SPA and RAMSAR site. The estuary intercepts the reed systems situated adjacent to the southern and western boundaries of the proposed development site.

**Table 1: Annex I & II Features.**

Feature Name	Scientific Term	EU Code	Annex I/II
Estuaries	Estuaries	1130	Annex I
Subtidal sandbanks	Sandbanks which are slightly covered by seawater all the time	1110	Annex I
Intertidal mudflats and sandflats	Mudflats and sandflats not covered by seawater at low tide	1140	Annex I
Atlantic salt meadows	Atlantic salt meadows ( <i>Glauco puccinellietalia maritimae</i> )	1330	Annex I
Reefs	Reefs	1170	Annex I
River lamprey	<i>Lampetra fluviatilis</i>	1099	Annex II
Sea lamprey	<i>Petromyzon marinus</i>	1095	Annex II
Twaite shad	<i>Alosa fallax</i>	1103	Annex II

**Table 2: Description of bird species making up the RAMSAR/SSSI composition of the Severn Estuary. (Red- Nationally important numbers, Blue – Internationally important numbers, Yellow – Annex 1 species).**

Common name	Latin name	Reason for selection	Primary habitat
Bewick's Swan	<i>Cygnus columbianus bewickii</i>	Annex 1 species, Internationally important numbers	Coastal grazing marsh, pools
European white-fronted goose	<i>Anser albifrons albifrons</i>	Internationally important numbers	Coastal grazing marsh, sandbanks
Shelduck	<i>Tadorna tadorna</i>	Internationally important numbers	Intertidal mud and sand
Gadwall	<i>Anas strepera</i>	Internationally important numbers	Coastal grazing marsh, pools
Dunlin	<i>Calidris alpina</i>	Internationally important numbers	Intertidal mud and sand
Redshank	<i>Tringa totanus</i>	Internationally important numbers	Intertidal mud and sand, saltmarsh, coastal grazing marsh
Wigeon	<i>Anas penelope</i>	Nationally important numbers	Intertidal mud, saltmarsh, coastal grazing marsh
Teal	<i>Anas creca</i>	Nationally important numbers	Shallow water, pools, coastal grazing marsh
Pintail	<i>Anas acuta</i>	Nationally important numbers	Shallow water, coastal grazing marsh
Pochard	<i>Aythya ferina</i>	Nationally important numbers	Estuary
Tufted duck	<i>Aythya fuligula</i>	Nationally important numbers	Estuary
Ringed plover	<i>Charadrius hiaticula</i>	Nationally important numbers	Intertidal
Grey plover	<i>Pluvialis squatarola</i>	Nationally important numbers	Intertidal, coastal grazing marsh
Curlew	<i>Numenius arquata</i>	Nationally important numbers	Intertidal, coastal grazing marsh
Whimbrel	<i>Numenius phaeopus</i>	Nationally important numbers	Coastal grazing marsh, intertidal
Spotted redshank	<i>Tringa erythropus</i>	Nationally important numbers	Intertidal



GENERAL SEASONAL VARIATION OF MOBILE DESIGNATED FEATURES AT SEVERN ESTUARY SPA

7.1.2 Over the course of a year, mobile features (birds) within the designated site fluctuate in their density within known roosts in a given month.

7.1.3 The figures below provide an indicative projection of which species are present during a specific month.

7.1.4 Note, this is not definitive and therefore could be subject to change as data improves over time.

**Table 3: Data BTO data (analysed 13th August 2015) – Designated Season: Non-breeding.**

Common Name	Latin Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Bewick's swan	<i>Cygnus columbianus bewickii</i>												
Dunlin	<i>Calidris alpina</i>												
Gadwall	<i>Anas strepera</i>												
Greater white-fronted goose	<i>Anser albifrons albifrons</i>												
Redshank	<i>Tringa tetanus</i>												
Shelduck	<i>Tadorna tadorna</i>												

7.1.5 From the available data, it appears that the months around June are the lowest in projected activity levels within a given year.

PHASE 5 – IDENTIFICATION OF WINTERING AND PASSAGE ROOSTS ON FUNCTIONALLY LINKED LAND OF THE SEVERN ESTUARY

7.1.6 Recent Phase 5 surveys have sought to evaluate flight lines of over-wintering, and passage roosts up the estuary. The figure below illustrates the identified flight lines in proximity to the project area. Please note: these assessments primarily focus on Slimbridge as the main point of context, as this is a major over wintering site, with a dense concentration of primary roosts, that make up the wider SAC.

