

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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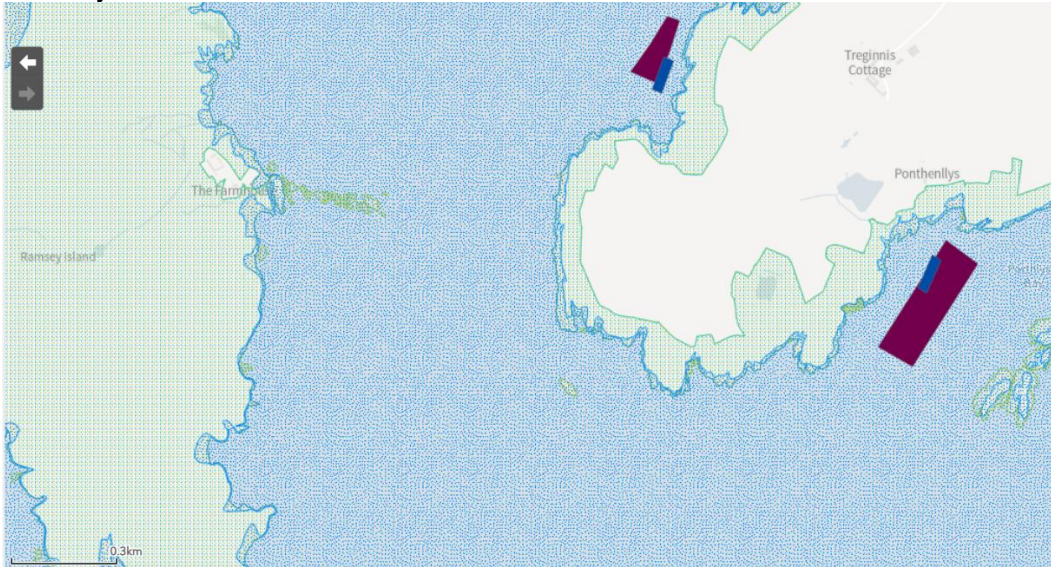
OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	DEML2540 Expansion to Car-Y-Mor trial restorative ocean farms in Ramsey Sound
HRA iteration/version	1

1. Plan or Project Details

Information about the plan or project		
1	Date application received	Duly made on 09 September 2025
2	Applicant details	For the Love of the Sea Ltd
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	Expansions to the existing farms at Carn Ar Wig and Porthlysgi in the Ramsey Sound, Pembrokeshire, currently licensed under DEML2013. Carn Ar Wig will increase to 2Ha and Porthlysgi will increase to 3Ha. Both sites will expand on the same locations as the current sites.

5	Relevant legislation or statutory basis	Marine and Coastal Access Act (2009)
6	Location	Ramsey Sound, Pembrokeshire  The map shows the coastline of Ramsey Sound, Pembrokeshire. Key locations labeled include Ramsey Island, The Farmhouse, Treginnis Cottage, Ponthenillys, and Porthyr. A red rectangle highlights the project area in the sound. A scale bar indicates 0.3km.
7	Plan or project documents, including any application documents	• DEML2540 - 1 - Car-y-Mor Marine License Application Form.docx.pdf • DEML2540 - 2 - Car-Y-Mor license - Method Statement v1.0.docx.pdf • DEML2540 - 3 - Car-Y-Mor license - Env Responsibilities v1.0.docx.pdf • DEML2540 - 7 - Car-Y-Mor license - INNS Biosecurity RA and Management Plan.docx.docx.pdf • DEML2540 - Application Form Section 12a(i) MCA & NRW Advisory Correspondence Evidence.pdf • DEML2540 - Application Form Section 12a(i) NRW Correspondence Evidence.pdf • DEML2540 - Application Form Section 12a(i) PCNPA Correspondence Evidence.pdf • DEML2540 - Application Form Section 12a(i) The Crown Estate Correspondence Evidence.pdf

