

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

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

Document owner: Head of Business for Natural Resource Management

Version History:

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

Next review date: **October 2025**

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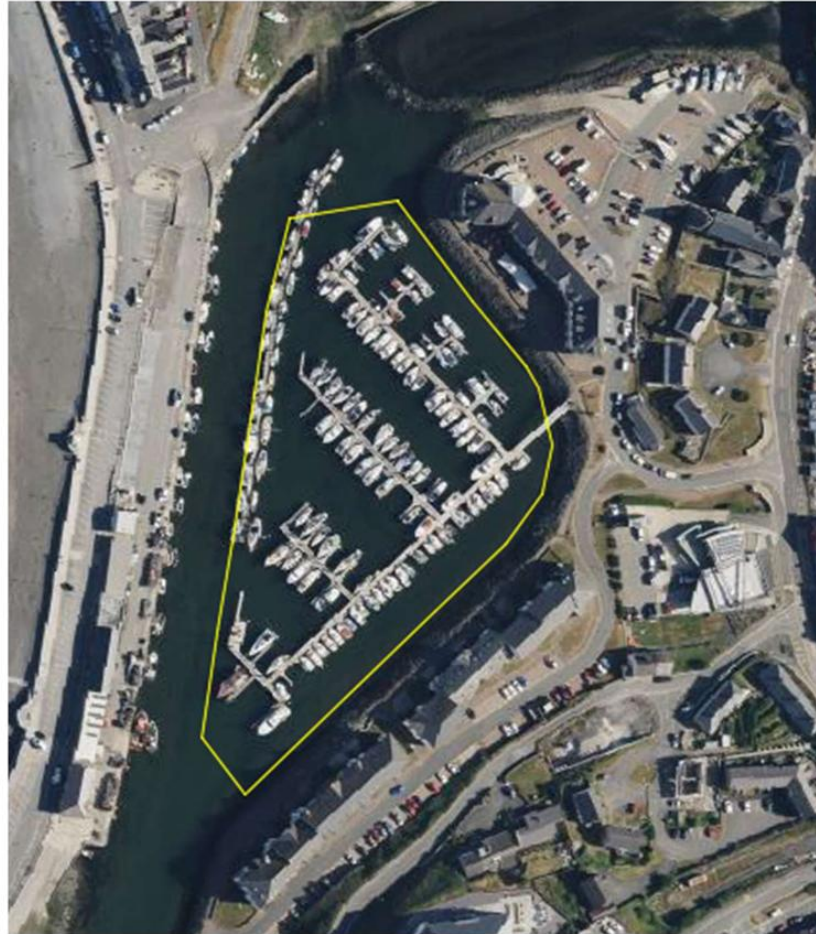
Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	Annual maintenance dredging campaign by water injection methods at Aberystwyth Marina.
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	04 August 2026
2	Applicant details	WM Dredging Limited
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer	N/A
4	Activity/ies proposed	The proposed dredge area is within Aberystwyth Marina and dredging method (water injection dredging (WID)) is the same as that under the previous marine licence (DML1907). The average dredge target level within the dredge area is -1.7mCD. To achieve this, a dredging tolerance of 0.3m is required, resulting in a maximum dredge level of -2.0mCD. The proposed dredge method is WID. The WID plant consists of a small vessel / floating pontoon with a powerful water pump and injection arm attached. The vessel is manoeuvred

		by its own propulsion system or attached tug. The injection arm is passed over the area to be dredged as the vessel is manoeuvred and the height of the injection arm is controlled. The system involves high volume, but low-pressure, water being injected into the sediments on the seabed. The low-pressure injection fluidises the sediments which will then flow as a dense fluid via natural seabed gradients towards lower bed levels. The density flow enters only the lower fraction of the water column. There is no deposit of dredged material and a disposal site is not required for WID. One WID dredging campaign per annum, each taking approx. 10-15 days. Each campaign will remove up to 32,000m³ of sediment to ensure a maximum depth of -2.0mCD. As per the previous marine licence (DML1907), no dredging to occur between 15 May and 30 September to avoid the bathing water season. Licence duration requested: 01/10/2026 to 30/09/2029
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009
6	Location	Aberystwyth Marina, Ceredigion:



