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

OGN 200 Form 1B

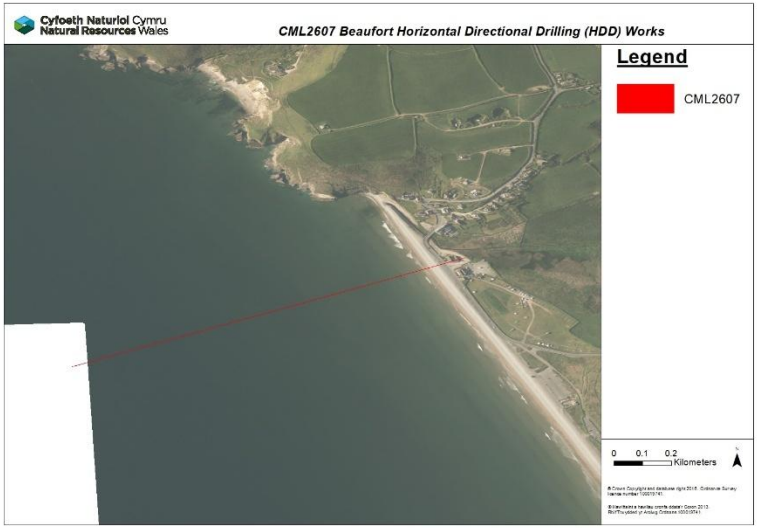
Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	Beaufort Horizontal Directional Drilling (HDD) Works
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	**Date application received**	25 February 2026
2	**Applicant details**	Apollo Submarine Cable System Limited
3	**NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer**	Jack Thompson – Marine Licensing Team
4	**Activity/ies proposed**	Beaufort Horizontal Directional Drilling (HDD) Works To facilitate improved internet connectivity, Vodafone is proposing the installation of a fibreoptic telecommunications cable from Kilmore Quay, Wexford, Ireland to Newgale, Pembrokeshire. Prior to the cable's installation, Horizontal Directional Drilling works are

		proposed to install cable ducting, through which the cable will later be fed. The cable will come ashore through the car park of the Newsurf Shop (above MHWS), where it will be connected to the onshore infrastructure. This application is for the HDD works only. Within the Newsurf Shop car park, an area approximately 50 m x 50 m for the operation of the drilling rig and support equipment/vehicles will be required. From here, the drilling operation will begin by drilling a pilot hole. Then, the drilling will be carried out continuously in intervals of 9.5 metres, equivalent to one length of drill pipe, until the Bottom Hole Assembly, (BHA), is at an along hole length of roughly 300 m, (i.e., horizontal at the end of the Entry Curve). The drill string will then continue to punch out on the seabed at a drilled length of 920 m. The HDD will exit from a subsea point approximately 920 m from shore, the exact location of which will be confirmed using a Multibeam Echo Sounder (MBES). Once confirmed, a dive vessel will be mobilised to this exit point, and divers will attach air bags to the Bottom Hole Assembly (BHA). The BHA can then by floated to the surface and retrieved and a bell mouth will be attached to the drill pipe. At the exit point, a marker buoy will be attached to a clump weight to indicate the location.
5	**Relevant legislation or statutory basis**	Marine and Coastal Access Act 2009
6	**Location**	Newgale Beach, Pembrokeshire 51.856844 -5.1259123 51.853453 -5.1381659 51.856842 -5.1259165 51.853458 -5.1381681

		
7	**Plan or project documents, including any application documents**	CML2607 - eng-marine-works-licence-application-Beaufort_Final_v1.0 _signed_Redacted (value only)_Redacted (full) CML2607 - OCU-HS-S1-FRM-035 Method Statement Risk Assessment - Newgale Rev1 CML2607 - P19421 - Report to Inform Habitats Regulations Assessment_Beaufort_v1.0Final-compressed CML2607 - P19421 - Beaufort HDD Consenting - Water Framework Directive Report_v1.0Final-compressed CML2607 - P19421 - Beaufort Marine Plan Policy Assessment_v1.0Final CML2607 - eng-marine-inns-biosecurity-ra-and-management-plan review-Final CML2607 - P19421 - Consultation and Responses_v1.0Final_Redacted-compressed
8	**Environmental Statement**	N/A
9	**Pre-application correspondence**	See “CML2607 - P19421 - Consultation and Responses_v1.0Final_Redacted-compressed

10	**NRW team responsibe for preparing this HRA report, and lead officer**	Jack Thompson – Marine Licensing Team
11	**Team or person responsible for approving the plan or project (competent authority role)**	As per 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?	N/A

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	No

OGN200) without conducting a project-specific LSE test?	