		• DEML2540 - Application Form Section 12a(i) Trinity House Correspondence Evidence.pdf • DEML2540 - Car y Mor Letters.pdf • DEML2540 - CYM welsh-national-marine-plan-signposting-en-only.xlsx • DEML2540 - Figure 1.pdf • DEML2540 - Figure 8.pdf • DEML2540 - Figure 2.pdf • DEML2540 - Figure 3.pdf • DEML2540 - Figure 4.pdf • DEML2540 - Figure 5.pdf • DEML2540 - Figure 6.pdf • DEML2540 - Figure 7.pdf • DEML2540 - Figure 11.pdf • DEML2540 - Figure 9.pdf • DEML2540 - Figure 10.pdf • DEML2540 - Figure 25 - Porthlysgi Proposed South End DDV Footage Habitats.pdf • DEML2540 - Figure 14 - Carn Ar Wig Current Farm Sonar Habitat Map.pdf • DEML2540 - Figure 15 - Carn Ar Wig Proposed Farm Sonar Habitat Map.pdf • DEML2540 - Figure 16 - Porthlysgi Current Farm Sonar Habitat Map.pdf • DEML2540 - Figure 17 - Porthlysgi Proposed Farm Sonar Habitat Map.pdf • DEML2540 - Figure 18 - Carn Ar Wig Current North End Diver Footage Habitats.pdf • DEML2540 - Figure 19 - Carn Ar Wig Current South End Diver Footage Habitats.pdf • DEML2540 - Figure 20 - Porthlysgi Current North End Diver Footage Habitats.pdf • DEML2540 - Figure 21 - Porthlysgi Current South End Diver Footage Habitats.pdf • DEML2540 - Figure 22 - Carn Ar Wig Proposed North End DDV Footage Habitats.pdf • DEML2540 - Figure 23 - Carn Ar Wig Proposed South End DDV Footage Habitats.pdf • DEML2540 - Figure 24 - Porthlysgi Proposed North End DDV Footage Habitats.pdf
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		• DEML2540 - Marine Mammal Entanglement Monitoring and Maintenance Log (July 2023-June 2024).xlsx • DEML2540 - Section 6c (i)_ Admiralty Chart of Project.pdf • DEML2540 - Section 6c (ii)_ Construction Plan and Sectional Drawings.pdf • DEML2540 - SLVIA v1.pdf • DEML2540 - View point photomontage.pdf • DEML2540 Baseline Benthic Habitat Survey Report - v5.pdf • DEML2540 Car-y-Mor Marine License Application Form .docx • DEML2540 Car y Mor Environmental information to inform HRA.docx • DEML2540 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25.docx • DEML2540 Response to Fitness Checks Questionnaire - Marine Mammals.docx • DEML2540 4.1 - Câr-Y-Môr Re-license - NRA MEAC Decom v1.5 - Carn Ar Wig.docx • DEML2540 4.2 - Câr-Y-Môr Re-license - NRA MEAC Decom v1.5 - Porthlysgi.docx • DEML2540 MARINE EMERGENCY ACTION CARD - Carn Ar Wig.docx • DEML2540 MARINE EMERGENCY ACTION CARD - Porthlysgi.docx • DEML2540 Physical Processes Assessment for Small-Scale Coastal Project_ Câr-y-Môr.docx • DEML2540 Aquaculture Environmental Management Plan.docx • DEML2540 Car Y Mor MECAL Cert Aug 23.pdf • DEML2540 Response to Fitness Checks Questionnaire - Water Quality.docx • DEML2540 Car Y Mor WFD scoping application (1).docx • DEML2540 Car Y Mor WFD Detailed Assessment application (1).docx • DEML2540 Car Y Mor WFD screening application (1).docx Further Information Submitted 11 December 2025; • DEML2540 7 - Car-Y-Mor license - INNS Biosecurity RA and Management Plan REVISED NOV25.docx • DEML2540 Aquaculture Environmental Management Plan REVISED NOV25.docx • DEML2540 Figure 4 Updated.pdf • DEML2540 Figure 5 Updated.pdf • DEML2540 Figure 11 Updated.pdf • DEML2540 Figure 8 Original.pdf
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		• DEML2540 MARINE EMERGENCY ACTION CARD - Carn Ar Wig REVISED NOV25.docx • DEML2540 Trinity House confirmation email for Nav Lighting.pdf • DEML2540 MARINE EMERGENCY ACTION CARD - Porthlysgi REVISED NOV25.docx • DEML2540 Updated Photomontages (HD).pdf • DEML2540 Further Information Request Point by Point Response as 11122025.pdf
8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Marine Licensing Team – Peter Morrison - Lead Specialist Officer
11	Team or person responsible for approving the plan or project (competent authority role)	As row 10