7.1.7 The above illustrates flightlines of species where flight lines have been identified at long range over the south Wales area, with the species listed below:

- ◆ Pintail
- ◆ Teal
- ◆ Curlew
- ◆ Redshank

7.1.8 In general, the resolution of information in this region is not as robust as that over further up the estuary, or along the north Devon coast, however there are several BTO recorder sites within the Wentlooge area, with the site's locality being relevant to BTO Location 60401.



Figure 5: Indictive flightlines with proximity to project – Pintail.



Figure 6: Indictive flightlines with proximity to project – Teal.



Figure 7: Indictive flightlines with proximity to project – Curlew.

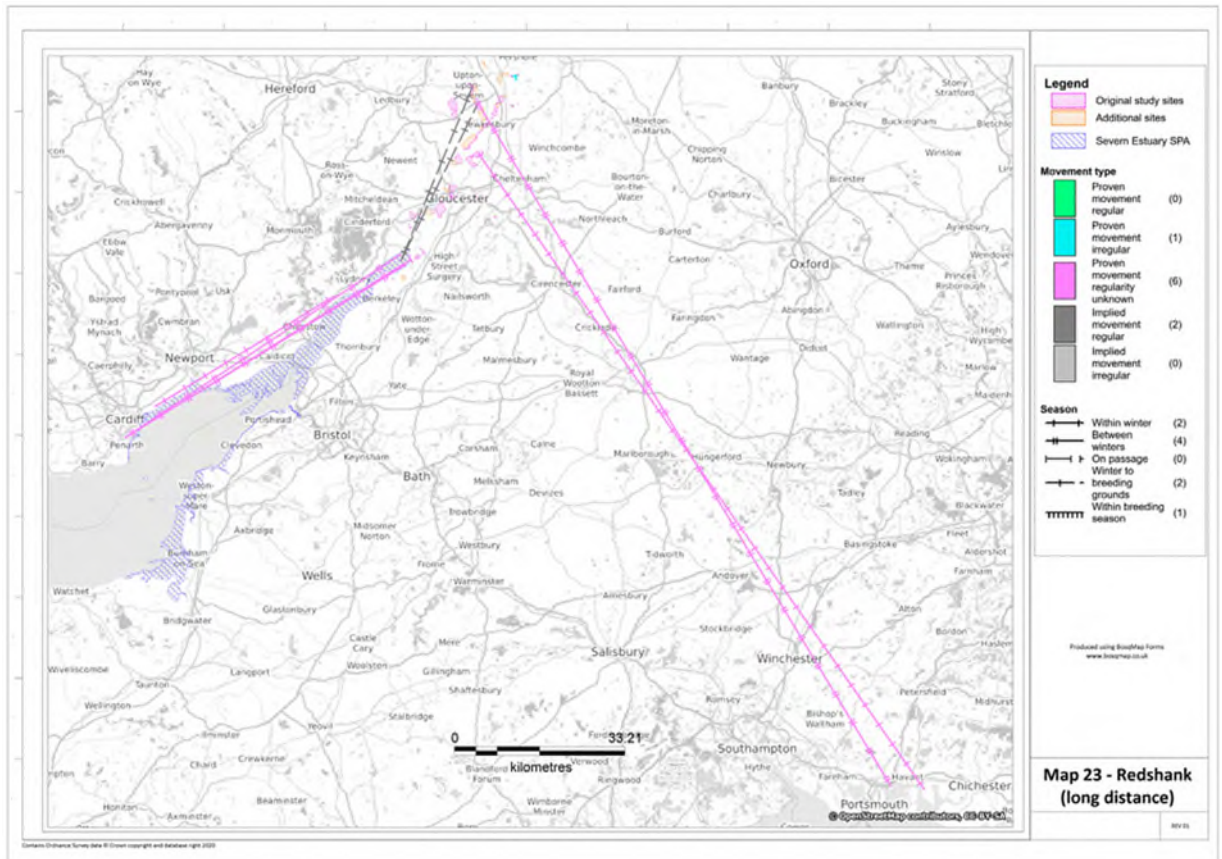


Figure 8: Indictive flightlines with proximity to project – Redshank.



