

Record of a Habitats Regulations Assessment of a project or spatially-specific plan

OGN 200 Form 1B (with structured tables for likely significant effect screening and appropriate assessment)

Document owner: Head of Business for Natural Resource Management

Version History:

Document Version	Date Published	Summary of Changes
2.0	21/10/2024	Following 2023/24 review of HRA OGNs

Next review date: **October 2025**

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OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	Construction of concrete headwall on the southern bank of the River Dee
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	Date received: 06 May 2026 Duly made: 03 June 2026
2	Applicant details	Copart UK 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	Construction of concrete headwall on the southern bank of the River Dee An outfall drainage pipe will be installed using Guided Auger Boring. The drilling rig will be positioned in a manhole, landward of MHWS, and drilling will then commence with the exit hole located adjacent to the River Dee.

		A precast head will be installed to the outfall pipe and the last section of pipe will be cut. The headwall installation area will be excavated to the required level to house the toe. This will then be lined with geotextile material, followed by 200-300mm of well-graded granular material, followed by a 50mm layer of sharp sand. In adverse ground conditions, a 75mm concrete later may be required with a 50mm thick granular overlay. The pre-case headwall will then be lowered in to position and connection made with the outfall pipe. Any voids will be filled with sand cement mortar or a high strength non-shrink grout or similar. Once the headwall has been laid, backfilling will take place. Backfill material will typically be similar to surrounding soil, free from large lumps, roots, rubbish or building rubble. The pipe section will be backfilled first, then around the headwall while compacting well at the front of the toe. Compacting will be undertaken in layers of maximum 200mm, working evenly on each side of the headwall. It may be necessary to provide protection in front of the toe. Metal grating will be installed post backfill to prevent any potential pipe entry. Erosion and scour protection will be installed to help prevent embankment soil from washing away and maintain the integrity of the drainage system.
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009

6	Location	 53.198599, -2.9830434 53.198512, -2.9827869 53.198466, -2.9828308 53.198554, -2.9831022
7	Plan or project documents, including any application documents	CML2615 - 20260505 Marine Licence Application COMPLETED CML2615 - 35403 R5 Rev2 - Copart Expansion - sHRA commentary for Marine Licence Application_as issued CML2615 - 23009-210 LOCATION PLAN MARINE LICENCE WORKS CML2615 - 23009-215 MARINE LICENCE WORKS SITE LAYOUT CML2615 - 23009-216 MARINE LICENCE WORKS CROSS-SECTION LONG-SECTION CML2615 - FP6202-T-01 Rev C CML2615 - 23009 WNMP_Marine Licence Application CML2615 - Additional SI_GSL3219_Copart Chester_Factual Report - March2025 CML2615 - CEMP_MYCO-CEMP-CCS-001 Construction Environmental Management Plan (CEMP) CML2615 - Copy of Sandycroft WFD_Appendix A CML2615 - P16952_Shear Design Ltd_Sandycroft WFD_v2.0 CML2615 - Safe System Of Work_MYCO-CCS-001 Copart Chester CML2615 - SHRA_Atmos Consulting 35403R2Rev4

8	Environmental Statement	N/A
9	Pre-application correspondence	Pre-application advice from Chris Roscoe in MLT as well as FRAP team.
10	NRW team responsible 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 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	Dee Estuary SAC [UK0030131] Dee Estuary SPA [UK9013011] Dee Estuary RAMSAR River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC [UK0030252]
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	N/A

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
Dee Estuary SAC			
Mudflats and sandflats not covered by seawater at low tide	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN IN	These features are all further than 3.5km away from the works location. The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of designated features.
Salicornia and other annuals colonising mud and sand	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN IN	The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting designated features.
Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN IN	
Estuaries	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN IN	
Annual vegetation of drift lines	NRW and Natural England conservation objectives:	SCREEN OUT	The drift lines are over 20km away and therefore, there is no impact pathway.

	Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994		
Vegetated sea cliffs of the Atlantic and Baltic Coasts	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN OUT	Habitat found above Highest Astronomical Tide (HAT) (refer conservation objectives) therefore no impact pathway.
Embryonic shifting dunes	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN OUT	Habitat is above HAT therefore no impact pathway.
Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes')	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN OUT	Habitat is above HAT therefore no impact pathway.
Fixed coastal dunes with herbaceous vegetation ('grey dunes')	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN OUT	Habitat is above HAT therefore no impact pathway.
Humid dune slacks	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN OUT	Habitat is above HAT therefore no impact pathway.
Sea lamprey <i>Petromyzon marinus</i>	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of eggs, reducing feeding success in

River lamprey <i>Lampetra fluviatilis</i>	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN IN	larvae and impeding access/egress to suitable burrowing habitat. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
Petalwort <i>Petalophyllum ralfsii</i>	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994	SCREEN OUT	Species occurs above HAT therefore no impact pathway.
Dee Estuary SPA			
Sandwich tern <i>Thalasseus sandvicensis</i> (passage)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
Common tern <i>Sterna hirundo</i> (breeding)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	Above water noise produced during construction may also detrimentally impact these features leading to disturbance/displacement.
Little tern <i>Sternula albifrons</i> (breeding)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	

Pintail <i>Anas acuta</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Teal <i>Anas crecca</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Dunlin <i>Calidris alpina</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Knot <i>Calidris canutus</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Oystercatcher <i>Haematopus ostralegus</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Bar-tailed godwit <i>Limosa lapponica</i>	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	

Black-tailed godwit <i>Limosa limosa</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Curlew <i>Numenius arquata</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Grey plover <i>Pluvialis squatarola</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Shelduck <i>Tadorna tadorna</i> (wintering)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Redshank <i>Tringa totanus</i> (passage)	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Redshank <i>Tringa totanus</i> (wintering)	NRW and Natural England conservation objectives:	SCREEN IN	

	Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)		
Waterbird assemblage (wintering) species in addition to those above: Sanderling <i>Callidris alba</i>, Cormorant <i>Phalacrocorax carbo</i>, Great crested grebe <i>Podiceps cristatus</i>, Lapwing <i>Vanellus vanellus</i>, Wigeon <i>Anas penelope</i>	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Dee Estuary RAMSAR			
Internationally important wetland regularly supporting 20,000 or more waterbirds.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in reduced foraging success.
Internationally important wetland, regularly supporting 1% or more redshank of the eastern Atlantic population on passage.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
Internationally important wetland, regularly supporting	NRW and Natural England conservation objectives:	SCREEN IN	Noise produced during construction may also detrimentally impact these features through disturbance/displacement.

1% or more wintering shelduck of the North-western European population.	Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)		
Internationally important wetland, regularly supporting 1% or more wintering teal of the North-western European population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering pintail of the North-western Europe population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering oystercatcher of the Europe and North-western Africa population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering grey plover of the Eastern Atlantic population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering knot of the North-western Canada to	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	

North-western Europe population.			
Internationally important wetland, regularly supporting 1% or more wintering dunlin of the Northern Siberia, Europe and Northern Africa population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering black-tailed godwit of the Icelandic population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering bar-tailed godwit of the Western Palearctic population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering curlew of the European population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
Internationally important wetland, regularly supporting 1% or more wintering redshank of the Eastern Atlantic population.	NRW and Natural England conservation objectives: Natural England & the Countryside Council for Wales' advice given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994 (naturalresources.wales)	SCREEN IN	
River Dee and Bala Lake SAC			

Water courses of plain to montane levels with <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of designated features. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting designated features.
Floating water-plantain <i>Luronium natans</i>	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of suitable habitat and eggs and reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
Atlantic salmon <i>Salmo salar</i>	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of suitable habitat and eggs and reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of eggs, reducing feeding success in larvae and impeding access/egress to suitable burrowing habitat. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of eggs, reducing feeding success in larvae and impeding access/egress to suitable burrowing habitat. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
Brook lamprey <i>Lampetra planeri</i>	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of eggs, reducing feeding success in larvae and impeding access/egress to suitable burrowing habitat. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.