2. Determining the need for a Habitats Regulations Assessment

2.1 Is there any possibility that the plan or project could negatively affect any European sites?	YES
2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated?	NO

2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site, in a way that would undermine that feature's conservation objectives?	
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3. Considering the likelihood of a significant effect (LSE)

3.1 Renewal of a project authorisation on the same or more restrictive terms as an extant authorisation

Is this a renewal of an extant authorisation which complies with NRW approved criteria for ruling out significant effects of renewals (see Part 2 of OGN200) without conducting a project-specific LSE test?	NO
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3.2 Likelihood of significant effects (LSE) test

3.2.1 Which European sites might be affected by the plan or project?

(a) Based on the plan or project specification, or information provided in the application, it is considered that these European sites have features which could be negatively affected by the plan or project	• Pembrokeshire Marine/Sir Benfro Forol SAC • West Wales Marine/ Gorllewin Cymru Forol SAC • St David's / Ty Ddewi SAC • Ramsey and St David's Peninsula Coast SPA The following sites have been considered only for their marine mammal features: • Bristol Channel Approaches SAC (Harbour porpoise) • Cardigan Bay SAC / Bae Ceredigion SAC (Bottlenose dolphin, grey seal) • Pen Llyn a'r Sarnau SAC / Llyn Peninsula and the Sarnau SAC (Bottlenose dolphin, grey seal) • North Anglesey Marine / Gogledd Môn Forol SAC (Harbour porpoise)
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(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
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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
Pembrokeshire Marine/Sir Benfro Forol SAC			
Estuaries Mudflats and sandflats not covered by seawater at low tide Sandbanks which are slightly covered by seawater all the time Shore dock <i>Rumex rupestris</i> Coastal Lagoons Atlantic salt meadows	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen OUT	No overlap between the feature and the activity. There is no credible pathway and no likely significant effect expected.

(<i>Glauco-P uccinelliet alia</i> <i>maritimae</i>)			
Submerged or partially submerged sea caves			
Large shallow inlets and bays Reefs		Screen IN	The overall distribution and extent of the feature can be affected through direct loss of habitat by abrasion
Large shallow inlets and bays Reefs		Screen IN	Increase deposition from faeces can result in increased siltation and levels of nutrient input
Large shallow inlets and bays Reefs		Screen IN	Potential impact pathway through the introduction of INNS.
Large shallow inlets and bays Reefs Grey Seal <i>Halichoeurus grypus</i> Otter <i>Lutra lutra</i> Allis shad <i>Alosa alosa</i> Twaite shad <i>Alosa fallax</i> River lamprey <i>Lampetra fluviatilis</i>		Screen IN	Pollution/marine litter: There is a risk of pollution from using machinery and littering from equipment (ropes/flotation devices) breaking off.

Sea lamprey <i>Petromyzon marinus</i>			
Grey Seal <i>Halichoerus grypus</i>		Screen IN	A risk of entanglement on the farm equipment exists
Grey Seal <i>Halichoerus grypus</i>		Screen IN	Risk of disturbance due to vessel movement
Grey Seal <i>Halichoerus grypus</i>		Screen IN	Risk of displacement/reduced habitat availability for the species by the farm infrastructure
Otter <i>Lutra lutra</i>		Screen Out	The risk of entanglement/disturbance of individuals is low as the activity is in deeper waters and of small scale. Access to farms will be done through public roads. No pathway expected
Allis shad <i>Alosa alosa</i> Twaite shad <i>Alosa fallax</i> River lamprey <i>Lampetra fluviatilis</i> Sea lamprey <i>Petromyzon marinus</i>		Screen Out	No pathway exists
West Wales Marine/ Gorllewin Cymru Forol SAC			
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives: West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	Screen IN	A risk of entanglement exists
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives: West Wales Marine pSAC: Draft Conservation Objectives And	Screen IN	Risk of disturbance due to vessel movement