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 [UK0013116] West Wales Marine/Gorllewin Cymru Forol SAC [UK0030397] St David's / Ty Ddewi SAC [UK0013045] Ramsey and St David's Peninsula Coast SPA [UK9014062] Cardigan Bay/Bae Ceredigion SAC [UK0012712]
(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**	North Anglesey Marine/Gogledd Môn Forol SAC [UK0030398] Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC [UK0030396] The above had initially been considered for **Harbour porpoise** as the activity falls within the Celtic & Irish Seas (Marine Mammal Management Unit). However, the impact upon harbour porpoise has already been considered in the assessment of the **West Wales Marine SAC** which the works are located within. As such, given these sites are located further away, further consideration does not need to be given as any impacts and mitigation regarding this feature have already been determined. Pen Llyn a 'r Sarnau/Lleyn Peninsula and the Sarnau SAC [UK0013117] The above had initially been considered for **Bottlenose Dolphin** and **Grey Seal** as the activity falls within the Celtic & Irish Seas (Marine Mammal Management Unit). However, the impact upon these receptors has already been considered in the assessment of the **Cardigan Bay SAC** and **Pembrokeshire Marine SAC** which are in closer proximity. As such, given this site is located further away, further consideration does not need to be given as any impacts and mitigation regarding this feature have already been determined.

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	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Sandbanks which are slightly covered by seawater all the time	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Mudflats and sandflats not covered by seawater at low tide	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	The HDD occurs beneath this habitat and the exit hole is not located within it. As such, there is no impact pathway.
Coastal Lagoons	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Large shallow inlets and bays	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	The exit point of the drill will result in minor disturbance of the substrate and suspension of sediment however, this will be negligible and not result in a LSE.

Reefs	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Submerged or partially submerged sea caves	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Atlantic salt meadows	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Grey Seal *Halichoerus grypus*	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN IN	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment which may result in LSE due to this receptors sensitivity.
Otter *Lutra lutra*	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN IN	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment which may result in LSE due to this receptors sensitivity.
Allis shad *Alosa alosa*	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	Drilling operations and vessel use will generate continuous noise and vibrations in the marine environment. However, risk of disturbance to migratory fish features from underwater noise and vibration is low due to the small scale and temporary nature of the proposed works. Any potential acoustic impacts are expected to remain highly localised due to the relatively low intensity of underwater noise anticipated within the proposed works area. Underwater noise generated from drilling operations will be of low intensity due to the activity predominantly taking place up to 17 m beneath the surfaceof the seabed. Furthermore, the works are not located within an estuary or enclosed area, therefore, it's unlikely any underwater noise and vibrations would impact fish migrations or lead to entrapment.
Twaite shad *Alosa fallax*	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	
River lamprey *Lampetra fluviatilis*	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	
Sea lamprey *Petromyzon marinus*	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	SCREEN OUT	
Shore dock	NRW conservation objectives:	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.

