# 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 |
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**Next review date: October 2025**

# OGN 200 Form 1B

## Record of a Habitats Regulations Assessment

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| **Plan or project name, brief description or application reference number** | CML2608 - Llanfairfechan Seawall Apron Failure |
| **HRA iteration/version** | N/A |

## 1. Plan or Project Details

| **Information about the plan or project** | | |
|---|---|---|
| **1** | **Date application received** | 18 March 2026 |
| **2** | **Applicant details** | M Group Transport (Rail & Aviation) Limited |
| **3** | **NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer** | N/A |
| **4** | **Activity/ies proposed** | Remedial works on up to 40m of sea wall. The proposed works are planned to fill the void space with pumped concrete to reinstate the defence. A small excavator will be lifted from the rail, into position below the void on or close to beach level, in order to removed broken away material.<br><br>Envisaged sequence of works is as follows: |

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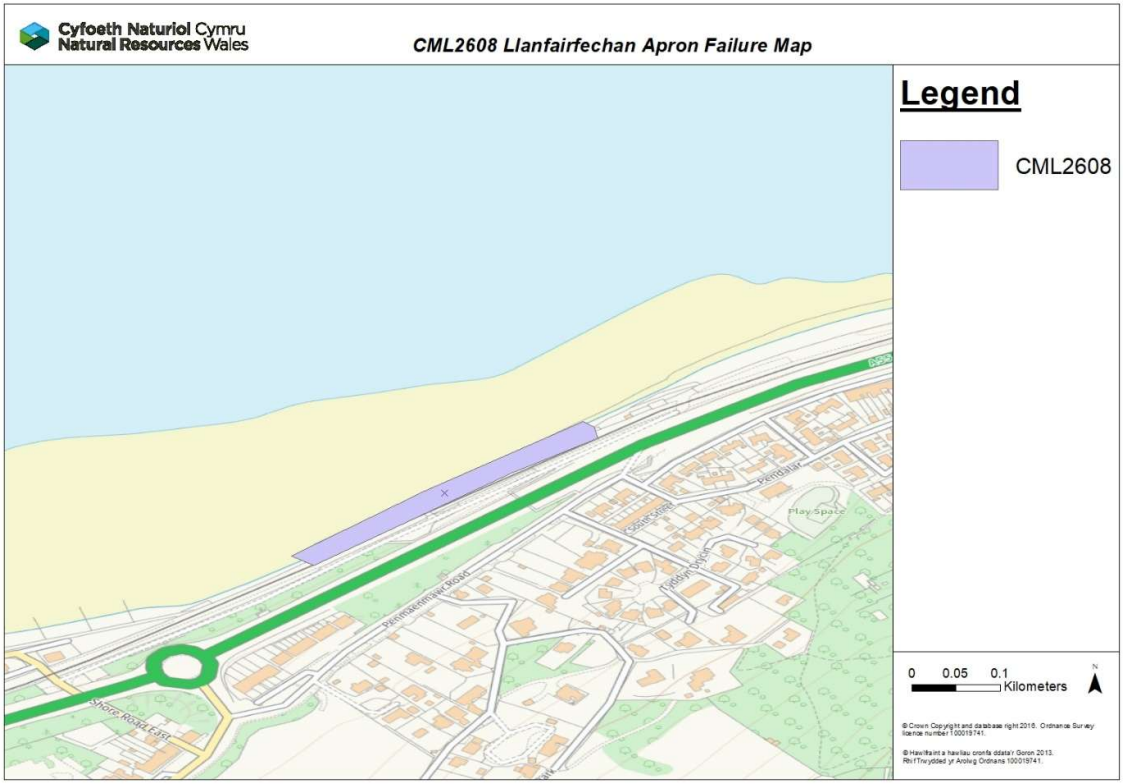
| | | • Removal of failed material<br>• Infilling and placement of clean stone material which has been scoured from the void<br>• Concrete backfill and cap of the void (similar to previous designs implemented on this defence alignment). |
| **5** | **Relevant legislation or statutory basis** | Marine and Coastal Access Act 2009 |
| **6** | **Location** | Llanfairfechan Sea Defence Wall<br>  |

