

# OGN 200 Form 1A

## Record of a Habitats Regulations Assessment

All staff using this form should be familiar with [OGN200](#) and should have had appropriate training in HRA.

A separate version of this form is available with guidance notes on how to complete it. You should refer to those notes when using this form.

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| <b>Plan or project name, brief description or application reference number</b> | Llanelltyd Sheet Pile Removal |
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| <b>HRA iteration/version</b> | <b>P01</b> |
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## 1. Plan or Project Details

| Information about the plan or project |                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 1                                     | Date application received                                                                                            | 11/05/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2                                     | Applicant details                                                                                                    | Sherron Kitchen. NRW, Specialist - Projects and Programme Delivery Team.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 3                                     | NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer | Sherron Kitchen. NRW, Specialist - Projects and Programme Delivery Team.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 4                                     | Activities proposed                                                                                                  | <p>A 30m section of sheet piling has catastrophically failed along the right bank of the Afon Mawddach leaving the sheet piling foundations exposed. The sheet piling was originally protecting part of a 100m long earth embankment that acts as an informal flood bund for the farmland behind it. The project aims to achieve a solution which eliminates future liability, withdraw maintenance obligations, address health &amp; safety and reach an agreement with the landowner. This project will ensure that NRW is meeting its regulatory and legal duties. The proposed works currently involve the removal of the full 100m section of sheet piling along the right hand bank of the Afon Mawddach. The method of removal of the piling is outlined below:</p> <p>The scope of works will include the following:</p> <ol style="list-style-type: none"><li>1. In advance of mobilising to site, the Contractor Site Manager will carry out a comprehensive photographic survey of the site, compound, and access routes. Copies of the survey will be made available to the client.</li><li>2. Mobilise to site to establish and position advance warning signage and direction finger boards along access routes. All suppliers and deliveries will be briefed on the traffic management plan.</li></ol> |

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|  | <p>3. Receive delivery of plant and equipment – 21t long reach excavator, 6t tracked dumper, site welfare provisions and timber bog mats.</p> <p>4. Install overhead cable protection measures along the access route.</p> <p>5. Carry out service location survey of proposed access track, including CAT scan. Contractor Site Agent to issue permit to break ground for any excavation or material movement activities. Permit to be received and signed by the Working Foreman.</p> <p>6. Form access route to working area by installing timber bog mats through agricultural land / wet ground. Position with excavator and fork attachment.</p> <p>7. Establish and mark out full length of sheet piles to be removed.</p> <p>8. Construct working level platform to position the long reach excavator on the embankment to carry out the works. Level existing ground and position additional timber bog mats.</p> <p>9. Excavator to clear material from the front and rear of the failed sheet piles to allow safe access for dive team, removed material to be retained on site.</p> <p>10. Divers to carry out initial underwater inspection of failed sheet pile section, confirm depth, condition, and extent of failure, Identify any obstructions or hazards.</p> <p>11. Divers descend to riverbed and locate sheet piles, using oxy-propane/oxy-arc cutting equipment, cut sheet piles at or just below riverbed level.</p> <p>12. Sheet piles to be retained / supported by excavator while cutting is carried out. Utilise chains or mechanical grab attachment.</p> <p>13. On the completion of cutting the divers will exit the watercourse prior to any lifting / moving of the sheet piles</p> |
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|   |                                                                | <p>14. The excavator will then carefully apply tension and extract the cut sections vertically. Lift sections clear of the water and place in a designated laydown area.</p> <p>15. The activity will then be repeated for the next section of sheet piles.</p> <p>16. Upon completion all removed sheet piles will be loaded onto the tracked dumper and removed from the site for loading onto a road going HGV for off-site disposal.</p> <p>17. Carry out reinstatement of riverbed, ensuring that no cut edges of sheet pile are left visible and are covered by the riverbed.</p> <p>18. Landscape works to embankment and commences removal of work platform / bog mats.</p> <p>19. Remove all fencing and signage, including overhead cable protection measures.</p> <p>20. Carry out full demobilisation of the site compound, including fencing and signage along access routes.</p> <p>21. Carry out post-completion photographic survey of works, compound area, and access routes.</p> |
| 5 | Relevant legislation or statutory basis                        | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6 | Location                                                       | <p>The site is located approximately 700m downstream of where the A470 road crosses the Afon Mawddach at the village of Llanelltyd, and immediately upstream of the confluence where the Afon Wnion meets the Afon Mawddach. The failed section of sheet pile is located at national grid reference SH 71189 19082.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7 | Plan or project documents, including any application documents | <p>JBA (2026) RWR-JBA-00-00-RP-EN-0001-S3-P01-Preliminary_Ecological_Appraisal. Unpublished</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|           |                                                                                                |                                                                                                                |
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|           |                                                                                                | Detailed drawings of the scheme are currently being produced and will be included as part of this application. |
| <b>8</b>  | <b>Environmental Statement</b>                                                                 | Not required.                                                                                                  |
| <b>9</b>  | <b>Pre-application correspondence</b>                                                          | None.                                                                                                          |
| <b>10</b> | <b>NRW team responsible for preparing this HRA report, and lead officer</b>                    | Hannah Webster – Senior Ecologist, JBA Consulting                                                              |
| <b>11</b> | <b>Team or person responsible for approving the plan or project (competent authority role)</b> | Dylan Morgan – Marine Licensing Officer – Marine Licensing Team                                                |