	Advice On Activities (naturalresources.wales)		
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives: West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	Screen IN	There is a risk of pollution from using machinery and littering from equipment breaking lose
Ramsey and St David's Peninsula Coast SPA			
1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts 4030 European dry heaths 1831 Floating water-plantain <i>Luronium natans</i> Chough <i>Pyrhacorax pyrrhacorax</i>	Microsoft Word - St David's SAC Plan English.doc	Screen Out	No overlap between the feature and the activity. There is no credible pathway and no likely significant effect expected.
Bristol Channel approaches / Dynesfeydd Môr Hafren SAC			
Harbour porpoise <i>Phocoena Phocoena</i> Bottlenose dolphin (<i>Tursiops truncatus</i>)	Joint Conservation Objectives (NRW, Natural England and JNCC): Bristol Channel Approaches pSAC: Draft Conservation Objectives and Advice on Activities	Screen IN	A risk of entanglement exists
Cardigan Bay SAC / Bae Ceredigion SAC			
Harbour porpoise <i>Phocoena Phocoena</i>	NRW conservation objectives:	Screen IN	A risk of entanglement exists

Grey Seal <i>Halichoerus grypus</i>	conservation-advice-for-cardigan-bay-sac.pdf		
Pen Llŷn a'r Sarnau SAC / Llyn Peninsula and the Sarnau SAC			
Grey Seal <i>Halichoerus grypus</i>	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen IN	• A risk of entanglement exists
North Anglesey Marine / Gogledd Môn Forol SAC			
Harbour porpoise <i>Phocoena</i> <i>Phocoena</i>	NRW conservation objectives: North Anglesey Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	Screen IN	• A risk of entanglement exists

TABLE 3.2.3 Screening decision of the plan or project 'alone'	
(a) If the screening conclusion for <u>all</u> features for all sites in Table 3.2.2 is 'SCREEN OUT'	The plan or project is not likely to have a significant effect on any European site, and no further consideration under the Habitats Regulations is required in order to determine the approval/application.
(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'	The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.

(c) If there are <u>no</u> features in Table 3.2.2 that are 'SCREEN IN' and <u>any</u> features that are 'IN COMB'	The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.
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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			
Large shallow inlets and bays Reefs	Loss of habitat and damage to feature such as through abrasion	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; The anchors and chains proposed will be deployed with the use of a drop down video camera to help micro-site the locations and extensive work has been done to identify and avoid potential reef areas in the Baseline Benthic Habitat Survey Report. During the operation phase there will be no contact onto the seabed or reef feature from ropes or the lantern nets. The oyster baskets will contact the seabed, but the area of impact will be small, just slightly greater than the actual size of the basket (1m x 0.5m). The baskets will be lowered gently to the seabed to avoid any damage to the baskets. Again, the Baseline Benthic Habitat Survey Report provides more information on the habitat types underneath the farm and will allow for avoiding any potential reefs. The baskets will be similar in size and shape to lobster and crab pots and studies have shown that potting has	No

		no significant effect on reef features (Stephenson et al., 2017; Walmsley et al., 2015). The slow descent and the small area of possible impact will have no adverse effect on the reef feature for the European site. Studies have shown that dropper line diameter (Plew et al., 2005) and dropper line and larger-scale spacing (i.e., long-line and raft) as well as farm size and configuration may influence current velocities (Boyd & Heasman, 1998; Smith et al., 2006; Aure et al., 2007; Duarte et al., 2008; Stevens et al., 2008). Mussel farms can increase flow and retention of water in an embayment (Lo et al., 2008). Increased retention and flushing can modify deposition regimes within farms and influence seabed communities, this could include shell deposits below the ropes (de Jong, 1994; Lloyd, 2003). Within DEML2540 Response to Further Information dated 11 December 2025 the applicant commits to including both sites within their program of annual monitoring, and agreeing clear trigger points with NRW A to ensure that the proposed works do not lead to an adverse impact on the Large Shallow inlet and bay feature or Reef. As there is uncertainty surrounding how the project infrastructure will interact with the feature over the long term licence period this may lead to adverse effect. Therefore due to this uncertainty adverse effect cannot be ruled out for the duration of the licence, and it is considered that monitoring will need to be secured.	
Large shallow inlets and bays Reefs	Siltation/ increase in nutrients	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; The growing of mussels on ropes and other shellfish in baskets can have an impact on the seabed through deposition from the shellfish and shell deposits. The main concern with suspended culture is a predicted	YES