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| **7** | **Plan or project documents, including any application documents** | CML2608 - 1025A - Llanfairfechan Apron (002) Application Form.pdf<br>CML2608 - 1025A - Llanfairfechan Apron - OS Map - Rev1.pdf<br>CML2608 - 1025A - Llanfairfechan Apron - AA - 2026 - MGroup - Rev1.pdf<br>CML2608 - Appendix A - Llanfairfechan Apron - Biosecurity Management Plan Risk Assessment - 2026.pdf<br>CML2608 - Appendix B - CNH3 Llanfairfechan Spec Notes Rev1.pdf<br>CML2608 - Appendix B - CNH3 W2300484 Llanfiarfechan_28012026.pdf<br>CML2608 - Copy of 1025A - Llanfairfechan Apron - WNMP Signposting Document_Completed.xlsx<br>CML2608 - 1025A - Llanfairfechan Apron - WFD-001 - 2026.pdf |
| **8** | **Environmental Statement** | N/A |
| **9** | **Pre-application correspondence** | Yes – but reference not stated in application form, possibly Q26019 Conwy Rail Sea Defence Damage |
| **10** | **NRW team responsible for preparing this HRA report, and lead officer** | Dylan Morgan – Marine Licensing Officer – Marine Licensing Team |
| **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

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| **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** | NO |

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| **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?** | |
| ~~**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?**~~ | |

# 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

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

## 3.2 Likelihood of significant effects (LSE) test

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

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| **(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** | **Traeth Lafan Sands SPA [UK9013031]**<br><br>**Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC [UK9013031]**<br><br>**Bae Lerpwl / Liverpool Bay SPA [UK9020294]** |
| **(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** | **Anglesey Terns / Morwenoliaid Ynys Môn SPA** was initially considered but ruled out due to distance (~6.0km) from location of works. |

### 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** |
| **European site name: Traeth Lafan SPA** | | | |
| Oystercatcher<br><br>*Haematopus ostralegus* | conservation-advice-for-traeth-lafan-spa.pdf | **SCREEN IN** | **Noise and Visual Disturbance:** The works are located within the SPA and therefore, there is the potential for disturbance/displacement due to increases in noise and visual disturbance.<br><br>**Pollution:** A small excavator will be lifted from the rail, into position below the void on or close to beach level, to remove failed material. Small submersible pump to be used as required to drain voids. Therefore, there is a potential impact pathway from hydrocarbon (fuel or oil) spillage. However, a pollution risk also exists due to the use of concrete to backfill the void as well as during any repointing works. |
| Wintering populations of Red-breasted Merganser, Curlew, Redshank and concentration of Great Crested Grebe | conservation-advice-for-traeth-lafan-spa.pdf | **SCREEN IN** | |
| **European site name: Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC** | | | |
| Mudflats and sandflats not covered by seawater at low tide | conservation-advice-for-menai-conwy-sac.pdf | **SCREEN IN** | **Pollution:** A small excavator will be lifted from the rail, into position below the void on or close to beach level, to remove failed material. Small submersible pump to be used as required to drain voids. Therefore, there is a potential impact pathway from hydrocarbon (fuel or oil) spillage. However, a pollution risk also exists due to the use of concrete to backfill the void as well as during any repointing works. INNS.<br><br>**Habitat loss:** short-term impact to intertidal habitat during the entire project. Restricted vehicle movement to the point of defence failure |

