

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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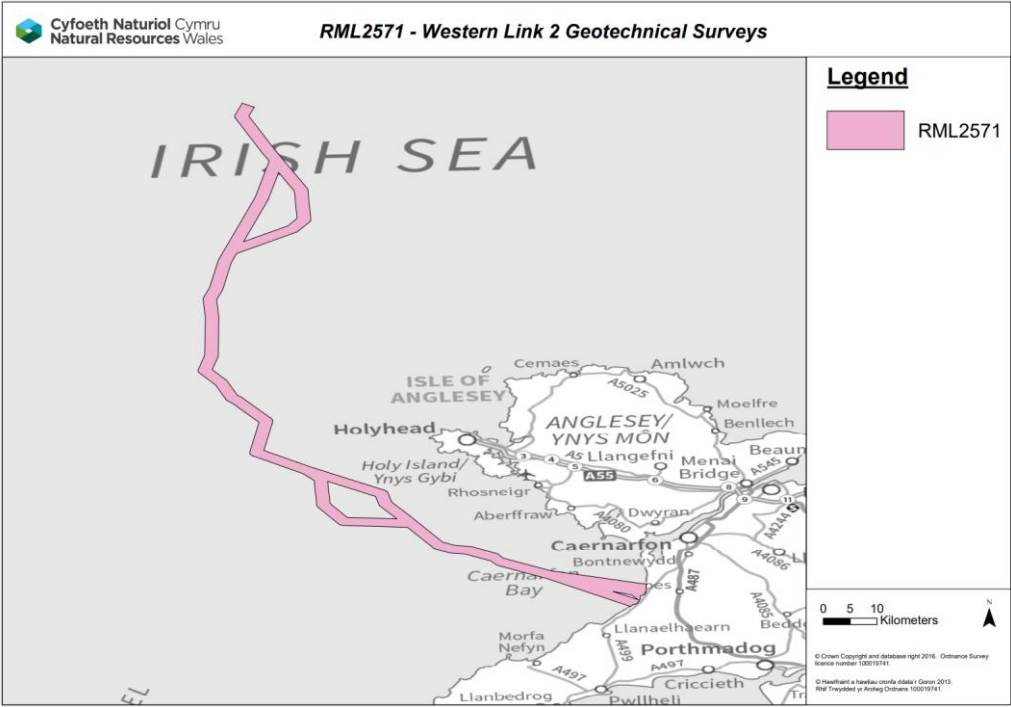
Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	RML2571v2 – Geotechnical surveys along the potential route of a HVDC transmission link in the Irish Sea
HRA iteration/version	1

1. Plan or Project Details

Information about the plan or project		
1	Date application received	08 December 2025 (original application) 31 July 2026 (variation application 2)
2	Applicant details	National Grid Electricity Transmission PLC
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	To inform the development of the Western Link 2 project, geotechnical surveys are required to gather baseline data on potential route options. The survey activity will comprise the following: - sediment grab sampling (0.01 m ² primary dual Van Veen grab, or secondary Hamon/Day grab):