## 2. Determining the need for a Habitats Regulations Assessment

|                                                                                                                                                                                                                                                 |     |
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| 2.1 Is there any possibility that the plan or project could negatively affect any European sites?                                                                                                                                               | Yes |
| 2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated? | No  |

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

### 3.1 Renewal of a project authorisation on the same or more restrictive terms as an extant authorisation

|                                                                                                                                                                                                                               |    |
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| Is this a renewal of an extant authorisation which complies with NRW approved criteria for ruling out significant effects of renewals (see Part 2 of <a href="#">OGN200</a> ) 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?

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

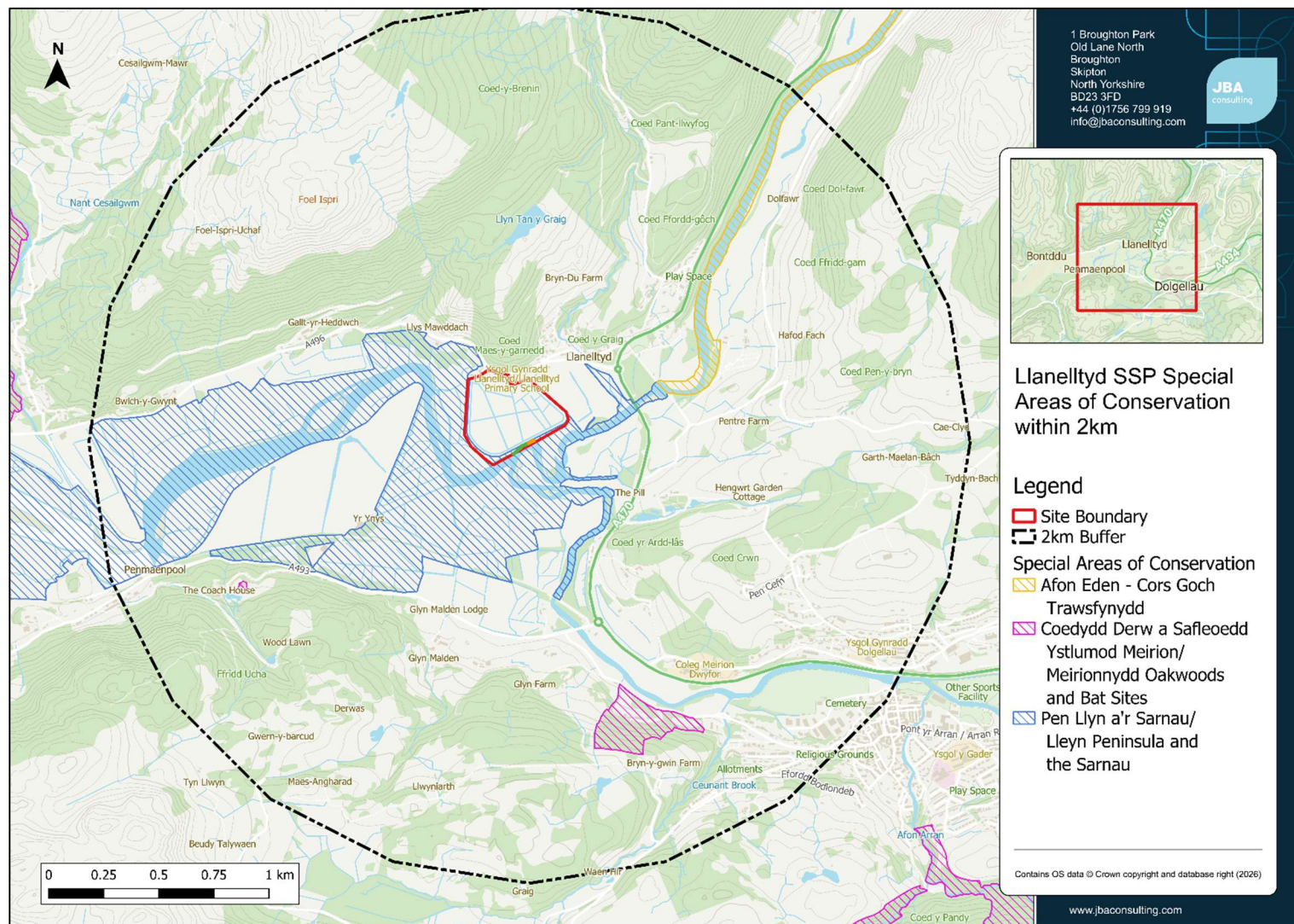


Figure 1. Special Areas of Conservation within 2km of the proposed site.



### 3.2.2 Screening for likelihood of significant effect

| TABLE 3.2.2 Screening assessment                                                                                                                                                                           |                                   |                                                                                                                                                                                                                                                             |           |
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| European site name: Pen Llŷn a'r Sarnau/ Lleyen Peninsula and the Sarnau SAC                                                                                                                               |                                   |                                                                                                                                                                                                                                                             |           |
| Qualifying feature                                                                                                                                                                                         | Risk (Pressure)                   | Likely Significant Effect Alone                                                                                                                                                                                                                             | Yes or No |
| Annex I habitats; primary reason for selection:<br>- 1110 Sandbanks which are slightly covered by sea water all the time<br>- 1150 Coastal lagoons<br>- 1160 Large shallow inlets and bays<br>- 1170 Reefs | Habitat loss/ Physical damage     | These Annex I habitats are not present within or adjacent to the works footprint (JBA 2026). Therefore, these habitats will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats. | No        |
|                                                                                                                                                                                                            | Water pollution/ Sediment release | During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.             | Yes       |
|                                                                                                                                                                                                            | Competition from INNS             | Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) which could impact habitats in the wider environment.     | Yes       |