AVAILABLE DATA - SEWBREC & OPEN BTO RECORDS

7.1.9 Data was previously acquired from South and East Wales Biodiversity Records Centre (SEWBReC) during the Ecological Appraisal for the site in 2024. This information contains records of bird species recorded within 2km of the proposed works site.

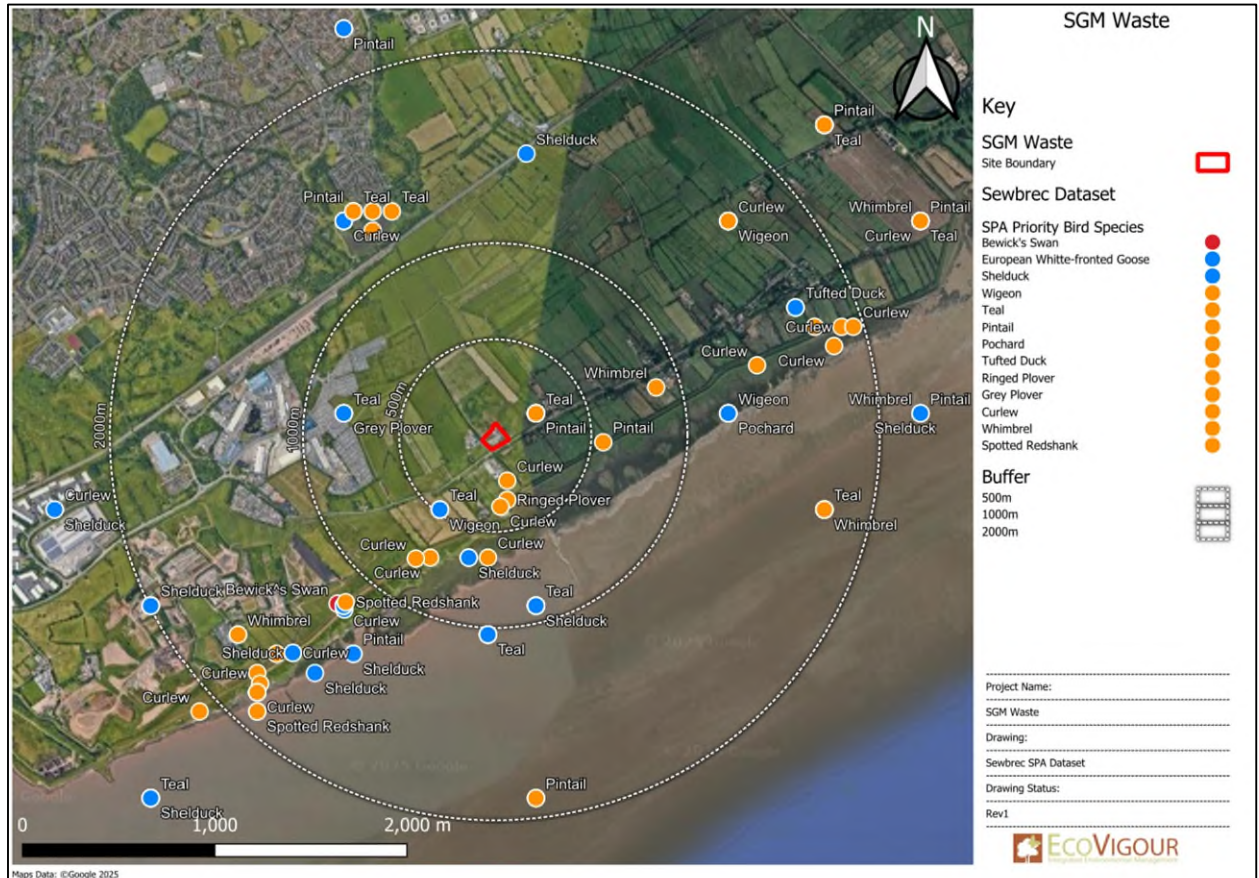


Figure 9: Sewbrec SPA Bird Species Records.

7.1.10 Please note, the locations outlined above are indicative and a from a range of recorder positions, describing flight routes, foraging activities, resting locations, over many decades. Therefore, species should be assumed to be present within a portion of the wider SSSI, depending on seasonal factors and daily conditions.