| | | | |
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| | | | below the structure. Mudflats and saltmarsh will be avoided at all times, unless movement around existing groynes is required. |
| Reefs | conservation-advice-for-menai-conwy-sac.pdf | **SCREEN OUT** | This feature is not located in close proximity to the works and as such, no impact pathway exists. |
| Sandbanks which are slightly covered by seawater all the time | conservation-advice-for-menai-conwy-sac.pdf | **SCREEN IN** | **Pollution:** A small excavator will be lifted from the rail, into position below the void on or close to beach level, to remove failed material. Small submersible pump to be used as required to drain voids. Therefore, there is a potential impact pathway from hydrocarbon (fuel or oil) spillage. However, a pollution risk also exists due to the use of concrete to backfill the void as well as during any repointing works. INNS.<br><br>**Habitat loss:** short-term impact to intertidal habitat during the entire project. Restricted vehicle movement to the point of defence failure below the structure. Mudflats and saltmarsh will be avoided at all times, unless movement around existing groynes is required. |
| Large shallow inlets and bays | conservation-advice-for-menai-conwy-sac.pdf | **SCREEN IN** | |
| Submerged or partially submerged sea caves | conservation-advice-for-menai-conwy-sac.pdf | **SCREEN OUT** | This feature is not located in close proximity to the works and as such, no impact pathway exists. |
| **Liverpool Bay/Bae Lerpwl SPA** | | | |
| Red-throated diver *Gavia stellata* (in non-breeding season) | NRW, Natural England and JNCC conservation objectives:<br><br>liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales) | **SCREEN IN** | **Noise and Visual Disturbance:** The works are located adjacent to the SPA, and the area is functionally linked. As such, there is the potential for disturbance/displacement due to increases in noise and visual disturbance.<br><br>**Pollution:** A small excavator will be lifted from the rail, into position below the void on or close to beach level, to remove failed material. Small submersible pump to be used as required to drain voids. Therefore, there is a potential impact pathway from hydrocarbon (fuel or oil) spillage. However, a pollution risk also exists due to the use of concrete to backfill the void as well as during any repointing works. |
| Little gull *Hydrocoloeus minutus* (in non-breeding season) | NRW, Natural England and JNCC conservation objectives:<br><br>liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales) | **SCREEN IN** | |
| Common scoter *Melanitta nigra* | NRW, Natural England and JNCC conservation objectives: | **SCREEN IN** | |

| | | | |
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| (in non-breeding season) | liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales) | | |
| Little tern *Sternula albifrons* (in breeding season) | NRW, Natural England and JNCC conservation objectives:<br><br>liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales) | **SCREEN IN** | |
| Common tern *Sterna hirundo* (in breeding season) | NRW, Natural England and JNCC conservation objectives:<br><br>liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales) | **SCREEN IN** | |
| Waterbird assemblage | NRW, Natural England and JNCC conservation objectives:<br><br>liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales) | **SCREEN IN** | |

TABLE 3.2.3 Screening decision of the plan or project ‘alone’

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| ~~(a) If the screening conclusion for all features for all sites in Table 3.2.2 is 'SCREEN OUT'~~ | ~~The plan or project is not likely to have a significant effect on any European site, and no further consideration under the Habitats Regulations is required in order to determine the approval/application.~~ |
| **(b) If the conclusion for any features in Table 3.2.2 is 'SCREEN IN'** | **The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.** |
| ~~(c) If there are no features in Table 3.2.2 that are 'SCREEN IN' and any features that are 'IN COMB'~~ | ~~The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.~~ |