| Annex I habitats; primary reason for selection:<br>- 1130 Estuaries                                                                                                                                        | Habitat loss/ Physical damage     | The proposed works are located on the Afon Mawddach estuary and construction activities will result in the small-scale temporary habitat loss of estuary bank habitat.                                                                                      | Yes       |
|                                                                                                                                                                                                            | Water pollution/ Sediment release | During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of                                                                 | Yes       |



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|                                                                                                                                                                                                                                                                                                                       |                                   | suitable on-site avoidance and mitigation measures.                                                                                                                                                                                                         |     |
|                                                                                                                                                                                                                                                                                                                       | Competition from INNS             | Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) which could impact habitats in the wider environment.     | Yes |
| Annex I habitats; not primary reason for selection:<br>-1140 Mudflats and sandflats not covered by seawater at low tide<br>-1310 Salicornia and other annuals colonizing mud and sand<br>-1330 Atlantic salt meadows ( <i>Glauco Puccinellietalia maritimae</i> )<br>-8330 Submerged or partially submerged sea caves | Habitat loss/ Physical damage     | These Annex I habitats are not present within or adjacent to the works footprint (JBA 2026). Therefore, these habitats will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats. | No  |
|                                                                                                                                                                                                                                                                                                                       | Water pollution/ Sediment release | During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.             | Yes |
|                                                                                                                                                                                                                                                                                                                       | Competition from INNS             | Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) which could impact habitats in the wider environment.     | Yes |
| Annex II species; not primary reason for selection:<br>-1349 Bottlenose dolphin <i>Tursiops truncatus</i>                                                                                                                                                                                                             | Habitat loss                      | The proposed scheme is over 10km from the coastline and any suitable Bottlenose dolphin habitat. Therefore, no loss of Bottlenose dolphin habitat is anticipated as part of the scheme. Works will not result in loss of marine habitat.                    | No  |
|                                                                                                                                                                                                                                                                                                                       | Physical damage/mortality         | The proposed scheme is over 10km from the coastline and any suitable Bottlenose dolphin habitat and therefore it is not anticipated that                                                                                                                    | No  |