<u>Latitude</u>	<u>Longitude</u>
52.41074	-4.08732
52.41042	-4.08691
52.41022	-4.08662
52.41015	-4.08655
52.40997	-4.08647

		52.40981 -4.08652 52.40965 -4.0867 52.40943 -4.08706 52.40883 -4.08802 52.409 -4.08826 52.40935 -4.08819 52.40966 -4.08812 52.41003 -4.08805 52.41037 -4.08798 52.41067 -4.08788
7	Plan or project documents, including any application documents	DML2626 - Aber Marina Dredge_ML Application Form DML2626 - Application Form Amendments DML2626 - Confirmed coordinates DML2626 - Aber Marina Dredge_HRA Stage 1 Info_FINAL DML2626 - Aber Marina Dredge_WFD Assessment Info_FINAL DML2626 - Aberystwyth Marina WNMP Assessment DML2626 - Aberystwyth Marina_Biosecurity RA DML2626 - sediment sample analysis results
8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Marine Licencing Team – Stephen Treby

11	Team or person responsible for approving the plan or project (competent authority role)	As above
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2. Determining the need for a Habitats Regulations Assessment

2.1 Is there any possibility that the plan or project could negatively affect any European sites?	Yes
2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated?	No
2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site, in a way that would undermine that feature's conservation objectives?	Yes

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

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

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

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

(a)	Based on the plan or project specification, or information provided in the application, it is considered that these European sites have features which could be negatively affected by the plan or project	Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC [UK0013117] West Wales Marine/Gorllewin Cymru Forol SAC [UK0030397] Northern Cardigan Bay / Gogledd Bae Ceredigion SPA [UK9020327] Bae Ceredigion/Cardigan Bay SAC [UK0012712]
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	Aberystwyth Marina is located adjacent to the Irish Sea. Considering the mobile nature of all Annex II marine mammal features of protected sites, the Marine Mammal Management Unit approach has been taken. West Wales Marine is the closest Harbour porpoise SAC and Pen Llyn a'r Sarnau is the closest Grey Seal and Bottlenose dolphin SAC. Therefore, by inference/iterative assessment, a similar conclusion can be made for marine mammal SACs further away. Other Grey Seal, Bottlenose dolphin and Harbour porpoise sites within the MMMU are Bristol Channel Approaches SAC, North Anglesey Marine SAC, Pembrokeshire Marine SAC and Cardigan Bay SAC

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment

Designated site feature	Relevant conservation objectives	Screening conclusion – ‘SCREEN OUT’, ‘SCREEN IN’ or ‘IN COMB’	Explanation
Pen Llyn a’r Sarnau/Lleyn Peninsula and the Sarnau SAC			
Reefs	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen In	There is the potential for impact pathways from an increase in suspended sediments.
Large Shallow inlets and bays	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Sandbanks which are slightly covered by seawater at all times	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Estuaries	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Coastal lagoons	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen Out	Habitat feature is not located near the proposed works

Mudflats and Sandflats	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Atlantic salt meadow	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Salicornia and other annuals colonising mud and sand feature	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Submerged or partially submerged sea caves	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen In	There is the potential for impact pathways from an increase in suspended sediments.
Bottlenose dolphin <i>Tursiops truncatus</i>	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen In	There is the potential for impact pathways from an increase in underwater noise and suspended sediments.
Grey Seal <i>Halichoerus grypus</i>	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen In	There is the potential for impact pathways from an increase in underwater noise and suspended sediments.
Otter <i>Lutra lutra</i>	NRW conservation objectives : conservation-advice-for-pen-llŷn-ar-sarnau-sac.pdf	Screen In	There is the potential for impact pathways from an increase in underwater noise and suspended sediments.
West Wales Marine/Gorllewin Cymru Forol SAC			
Harbour porpoise <i>Phocoena phocoena</i>	NRW conservation objectives : West Wales Marine pSAC: Draft Conservation Objectives And Advice On Activities (naturalresources.wales)	Screen In	There is the potential for impact pathways from an increase in underwater noise and suspended sediments.