7.1.11 In order to assess the locations broad overall assemblage value, the available datasets from Sewbrec have been compared with the published BTO Severn Estuary Year 5 averages, in order to better quantify the sites general usage in the wider context to the SPA & RAMSAR.

Table 4: Sewbrec Data Compared to BTO Severn Estuary Year 5 Avg.

English Name	Scientific Name	Approx. Total Recordings	Notes	Approx. 5 Year Avg	BTO Count 5 Year Avg
Bewick's Swan	Cygnus columbianus bewickii	6	4 ADS & 2 JUVS (2010)	2	113
European White-fronted Goose	Anser albifrons albifrons	29	In Flight (1982)	4	186
Shelduck	Tadorna tadorna	4630	Data ranged from 1950	308	7696



English Name	Scientific Name	Approx. Total Recordings	Notes	Approx. 5 Year Avg	BTO Count 5 Year Avg
Wigeon	Mareca penelope	1907	Data ranged from 1980*	211	6882
Teal	Anas crecca	2734	Data ranged from 1980*	303	4640
Pintail	Anas acuta	1792	Data ranged from 1980*	199	797
Tufted Duck	Aythya fuligula	465	Data ranged from 1990*	66	NA
Ringed Plover	Charadrius hiaticula	539	Data ranged from 1990*	77	1153
Grey Plover	Pluvialis squatarola	843	Data ranged from 1990*	100	484
Curlew	Numenius arquata	4148	Data ranged from 1985*	518	3004
Whimbrel	Numenius phaeopus	1809	Data ranged from 1985*	226	467
Spotted Redshank	Tringa erythropus	198	Data ranged from 1990*	28	4432

\*Some date ranges from 1930 but have adjusted data limit to periods of greater recording numbers, for more conservative estimates.

- 7.1.12 Reviewing the available Sewbrec data within 2km of the site location, and comparing the averaged out 5 year count values, no individual species recordings are greater than the Severn Overall year 5 average, However, overall, a significant number of the notable SPA assemble have been recorded within this region.
- 7.1.13 In terms of flight lines , of those observed within the phase 5 report, Redshank, Curlew, Pintail and Teal appear to consistently migrate over this region within winter periods, with red shank and teal observed moving between winters. This appears to be borne out with the consistent observations supplied within the overall dataset.
- 7.1.14 Given the sites localised and limited scale, the follow section will outline localised mitigative measures, which will seek to address in-direct impact vectors. Consequently, provided these proposed mitigation measures are effectively implement and adhered to, wider impacts to the larger SPA assemblage and localised SSSI features will be unlikely.



## 7. ASSESSMENT OF POTENTIAL IMPACTS RESULTING FROM SPECIFIC ACTIVITIES AND PROPOSED MITIGATION MEASURES – SGM WASTE

This section outlines the receptors of potential damaging vectors as a result of the proposed works and proposes appropriate mitigative measures to ensure that there is not a significant likelihood of impacts.

### 8.1 ANNEX I HABITATS – IMPACTS & MITIGATION

Receptor	Affected Site	Potential Hazard	Mitigation Measures	Likelihood of Impact
Estuarine habitat, intertidal mudflats & sand flats.	SAC/ SPA/ Ramsar	Contamination of the Tarwick Reen due to releases of contaminated surface runoff from the facility.	<p>A drainage and surface water treatment system has been put in place at the facility to contain and treat runoff from the facility. This consists of:</p> <ul style="list-style-type: none"><li>• An impermeable concrete slab within the Domestic, Commercial and Industrial (DCI) Materials Recovery Facility Building and surrounding the building. All waste tipping and sorting is confined to the interior of the building to prevent it becoming saturated with rain water. All runoff from the interior of the building (potential for rainwater within skips / bins) is captured in a perimeter drain, which drains into a sealed tank and is then removed from site by tanker;</li><li>• Sorted DCI wastes are stored on an impermeable concrete slab outside of the MRF building, but are covered to prevent rainfall ingress (this also increases the weight of wastes, which is commercially detrimental to the business). Runoff from this slab enters the site drainage system;</li><li>• Site runoff enters a network of pipes and chambers, which discharge into a 234m<sup>3</sup> attenuation pond, with a high level circular weir outfall. This removes suspended solids from site runoff. Runoff then flows into a Full Retention Hydrocarbon Separator, which removes any hydrocarbons which may be present from site runoff. The outlet from the hydrocarbon separator can be closed to prevent water flowing off site, in the event of a major spillage or to contain firefighting water, if required;</li><li>• Liquid and fine powder wastes are not accepted by the facility;</li><li>• Out of specification wastes, are either rejected at the clients property, or if not identified until tipped, are immediately re-loaded and returned to the consigners or are quarantined, within the quarantine area, which forms part of the MRF and hence has sealed drainage into a tank.</li></ul>	Impact Not Likely to be Significant, with appropriate mitigation.