		increase in sedimentation beneath the lantern nets and longlines, caused by reduced flow because of the suspension structure, and increased levels of faeces and pseudofaeces from the mussels and associated epibiota. Generally investigations into the effects of suspended culture on sedimentation rates have shown that the effect is minimal and that the risk of adverse effects is low (Grant et al., 1995; Jeffs et al., 1999; Crawford, 2001; Crawford et al., 2001; Crawford, 2003; Crawford et al., 2003; Danovaro et al., 2004). Although some effects on organic matter inputs to benthic environments can be observed in sheltered bays, the scale and location of this proposal (within a highly dynamic environment) would have little or no impact on the seabed habitats.	
Large shallow inlets and bays Reefs	INNS	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; There is no evidence that seaweed diseases have been transferred as a result of seaweed culture, unlike other forms of finfish, crustacean and mollusc culture where there are many documented examples of translocation of pathogens as a result of movements of cultured animals (Welcomme, 1988; NCC, 1989). The risks of introducing pathogens and invasive species with seedstock, juvenile shellfish or on equipment or footwear will be reduced by strict cleaning and checking procedures, and through regular inspections. The introduction of non-native species will be controlled through the continued implementation of the <u>INNS Biosecurity Protocol</u> submitted with this application. No Pacific Oysters are reported in Ramsey Sound – strict procedures will be followed to ensure none are introduced. Additionally, the Society's INNS Biosecurity protocol encourages all involved to be vigilant for non-native species using the sites as stepping stones. Samples from header and	NO

		cultivation ropes are taken as part of work done on the farms so if the site is used as a stepping stone it has a good chance of being identified. Any non-native species will be reported and removed. NRW A as the ANCB consider that introduction on invasive species is feasible and welcome the proposal to adhere to a Biosecurity Protocol. However presented within NRW A response dated 22 January 2026 that further clarity is required to the biosecurity protocol that was provided with the application. Without such clarification adverse effect cannot be ruled out.	
Large shallow inlets and bays Reefs Grey Seal <i>Halichoerus grypus</i> Otter <i>Lutra lutra</i> Allis shad <i>Alosa alosa</i> Twaite shad <i>Alosa fallax</i> River lamprey <i>Lampetra fluviatilis</i> Sea lamprey <i>Petromyzon marinus</i>	Pollution/littering	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; There is a minimal risk of litter (ropes etc.), hydrocarbon spill (boat fuel and lubricants) and noise (boat & other human activity). Mitigation measures put in place will include regular maintenance of the farm to reduce equipment coming loose in storms, lowering of ropes during bad weather, regular inspections, use of approved boat fuel, appropriate oil safety plans on the boat used, the boat used minimally and at slow speeds steering clear of known seal haul out areas and bird nesting areas. The DEML2540 Aquaculture Environmental Management Plan indicates how control of pollutants and waste management will be undertaken. Câr-Y-Môr will pressure wash equipment and vessels to remove marine growths and fouling. No chemicals are used for pressure washing.	YES