Northern Cardigan Bay / Gogledd Bae Ceredigion SPA			
Red-throated diver <i>Gavia stellata</i>	NRW conservation objectives : conservation-advice-for-northern-cardigan-bay-spa.pdf	Screen In	There is the potential for impact pathways from an increase in suspended sediments.
Bae Ceredigion/Cardigan Bay SAC			
Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	Screen In	There is the potential for impact pathways from an increase in suspended sediments.
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: conservation-advice-for-cardigan-bay-sac.pdf	Screen In	There is the potential for impact pathways from an increase in suspended sediments.

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

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

4.1 Assessment of plan or project as defined

Table 4.1 Appropriate assessment			
European site feature/s	Description of impacts	Assessment in view of conservation objectives	Can adverse effect on site integrity be ruled out? 'YES' or 'NO'
European site name: Pen Llyn a'r Sarnau/Lleyn Peninsula and the Sarnau SAC			
Reefs	An increase in suspended sediments could lead to: - physical change of habitat from smothering of relocated sediment - chemically changing the water and sediment quality conditions through the relocation of sediment	Reefs are present in Cardigan Bay at a distance of approximately 3.5km north of the entrance to the river / harbour at Aberystwyth. The amount of fluidised sediment which would reach this distance above background levels would be minimal.	YES
Submerged or partially submerged sea caves	As above	Seacaves are present in Cardigan Bay at a distance of approximately 3.5km north of the entrance to the river / harbour at Aberystwyth. The amount of fluidised sediment which would reach this distance above background levels would be minimal.	YES
Bottlenose dolphin	There is the potential for impact pathways from an increase in underwater noise and suspended sediments.	There is a limited source for underwater noise disturbance from the WID plant because WID generates continuous (non-impulsive) underwater noise. The proposed maintenance dredging activity will take place within the confines of Aberystwyth	YES

		Harbour such that quay wall and breakwater structures will substantially restrict underwater noise propagation to the nearshore coastal waters. Bottlenose dolphin are wholly subtidal, highly mobile and transient. Given that the potential impacts from the works would be short lived during suitable states of the tide and temporary in nature (10-15 days), it is considered that residual impacts to marine mammal features would be de minimis as the area can be avoided temporarily if required.	
Grey seal	As above.	There is a limited source for underwater noise disturbance from the WID plant because WID generates continuous (non-impulsive) underwater noise. The proposed maintenance dredging activity will take place within the confines of Aberystwyth Harbour such that quay wall and breakwater structures will substantially restrict underwater noise propagation to the nearshore coastal waters. Grey seal are highly mobile and transient. Given that the potential impacts from the works would be short lived during suitable states of the tide and temporary in nature (10-15 days), it is considered that residual impacts to marine mammal features would be de minimis as the area can be avoided temporarily if required.	YES
European site name: West Wales Marine/Gorllewin Cymru Forol SAC			
Harbour porpoise	As above.	There is a limited source for underwater noise disturbance from the WID plant because WID generates continuous (non-impulsive) underwater noise. The proposed maintenance dredging activity will take place within the confines of Aberystwyth Harbour such that quay wall and breakwater	YES

		structures will substantially restrict underwater noise propagation to the nearshore coastal waters. Harbour porpoise are wholly subtidal, highly mobile and transient. Given that the potential impacts from the works would be short lived during suitable states of the tide and temporary in nature (10-15 days), it is considered that residual impacts to marine mammal features would be de minimis as the area can be avoided temporarily if required. Refer to approved document '<i>DML2626 - Aber Marina Dredge_HRA Stage 1 Info_FINAL</i>' for quantitative evidence regarding potential impacts from underwater noise.	
European site name: Northern Cardigan Bay / Gogledd Bae Ceredigion SPA			
Red-throated diver	There is the potential for an impact pathway from an increase in suspended sediments.	Vertical dispersion of the fluidised sediment is expected to remain close to the bed such that there will be limited exchange with the overlying water column. It is considered that RTD have sufficient foraging and loafing areas across the 82312.9 hectare site such that the short lived and temporary nature of any potential impacts is unlikely to have any lasting effect on the species.	YES
European site name: Bae Ceredigion/Cardigan Bay SAC			
River lamprey	There is the potential for impact pathways from an increase in suspended sediments.	Cardigan Bay SAC is at a distance of approximately 18km south of the entrance to the river / harbour at Aberystwyth. The amount of fluidised sediment which would reach this distance above background levels would be minimal.	YES