Receptor	Affected Site	Potential Hazard	Mitigation Measures	Likelihood of Impact
Estuarine habitat, intertidal mudflats & sand flats.	SAC/ SPA/ Ramsar	Contamination of the estuary from spillage of hydrocarbons during refuelling of plant and equipment or due to equipment failure.	<p>All COSHH substances, including bulk fuels, are stored within dedicated COSHH Unit, with a bunded floor.</p> <p>A refuelling procedure is implemented, whereby plant and vehicles are re-fuelled on a concrete slab and plant nappies are placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals.</p> <p>A detailed Emergency Preparedness and Response Plan has been included within the sites Environmental Management System and copied of this are retained in all site offices and the COSHH Store. Staff have been trained in this procedure. This details how spills will be contained and cleaned up. The Emergency plan appoint an Incident Coordinator, define roles and responsibilities during an incident, detail response procedures and contain an inventory of response equipment to be maintained on site. Plant will also be available to form bunds to contain spills and remove contaminated soils from site if required.</p> <p>A 120l spill kit and additional absorbent granules are located within the COSHH Area.</p> <p>GPP5 Guidance for Pollution Prevention - Works and maintenance in or near water, will be referenced to.</p> <p>In the event of a large spill, the outlet from the Hydrocarbon Separator will be closed and liquids will be retained on site.</p>	Impact Not Likely to be Significant, with appropriate mitigation.
Estuarine habitat, intertidal mudflats & sand flats.	SAC/ SPA/ Ramsar	Contamination of the estuary from dust and other emissions to air, from the operation of the facility.	<p>A Dust Mitigation and Management Plan has been prepared for the operation of the facility. Dust from the site will be controlled through a combinations of:</p> <ul style="list-style-type: none"> <li>• Processing wastes within a building to prevent fine particles being wind blown;</li> <li>• Damping down of processing operations such as the trommell, screen and picking line;</li> <li>• Spray mist damping down of the interior of the MRF building;</li> <li>• Spray mist damping down of the waste storage areas;</li> <li>• Bowser and spray bar damping down of access routes around the site.</li> </ul>	
Salt marshes (also part of estuarine habitat)	SAC/ SPA/ Ramsar/ SSSI	No impact	See comments above under estuarine habitat.	No impact





Receptor	Affected Site	Potential Hazard	Mitigation Measures	Likelihood of Impact
Rocky shores (also part of estuarine habitat)	SAC/ SPA/ Ramsar	No impact	See comments above under estuarine habitat.	No impact
Reedbeds/ swamps	SSSI	No impact	See comments above under estuarine habitat.	No impact
Neutral grassland	SSSI	No impact	See comments above under estuarine habitat.	No impact
Vascular plant assemblage associated with salt marsh (part of estuarine habitat)	SAC/ SSSI	No impact	See comments above under estuarine habitat.	No impact
All Annex I Habitats	SAC/ SPA/ Ramsar/ SSSI	Loss of Habitat	The project works do not require any land take or modification of Annex I habitats which make up the statutory sites.	