Grey Seal <i>Halichoerus grypus</i>	Entanglement	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; Seals are known to get entangled in ropes in the marine environment. These are mainly where the rope becomes slack in the water column and could entangle the seal. There are a number of rope grown mussel farms and seaweed farms in bays in Scotland where seals are known to feed and there have been no reports of any entangled in the ropes that hang from the rafts. An MSC assessment of the Shetland and Scottish Mainland rope grown fishery states that <i>"since the entanglement of marine mammals in mussel ropes has never happened since rope culture started, it can be considered a highly unlikely event"</i> (Cappell & Keus, 2017). Considering the scale of the farming in Scotland relative to the small scale proposed sites it can be considered that the proposal will not have an adverse effect on the Grey seal population in the SAC. The current trial sites have been in place for 5 years and have had no entanglement recordings. Grey seal haul out sites are present in the Ramsey Sound. Grey seals are one of the key species that the Pembrokeshire Marine SAC is designated for, with a breeding population of around 5,000 individuals, and making up 4% of the UK grey seal population. Pupping season is in the autumn, from August at the earliest, to December at the latest. The Ramsey Sound population is mostly on the south east coast of the island. Seals have been found visiting the farm and interacting with divers. There is therefore a risk for entrapment. However, no fishing nets will be used and all ropes will be kept taught and moored reducing opportunities for entrapment. To date, no entrapment has been recorded at the trial sites. A	NO
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		number of ropes grown mussel farms in Scotland have been assessed for this risk, and no marine mammals have been found to become entangled. A Marine Mammal Entanglement Protocol will be implemented and secured through conditions in the licence (<u>DEML2540 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25</u>) and all volunteers and the local community are informed of the monitoring protocol. These include regular checking of the anchoring lines to keep the lines taut at all times, checking of the farm after extreme weather and at regular intervals, and frequent maintenance. Furthermore, remote underwater cameras will be regularly used on the farms at different depths. If any entanglement risk to mammals is identified, the Society will be notified so actions can be taken immediately to reduce the risk. The small scale of the activity (0.6% of the area of Ramsey Sound and 0.002% of the SAC) will not have a significant effect on overall integrity of grey seal populations. However this conclusion is subject to the adherence to a Marine Mammal Entanglement Protocol to be secured through the Marine Licence.	
Grey Seal <i>Halichoerus grypus</i>	Habitat availability	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; Grey seal diet varies by location and season; they largely consume demersal or benthic fish species (Hall, 2002; Prime & Hammond, 1990). Individual prey preferences also exist as well as temporal and geographical variations in diet and differences in prey between age groups (Prime & Hammond, 1990; Hauksson & Bogason, 1997; Beck et al., 2005; Tucker et al., 2007; Brasseur et al., 2010). Trisopterus species (Bib, Norway Pout and Poor Cod), plaice and whiting appeared to be the main	YES

		prey species of the Grey seal with an increase in flatfish showing in the eastern Irish Sea (Kiely et al. 2000). Information by the Sea Mammal Research Unit (SMRU) indicates that the diet of seals mainly consists of sandeel, cod, haddock, saithe, whiting, herring, garfish, sea scorpions and dragonets. Plaice and sole also formed part of their prey in the North Sea (SMRU). The small scale and footprint of the proposed activity will not adversely affect the habitat of any of the prey species of the Grey seal. To the contrary they create nursery areas for many of these species and seals have been attracted to feed in the area.	
Grey Seal <i>Halichoerus grypus</i>	Disturbance	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; To minimise disturbance to seals and other animals in the area, boat speed will be reduced as well as any other disturbance, as a key objective of these farms is to improve marine ecosystems. Regardless, the small scale of the activity (0.6% of the area of Ramsey Sound and 0.002% of the SAC) will not have a significant effect on overall integrity of grey seal populations as vessel movements will be very localised.	Yes
European site name: West Wales Marine SAC			
Harbour porpoises (<i>Phocoena phocoena</i>)	Entanglement	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; Harbour porpoises (<i>Phocoena phocoena</i>) are present in the site and there is a porpoise sensitive area within the Sound, identified under the Pembrokeshire Marine Code, with 'cautionary' areas	NO

		to the north of the Sound, and 'extreme caution' areas to the south. The potential impact on harbour porpoises is not considered significant as these tend to stay in the fast moving tidal areas through the centre of the sound feeding (Pierpoint, 2008). The applicant has submitted and confirms will abide by a Marine Mammal Entanglement Protocol (<u>DEML2540 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25</u>). All volunteers and the local community are informed of the monitoring protocol. These include regular checking of the anchoring lines to keep the lines taut at all times, checking of the farm after extreme weather and at regular intervals, and frequent maintenance. Furthermore, remote underwater cameras will be regularly used on the farms at different depths. If any entanglement risk to mammals is identified, the Society will be notified so actions can be taken immediately to reduce the risk. However this conclusion is subject to the adherence to a Marine Mammal Entanglement Protocol to be secured through the Marine Licence.	
Harbour porpoises (<i>Phocoena phocoena</i>)	Disturbance	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; To minimise disturbance to marine mammals in the area, boat speed will be reduced as well as any other form of disturbance, as a key objective of these farms is to improve marine ecosystems. Regardless, the small scale of the activity together with the normal distribution of porpoises in the fast moving tidal areas through the centre of the sound (Pierpoint, 2008), will not have a significant effect on	YES