Rumex rupestris	conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf		
West Wales Marine SAC			
Harbour porpoise *Phocoena phocoena*	NRW conservation objectives: West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	SCREEN IN	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment which may result in LSE due to this receptors sensitivity.
St David's / Ty Ddewi SAC			
1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts	Microsoft Word - St David's SAC Plan English.doc	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
4030 European dry heaths	Microsoft Word - St David's SAC Plan English.doc	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
1831 Floating water-*plantain Luronium natans*	Microsoft Word - St David's SAC Plan English.doc	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Ramsey and St David's Peninsula Coast SPA			
Chough *Pyrrhocorax pyrrhocorax*	Microsoft Word - St David's SAC Plan English.doc	SCREEN OUT	The SPA is located approximately 1km from the works. Given that the drilling operations will be occurring under the seabed, it is unlikely there will be any LSE on this feature.
Cardigan Bay/Bae Ceredigion SAC			
Sandbanks which are slightly	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.

covered by sea water all the time			
Reefs	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Submerged or partially submerged sea caves	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	This feature is not present within the location of the works and as such, there is no impact pathway.
Bottlenose dolphin *Tursiops truncatus*	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN IN	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment which may result in LSE due to this receptors sensitivity.
Sea lamprey *Petromyzon marinus*	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	Drilling operations and vessel use will generate continuous noise and vibrations in the marine environment. However, risk of disturbance to migratory fish features from underwater noise and vibration is low due to the small scale and temporary nature of the proposed works. Any potential acoustic impacts are expected to remain highly localised due to the relatively low intensity of underwater noise anticipated within the proposed works area. Underwater noise generated from drilling operations will be of low intensity due to the activity predominantly taking place up to 17 m beneath the surfaceof the seabed. Furthermore, the works are not located within an estuary or enclosed area, therefore, it's unlikely any underwater noise and vibrations would impact fish migrations or lead to entrapment.
River lamprey *Lampetra fluviatilis*	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN OUT	
Grey seal *Halichoerus grypus*	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	SCREEN IN	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment which may result in LSE due to this receptors sensitivity.

TABLE 3.2.3 Screening decision of the plan or project 'alone'	
~~(a) If the screening conclusion for all features for all sites in Table 3.2.2 is 'SCREEN OUT'~~	~~The plan or project is not likely to have a significant effect on any European site, and no further consideration under the Habitats Regulations is required in order to determine the approval/application.~~
(b) If the conclusion for any features in Table 3.2.2 is 'SCREEN IN'	**The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.**
~~(c) If there are no features in Table 3.2.2 that are 'SCREEN IN' and any features that are 'IN COMB'~~	~~The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.~~

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

4.1 Assessment of plan or project as defined

Table 4.1 Appropriate assessment			
European site feature/s	**Description of impacts**	**Assessment in view of conservation objectives**	**Can adverse effect on site integrity be ruled out? 'YES' or 'NO'**
European site name: Pembrokeshire Marine / Sir Benfro Forol SAC			
Grey Seal *Halichoeurus grypus*	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment within the hearing range of grey seal therefore, there is potential for auditory injury and disturbance from vessel presence/noise during survey and drilling operations. Drilling operations and vessel activities are operating close to the coast where seals haul-out which may also result in disturbance.	**HDD Operations:** Nedwell *et al*. (2012) report underwater noise levels of 129.5 dB re 1 µPa during HDD operations in a shallow riverine environment where drilling occurred directly beneath the riverbed. The measurements were taken in an exceptionally quiet setting with no other significant noise sources. In contrast, the proposed onshore works are located at the popular beach of Newgale, a coastal marine environment where natural oceanographic processes occur and there are additional anthropogenic noise inputs from recreational users. Consequently, the sound pressure levels reported by Nedwell *et al.* (2012) can be considered a conservative comparison, as HDD-related noise at Newgale would occur within an environment where background noise levels are naturally higher. These noise levels are very low in comparison to grey seal or otter hearing threshold for injury or disturbance.	YES
Otter *Lutra lutra*	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment within the hearing range of otters; therefore, there is potential for auditory injury and disturbance from vessel presence/noise during survey and drilling operations. Drilling operations and vessel activities are operating close to the coast where otters have holts which may also result in disturbance.		YES