	- Cone Penetration Testing (offshore, >10 m water depth) or T-bar) - Cone Penetration Testing (nearshore, <10 m water depth) - vibrocore samples (offshore, >10 m water depth) - vibrocore samples (nearshore, <10 m water depth) - borehole samples (nearshore, <10 m water depth) Drop down video transects (Remotely Operated Vehicle (ROV)) will also take place in 10 km intervals with a minimum length of 200 m, increasing to 500 m in sensitive areas. Geophysical surveys are also proposed to take place as part of the wider survey campaign of the project. A separate European Protected Species (EPS) risk assessment and licence has been prepared for the geophysical survey Deposits as per the agreed 'emergency procedures' in the event of hitting an aquifer under pressure. The survey is expected to take place between 1 March 2026 to 31 March 2027 over an anticipated duration of 3 months. The Licence Holder has provided a clear summary of the proposed changes to the activity from the previous variation request within supporting document <i>RML2571v2 - RML2571v1 Application Form Amendments</i>. The Licence Holder has requested additional samples to be collected within the already licenced area as per the below: • 9 jack-up barge deployments (nearshore, <10 m water depth) • 9 boreholes (nearshore, <10 m water depth) • 9 cone penetration tests (nearshore, <10 m water depth) • 16 vibrocres (nearshore, <10 m water depth) • 18 grabs across the licenced survey corridor This would increase the total number of each sample type across the same licensed area (250.17 km²) as listed below: • 18 jack-up barge deployments (nearshore, <10 m water depth) • 18 boreholes (nearshore, <10 m water depth) • 18 cone penetration tests (nearshore, <10 m water depth)
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		• 18 vibrocores (nearshore, <10 m water depth) • 348 grabs across the licenced survey corridor
5	Relevant legislation or statutory basis	Marine and Coastal Access Act (2009)
6	Location	Irish Sea: 
7	Plan or project documents, including any application documents	RML2571 - WL2 Application RML2571 - WL2 Survey Corridor Coordinates Wales RML2571 - WNMP RML2571 - WL2 Survey Corridor Wales Shapefile RML2571 - WL2 INNS Biosecurity RA and Management Plan RML2571 - NRW Geotechnical Survey Technical Note_rev01

		RML2571 - Marine Jurisdictions and the WL2 2026 Survey Licence Corridor RML2571 - Application Form Amendments RML2571 - NRW Geotechnical Survey Technical Note_rev02 RML2571v1 - Application Form RML2571v1 - 81535 NRW Geotechnical Survey Technical Note_May_Submission RML2571v1 - Complex variation request - Duly Making Checks LH Response RML2571v2 - Application Form RML2571v2 - Application Form Amendments RML2571v2 - 81535 NRW Geotechnical Survey Technical Note_LF2 Licence Amendment
8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Marine Licencing Team – Vicky Fisk
11	Team or person responsible for approving the plan or project (competent authority role)	Marine Licencing Team

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?	YES
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3. Considering the likelihood of a significant effect (LSE)

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	North Anglesey Marine/Gogledd Môn Forol SAC [UK0030398] Anglesey Terns / Morwenoliaid Ynys Môn draft SPA [UK9013061] West Wales Marine/Gorllewin Cymru Forol SAC [UK0030397]
(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
North Anglesey Marine/Gogledd Môn Forol SAC			
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives: North Anglesey Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	Screen In	Habitat maps show a direct overlap between the SAC and proposed activity. Impact pathways likely to have a significant effect are: - Noise disturbance from vessel presence and survey activity - Visual disturbance from vessel presence and survey activity
Anglesey Terns / Morwenoliaid Ynys Môn draft SPA			
Breeding population of Arctic tern <i>Sterna paradisae</i>	conservation-advice-for-anglesey-terns-spa.pdf	Screen In	Habitat maps show a direct overlap between the SPA and proposed activity. Impact pathways likely to have a significant effect are: - Noise disturbance from vessel presence and survey activity - Visual disturbance from vessel presence and survey activity
Breeding population of common tern <i>Sterna hirundo</i>	conservation-advice-for-anglesey-terns-spa.pdf	Screen In	As above
Breeding population of roseate tern <i>Sterna dougallii</i>	conservation-advice-for-anglesey-terns-spa.pdf	Screen In	As above

Sandwich tern <i>Sterna sandvicensis</i>	conservation-advice-for-anglesey-terns-spa.pdf	Screen In	As above
West Wales Marine/Gorllewin Cymru Forol SAC			
Harbour porpoise <i>Phocoena phocoena</i>	West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	Screen In	There is not a direct overlap between the SAC and proposed activity. However, Harbour porpoise are highly mobile features. As such, impact pathways likely to have a significant effect are: - Noise disturbance from vessel presence and survey activity - Visual disturbance from vessel presence and survey activity