Bullhead <i>Cottus gobio</i>	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of suitable habitat and eggs and reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.
Otter <i>Lutra lutra</i>	NRW conservation objectives: CONSERVATION OBJECTIVES FOR N2K SITES (naturalresources.wales)	SCREEN IN	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features. Above water noise produced during construction may also detrimentally impact these features leading to disturbance/displacement.

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

(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'	The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.
(c) If there are <u>no</u> features in Table 3.2.2 that are 'SCREEN IN' and <u>any</u> features that are 'IN COMB'	The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.

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: Dee Estuary SAC			
Mudflats and sandflats not covered by seawater at low tide	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of designated features. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting designated features.	Increased sedimentation and contamination have the potential to lead to the degradation/loss of these features thus undermining the conservation objectives of the site.	NO
Salicornia and other annuals colonising mud and sand			
Atlantic salt meadows (Glauco-Puccinellietalia maritimae)			
Estuaries			
Sea lamprey <i>Petromyzon marinus</i>	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of eggs, reducing feeding success in larvae and impeding access/egress to suitable burrowing habitat.	Increased sedimentation and contamination have the potential to lead to reductions in population size thus undermining the conservation objectives of the site.	
River lamprey <i>Lampetra fluviatilis</i>			

	The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.		
European site name: Dee Estuary SPA			
All features	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features. Above water noise produced during construction may also detrimentally impact these features leading to disturbance/displacement.	Increased sedimentation, contamination and above water noise have the potential to lead to reductions in bird populations thus undermining the conservation objectives of the site.	NO
European site name: Dee Estuary RAMSAR			
All features	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features. Noise produced during construction may also detrimentally impact these features through disturbance/displacement.	Increased sedimentation, contamination and above water noise have the potential to lead to reductions in bird populations thus undermining the conservation objectives of the site.	NO

European site name: River Dee and Bala Lake SAC			
Water courses of plain to montane levels with <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation Floating water-plantain <i>Luronium natans</i>	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of designated features. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting designated features.	Increased sedimentation and contamination have the potential to lead to the degradation/loss of these features thus undermining the conservation objectives of the site.	NO
Atlantic salmon <i>Salmo salar</i>	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of suitable habitat and eggs and reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.	Increased sedimentation and contamination have the potential to lead to reductions in population size thus undermining the conservation objectives of the site.	
Sea lamprey <i>Petromyzon marinus</i> River lamprey <i>Lampetra fluviatilis</i> Brook lamprey <i>Lampetra planeri</i>	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of eggs, reducing feeding success in larvae and impeding access/egress to suitable burrowing habitat. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.	Increased sedimentation and contamination have the potential to lead to reductions in population size thus undermining the conservation objectives of the site.	NO

Bullhead <i>Cottus gobio</i>	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in smothering of suitable habitat and eggs and reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features.	Increased sedimentation and contamination have the potential to lead to reductions in population size thus undermining the conservation objectives of the site.	NO
Otter <i>Lutra lutra</i>	The construction works have the potential to disturb silt/sediment, thus increasing concentrations in the water column. Although localised, this has the potential to be transported downstream resulting in reduced foraging success. The use of vehicles or machinery during construction, requiring fuel or hydraulic oil, may pose a risk via accidental spillage at a localised scale. This could have an acute effect on the water quality of the river thus impacting these features. Above water noise produced during construction may also detrimentally impact these features leading to disturbance/displacement.	Increased sedimentation, contamination and above water noise have the potential to lead to reductions in population size thus undermining the conservation objectives of the site.	NO