		Given the onshore location is already an area with high recreational traffic and the onshore works will occur from a car park which is located off the beach and already developed with high movement of vehicles and people, the additional equipment required for HDD operations is not considered a risk for visual or in-air noise disturbance beyond baseline levels. Overall, HDD operations emit very low noise which is likely to fall under baseline levels for a coastal environment. Therefore, this source is unlikely to cause behavioural disturbance at either the individual or population level. Given the temporary nature of HDD operations and the limited acoustic footprint if any disturbance were to occur as a result it would be shortlived, localised and reversible with no implications for survival, reproduction, or population viability. **Vessel Disturbance:** Overall, vessel noise generated during the proposed survey is non-impulsive and remains well below established thresholds for permanent auditory injury in marine mammals. When combined with the small vessel size, limited survey duration, slow operating speeds, and adherence to best-practice mitigation measures, the risk of auditory injury is considered negligible. Behavioural disturbance may occur but is expected to be minor, temporary, and spatially restricted, and is unlikely to interfere with critical life functions such as survival, reproduction, or migration, or to result in population-level effects. Due to the area being a key region for grey seal pupping, however, the Project will ensure that	

		vessels do not approach seals hauled out within 500 m to limit risk of disturbance. The physical presence of the survey vessel(s) in the nearshore may cause some temporary disturbance to otters should they be in the immediate vicinity of the landfall site. This may result in otters temporarily avoiding their chosen feeding/resting location; however, they are likely to willingly move to another nearby location. As the nearest holts have been identified to be located more than 4.5 km from the onshore works, the proposed works are not thought to be able to disturb individuals at their most sensitive location (Kean and Chadwick, 2021; Natural Resources Wales, 2025). The presence of up to two extra vessels in the area for a limited duration is not deemed a significant increase in vessel activity.	
European site name: West Wales Marine SAC			
Harbour porpoise *Phocoena phocoena*	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment within the hearing range of harbour porpoise; therefore, there is potential for auditory injury and disturbance from vessel presence/noise during survey and drilling operations.	**HDD Operations:** The main energy of continuous noise from proposed works including drilling is largely below 1kHz (MMO, 2005) which is outside of the peak range of sensitivity for harbour porpoise (12 – 140 kHz). Considering the low noise levels reported by Nedwell *et al*. (2012), if these works were audible above the baseline soundscape of the coastal region at Newgale, this source is unlikely to cause behavioural disturbance at either the individual or population level. Given the temporary nature of HDD operations and the limited acoustic footprint if any disturbance were to occur as a result it would be short-lived,	YES

		localised and reversible with no implications for survival, reproduction, or population viability. **Vessel Disturbance:** The waters surrounding the Pembrokeshire coast are a high traffic area, largely due to the Port of Milford Haven, and therefore, harbour porpoise in the area are exposed to marine traffic on a regular basis and should therefore be accustomed to vessel movements. The addition of up to two vessels that will be required for the works will not significantly increase vessel traffic in the area. Works are planned to occur across 57 days from September, which coincides with the less productive foraging season for harbour porpoise. As harbour porpoise distribution condenses more within Cardigan Bay in the winter (Heinänen and Skov, 2015), which lies approximately 35.5 km north along the coastline, St. Brides Bay which encompasses the Project's location is not considered a key region for harbour porpoise at this time of year. Therefore, if any disturbance does occur, harbour porpoise have more suitable regions within their range to support feeding and resting behaviours. Given the anticipated local, spatial range of impact, the impact is considered to be short-term and temporary.	
European site name: Cardigan Bay/Bae Ceredigion SAC			
Bottlenose dolphin *Tursiops truncatus*	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment within the hearing range of bottlenose dolphin; therefore, there is potential for auditory injury and disturbance from vessel	**HDD Operations:** The main energy of continuous noise from proposed works including drilling is largely below 1kHz (MMO, 2005) which is outside of the peak range of sensitivity for bottlenose dolphin (40 – 100 kHz).	YES