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

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

|                                                                                                                                                                             |                                   | suitable Otter habitat and prey species within the SAC, in the absence of suitable on-site avoidance and mitigation measures.                                                                                                                                                                                                               |                  |
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| <b>European site name:</b> Afon Eden - Cors Goch Trawsfynydd SAC                                                                                                            |                                   |                                                                                                                                                                                                                                                                                                                                             |                  |
| <b>Qualifying feature</b>                                                                                                                                                   | <b>Risk (Pressure)</b>            | <b>Likely Significant Effect Alone</b>                                                                                                                                                                                                                                                                                                      | <b>Yes or No</b> |
| Annex I habitats; not primary reason for selection:<br>-7110 Active raised bogs                                                                                             | Habitat loss/ Physical damage     | The proposed works are located approximately 0.65km East of the Afon Eden SAC and the habitat Active raised bogs is not present in or adjacent to the proposed works boundary. Therefore, this habitat will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats. | No               |
|                                                                                                                                                                             | Water pollution/ Sediment release | During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.                                                                                                                 | Yes              |
|                                                                                                                                                                             | Competition from INNS             | Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) which could impact habitats in the wider environment.                                                                                     | Yes              |
| Annex II species; primary reason for selection:<br>-1029 Freshwater pearl mussel <i>Margaritifera margaritifera</i><br>-1831 Floating water-plantain <i>Luronium natans</i> | Habitat loss/ Physical damage     | The proposed works are located approximately 0.65km East of the Afon Eden SAC and these habitats are not present in or adjacent to the proposed works boundary. Therefore, this habitat will not be directly impacted upon by the proposed works and there will be no habitat loss or physical damage to these SAC habitats.                | No               |

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|                                                                                                 | Water pollution/ Sediment release | During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC, in the absence of suitable on-site avoidance and mitigation measures.                                                                                                                                                                                                                                                                       | Yes |
|                                                                                                 | Competition from INNS             | Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) which could impact habitats in the wider environment.                                                                                                                                                                                                                                           | Yes |
| Annex II species; not primary reason for selection:<br>-1106 Atlantic salmon <i>Salmo salar</i> | Habitat loss                      | The proposed works are located approximately 0.65km East of the Afon Eden SAC which is hydrologically connected to the Afon Mawddach. The Afon Mawddach is likely to support Atlantic salmon populations associated with the Afon Eden SAC and therefore the proposed works have the potential to impact this SAC species. The proposed works have the potential to result in some small-scale temporary loss of habitat suitable to support Atlantic salmon during the sheet pile removal works. | Yes |
|                                                                                                 | Physical damage/mortality         | If in-channel works are proposed for the sheet pile removal, fish species maybe susceptible to harm or injury during the construction phase.                                                                                                                                                                                                                                                                                                                                                      | Yes |
|                                                                                                 | Noise and visual disturbance      | The sheet pile removal works will include works to the right bank of the Mawddach, which has the potential to cause vibration of the ground and adjacent water column. This could cause disturbance to fish, which could affect their movement past the area of construction works.                                                                                                                                                                                                               | Yes |
|                                                                                                 | Water pollution/ Sediment release | During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within                                                                                                                                                                                                                                                                                                                                                      | Yes |

|                                                                                       |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |
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|                                                                                       |                              | the SAC, in the absence of suitable on-site avoidance and mitigation measures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |     |
| Annex II species; not primary reason for selection:<br>-1355 Otter <i>Lutra lutra</i> | Habitat loss                 | The proposed works are located approximately 0.65km East of the Afon Eden SAC which is hydrologically connected to the Afon Mawddach. The Afon Mawddach is likely to support Otter populations associated with the Afon Eden SAC and therefore the proposed works have the potential to impact this SAC species. As highlighted in the PEA completed for the proposed works (JBA 2026) no Otter holts or resting sites were identified within the proposed works boundary, however, there is the potential for Otter to be present in the works area foraging and commuting. The works will result in a small area of temporary habitat loss, however, there is ample alternative habitat available, and any potential impact on Otter habitat would be negligible. | No  |
|                                                                                       | Physical damage/mortality    | The works area is relatively small scale and no holts or resting sites for Otter are present on site (JBA 2026). Any Otter present in the works area can reasonably be expected to move away from harm, however, there is potential for construction activities to cause harm during the sheet pile removal.                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Yes |
|                                                                                       | Noise and visual disturbance | Elevated noise levels from construction activities and plant, and lighting of the river corridor during the removal works could cause temporary disturbance to Otter in close proximity to the construction works. This disturbance could affect Otter movement in the area and could hinder or prevent Otter from commuting, foraging or resting.                                                                                                                                                                                                                                                                                                                                                                                                                  | Yes |

|  |                                   |                                                                                                                                                                                                                                                                            |     |
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|  | Water pollution/ Sediment release | During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon suitable Otter habitat and prey species within the SAC, in the absence of suitable on-site avoidance and mitigation measures. | Yes |
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**TABLE 3.2.3 Screening decision of the plan or project 'alone'**