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: Dee Stuary SAC				
European site Feature	Adverse effect(s)	Can adverse effect(s) be mitigated by	Additional imposed mitigation measure(s)	Can adverse effect on

		additional imposed conditions or restrictions? 'YES' or 'NO'		site integrity be ruled out? 'YES' or 'NO'
Mudflats and sandflats not covered by seawater at low tide Salicornia and other annuals colonising mud and sand Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Estuaries Sea lamprey <i>Petromyzon marinus</i> River lamprey <i>Lampetra fluviatilis</i>	Increased sedimentation Contamination	YES	A number of pollution prevention procedures will be implemented in line with good practice. - All treatment of the water off flow from the Site will be conforming to the Simple Index Approach in the CIRIA Report C753 following the SuDS Manual. - All material will be disposed of in the appropriate skip with secure lids and no holes in any of the skips so that there are no potential pollution incidents. - All refuelling will be carried out away from the SAC. At any refuelling point a spill kit will be available, an absorbent spill blanket will be laid out whilst refuelling takes place. Fuel will be contained within its own compound; at the end of each day the fuel will be secured within the compound. - A bespoke CEMP will be created prior to construction to ensure pollution prevent measures are in line with British standards. - The operational silt management will be in line with treatment of TSS (Total Suspended Solids) within the Simple Index Approach of CIRIA Report C753 "The SiDS Manual". - Silt will be trapped within the Type 3 stone layer, similar to that of a large scale filter drain know as a 'French drain'. - Any dusty operations are to cease in the case of high winds to control the levels of dust entering the SAC and SPA. - A biosecurity risk assessment will be produced and followed so as not to introduce non-native species into the Dee Estuary and Bala Lake SAC.	YES

			- The works are also proposed to be undertaken within September outside the spawning season for sea lamprey (May-July) and river lamprey (April-May).	
European site name: Dee Estuary SPA				
All features	Increased sedimentation Contamination Above water noise	YES	A number of pollution prevention procedures will be implemented in line with good practice. - All treatment of the water off flow from the Site will be conforming to the Simple Index Approach in the CIRIA Report C753 following the SuDS Manual. - All material will be disposed of in the appropriate skip with secure lids and no holes in any of the skips so that there are no potential pollution incidents. - All refuelling will be carried out away from the SAC. At any refuelling point a spill kit will be available, an absorbent spill blanket will be laid out whilst refuelling takes place. Fuel will be contained within its own compound; at the end of each day the fuel will be secured within the compound. - A bespoke CEMP will be created prior to construction to ensure pollution prevent measures are in line with British standards. - The operational silt management will be in line with treatment of TSS (Total Suspended Solids) within the Simple Index Approach of CIRIA Report C753 "The SiDS Manual". - Silt will be trapped within the Type 3 stone layer, similar to that of a large scale filter drain know as a 'French drain'. - Any dusty operations are to cease in the case of high winds to control the levels of dust entering the SAC and SPA. - A biosecurity risk assessment will be produced and followed so as not to introduce non-native species into the Dee Estuary and Bala Lake SAC.	YES

European site name: Dee Estuary RAMSAR

All features	Increased sedimentation Contamination Above water noise	YES	A number of pollution prevention procedures will be implemented in line with good practice. - All treatment of the water off flow from the Site will be conforming to the Simple Index Approach in the CIRIA Report C753 following the SuDS Manual. - All material will be disposed of in the appropriate skip with secure lids and no holes in any of the skips so that there are no potential pollution incidents. - All refuelling will be carried out away from the SAC. At any refuelling point a spill kit will be available, an absorbent spill blanket will be laid out whilst refuelling takes place. Fuel will be contained within its own compound; at the end of each day the fuel will be secured within the compound. - A bespoke CEMP will be created prior to construction to ensure pollution prevent measures are in line with British standards. - The operational silt management will be in line with treatment of TSS (Total Suspended Solids) within the Simple Index Approach of CIRIA Report C753 "The SiDS Manual". - Silt will be trapped within the Type 3 stone layer, similar to that of a large scale filter drain know as a 'French drain'. - Any dusty operations are to cease in the case of high winds to control the levels of dust entering the SAC and SPA. - A biosecurity risk assessment will be produced and followed so as not to introduce non-native species into the Dee Estuary and Bala Lake SAC.	YES
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European site name: River Dee and Bala Lake SAC

