

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

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

Document owner: Head of Business for Natural Resource Management

Version History:

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

Next review date: **October 2025**

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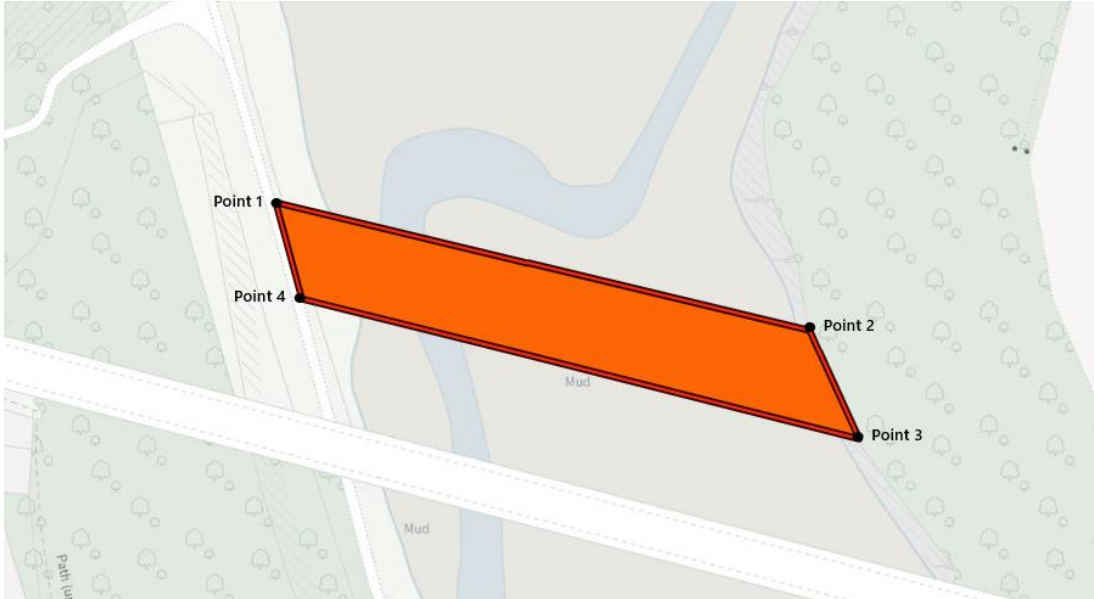
OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	Trenchless crossing (HDD Method) of Westfield Pill in Milford Haven Waterway (Dyfrffordd Aberdaugleddau)
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	24/07/2026
2	Applicant details	National Grid Electricity Distribution plc
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer	N/A
4	Activity/ies proposed	Trenchless crossing (HDD Method) of Westfield Pill in Milford Haven at a depth of 15-20m below the seabed. The bored hole will accommodate a new 132kV underground cable link between Golden Hill substation and Milford Haven Substation. The proposed core working hours are:

		▪ Monday to Friday 08:00-18:00 ▪ Saturdays 08:00-13:00
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009
6	Location	Westfield Pill, Milford Haven Waterway, Pembrokeshire: Point 1 – Latitude: 51.716737, Longitude: -4.944552 Point 2 - Latitude: 51.716528, Longitude: -4.942844 Point 3 - Latitude: 51.716316, Longitude: -4.942686 Point 4 - Latitude: 51.716550, Longitude: -4.944453  The map shows a quadrilateral area defined by four points: Point 1 (top-left), Point 2 (top-right), Point 3 (bottom-right), and Point 4 (bottom-left). The area is shaded orange. The map includes a river, a path, and a road. The labels 'Point 1', 'Point 2', 'Point 3', and 'Point 4' are placed near their respective vertices. The river is labeled 'Mud' in two locations. A path is labeled 'path (un)' and a road is labeled 'road'.