# 4. Appropriate assessment of the plan or project when considered alone

## 4.1 Assessment of plan or project as defined

| **Table 4.1 Appropriate assessment** | | | |
|---|---|---|---|
| **European site feature/s** | **Description of impacts** | **Assessment in view of conservation objectives** | **Can adverse effect on site integrity be ruled out? 'YES' or 'NO'** |
| **European site name: Traeth Lafan Sands SPA** | | | |
| Oystercatcher<br><br>*Haematopus ostralegus*<br>Wintering populations of Red-breasted Merganser, Curlew, Redshank and concentration of Great Crested Grebe | • Disturbance (noise & visual)<br>• Pollution (concrete, hydrocarbons & INNS) | Consideration was given to impacts within document: *CML2608 - 1025A - Llanfairfechan Apron - AA - 2026 - MGroup - Rev1.pdf.*<br><br>The applicant has incorporated several mitigation measures into their method statement to minimise noise and visual disturbance such as:<br><br>• The project is programmed to occur during Summer or early Autumn months. This is to ensure best possible working conditions while also working within a traditionally less impactful period for over wintering species.<br>• Project activities will create a source of light and noise over 6-10 hours during the day. Times will vary due to the variation in the tide and weather.<br>• As working hours are not continuous there will be periods where birds are not disturbed by site activities. However, it is likely that local bird populations are habituated to a level of disturbance from human activities, due to large numbers of pedestrians being present throughout the year (peak being summer).<br><br>The applicant has incorporated several mitigation measures into their method statement to minimise pollution such as:<br><br>• Works will only occur during low tide conditions.<br>• Concrete used will be a rapid drying marine standard which will have cured by the time the tide returns to the working area. | **YES** |

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| | | • Covers around rapid dry concrete to be in place for several hours at a time and not long-term features.<br>• All machinery and equipment to undergo biosecurity control measures before entering the estuarine environment. See Biosecurity Management Plan in Appendix A.<br>• All plant machinery movement, excluded the use of the small plant machine at the base of the damaged apron, will occur within the confines of the rail corridor. No movement of plant machines along the estuary bed to access the site is required, with all material and machine lowered to the works site via crane.<br>• No refuelling of plant machinery or equipment will occur within the estuary habitat.<br>• All items of static plant will be placed within a plant nappy when not in use.<br>• Fuelled equipment will be checked for defects and leaks prior to the start of each shift.<br>• A refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose.<br>• Plant Machinery will only operate in low tide conditions and will be removed from the estuary ahead of the rising tide. Provision will be made to remove broken down plant / vehicles or plant and vehicles which become bogged down.<br>• Plant will be checked for defects and leaks prior to the start of each shift. Within the compound, a refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose.<br>• Network Rail have a spillage plan and specialised contractor in place to respond to and clean up spills.<br>• The project EMP will support this document with the relevant copies of GPP's available on site and references to the EMP which supports this document.<br>• The Contractor will develop and implement an Emergency Awareness and Response Plan. This will describe how spills will be contained and cleaned up. Negligible likelihood of impacts with mitigation in place. Title: Habitat Regulations Assessment (HRA) \| | |

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| | | 1025A - Llanfairfechan Apron Page \| 44 Receptor Affected Site Potential Hazard Mitigation Measures Likelihood of Impact.<br>• The emergency plan will 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.<br>• Plant will also be available to remove contaminated ballast from site if required.<br>• All machinery entering the estuary will undergo regular checks and only use approved biodegradable oils.<br><br>Standard pollution prevention and use of concrete conditions will also be added to the licence. Consequently, the project is unlikely to cause a significant impact to these species.<br><br>The applicant's assessment of effects takes account of mitigation measures that have been adopted as part of the project. Given the conclusions above, it is considered that in the absence of any mitigation measures, however, there is a potential to compromise this conservation objective. | |
| **European site name: Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC** | | | |
| Mudflats and sandflats not covered by seawater at low tide<br>Sandbanks which are slightly covered by seawater all the time<br>Large shallow inlets and bays | • Pollution (concrete, hydrocarbons & INNS)<br>• Habitat loss | Consideration was given to impacts within document: *CML2608 - 1025A - Llanfairfechan Apron - AA - 2026 - MGroup - Rev1.pdf and CML2608 - Appendix A - Llanfairfechan Apron - Biosecurity Management Plan Risk Assessment - 2026.pdf.*<br><br>The overall footprint of the project is relatively low and is largely limited to the footprint of the structure. As such will not cause permanent habitat loss.<br><br>Regarding long term SMP2 policy and Coastal Squeeze. As the project concerns only the correction of failures, in line with resent similar repairs, the works currently coincide with the understanding of defence maintenance, in a Hold the Line policy context.<br><br>Several mitigation measures were proposed within the applicant's HRA & Biosecurity Plan, without these mitigation measures we cannot rule out an adverse effect to these features. | NO |