		overall integrity of grey seal populations as vessel movements will be very localised.	
Harbour porpoises (<i>Phocoena phocoena</i>)	Pollution/littering	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; There is a minimal risk of litter (ropes etc.), hydrocarbon spill (boat fuel and lubricants) and noise (boat & other human activity). Mitigation measures put in place will include regular maintenance of the farm to reduce equipment coming loose in storms, lowering of ropes during bad weather, regular inspections, use of approved boat fuel, appropriate oil safety plans on the boat used, the boat used minimally and at slow speeds steering clear of known seal haul out areas and bird nesting areas. The DEML2540 Aquaculture Environmental Management Plan indicates how control of pollutants and waste management will be undertaken. Câr-Y-Môr will pressure wash equipment and vessels to remove marine growths and fouling. No chemicals are used for pressure washing.	YES
European site name: Bristol Channel Approaches SAC (Harbour porpoise), Cardigan Bay SAC / Bae Ceredigion SAC (Bottlenose dolphin, grey seal), Pen Llyn a'r Sarnau SAC / Llyn Peninsula and the Sarnau SAC (Bottlenose dolphin, grey seal), North Anglesey Marine / Gogledd Môn Forol SAC (Harbour porpoise)			
Harbour porpoises (<i>Phocoena phocoena</i>) Grey Seal <i>Halichoerus grypus</i> Bottlenose dolphin	Entanglement	As set out in the <i>Environmental Impact Assessment and Document to inform a Habitat Regulation Assessment</i> submitted by the applicant; Harbour porpoises (<i>Phocoena phocoena</i>) are present in the site and there is a porpoise sensitive area within the Sound, identified under the Pembrokeshire Marine Code, with 'cautionary' areas to the north of the Sound, and 'extreme caution' areas to the south. The potential impact on harbour porpoises is not considered significant as these tend to stay in the	NO

(<i>Tursiops truncatus</i>)		fast moving tidal areas through the centre of the sound feeding (Pierpoint, 2008). The applicant has submitted and confirms will abide by a Marine Mammal Entanglement Protocol (<u>DEML2540 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25</u>). All volunteers and the local community are informed of the monitoring protocol. These include regular checking of the anchoring lines to keep the lines taut at all times, checking of the farm after extreme weather and at regular intervals, and frequent maintenance. Furthermore, remote underwater cameras will be regularly used on the farms at different depths. If any entanglement risk to mammals is identified, the Society will be notified so actions can be taken immediately to reduce the risk. However this conclusion is subject to the adherence to a Marine Mammal Entanglement Protocol to be secured through the Marine Licence.	
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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 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'

European site name: West Wales Marine/Gorllewin Cymru Forol SAC, Bristol Channel approaches / Dynesfeydd Môr Hafren SAC				
Harbour porpoises (<i>Phocoena phocoena</i>)	Entanglement	YES	A condition for the applicant to work in line with the Marine Mammal Entanglement Protocol (<u>DEML2540 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25</u>) will be added to the licence to ensure the control of entanglement	YES
European site name: Pembrokeshire Marine/Sir Benfro Forol SAC				
Large shallow inlets and bays Reefs	INNS	YES	The introduction of non-native species will be controlled through the requirement to produce and implement a Biosecurity Protocol. This will be secured through conditions in the licence to ensure that works are undertaken in line with the INNS Biosecurity Protocol.	YES
Grey Seal <i>Halichoerus grypus</i>	Entanglement	YES	A condition for the applicant to work in line with the Marine Mammal Entanglement Protocol (<u>DEML2540 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25</u>) will be added to the licence to ensure the control of entanglement	YES
Large shallow inlets and bays Reefs	Loss of habitat and damage to feature such as through abrasion	YES	Within DEML2540 Response to Further Information dated 11 December 2025 the applicant commits to including both sites within their program of annual monitoring, and agreeing clear trigger points with NRW A to ensure that the proposed works do not lead to an adverse impact on the Large Shallow inlet and bay feature or Reef. A condition will be placed within the licence to ensure that a suitable programme of monitoring and reporting is carried out during the duration of the licence.	Yes
European site name: Bristol Channel Approaches SAC (Harbour porpoise), Cardigan Bay SAC / Bae Ceredigion SAC (Bottlenose dolphin, grey seal), Pen Llyn a'r Sarnau SAC / Llyn Peninsula and the Sarnau SAC (Bottlenose dolphin, grey seal), North Anglesey Marine / Gogledd Môn Forol SAC (Harbour porpoise)				
Harbour porpoises (<i>Phocoena phocoena</i>) Grey Seal <i>Halichoerus grypus</i>	Entanglement	YES	A condition for the applicant to work in line with the Marine Mammal Entanglement Protocol (<u>DEML2540 6 - Car-Y-Mor license - Marine Mammal Entanglement protocol REVISED AUG 25</u>) will be added to the licence to ensure the control of entanglement	YES