		Additionally, dredging will be undertaken on ebb tides therefore the amount of fluidised sediment which would reach upstream is minimal.	
Sea Lamprey	There is the potential for impact pathways from an increase in suspended sediments.	As above	YES

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

Table 4.2 Appropriate assessment of the plan or project taking into account additional conditions or restrictions				
European site name:				
European site Feature	Adverse effect(s)	Can adverse effect(s) be mitigated by additional imposed conditions or restrictions? 'YES' or 'NO'	Additional imposed mitigation measure(s)	Can adverse effect on site integrity be ruled out? 'YES' or 'NO'
European site name:				

4.3 Concluding the appropriate assessment of the plan or project alone

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

5. In combination assessment

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

Table 5.2 Addressing in combination effects

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

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)	
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)	
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)	
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)	X
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: - the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or - the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers (*SSSI consents cannot be given as derogations)	
Signed: S. Treby Name: Stephen Treby Position: Senior Marine Licencing Officer Date: 24 August 2026	

Was this HRA conclusion an escalated decision? YES or NO	
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7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Relevant section of the HRA report	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
3	23/09/2026 & 29/09/2026	NRW TE were consulted and agree with the overall conclusion of the HRA. For completeness the following changes were made: Reference to the Marine mammal management units (MMMUs) have been included in section 3.2.1. Cardigan Bay SAC was added with both River lamprey and Sea Lamprey being screened in for impact pathways resulting from an increase in suspended sediments.
4	As above	A link to the quantitative evidence regarding underwater noise for Harbour porpoise which was supplied by the applicant has been added to the assessment. Quantitative evidence regarding underwater noise was not supplied for Bottlenose dolphin or Grey seal however this will not change the overall conclusion of the assessment. It was concluded that there would be no Adverse Effect on Integrity due to impacts to River lamprey and Sea Lamprey due to the distance from Cardigan Bay SAC and timing of the works which coincide with ebb tides to ensure movement of sediment out to sea.

8. ANCB Advice (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: Stephen Treby - Marine Licensing Team
FROM: Bridget Randall-Smith - Marine Area Management and Advice Team
SUBJECT: Habitats Regulations Assessment of DML2626 Annual maintenance dredging campaign at Aberystwyth Marina (Band 2)

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

NRW Advisory (A) agree in principal with the conclusion of the above mentioned HRA, with respect to the marine features of the following protected sites:

- Pen Llyn a'r Sarnau SAC
- West Wales Marine SAC
- Northern Cardigan Bay SPA

However, for completeness and robustness of the HRA:

- NRW (A) advise that sea and river lamprey feature of the Cardigan Bay SAC should also be included in the HRA, as there is functional linkage and the rivers Rheidol and Ystwyth are noted as contributing to the marine site population in the newly published Reg S37 advice.
- NRW (A) advises that Marine mammal management units (MMUs) should be used as the appropriate scale for the HRA screening. Bristol Channel Approaches SAC, North Anglesey Marine SAC, Pembrokeshire Marine SAC and Cardigan Bay SAC should have also been initially considered in Section 3.2.1.b for marine mammals but can be ruled out without further consideration as Bottlenose dolphin, Harbour porpoise and Grey seal are already considered in the HRA for Pen Llyn a'r Sarnau SAC and West Wales Marine SAC and the adverse effects were ruled out.
- NRW (A) note that whilst in agreement with the HRA conclusion, Marine Licensing's Form 1 HRA would benefit from including the quantitative evidence regarding underwater noise supplied by the applicant for marine mammals.

Signed:

BJRandall-Smith

Bridget Randall-Smith
Senior Marine Advisory Officer
Marine Area Advice and Management Team

Date: 29/09/2026