	presence/noise during survey and drilling operations.	Considering the low noise levels reported by Nedwell *et al*. (2012), if these works were audible above the baseline soundscape of the coastal region at Newgale, this source is unlikely to cause behavioural disturbance at either the individual or population level. Given the temporary nature of HDD operations and the limited acoustic footprint if any disturbance were to occur as a result it would be short-lived, localised and reversible with no implications for survival, reproduction, or population viability. **Vessel Disturbance:** The waters surrounding the Pembrokeshire coast are a high traffic area, largely due to the Port of Milford Haven, and therefore, bottlenose dolphin in the area are exposed to marine traffic on a regular basis and should therefore be accustomed to vessel movements. The addition of up to two vessels that will be required for the works will not significantly increase vessel traffic in the area. Given the limited footprint of the works, if any disturbance does occur, there are plenty of alternative regions within their range for bottlenose dolphin to move to.Given the anticipated local, spatial range of impact, the impact is considered to be short-term and temporary.	
Grey seal *Halichoerus grypus*	Drilling operations and survey vessel use will generate continuous noise and vibrations in the marine environment within the hearing range of grey seal therefore, there is potential for auditory injury and disturbance from vessel presence/noise during survey and drilling operations.	**HDD Operations:** Nedwell *et al*. (2012) report underwater noise levels of 129.5 dB re 1 µPa during HDD operations in a shallow riverine environment where drilling occurred directly beneath the riverbed. The measurements were taken in an exceptionally quiet setting with no other significant noise sources. In contrast, the proposed onshore works are located at the	YES

	Drilling operations and vessel activities are operating close to the coast where seals haul-out which may also result in disturbance.	popular beach of Newgale, a coastal marine environment where natural oceanographic processes occur and there are additional anthropogenic noise inputs from recreational users. Consequently, the sound pressure levels reported by Nedwell *et al.* (2012) can be considered a conservative comparison, as HDD-related noise at Newgale would occur within an environment where background noise levels are naturally higher. These noise levels are very low in comparison to grey seal hearing threshold for injury or disturbance. Given the onshore location is already an area with high recreational traffic and the onshore works will occur from a car park which is located off the beach and already developed with high movement of vehicles and people, the additional equipment required for HDD operations is not considered a risk for visual or in-air noise disturbance beyond baseline levels. Overall, HDD operations emit very low noise which is likely to fall under baseline levels for a coastal environment. Therefore, this source is unlikely to cause behavioural disturbance at either the individual or population level. Given the temporary nature of HDD operations and the limited acoustic footprint if any disturbance were to occur as a result it would be shortlived, localised and reversible with no implications for survival, reproduction, or population viability. **Vessel Disturbance:** Overall, vessel noise generated during the proposed survey is non-	

		impulsive and remains well below established thresholds for permanent auditory injury in marine mammals. When combined with the small vessel size, limited survey duration, slow operating speeds, and adherence to best-practice mitigation measures, the risk of auditory injury is considered negligible. Behavioural disturbance may occur but is expected to be minor, temporary, and spatially restricted, and is unlikely to interfere with critical life functions such as survival, reproduction, or migration, or to result in population-level effects. Due to the area being a key region for grey seal pupping, however, the Project will ensure that vessels do not approach seals hauled out within 500 m to limit risk of disturbance.	

4.3 Concluding the appropriate assessment of the plan or project alone

Table 4.3 Conclusion of the appropriate assessment alone	
(a) If Table 4.1, or the right hand column of Table 4.2 if applicable, is 'YES' for all features	**It has been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of any European sites.**
~~**(b) If there are any 'NO's in the right hand column of Table 4.2**~~	~~**It has not been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of one or more European sites.**~~
(c) Are there are any residual effects of the plan or project (net of mitigation measures) which, though not adverse on their own, could be significant when considered in combination with the effects of other plans or projects?	**NO**

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, and the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	
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 not been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project cannot be given unless either: • **the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or** • **the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers** **(*SSSI consents cannot be given as derogations)**	
Signed: J. Thompson **Name: Jack Thompson** **Position: Senior Marine Licensing Officer** **Date: 25 March 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
4	06 May 2026 18 June 2026	NRW A requested further evidence of the noise levels that the works would produce before they could agree with the conclusion of no adverse effect on marine mammals. Applicant provided additional information to address NRW A's concerns. Additional evidence was provided of the noise that the works would produce and it was concluded that this would not result in an adverse effect on marine mammals. Additional pollution prevention measures were proposed which NRW A were happy with.