Bottlenose dolphin (<i>Tursiops truncatus</i>)				
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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?	Yes

5. In combination assessment

Table 5.1 Identification and assessment of in combination effects				
European site name:				
'INCOMB' impacts from screening Table 3.2.2 and/or residual effect from appropriate assessment in section 4	European site feature(s) concerned	Other plans or projects with effects that might interact with the effects of the plan or project to render its effects significant/adverse (if any)	Nature of the in combination effect (if any) and assessment in view of conservation objectives	Can significant or adverse in combination effects be ruled out for all features?
Loss of habitat and damage to feature such as through abrasion	Pembrokeshire Marine/Sir Benfro Forol SAC; Large shallow inlets and bays Reefs	Car-y-Mor – Marine Licence DEML2151	The project is a 3Ha Seaweed and shellfish site in Ramsey Sound, with the potential for site infrastructure to impact on the loss or damage to habitat. However monitoring and reporting measures are in place and secured through Marine Licence DEML2151 therefore no adverse in-combination is predicted.	Yes
(a) If the right hand column is 'YES' for all rows		The plan or project, when considered in combination with other plans and projects, is either not likely to have a significant effect on, or will not adversely affect the integrity of, any European site.		
(b) If any rows in the right hand column are 'NO'		The plan or project is likely to have a significant effect on, or an adverse effect on, European site/s in combination with other plans or projects.		

Table 5.2 Addressing in combination effects

	Additional imposed mitigation measures,	Taking into account any additional measures identified and how they would be applied, can adverse effects on site features from in combination effects be ruled out? 'YES' or 'NO'
In combination assessment: conclusion		
(a) If the right hand column is 'YES' in all cases	It can be concluded that the plan or project will not adversely affect the integrity of any European sites, either alone or in combination with other plans or projects.	
(b) If any row is 'NO' in the right hand column	It <u>cannot</u> be concluded that the plan or project will not adversely affect the integrity of any European sites, when considered in combination with other plans or projects.	

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	
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:	
Name: Peter Morrison	Position: Lead Specialist Officer, Marine Licensing
Date: 16 February 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
all	24/02/2026	NRW A agree with conclusion of the HRA subject to the conditions to be attached to the Marine Licence detailed in section 4.2.

9. Appendix - Supporting information

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: Pete Morrison, MLT

FROM: Katie Reynolds, MAAMT

SUBJECT: Habitats Regulations Assessment of DEML2540 Restorative Ocean Farms at Ramsey Sound

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

We note the updated HRA dated 16th Feb 2026. We advise that monitoring of the seabed and adjacent habitats (including any reef features) should be conditioned as part of the Marine Licence to avoid adverse effect on site integrity. This could be achieved through a condition for NRW Advisory to review and agree a periodic monitoring (in the form of a monitoring report) and associated trigger levels.

Additionally, provided there is a condition as part of the marine license for the applicant to submit a Biosecurity Risk assessment to be approved by NRW Advisory, we are able to agree with the conclusions of the HRA; which is 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.

Signed: *KReynolds*

Date: 24/02/2026