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

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

### 4.1 Assessment of plan or project as defined

| Table 4.1 Appropriate assessment of the plan or project as defined                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                   |
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| European site name: Pen Llŷn a'r Sarnau/ Lleyen Peninsula and the Sarnau SAC                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                   |
| Qualifying feature                                                                                                                                                                                                             | Risk (Pressure)/ Description of impacts and Assessment in view of conservation objectives                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Can adverse effects on site integrity be ruled out? 'Yes' or 'NO' |
| Annex I habitats; primary reason for selection:<br>- 1110 Sandbanks which are slightly covered by sea water all the time<br>- 1150 Coastal lagoons<br>- 1160 Large shallow inlets and bays<br>- 1130 Estuaries<br>- 1170 Reefs | Water pollution/ Sediment release - During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream.                                                                                             | Yes                                                               |
|                                                                                                                                                                                                                                | Competition from INNS - Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) to SAC habitats in the wider area, thus impacting their condition. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the Construction Environmental Management Plan (CEMP). These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). An INNS management plan will put in place for the site. | Yes                                                               |
| Annex I habitats; primary reason for selection:<br>- 1130 Estuaries                                                                                                                                                            | The proposed works are located on the Afon Mawddach estuary and construction activities will result in the small-scale temporary habitat loss of estuary habitat along the right bank. Any habitat loss will be temporary and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Yes                                                               |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                                                                                                                                                                                                                                                                                                                                                                                             | small in scale. All habitats impacted by the proposed works will be reinstated once the works have been completed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |
|                                                                                                                                                                                                                                                                                                                                                                                             | Water pollution/ Sediment release - During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream.                                                                                             | Yes |
|                                                                                                                                                                                                                                                                                                                                                                                             | Competition from INNS - Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) to SAC habitats in the wider area, thus impacting their condition. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the Construction Environmental Management Plan (CEMP). These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). An INNS management plan will put in place for the site. | Yes |
| <p>Annex I habitats; not primary reason for selection:</p> <ul style="list-style-type: none"> <li>-1140 Mudflats and sandflats not covered by seawater at low tide</li> <li>-1310 Salicornia and other annuals colonizing mud and sand</li> <li>-1330 Atlantic salt meadows (<i>Glauco Puccinellietalia maritimae</i>)</li> <li>-8330 Submerged or partially submerged sea caves</li> </ul> | Water pollution/ Sediment release - During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream.                                                                                             | Yes |
|                                                                                                                                                                                                                                                                                                                                                                                             | Competition from INNS - Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) to SAC habitats in the wider area, thus impacting their condition. Standard                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Yes |

|                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     |
|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                                                                                                           | practise biosecurity measures will be followed, and a biosecurity plan created as part of the Construction Environmental Management Plan (CEMP). These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). An INNS management plan will put in place for the site.                                                                                                                                                                                                                       |     |
| Annex II species; not primary reason for selection:<br>-1349 Bottlenose dolphin <i>Tursiops truncatus</i> | Water pollution/ Sediment release - During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC that support Bottlenose dolphin. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream. | Yes |
| Annex II species; not primary reason for selection:<br>-1364 Grey seal <i>Halichoerus grypus</i>          | Water pollution/ Sediment release - During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC that support Grey seal. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream.          | Yes |
| Annex II species; not primary reason for selection:<br>-1355 Otter <i>Lutra lutra</i>                     | Physical damage/ mortality - The works area is relatively small scale and no holts or resting sites for Otter are present on site (JBA 2026) however Otter are known to forage and commute in the area. Any Otter present in the works area can reasonably be expected to move away from harm, however, there is potential for construction activities to cause harm during the sheet pile removal.                                                                                                                                                                                                                                                                                   | No  |
|                                                                                                           | Noise and visual disturbance - Elevated noise levels from construction activities and plant, and lighting of the river corridor during the removal works could cause temporary disturbance to Otter in close proximity to the                                                                                                                                                                                                                                                                                                                                                                                                                                                         | No  |