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| | | The applicant's assessment of effects takes account of mitigation measures that have been adopted as part of the project. Given the conclusions above, it is considered that in the absence of any mitigation measures, however, there is a potential to compromise this conservation objective. Consequently, an adverse effect cannot be ruled out due to the above. | |
| **European site name: Liverpool Bay/Bae Lerpwl SPA** | | | |
| Red-throated diver *Gavia stellata* (in non-breeding season)<br>Little gull *Hydrocoloeus minutus* (in non-breeding season)<br>Common scoter *Melanitta nigra* (in non-breeding season)<br>Little tern *Sternula albifrons* (in breeding season)<br>Common tern *Sterna hirundo* (in breeding season)<br>Waterbird assemblage | • Disturbance (noise & visual)<br>• Pollution (concrete & hydrocarbons)<br>• INNS | Consideration was given to impact within document: *CML2608 - 1025A - Llanfairfechan Apron - AA - 2026 - MGroup - Rev1.pdf.*<br><br>• The project is programmed to occur during Summer or early Autumn months. This is to ensure best possible working conditions while also working within a traditionally less impactful period for over wintering species.<br>• Project activities will create a source of light and noise over 6-10 hours during the day. Times will vary due to the variation in the tide and weather.<br>• As working hours are not continuous there will be periods where birds are not disturbed by site activities. However, it is likely that local bird populations are habituated to a level of disturbance from human activities, due to large numbers of pedestrians being present throughout the year (peak being summer).<br><br>The applicant has incorporated several mitigation measures into their method statement to minimise pollution such as:<br><br>• Works will only occur during low tide conditions.<br>• Concrete used will be a rapid drying marine standard which will have cured by the time the tide returns to the working area.<br>• Covers around rapid dry concrete to be in place for several hours at a time and not long-term features.<br>• All machinery and equipment to undergo biosecurity control measures before entering the estuarine environment. See Biosecurity Management Plan in Appendix A.<br>• All plant machinery movement, excluded the use of the small plant machine at the base of the damaged apron, will occur within the confines of the rail corridor. No movement of plant machines along the estuary bed to access the site is required, with all material and machine lowered to the works site via crane. | YES |

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| | | • No refuelling of plant machinery or equipment will occur within the estuary habitat.<br>• All items of static plant will be placed within a plant nappy when not in use.<br>• Fuelled equipment will be checked for defects and leaks prior to the start of each shift.<br>• A refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose.<br>• Plant Machinery will only operate in low tide conditions and will be removed from the estuary ahead of the rising tide. Provision will be made to remove broken down plant / vehicles or plant and vehicles which become bogged down.<br>• Plant will be checked for defects and leaks prior to the start of each shift. Within the compound, a refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose.<br>• Network Rail have a spillage plan and specialised contractor in place to respond to and clean up spills.<br>• The project EMP will support this document with the relevant copies of GPP's available on site and references to the EMP which supports this document.<br>• The Contractor will develop and implement an Emergency Awareness and Response Plan. This will describe how spills will be contained and cleaned up. Negligible likelihood of impacts with mitigation in place. Title: Habitat Regulations Assessment (HRA) \| 1025A - Llanfairfechan Apron Page \| 44 Receptor Affected Site Potential Hazard Mitigation Measures Likelihood of Impact.<br>• The emergency plan will 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.<br>• Plant will also be available to remove contaminated ballast from site if required.<br>• All machinery entering the estuary will undergo regular checks and only use approved biodegradable oils. | |

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| | | Standard pollution prevention and use of concrete conditions will also be added to the licence. Consequently, the project is unlikely to cause a significant impact to these species. Further details can be found in the following document: *CML2608 - 1025A - Llanfairfechan Apron - AA - 2026 - MGroup - Rev1.pdf.* | |

