

OGN 200 Form 1A

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	Llanelltyd Sheet Pile Removal
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HRA iteration/version	P01
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1. Plan or Project Details

Information about the plan or project		
1	Date application received	
2	Applicant details	
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer	
4	Activity/ies proposed	<p>A 30m section of sheet piling has catastrophically failed along the right bank of the Afon Mawddach leaving the sheet piling foundations exposed. The sheet piling was originally protecting part of a 1000m long earth embankment that acts as an informal flood bund for the farmland behind it. The project aims to achieve a solution which eliminates future liability, withdraw maintenance obligations, address health & safety and reach an agreement with the landowner. This project will ensure that NRW is meeting its regulatory and legal duties. The proposed works currently include four different options for sheet pile removal at the site:</p> <ol style="list-style-type: none"> 1. Full 100m sheet pile removal. 2. Cutting down the 100m sheet pile down to as low as possible (down to silt bed level). 3. Leaving 70m of piling to be left in situ and removing the full 30m length of pile. 4. Cutting down the 30m of failed piling to bed level to remove immediate risk.
5	Relevant legislation or statutory basis	N/A

6	Location	The site is located approximately 700m downstream of where the A470 road crosses the Afon Mawddach at the village of Llanelltyd, and immediately upstream of the confluence where the Afon Wnion meets the Afon Mawddach. The failed section of sheet pile is located at national grid reference SH 71189 19082.
7	Plan or project documents, including any application documents	JBA (2026) RWR-JBA-00-00-RP-EN-0001-S3-P01-Preliminary_Ecological_Appraisal. Unpublished Detailed drawings of the scheme are currently being produced and will be included as part of this application.
8	Environmental Statement	Not required.
9	Pre-application correspondence	None.
10	NRW team responsible for preparing this HRA report, and lead officer	Hannah Webster – Ecologist, JBA Consulting
11	Team or person responsible for approving the plan or project (competent authority role)	

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

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	-Pen Llŷn a'r Sarnau/ Lley'n Peninsula and the Sarnau Special Area of Conservation (SAC) UK0013117 -Afon Eden - Cors Goch Trawsfynydd SAC UK0030075 -Coedydd Derw a Safleoedd Ystlumod Meirion/ Meirionnydd Oakwoods and Bat Sites SAC UK0014789
(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	Coedydd Derw a Safleoedd Ystlumod Meirion/ Meirionnydd Oakwoods and Bat Sites SAC – Due to the nature of the proposed works and the distance from the designated site impacts to this SAC were screened out.