		Cyfoeth Naturiol Cymru Natural Resources Wales CML2625 - Trenchless crossing (HDD Method) of Westfield Pill in Milford Haven Legend CML2625 0 0.0275 0.055 Kilometers © Crown Copyright and database right 2016. Ordnance Survey licence number 100019741. © Hawflaith a hawliau cronfa ddata'r Goron 2013. Rheif Treysidde yr Arrolwg Ordnans 100019741.
7	Plan or project documents, including any application documents	CML2625 - 81778_NGED_eng-marine-works-licence-application_Rev02 (002) CML2625 - 81778_NGED_eng-marine-inns-biosecurity-ra-and-management-plan_Rev02 CML2625 - 4567-Drawing-HDD1(Rev.5) CML2625 - 2488549 D01 (00) - Pembroke Reinforcement HRA - Stage 1 & 2 CML2625 - 81778_NGED_Milford Haven - Pembroke 132kV Reinforcement Scheme_WFD_Rev02 (1) CML2625 - 81778_NGED_welsh-national-marine-plan-signposting-en-only_Rev02 CML2625 - Method Statement and Risk Assessment Westfield Pill HDD Rev 2 CML2625 - OCMA Safety Data Sheet

		CML2625 - OCU-HS-S1-FRM-025 Break out plan - Westfield Pill CML2625 - PAC L - Safety Data Sheet CML2625 - SODA ASH Safety Data Sheet CML2625 - Confirmed coordinates CML2625 – HDD CEMP Rev01
8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Stephen Treby – Marine Licencing Team
11	Team or person responsible for approving the plan or project (competent authority role)	As above

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,	YES

in a way that would undermine that feature's conservation objectives?	
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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	Pembrokeshire Marine/Sir Benfro Forol SAC [UK0013116]
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	N/A

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment			
Designated site feature	Relevant conservation objectives	Screening conclusion – 'SCREEN OUT',	Explanation

		'SCREEN IN' or 'IN COMB'	
Pembrokeshire Marine/Sir Benfro Forol SAC			
Estuaries	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Sandbanks which are slightly covered by seawater all the time	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Mudflats and sandflats not covered by seawater at low tide	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	The habitat feature is not located within the footprint of the proposed works and as such any direct habitat loss or physical damage is deemed highly unlikely.
Coastal Lagoons	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	The habitat feature is not located within the footprint of the proposed works and as such any direct habitat loss or physical damage is deemed highly unlikely.
Large shallow inlets and bays	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
Reefs	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	The habitat feature is not located within the footprint of the proposed works and as such any direct habitat loss or physical damage is deemed highly unlikely.
Submerged or partially submerged sea caves	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Habitat feature is not located near the proposed works

Atlantic salt meadows	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	The habitat feature is not located within the footprint of the proposed works and as such any direct habitat loss or physical damage is deemed highly unlikely.
Grey Seal <i>Halichoerus grypus</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	This mobile feature is unlikely to be present near the proposed works as they are more closely associated with coastal Environments.
Otter <i>Lutra lutra</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen In	There is potential for disturbance from Electromagnetic fields (EMF), visual disturbance and noise and vibration disturbance
Allis shad <i>Alosa alosa</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen In	There is potential for disturbance from Electromagnetic fields (EMF) and noise and vibration disturbance
Twaite shad <i>Alosa fallax</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen In	There is potential for disturbance from Electromagnetic fields (EMF) and noise and vibration disturbance
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen In	There is potential for disturbance from Electromagnetic fields (EMF) and noise and vibration disturbance
Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen In	There is potential for disturbance from Electromagnetic fields (EMF) and noise and vibration disturbance
Shore dock <i>Rumex rupestris</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Habitat feature is not located near the proposed works