|                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                          |
|---------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
|                                                                                 | construction works. This disturbance could affect Otter movement in the area and could hinder or prevent Otter from commuting, foraging or resting.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                          |
|                                                                                 | Water pollution/ Sediment release - During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC that support Otter. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream.  | Yes                                                                      |
| <b>European site name:</b> Afon Eden - Cors Goch Trawsfynydd SAC                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                          |
| <b>Qualifying feature</b>                                                       | <b>Risk (Pressure)/ Description of impacts and Assessment in view of conservation objectives</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Can adverse effects on site integrity be ruled out? 'YES' or 'NO'</b> |
| Annex I habitats; not primary reason for selection:<br>-7110 Active raised bogs | Water pollution/ Sediment release - During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream. | Yes                                                                      |
|                                                                                 | Competition from INNS - Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) to SAC habitats in the wider area, thus impacting their condition. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the Construction Environmental Management Plan (CEMP). These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction                                                                                     | Yes                                                                      |

|                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                                                                                                                                                                                            | measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). An INNS management plan will put in place for the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |
| <p>Annex II species; primary reason for selection:</p> <p>-1029 Freshwater pearl mussel <i>Margaritifera margaritifera</i></p> <p>-1831 Floating water-plantain <i>Luronium natans</i></p> | <p>Water pollution/ Sediment release - During the proposed works, accidental fuel leaks or spills, or sediment mobilisation, could cause changes in water chemistry and impact upon the habitats within the SAC. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream.</p>                                                                                             | Yes |
|                                                                                                                                                                                            | <p>Competition from INNS - Himalayan balsam <i>Impatiens glandulifera</i> has been recorded throughout the site and therefore the proposed works have the potential to spread terrestrial Invasive Non-Native Species (INNS) to SAC habitats in the wider area, thus impacting their condition. Standard practise biosecurity measures will be followed, and a biosecurity plan created as part of the Construction Environmental Management Plan (CEMP). These industry standard measures are put in place on all construction sites so are not considered to be avoidance or reduction measures for a European site in the context of the Conservation of habitats and species regulations (2019, as amended). An INNS management plan will put in place for the site.</p> | Yes |
| <p>Annex II species; not primary reason for selection:</p> <p>-1106 Atlantic salmon <i>Salmo salar</i></p>                                                                                 | <p>Habitat loss - The proposed works are located approximately 0.65km East of the Afon Eden SAC which is hydrologically connected to the Afon Mawddach. The Afon Mawddach is likely to support Atlantic salmon populations associated with the Afon Eden SAC and therefore the proposed works have the potential to impact this SAC species. The proposed works have the potential to result in some small-scale temporary loss of habitat suitable to support Atlantic salmon during the sheet pile removal works. Any habitat loss will be temporary and small in scale. All habitats impacted by the proposed works will be reinstated once the works have been completed.</p>                                                                                            | Yes |
|                                                                                                                                                                                            | <p>Physical damage/mortality - If in-channel works are proposed for the sheet pile removal, fish species maybe susceptible to harm or injury during the construction phase.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | No  |

|                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |
|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                                                                                       | Noise and visual disturbance - The sheet pile removal works will include works to the right bank of the Mawddach, which has the potential to cause vibration of the ground and adjacent water column. This could cause disturbance to fish, which could affect their movement past the area of construction works.                                                                                                                                                                                                                                                                                                                                                                 | No  |
|                                                                                       | Water pollution/ Sediment release - During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC that support Atlantic salmon. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream. | Yes |
| Annex II species; not primary reason for selection:<br>-1355 Otter <i>Lutra lutra</i> | Physical damage/ mortality - The works area is relatively small scale and no holts or resting sites for Otter are present on site (JBA 2026) however Otter are known to forage and commute in the area. Any Otter present in the works area can reasonably be expected to move away from harm, however, there is potential for construction activities to cause harm during the sheet pile removal.                                                                                                                                                                                                                                                                                | No  |
|                                                                                       | Noise and visual disturbance - Elevated noise levels from construction activities and plant, and lighting of the river corridor during the removal works could cause temporary disturbance to Otter in close proximity to the construction works. This disturbance could affect Otter movement in the area and could hinder or prevent Otter from commuting, foraging or resting.                                                                                                                                                                                                                                                                                                  | No  |
|                                                                                       | Water pollution/ Sediment release - During the construction phase, accidental fuel or concrete spills could cause changes in water chemistry and impact upon the habitats within the SAC that support Otter. Standard construction industry practices and associated measures for the management of pollution prevention will be implemented throughout the duration of the proposed works. These will be followed and outlined as part of the Construction Environment Management Plan (CEMP). Appropriate silt containment measures, such as a barrier of silt containment mats, will be put in place to reduce the chance of sediment pollution migrating downstream.           | 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: Pen Llŷn a'r Sarnau/ Lley'n Peninsula and the Sarnau SAC                                      |                              |                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                  |
| European site Feature                                                                                             | Adverse effect(s)            | Can adverse effect(s) be mitigated by additional imposed conditions or restrictions? 'YES' or 'NO' | Additional imposed mitigation measure(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Can adverse effect on site integrity be ruled out? 'YES' or 'NO' |
| Annex II species; not primary reason for selection: -1355 Otter <i>Lutra lutra</i>                                | Physical damage/mortality    | Yes                                                                                                | A pre-works check will be completed as close to the construction works starting as possible in order to identify any new potential holts or resting areas within the site area. Prior to works commencing each day, the works area and immediate vicinity will be checked for Otter presence. Should an Otter be encountered on site during the works, all works should cease immediately, and advice be obtained from an experienced ecologist. Works will not be undertaken at night and watercourses will not be illuminated by lighting, such as security lights, during works. Excavations left overnight should either be covered, or an escape ramp installed to prevent the trapping of Otter. | Yes                                                              |
|                                                                                                                   | Noise and visual disturbance | Yes                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Yes                                                              |
| European site name: Afon Eden - Cors Goch Trawsfynydd SAC                                                         |                              |                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                  |
| European site Feature                                                                                             | Adverse effect(s)            | Can adverse effect(s) be mitigated by additional imposed conditions or restrictions? 'YES' or 'NO' | Additional imposed mitigation measure(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Can adverse effect on site integrity be ruled out? 'YES' or 'NO' |