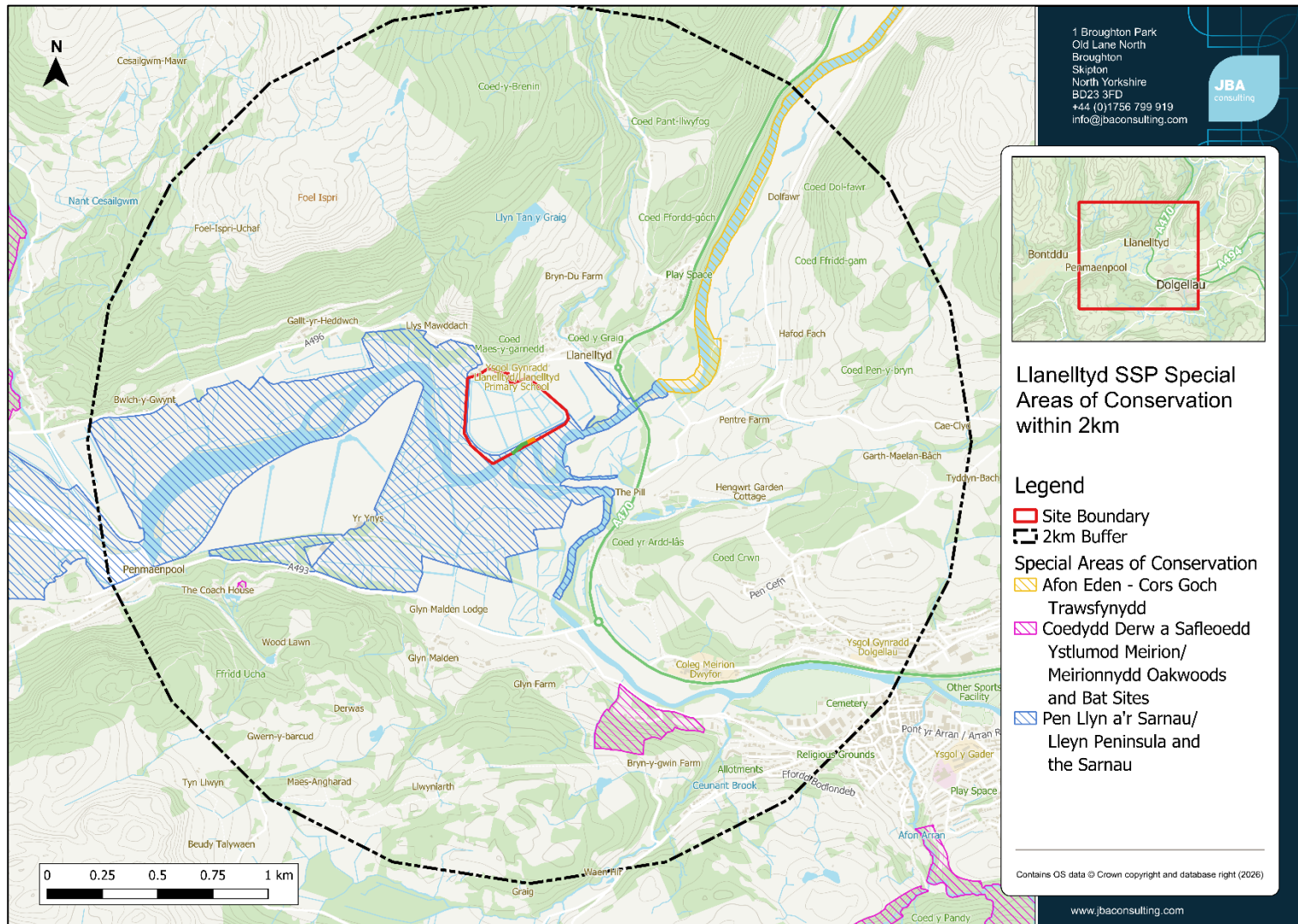


Figure 1. Special Areas of Conservation within 2km of the proposed site.

3.2.2 Screening for likelihood of significant effect

TABLE 3.2.2 Screening assessment			
European site name: Pen Llŷn a'r Sarnau/ Lleyn Peninsula and the Sarnau SAC			
Qualifying feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No
Annex I habitats; primary reason for selection: - 1110 Sandbanks which are slightly covered by sea water all the time - 1150 Coastal lagoons - 1160 Large shallow inlets and bays - 1130 Estuaries - 1170 Reefs	Habitat loss/ Physical damage	These Annex I habitats are not present within or adjacent to the works footprint (JBA 2026). Therefore, these habitats will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats.	No
	Water pollution/ Sediment release	During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
	Competition from INNS	The proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS), however, no INNS were recorded within the works footprint. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the Construction Environmental Management Plan (CEMP). These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). However, these measures will reduce any potential small scale	No

		minor impacts to negligible levels. Therefore, no likely significant effect is anticipated.	
Annex I habitats; not primary reason for selection: -1140 Mudflats and sandflats not covered by seawater at low tide -1310 Salicornia and other annuals colonizing mud and sand -1330 Atlantic salt meadows (<i>Glauco Puccinellietalia maritima</i>) -8330 Submerged or partially submerged sea caves	Habitat loss/ Physical damage	These Annex I habitats are not present within or adjacent to the works footprint (JBA 2026). Therefore, these habitats will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats.	No
	Water pollution/ Sediment release	During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
	Competition from INNS	The proposed works have the potential to spread terrestrial INNS, however, no INNS were recorded within the works footprint. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the CEMP. These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). However, these measures will reduce any potential small scale minor impacts to negligible levels. Therefore, no likely significant effect is anticipated.	No
Annex II species; not primary reason for selection: -1349 Bottlenose dolphin <i>Tursiops truncatus</i>	Habitat loss	The proposed scheme is over 10km from the coastline and any suitable Bottlenose dolphin habitat. Therefore, no loss of Bottlenose dolphin habitat is anticipated as part of the scheme. Works will not result in loss of marine habitat.	No

	Physical damage/mortality	The proposed scheme is over 10km from the coastline and any suitable Bottlenose dolphin habitat and therefore it is not anticipated that Bottlenose dolphin will be encountered during the proposed works.	No
	Noise and visual disturbance	The proposed scheme is over 10km from the coastline and any suitable Bottlenose dolphin habitat. Given the distance of the scheme from any suitable habitat, it is not anticipated that the proposed scheme will result in any disturbance to Bottlenose dolphin.	No
	Water pollution/ Sediment release	During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
Annex II species; not primary reason for selection: -1364 Grey seal <i>Halichoerus grypus</i>	Habitat loss	The proposed scheme is over 10km from the coastline and 5km from the Mawddach Estuary and any suitable hauling out spot for seals. Therefore, no loss of Grey seal habitat is anticipated as part of the scheme. Works will not result in loss of marine habitat.	No
	Physical damage/mortality	The proposed scheme is over 10km from the coastline and 5km from the Mawddach Estuary and any suitable hauling out spot for seals and therefore it is not anticipated that seals will be encountered during the proposed works. Given the distance of the scheme from any suitable habitat it is not anticipated that the proposed scheme will result in any seal mortality.	No
	Noise and visual disturbance	The proposed scheme is over 10km from the coastline and 5km from the Mawddach Estuary and any suitable hauling out spot for seals and habitats on site are unsuitable for foraging. Given	No