Water courses of plain to montane levels with <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation Floating water-plantain <i>Luronium natans</i> Atlantic salmon <i>Salmo salar</i> Sea lamprey <i>Petromyzon marinus</i> River lamprey <i>Lampetra fluviatilis</i> Brook lamprey <i>Lampetra planeri</i> Bullhead <i>Cottus gobio</i>	Increased sedimentation Contamination	YES	A number of pollution prevention procedures will be implemented in line with good practice. - All treatment of the water off flow from the Site will be conforming to the Simple Index Approach in the CIRIA Report C753 following the SuDS Manual. - All material will be disposed of in the appropriate skip with secure lids and no holes in any of the skips so that there are no potential pollution incidents. - All refuelling will be carried out away from the SAC. At any refuelling point a spill kit will be available, an absorbent spill blanket will be laid out whilst refuelling takes place. Fuel will be contained within its own compound; at the end of each day the fuel will be secured within the compound. - A bespoke CEMP will be created prior to construction to ensure pollution prevent measures are in line with British standards. - The operational silt management will be in line with treatment of TSS (Total Suspended Solids) within the Simple Index Approach of CIRIA Report C753 "The SiDS Manual". - Silt will be trapped within the Type 3 stone layer, similar to that of a large scale filter drain known as a 'French drain'. - Any dusty operations are to cease in the case of high winds to control the levels of dust entering the SAC and SPA. - A biosecurity risk assessment will be produced and followed so as not to introduce non-native species into the Dee Estuary and Bala Lake SAC.	YES
	Increased sedimentation Contamination Above water noise			
Otter <i>Lutra lutra</i>			- Prior to works commencing a pre-construction ecology check will be made of the working area and access points. The ecologist will check for protected species such as otter holts, bats, and nesting birds. Should a protected species/roost/holt/resting place be encountered, works will not commence, and Natural Resources Wales will be contacted to discuss it and the potential for licensing elements of any works that may disturb it.	

			- An experienced Ecological Clerk of Works (ECoW) will be appointed and attend Site at regular intervals throughout the project. - A lighting plan will be implemented to ensure protected species are not disturbed. - The works are also proposed to be undertaken within September outside the spawning season for salmon (October-November), sea lamprey (May-July), brook lamprey (May-June), river lamprey (April-May) and bullhead (February-June).	
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4.3 Concluding the appropriate assessment of the plan or project alone

Table 4.3 Conclusion of the appropriate assessment alone	
(a) If Table 4.1, or the right hand column of Table 4.2 if applicable, is 'YES' for all features	It has been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of any European sites.
(b) If there are any 'NO's in the right hand column of Table 4.2	It has not been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of one or more European sites.
(c) Are there 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, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)	X
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: - the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or - the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers (*SSSI consents cannot be given as derogations)	
Signed: Name: Jack Thompson Position: Senior Marine Licensing Officer Date: 01 July 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
6	31/07/2026	NRW A agree with the conclusions of the HRA.

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, Senior Marine Licencing Officer, Marine Licencing Team,

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

SUBJECT: Habitats Regulations Assessment of CML2615 Construction of headwall on the southern bank of the River Dee for Copart UK Ltd

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 agree that the proposal will not have an Adverse Effect on Site Integrity on the Dee estuary SPA, Dee Estuary SAC or the Dee Estuary RAMSAR site

Signed: *Rowland Sharp*

Date: 31/07/2026