## 4.2 Appropriate assessment of the plan or project taking into account additional conditions or restrictions imposed by the competent authority

| **Table 4.2 Appropriate assessment of the plan or project taking into account additional conditions or restrictions** | | | | |
|---|---|---|---|---|
| **European site name: Y Fenai a Bae Conwy/Menai Strait and Conwy Bay SAC** | | | | |
| **European site Feature** | **Adverse effect(s)** | **Can adverse effect(s) be mitigated by additional imposed conditions or restrictions? 'YES' or 'NO'** | **Additional imposed mitigation measure(s)** | **Can adverse effect on site integrity be ruled out? 'YES' or 'NO'** |
| Mudflats and sandflats not covered by seawater at low tide<br>Sandbanks which are slightly covered by seawater all the time<br>Large shallow inlets and bays | • Pollution (concrete & hydrocarbons)<br>• INNS<br>• Habitat loss | YES | To minimise pollution risks, the following measures are in place:<br>• Overall, there will be a short-term impact to the intertidal habitat during the entire project. Vehicle movement will be restricted to the point of defence failure below the structure. Mudflats and saltmarsh will be avoided at all times, unless movement around existing groynes is required.<br>• Plant machinery will not deviate from the designated working at any time and will be deployed via track mounted crane only. The machine will not leave the working area via the intertidal habitat.<br>• Additional measures will include regular periodic (i.e. daily) visual assessment of the intertidal mudflat, particularly the area of stable mud habitat. This is to ensure that the area does not become visually impacted i.e. rutted or compacted in specific areas as a result of vehicle access across the intertidal area. | **YES** |

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| | | | • Mobile habitat is anticipated to regenerated readily, with re-establishment likely to occur over 1-2 years following completion of reactive works.<br>• All plant machinery movement, excluded the use of the small plant machine at the base of the damaged apron, will occur within the confines of the rail corridor. No movement of plant machines along the estuary bed to access the site is required, with all material and machine lowered to the works site via crane.<br>• No refuelling of plant machinery or equipment will occur within the estuary habitat.<br>• All items of static plant will be placed within a plant nappy when not in use.<br>• Fuelled equipment will be checked for defects and leaks prior to the start of each shift.<br>• A refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose.<br>• Plant Machinery will only operate in low tide conditions and will be removed from the estuary ahead of the rising tide. Provision will be made to remove broken down plant / vehicles or plant and vehicles which become bogged down.<br>• Plant will be checked for defects and leaks prior to the start of each shift. Within the compound, a refuelling procedure will be implemented, whereby plant nappies will be placed beneath fuelling apertures during fuelling and refuelling will only be undertaken by designated, trained individuals using equipment specifically designed for that purpose.<br>• Network Rail have a spillage plan and specialised contractor in place to respond to and clean up spills.<br>• The project EMP will support this document with the relevant copies of GPP's available on site and references to the EMP which supports this document.<br>• The Contractor will develop and implement an Emergency Awareness and Response Plan. This will describe how spills will be contained and cleaned up.<br>• The emergency plan will 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. | |

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| | | | • Plant will also be available to remove contaminated ballast from site if required.<br>• All machinery entering the estuary will undergo regular checks and only use approved biodegradable oils.<br>• Works will only occur during low tide conditions.<br>• Concrete used will be a rapid drying marine standard which will have cured by the time the tide returns to the working area.<br>• Covers around rapid dry concrete are to be in place for several hours at a time and are not long-term features.<br>• All machines and equipment will undergo biosecurity control measures before entering the estuarine environment. See document: *CML2608 - Appendix A - Llanfairfechan Apron - Biosecurity Management Plan Risk Assessment – 2026*<br><br>Furthermore, additional mitigation measures are detailed and considered below through the following documents *CML2608 - 1025A - Llanfairfechan Apron - AA - 2026 - MGroup - Rev1.pdf* &<br>*CML2608 - Appendix A - Llanfairfechan Apron - Biosecurity Management Plan Risk Assessment - 2026.pdf.*<br><br>• Work schedules will work around the tides and weather conditions predominantly. The working pattern will, generally be organised on a 5-6 day calendar with Saturdays and/or Sundays off. The hours of those days will favour daylight hours, however there will be night working (normally Saturday nights) with the occasional mid-weeknights due to possession access (e.g., periods where rail equipment can be moved from other areas).<br>• Works are programmed during the summer and autumn, reducing the likelihood of potential indirect impacts to the winter roosting assemblage of birds and supporting habitats.<br>• Pollution control measures and emergency response plans will allow for robust controls over hydrocarbon pollution events, which are unlikely. These are further detailed in the attached Environmental Management measures within Task Briefs, which references GPP supporting documentation.<br>• At no point will the permanently flowing portion of the bay be impeded.<br>• Mobilisation of sediment is likely to be highly limited as only a very limited number of machines will come into contact with the | |