		the distance of the scheme from any suitable habitat it is not anticipated that the proposed scheme will result in any disturbance to seals.	
	Water pollution/ Sediment release	During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
Annex II species; not primary reason for selection: -1355 Otter <i>Lutra lutra</i>	Habitat loss	As highlighted in the Preliminary Ecological Appraisal (PEA) completed for the proposed works (JBA 2026) no Otter holts or resting sites were identified within the proposed works boundary, however, there is the potential for Otter to be present in the works area foraging and commuting. The works will result in a small area of temporary habitat loss, however, there is ample alternative habitat available, and any potential impact on Otter habitat would be negligible.	No
	Physical damage/mortality	The works area is relatively small scale and no holts or resting sites for Otter are present on site (JBA 2026). Any Otter present in the works area can reasonably be expected to move away from harm, however, there is potential for construction activities to cause harm during the sheet pile removal.	Yes
	Noise and visual disturbance	Elevated noise levels from construction activities and plant, and lighting of the river corridor during the removal works could cause temporary disturbance to Otter in close proximity to the construction works. This disturbance could affect Otter movement in the area and could hinder or prevent Otter from commuting, foraging or resting.	Yes

	Water pollution/ Sediment release	During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon suitable Otter habitat and prey species within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
European site name: Afon Eden - Cors Goch Trawsfynydd SAC			
Qualifying feature	Risk (Pressure)	Likely Significant Effect Alone	Yes or No
Annex I habitats; not primary reason for selection: -7110 Active raised bogs	Habitat loss/ Physical damage	The proposed works are located approximately 0.65km East of the Afon Eden SAC and the habitat Active raised bogs is not present in or adjacent to the proposed works boundary. Therefore, this habitat will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats.	No
	Water pollution/ Sediment release	During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
	Competition from INNS	The proposed works have the potential to spread terrestrial INNS, however, no INNS were recorded within the works footprint. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the CEMP. These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). However, these	No

		measures will reduce any potential small scale minor impacts to negligible levels. Therefore, no likely significant effect is anticipated.	
Annex II species; primary reason for selection: -1029 Freshwater pearl mussel <i>Margaritifera margaritifera</i> -1831 Floating water-plantain <i>Luronium natans</i>	Habitat loss/ Physical damage	The proposed works are located approximately 0.65km East of the Afon Eden SAC and these habitats are not present in or adjacent to the proposed works boundary. Therefore, this habitat will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats.	No
	Water pollution/ Sediment release	During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
	Competition from INNS	The proposed works have the potential to spread terrestrial INNS, however, no INNS were recorded within the works footprint. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the CEMP. These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). However, these measures will reduce any potential small scale minor impacts to negligible levels. Therefore, no likely significant effect is anticipated.	No
Annex II species; not primary reason for selection: -1106 Atlantic salmon <i>Salmo salar</i>	Habitat loss	The proposed works are located approximately 0.65km East of the Afon Eden SAC which is hydrologically connected to the Afon Mawddach. The Afon Mawddach is likely to support Atlantic	Yes

		salmon populations associated with the Afon Eden SAC and therefore the proposed works have the potential to impact this SAC species. The proposed works have the potential to result in some small-scale temporary loss of habitat suitable to support Atlantic salmon during the sheet pile removal works.	
	Physical damage/mortality	If in-channel works are proposed for the sheet pile removal, fish species maybe susceptible to harm or injury during the construction phase.	Yes
	Noise and visual disturbance	The sheet pile removal works will include works to the right bank of the Mawddach, which has the potential to cause vibration of the ground and adjacent water column. This could cause disturbance to fish, which could affect their movement past the area of construction works.	Yes
	Water pollution/ Sediment release	During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes
Annex II species; not primary reason for selection: -1355 Otter <i>Lutra lutra</i>	Habitat loss	The proposed works are located approximately 0.65km East of the Afon Eden SAC which is hydrologically connected to the Afon Mawddach. The Afon Mawddach is likely to support Otter populations associated with the Afon Eden SAC and therefore the proposed works have the potential to impact this SAC species. As highlighted in the PEA completed for the proposed works (JBA 2026) no Otter holts or resting sites were identified within the proposed works boundary, however, there is the potential for Otter to be present in the works area foraging and commuting. The works will result in a small	No

		area of temporary habitat loss, however, there is ample alternative habitat available, and any potential impact on Otter habitat would be negligible.	
	Physical damage/mortality	The works area is relatively small scale and no holts or resting sites for Otter are present on site (JBA 2026). Any Otter present in the works area can reasonably be expected to move away from harm, however, there is potential for construction activities to cause harm during the sheet pile removal.	Yes
	Noise and visual disturbance	Elevated noise levels from construction activities and plant, and lighting of the river corridor during the removal works could cause temporary disturbance to Otter in close proximity to the construction works. This disturbance could affect Otter movement in the area and could hinder or prevent Otter from commuting, foraging or resting.	Yes
	Water pollution/ Sediment release	During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon suitable Otter habitat and prey species within the SAC, in the absence of suitable on-site avoidance and mitigation measures.	Yes

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

<p>(a) If the screening conclusion for <u>all</u> features for all sites in Table 3.2.2 is 'SCREEN OUT'</p>	<p>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.</p>
<p>(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'</p>	<p>The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.</p>
<p>(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'</p>	<p>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.</p>