Cyfoeth Naturiol Cymru
Natural Resources Wales

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 autority team

TO: Jack Thompson, Marine Licencing Team

FROM: Siân Cuthbertson, Marine Area Advice and Management Team

SUBJECT: Habitats Regulation Assessment of CML2607 Beaufort Horizontal Directional Drilling (HDD) Works

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

Marine water quality

While NRW (A) welcome the detailed plans for spoil separation and disposal, the proximity of the ground-penetrating works to the WFD coastal waterbody (approx. 60m) presents a potential pollution risk from drilled material (dust/concrete/sediments). The applicant's method statement states in Section 8: '*All works will be conducted in accordance with the OCU Environmental management plan and any specific environmental consents*'. Please can the applicant provide specific measures in their method statement to prevent drilled material from the ground-penetrating works from entering the waterbody, e.g. the use of silt curtains or equivalents? We welcome the measures listed in the Risk Assessment table on page 31, point 18: 'Harm to the environment', but we note that no measures are provided to prevent contamination of the waterbody by drilled materials.

NRW (A) agree with the conclusion of the WFD Compliance Assessment (CA), that the in-water works of the activity has no potential to cause deterioration of any water body or prevent a water body or WFD Protected Area from meeting its objectives (page

22). However, noting our point above, there is a potential pollution impact pathway from drilled material at the onshore rig site that has not been assessed. We acknowledge that this risk is likely to be minor, but we advise that it is scoped into the WFD CA.

Benthic Ecology

While NRW(A) agree with the overall outcome of the assessment in relation to impacts on the Sir Benfro Forol / Pembrokeshire Marine SAC, we advise that potential impacts on the large shallow inlets and bays (LSIB) and reefs Annex 1 features should not be 'screened out'.

The LSIB feature of Pembrokeshire marine SAC is made up of a series of 'complex' habitat features some of which would be more susceptible to impacts resulting from the HDD exit pit and associated infrastructure proposed as part of the current works. Given that HRA guidelines clearly state that the screening stage does not consider avoidance or reduction measures, and the document to inform the HRA (undertaken by the applicant) has included information on,

i) the likely habitat types in the vicinity of the proposed exit pit i.e. Infralittoral fine sand / muddy sand, and of low sensitivity,

ii) pollution control measures from vessels and equipment,

iii) measures to control invasive non-native species and

iv) information on disturbance / smothering and siltation in relation to the specific habitat types.

We feel this information would be better included as evidence in Stage 2: of the appropriate assessment (AA), which would adequately explain why Adverse Effect on \site Integrity (AEOSI) can be ruled out. NRW(A) are of the opinion that this approach should be applied to both the LSIB and reefs features of the Pembrokeshire Marine SAC.

NRW(A) advise that the biosecurity risk assessment should be updated with relevant information on vessel biofouling, last visited ports and relevant biosecurity mitigation measures, e.g. ensuring all equipment is clean and free of any fouling from the previous campaign / destination. This should be submitted to NRW(A) for review prior to commencement of works to ensure the risks posed by marine INNS are minimised.

Marine Mammals

For the HRA to be robust, NRW(A) advise the described expected coastal baseline noise levels should be stated and evidenced. The Appropriate Assessment states that "*HDD operations emit very low noise which is likely to fall under baseline levels for a*

coastal environment". However, no evidence is provided to support this statement. This baseline should be provided and evidenced within the Appropriate Assessment.

NRW(A) believe there is a need for further assessment of disturbance to marine mammals. There is a known sensitivity of harbour porpoise to vessel noise (Dyndo et al 2015; Wisniewska et al 2018; Rojano-Doñate et al 2023). While there is existing vessel traffic in the wider Pembrokeshire region, basing assessment conclusions on assumptions that marine mammals are accustomed to vessel movements should be avoided, as this risks speculation and overlooking the extent of a potential impact pathway. While it is reasonably likely that boat noise as a stressor is tolerated by marine mammals, absence of displacement is not evidence of absence of all detrimental consequences to animals. Responses may be physiological which are harder to detect, and animals may react by reducing foraging which leads to energy intake costs (e.g. harbour porpoise, see Rojano-Donate et al. 2023 - presented at Oceanoise 2023), or making deeper dives increasing swimming effort, and ceasing echolocation and foraging for several minutes (Wisniewska et al. 2018). Thus, the presence of vessels almost certainly has an energetic cost to harbour porpoise. Similar findings were made by Pirotta et al. (2013, 2015), Dyndo et al. (2015), Oakley et al. (2017), Marley et al. (2017a, 2017b).