ANNEX II SPECIES – IMPACTS & MITIGATION

Receptor	Affected Site	Potential Hazard	Mitigation Measures	Likelihood of Impact
Aggregations of non-breeding birds	SPA Ramsar/ SSSI	Noise disturbance / Visual Disturbance / Dust and other airbourne emissions.	<p>The site is located 285m from the edge of the estuary and there is no line of sight from the estuary to the site. There is a 5m high flood embankment along the edge of the estuary, which also screens the estuary from the site.</p> <p>Predicted noise calculations have been undertaken for the site as part of a BS 4142 Assessment undertaken and these demonstrate that noise levels from the site are above background levels at the nearest residential receptor 25m west of the site boundary. However, due to the 285m distance from the site, noise outputs from the site will be below background ambient noise conditions at the edge of the SSSI / SAC and would not be perceptible.</p> <p>Dust from the site will be controlled through a combinations of:</p> <ul style="list-style-type: none"> <li>• Processing wastes within a building to prevent fine particles being wind blown;</li> <li>• Damping down of processing operations such as the trommell, screen and picking line;</li> <li>• Spray mist damping down of the interior of the MRF building;</li> <li>• Spray mist damping down of the waste storage areas;</li> <li>• Bowser and spray bar damping down of access routes around the site.</li> </ul>	Negligible likelihood of impacts
Individual wintering birds (Bewick's swan, European white-fronted goose, wigeon, gadwall, shoveler, pochard)	SPA/ Ramsar/ SSSI	Noise disturbance / Visual Disturbance / Dust and other airbourne emissions.	See comments under non-breeding bird aggregations	Negligible likelihood of impacts
Fish Assemblage >110 species	SAC/ Ramsar	Contamination of the estuary via the Tarwick Reen	See comments under estuarine habitat	Impact Not Likely to be Significant



Receptor	Affected Site	Potential Hazard	Mitigation Measures	Likelihood of Impact
Individual fish species (Twaite & Allis shad, River & Sea Lamprey, Salmon, Sea trout and Eel)	SAC/ Ramsar/ SSSI	Contamination of the estuary via the Tarwick Reen.	See comments under estuarine habitat	Impact Not Likely to be Significant





## 8. POTENTIAL IN-COMBINATION EFFECTS

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### 9.1 OVERVIEW

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- 9.1.1 It is necessary to consider the potential for significant effects from this site in-combination with other sites in the same area.
- 9.1.2 In addition, the plan or project must have been subject to an HRA, which has confirmed that the plan or project is not likely to have a significant effect or demonstrates that the effects have been sufficiently assessed so as to be reasonably understood.
- 9.1.3 The assessment of in-combination effects must also focus on other projects that have the potential to cause the same types of effects as the proposed maintenance (so that these effects may occur in-combination) and where similar potential impact pathways may exist.
- 9.1.4 Therefore, this assessment has focused on other projects that could give rise to noise, visual or physical impacts on the SAC species and does not consider projects that could cause different effects.

## 9. KNOWN PROJECTS WITHIN THE WIDER AREA

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- 10.1.1 Sites within 0.65km of the SGM Waste Management Site are predominantly agricultural or small-scale vehicle/plant engineering businesses.
- 10.1.2 0.65km to the west of the site is Wentlooge Corporate Park, with several businesses including, caravan / motorhome storage, self-storage facilities, freight and parcel delivery depots and heavy industrial. Most of these businesses have been at the site for over 30yrs, but there have been heavy industrial industries on the site, since the 1930s. We have not been able to locate an HRA information for these sites.
- 10.1.3 1.5km SW of the site is Atlantic Recycling and Neal Soils, which are also Waste Management Facilities, undertaking similar activities to SGM Waste Management. It is likely that these facilities will have been subject to assessment under the Habitat Regulations, but we have not been able to locate these documents.
- 10.1.4 Emissions from these sites are likely to be similar to those anticipated from SGM Waste Management, but it has not been possible to quantify these. The sites are operated under an Environmental Permit and details of the water treatment system for the site have been reviewed and appear to be adequate and hence it has been assessed that there will be no likely cumulative impacts in terms of water quality within the estuary.



## 10. HRA CONCLUSION

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- 11.1.1 Key identified potential impacts are related to impacts on water quality and hence estuarine habitat, due to the release of contaminated surface water runoff from the site. These will be controlled through robust controls on the wastes accepted by the site, the way in which they are stored and sorted / processed and the containment and treatment of runoff from the site (Refer to Section 9)
- 11.1.2 Monitoring will be undertaken for dust (deposition and direction dust gauges with EAC% and AAC% measured), water quality within the Tarwick Reen, which will ultimately receive runoff from the site and noise and vibration from the site will be monitored at the nearest residential receptor 25m west of the sites western boundary.
- 11.1.3 It is therefore concluded that the operation of the proposed facility will not have an adverse impact upon the Severn Estuary SAC, SPA and Ramsar key features either in isolation or in combination.



## 11. APPENDIX A – SUPPORTING DOCUMENTATION

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Appendix A - SGM Waste Proposed Site Layout