|                                                                                                 |                              |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |
|-------------------------------------------------------------------------------------------------|------------------------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| Annex II species; not primary reason for selection:<br>-1106 Atlantic salmon <i>Salmo salar</i> | Physical damage/mortality    | Yes | Works will be completed outside of the main migratory and spawning period, (mid October to mid May, this can vary river to river and NRW should be consulted to confirm the exact dates for this site) to reduce disturbance impacts to fish species utilising the River Mawddach. A proportion of open channel should be maintained at all time during the construction works in order to maintain fish passage.                                                                                                                                                                                                   | Yes |
|                                                                                                 | Noise and visual disturbance | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |
| Annex II species; not primary reason for selection:<br>-1355 Otter <i>Lutra lutra</i>           | Physical damage/mortality    | Yes | An Otter check will be completed as close to the construction works starting as possible in order to identify any potential new holts or resting areas within the site area. Works near the watercourse will not be undertaken at night and the river will not be illuminated by lighting, such as security lights, during works. Excavations left overnight will either be covered, or an escape ramp installed to prevent the trapping of animals such as Otter. Should an Otter be encountered on site during the works, all works will cease immediately, and advice be obtained from an experienced ecologist. | Yes |
|                                                                                                 | Noise and visual disturbance | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes |

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

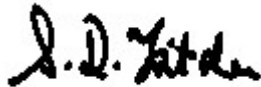
| Table 4.3 Conclusion of the appropriate assessment alone                                                                                                                                                                        |                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (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.                        |
| <del>(b) If there are any 'NO's in the right hand column of Table 4.2</del>                                                                                                                                                     | <del>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.</del> |
| (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? | Yes                                                                                                                                                            |

## 5. In combination assessment

| Table 5.1 Identification and assessment of in combination effects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>European site name:</b> Pen Llŷn a'r Sarnau/ Lleyr Peninsula and the Sarnau SAC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>In combination assessment:</b><br><br><p>The Cyngor Gwynedd planning portal was searched on the 9<sup>th</sup> June 2026 or any planning applications for projects which could act in combination with the proposed works to cause likely significant effects to the Pen Llŷn a'r Sarnau/ Lleyr Peninsula and the Sarnau SAC. No plans were identified that could potentially act in-combination with the proposed works. All of the planning applications within 2km of the site are all small-scale works that have no direct connection to the site. There are no National Infrastructure Planning projects in the vicinity of the proposed works. No other projects or plans have been identified which could cause in combination effects with the proposed works.</p> |
| <b>Can significant or adverse in combination effects be ruled out for all features?</b><br><br><b>YES</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>European site name:</b> Afon Eden - Cors Goch Trawsfynydd SAC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>In combination assessment:</b><br><br><p>The Cyngor Gwynedd planning portal was searched on the 9<sup>th</sup> June 2026 or any planning applications for projects which could act in combination with the proposed works to cause likely significant effects to the Afon Eden - Cors Goch Trawsfynydd SAC. No plans were identified that could potentially act in-combination with the proposed works. All of the planning applications within 2km of the site are all small-scale works that have no direct connection to the site. There are no National Infrastructure Planning projects in the vicinity of the proposed works. No other projects or plans have been identified which could cause in combination effects with the proposed works.</p>                   |
| <b>Can significant or adverse in combination effects be ruled out for all features?</b><br><br><b>YES</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Table 5.2 In combination assessment: results                                  |                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) If the answer for all features considered in Table 5.1 is 'YES'           | 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. |
| <del>(b) If the answer for any features considered in Table 5.1 is 'NO'</del> | <del>The plan or project in its current form is likely to have a significant effect on, or an adverse effect on, European site/s in combination with other plans or projects.</del>                        |