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| | | | estuary/bay bed during low-tide and will essentially beach in-situ, reducing the likelihood of agitating the bed and sediment.<br>• Biosecurity measures in place at the compound will make sure that all equipment and vehicles delivered to site have been cleaned and disinfected prior to deployment into the SAC environment. This forms part of the guidance outlined in the Biosecurity Risk Assessment & Management Plan (in Supporting Information).<br>• There will be a temporary reduction in available habitat and quality during the project undertaking and a short period of re-establishment afterwards.<br><br>Viewing scope of this project and this appropriate assessment, adverse effects to the SAC features is unlikely and as such can be ruled out. The mitigation will be secured via the Method Statement (including the above commitments), and adherence to Biosecurity Risk Assessment and Management Plan will be secured through the Marine Licence. | |

## 4.3 Concluding the appropriate assessment of the plan or project alone

| **Table 4.3 Conclusion of the appropriate assessment alone** | |
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| **(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?**~~ | |

## 6. Conclusion

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| **HRA is not required because there is no conceivable impact on any European sites.<br>(As documented in section 2.1)** | |
| **HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, and the plan or project is not likely to have a significant effect on any other European sites.<br>(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.<br>(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.<br>(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 not been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable.<br>Approval for the plan or project cannot be given unless either:**<br>• **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**<br>• **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**<br>**(*SSSI consents cannot be given as derogations)** | |
| **Signed:**  <br><br>**Name: Dylan Morgan** **Position: Marine Licensing Officer**<br><br>**Date: 24 April 2026** | |
| **Was this HRA conclusion an escalated decision? YES or NO** | **NO** |

## 7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

| Relevant section of the HRA report | Correspondence and/or meetings with the ANCB | Description of how the comments from the ANCB have been taken into account |
|---|---|---|
| **2** | | |
| **3** | | |
| **4** | Consultation with NRW A | NRW A agree with the conclusion of this HRA. |
| **5** | | |