Other arguments, such as the small increase in the number of vessels compared to the baseline shipping traffic, should also be quantified within a local context. This baseline assessment should include details of the types of vessels expected to operate, as these will influence underwater noise generation. Relevant characteristics include vessel size and whether dynamic positioning (DP) is required. The use of DP can result in source levels of up to 206 dB re 1 µPa·m (Kongsberg Maritime AS 2013; Jiménez-Arranz et al. 2020). Additional contributors to underwater noise include continuous sources such as drilling activities, vessel engine noise, and general operational noise. NRW (A) recommend the use of the Level B harassment threshold of 120 dB re 1 µPa SPL_{rms}. Level B harassment is defined as activities that have the potential to disturb marine mammals, to a biologically significant degree, without causing injury. Such disturbance may disrupt behavioural patterns including migration, nursing, breeding, feeding, or sheltering (NRW 2023).

Given the proposed works are located within the Gorllewin Cymru Forol / West Wales Marine SAC (WWM SAC), the above should be considered within the Appropriate Assessment. NRW(A) would consider it likely that, once the scale and nature of the works within the relevant spatial context have been quantitatively assessed, a conclusion of no AEOSI Integrity could be reached. A similarly more quantitative approach should be taken in the assessments for grey seal and bottlenose dolphin, the latter of which can also take into account the location of the works within the Irish Sea MMMU but outside of Bae Ceredigion / Cardigan Bay SAC.

NRW(A) further advise that additional assessment of the Multi Beam Echo Sounder (MBES) is required. The noise generated by the MBES has not been included in the assessment for marine mammals. MBES source levels and frequencies vary depending on the model and settings and can occur both within the hearing range of marine mammals and exceed the injury thresholds (Crocker and Fratantonio (2016), Kongsberg Maritime AS (2011), Southall et. al. (2019)). The Marine Licence application form 12(c) response

states that "*The MBES planned to locate the punch-out point operates at approximately 400 kHz*", which NRW(A) agrees "*is above the hearing range of marine mammals*." The technical details of the MBES unit and settings should be controlled via the licence, and this detail included in the HRA to assess the risk of injury, alongside disturbance from this additional source.
Should operations have the potential to operate with noise levels that would exceed injury thresholds, the JNCC (2017) 'Guidelines for Minimising the Risk of Injury to Marine Mammals from Geophysical Surveys' should be followed.

NRW(A) requests clarification of the schedule of works. The application form states that "*Works are planned to occur across 57 days from September*", however, the application form also states, "*The HDD works are expected to commence in October 2026*." The dates over which the work will occur is pertinent when considering the different winter and summer regions of Gorllewin Cymru Forol / West Wales Marine SAC, with summer defined April to September inclusive and winter October to March inclusive. However, given the consultation requests that NRW(A), "*assess the application over a calendar year to highlight any potential seasonal issues that could arise as a result of the proposal*" both the winter and summer extents of the SAC should be considered.

All other receptors

For all other receptors NRW(A) agree with the conclusions of the HRA.

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Signed: 

Date: 06/05/2026

Cyfoeth Naturiol Cymru
Natural Resources Wales

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: Jack Thompson, Marine Licencing Team

FROM: Siân Cuthbertson, Marine Area Advice and Management Team

SUBJECT: Habitats Regulation Assessment of CML2607 Beaufort Horizontal Directional Drilling (HDD) Works

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

Having reviewed the updated HRA received on the 29th of May 2026, NRW(A) are now satisfied that the project will not adversely affect the integrity of any protected site, provided that all mitigation measures and methods stated are followed.

Signed:

Date: 18/06/2026