## 6. Conclusion

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
| HRA is not required because there is no conceivable impact on any European sites.<br>(As documented in section 2.1)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |   |
| HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites.<br>(As documented in section 2.2 and 2.3)                                                                                                                                                                                                                                                                                                                                                                                                                                                     |   |
| This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects.<br>(As documented in section 3.1 of this form)                                                                                                                                                                                                                                                                                                                                                                                                                                                    |   |
| The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |   |
| In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects.<br>(As documented in section 4 of this form, and section 5 if applicable)                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | X |
| In light of the conclusions of the appropriate assessment, it has <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.<br>Approval for the plan or project <u>cannot</u> be given unless either: <ul style="list-style-type: none"> <li>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</li> <li>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</li> </ul> (*SSSI consents cannot be given as derogations) |   |
| <p>Signed: </p> <p>Sherron Kitchen, NRW, Specialist - Projects and Programme Delivery Team.</p> <p>And supported by</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |   |

Name: Hannah Webster  
Position: Senior Ecologist

*H. Webster*

Date: 09/06/2026

Was this HRA conclusion an escalated decision? YES or NO

No

## 7. Countersignature

I have reviewed the HRA documented in this form and confirm that I agree with the conclusion recorded in section 6.

## 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:** Sherron Kitchen, Specialist – Projects and Programme Delivery

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

**SUBJECT:** Habitats Regulations Assessment of Llanelltyd sheet pile removal

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

The Marine Area Advice and Management Team agrees with the conclusion of the HRA that the project will not have an Adverse Effect on Site Integrity on the Pen Llyn a'r Sarnau SAC, the Afon Eden - Cors Goch Trawsfynydd SAC or the Meirionnydd Oakwoods and Bat Sites SAC.

Signed: *Rowland Sharp*

Date: 09/07/2026

**Form 3**

**Appropriate nature conservation body (ANCB) response to an internal HRA consultation**

This form should be completed by the team or individual providing the ANCB advice to the competent authority team

**TO:** Dylan Morgan, Marine Licensing Officer, Marine Licencing Team

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

**SUBJECT:** Habitats Regulations Assessment of Llanelltyd sheet pile removal

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

The Marine Area Advice and Management Team agrees with the conclusion of the HRA that the project will not have an Adverse Effect on Site Integrity on the Pen Llyn a'r Sarnau SAC, the Afon Eden - Cors Goch Trawsfynydd SAC or have a Likely Significant Effect on the Meirionnydd Oakwoods and Bat Sites SAC.

Signed: *Rowland Sharp*

Date: 04/08/2026



Form 4

## Internal application for an NRW statutory authorisation:

### Habitats Regulations Assessment by the authorising team

This form should be completed by the authorising team.

**AUTHORISING TEAM:** Marine Licensing Team

**APPLICANT:** Project and Programme Delivery Team

**APPLICATION DATE:** application accepted as complete 13 July 2026

**TYPE OF AUTHORISATION:** Marine Licence

**PROJECT DETAILS:** RML2616 – Llanelltyd Sheet Pile Removal

1. We have carefully considered the Form 1 HRA report provided with this application, and we consider that it adequately addresses the potential implications for any European sites potentially affected by the project. We note that, where relevant, the necessary consultation has taken place with the ANCB and that their representations have been properly taken into account. On this basis, we adopt the reasoning and conclusions of the HRA report provided. Any additional comments are noted below.
2. ~~We have carefully considered the Form 1 HRA report provided with this application and we have discussed the HRA with applicant. We are not satisfied that the applicant's HRA adequately addresses the potential implications for European sites.~~

~~Our main reasons for this are summarised below. We have carried out our HRA which is recorded in the attached HRA report.~~

~~3. We note that no HRA report has been provided with this application and we are satisfied that the project does not require an HRA. Any additional comments are noted below.~~

Signed: 

Name: Dylan Morgan – Marine Licensing Officer

Date: 03 August 2026

**Additional comments by the authorising team:**

N/A