## 8. 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:** Dylan Morgan, Marine Licensing Officer,

**FROM:** Rowland Sharp, Senior Marine Advisor, Marine Area Advice and Management Team

**SUBJECT:** Habitats Regulations Assessment for CML2608 Llanfairfechan Seawall Apron Failure

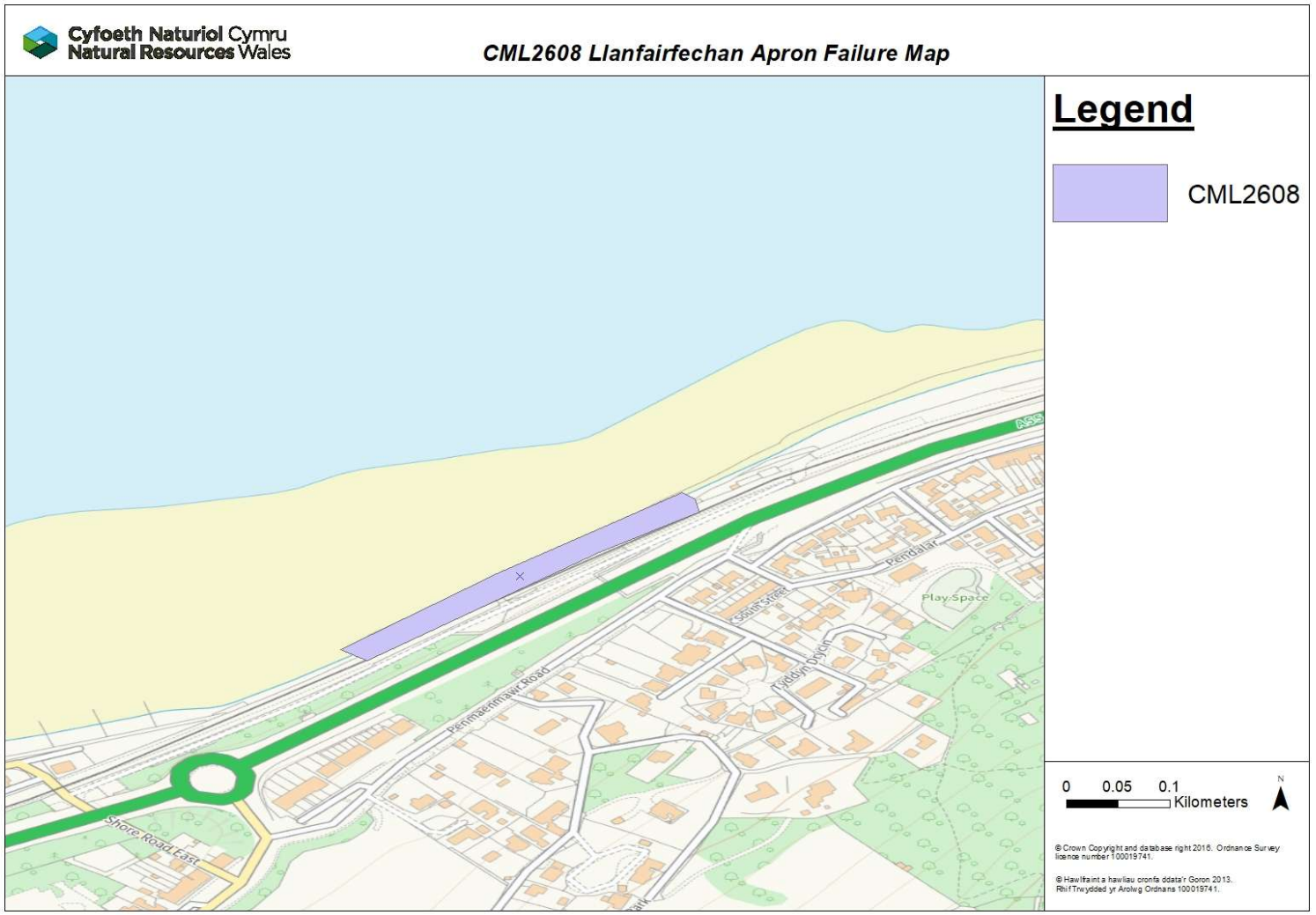
Thank you for consulting Marine Area Advice and Management Team on the above. Our comments are as follows:

| |
|---|
| The Marine Area Advice and Management Team agrees with the conclusion of the HRA (dated 27/05/2026) that there will be no Adverse Effect on the Menai Strait and Conwy bay SAC, Liverpool bay SPA or the Traeth Lafan sands SPA or any European Protected Marine Site. |

Signed: Rowland Sharp

Date: 10/06/2026

## 9. Appendix - Map



## 9. Appendix – Supporting Information

CML2608 - 1025A - Llanfairfechan Apron - AA - 2026 - MGroup - Rev1.pdf
CML2608 - Appendix A - Llanfairfechan Apron - Biosecurity Management Plan Risk Assessment - 2026.pdf
CML2608 - Appendix B - CNH3 Llanfairfechan Spec Notes Rev1.pdf
CML2608 - Appendix B - CNH3 W2300484 Llanfiarfechan_28012026.pdf