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: North Anglesey Marine/Gogledd Môn Forol SAC			
Harbour porpoise <i>Phocoena phocoena</i>	Noise disturbance from vessel presence and survey activity & Visual disturbance from vessel presence and survey activity	The area in which the geotechnical surveys are proposed already experiences a consistent level of vessel traffic. Though the number and type of vessels to be deployed for the proposed surveys are yet to be determined, the introduction of additional vessels for the purpose of geotechnical surveys is not a novel impact for marine mammals present in the area. The noise associated with the geotechnical works will be short term, temporary and intermittent, therefore it is not anticipated that there would be an adverse effect on site integrity.	YES
European site name: Anglesey Terns / Morwenoliaid Ynys Môn draft SPA			
Breeding population of Arctic tern <i>Sterna paradisae</i> Breeding population of	Noise disturbance from vessel presence and survey activity & Visual disturbance from vessel presence and survey activity	There is minimal direct overlap between the proposed activities and the SPA. Ornithological receptors would have to be at their range maximum before the impact pathway has a likely significant effect. Adverse effect on site integrity is not anticipated as noise and visual impacts will be temporally and	YES

common tern <i>Sterna Hirundo</i> Breeding population of roseate tern <i>Sterna dougallii</i> Sandwich tern <i>Sterna sandvicensis</i>		spatially restricted to the area where the surveys are taking place.	
European site name: West Wales Marine / Gorllewin Cymru Forol SAC			
Harbour porpoise <i>Phocoena phocoena</i>	Noise disturbance from vessel presence and survey activity & Visual disturbance from vessel presence and survey activity	The area in which the geotechnical surveys are proposed already experiences a consistent level of vessel traffic. Though the number and type of vessels to be deployed for the proposed surveys are yet to be determined, the introduction of additional vessels for the purpose of geotechnical surveys is not a novel impact for marine mammals present in the area. The noise associated with the geotechnical works will be short term, temporary and intermittent, therefore it is not anticipated that there would be an adverse effect on site integrity.	YES

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:

European site Feature	Adverse effect(s)	Can adverse effect(s) be mitigated by additional imposed conditions or restrictions? 'YES' or 'NO'	Additional imposed mitigation measure(s)	Can adverse effect on site integrity be ruled out? 'YES' or 'NO'
European site name:				

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	NO

considered in combination with the effects of other plans or projects?	
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5. In combination assessment

Table 5.1 Identification and assessment of in combination effects				
European site name:				
'INCOMB' impacts from screening Table 3.2.2 and/or residual effect from appropriate assessment in section 4	European site feature(s) concerned	Other plans or projects with effects that might interact with the effects of the plan or project to render its effects significant/adverse (if any)	Nature of the in combination effect (if any) and assessment in view of conservation objectives	Can significant or adverse in combination effects be ruled out for all features?
(a) If the right hand column is 'YES' for all rows		The plan or project, when considered in combination with other plans and projects, is either not likely to have a significant effect on, or will not adversely affect the integrity of, any European site.		
(b) If any rows in the right hand column are 'NO'		The plan or project is likely to have a significant effect on, or an adverse effect on, European site/s in combination with other plans or projects.		

Table 5.2 Addressing in combination effects

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

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)	X
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: - the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or - the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers (*SSSI consents cannot be given as derogations)	
Signed: Vicky Fisk Name: Vicky Fisk Position: Marine Licencing Officer Date: 07 August 2026	

Was this HRA conclusion an escalated decision? YES or NO	NO
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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	Email response received from NRW (A) on 24 August 2026.	NRW (A) agreed with the outcome of the HRA and raised no concerns to the proposed changes in activities provided that all survey activities are undertaken in accordance with the relevant JNCC guidelines, utilised reduced vessel speeds and and adherence to the Wild Seas Wales (2025) Marine Code to minimise the potential for noise and visual disturbance associated with vessel presence.

9. Appendix



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: Vicky Fisk, Marine Licencing Officer, Marine Licencing Team,

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

SUBJECT: Habitats Regulations Assessment of RML2571v2 Variation to RML2571

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 North Anglesey Marine/Gogledd Môn Forol SAC, Anglesey Terns / Morwenoliaid Ynys Môn draft SPA, West Wales Marine/Gorllewin Cymru Forol SAC or any other European Protected site

Signed: *Rowland Sharp*

Date: 26/08/2026