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: Pembrokeshire Marine/Sir Benfro Forol SAC			
Otter <i>Lutra lutra</i>	There is potential for Otter to be disturbed by Electromagnetic fields (EMF), visual disturbance and noise and vibration disturbance.	<u>Electromagnetic fields (EMF)</u> The cable will have an insulating layer, which would eliminate the electric field. Furthermore, burying the cable 15-20m below the river bed would further ensure the electric field does not reach the water column. Unlike electric fields, the magnetic field produced by an underground cable is not shielded by the cable insulation and can move through substrates, extending directly above the cable and to either side, with the strongest magnetic field detected directly above the cable location. Increasing the separation distance between the source of the magnetic field (the cable) and potential receptors is recognised as an important way of minimising potential impacts (OES Environmental Tethys Management Measures Tool for Marine Energy, 2025), with a recommendation to bury cables at a minimum depth of 1m to minimise	NO (visual disturbance only)

		potential effects from magnetic fields. The cables for the proposed development will be between 15-20 m below the river bed; much greater than the minimum recommend depth of 1m. In addition, the level of magnetic field for a 132kV underground cable buried at 1m (under normal conditions) would be less than natural background levels. <u>Visual Disturbance</u> The sections of the route in close proximity to Cosheston Pill and the Cleddau Bridge are both along the A477. There is existing visual disturbance from vehicles and lighting along this stretch of the road. The send and receive pits associated with the HDD crossing will be located at least 280 m from the SAC, and are also screened by woodland and the slope of the land. Temporary lighting may be required which could lead to adverse effects without mitigation. <u>Noise and vibration disturbance</u> The drilling is proposed to be 15-20m below the surface of the river bed, which would reduce potential impacts from vibrations. In addition, the drilling will be rotary rather than percussive, which produces less noise and vibration. The drilling rig would be located at the drilling compounds, approximately 280 m west of Westfield Pill. The habitats surrounding the rig are neutral grassland and the SAC and Westfield Pill are screened by broadleaved woodland, and are downhill of the drilling rigs, by approximately 30 m (measured vertically). As such, noise and vibration	
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		disturbance of otter within Westfield Pill is considered unlikely. <u>Considering the above, the risk of noise and vibration disturbance is negligible.</u>	
Allis shad <i>Alosa alosa</i>	There is potential for Allis shad to be disturbed by Electromagnetic fields (EMF) and noise and vibration disturbance	<u>Noise and vibration disturbance</u> The drilling is proposed to be 15-20m below the surface of the river bed, which would reduce potential impacts from vibrations. In addition, the drilling will be rotary rather than percussive, which produces less noise and vibration. The drilling rig would be located at the drilling compounds, approximately 280 m west of Westfield Pill. The habitats surrounding the rig are neutral grassland and the SAC and Westfield Pill are screened by broadleaved woodland, and are downhill of the drilling rigs, by approximately 30 m (measured vertically). As such, noise and vibration disturbance of fish within Westfield Pill is considered unlikely. <u>Considering the above, the risk of noise and vibration disturbance is negligible.</u>	Yes
Twaite shad <i>Alosa fallax</i>	There is potential for Twaite shad to be disturbed by Electromagnetic fields (EMF) and noise and vibration disturbance	As above	Yes
River lamprey <i>Lampetra fluviatilis</i>	There is potential for River lamprey to be disturbed by Electromagnetic fields (EMF) and noise and vibration disturbance	As above	Yes
Sea lamprey <i>Petromyzon marinus</i>	There is potential for Sea lamprey to be disturbed by Electromagnetic fields (EMF) and noise and vibration disturbance	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: Pembrokeshire Marine/Sir Benfro Forol 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'
Otter <i>Lutra lutra</i>	Visual disturbance	YES	The CEMP outlines that most works will be undertaken during the core daytime hours of 08:00-18:00. Should temporary lighting be required during construction, it will be positioned sensitively and directed downwards to minimise impacts of light pollution on wildlife.	YES

4.3 Concluding the appropriate assess

ment of the plan or project alone

Table 4.3 Conclusion of the appropriate assessment alone	
(a) If Table 4.1, or the right hand column of Table 4.2 if applicable, is 'YES' for all features	It has been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of any European sites.

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

6. Conclusion

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

the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers (*SSSI consents cannot be given as derogations)	
Signed: S. Treby Name: Stephen Treby Date: 04/08/2026 Position: Senior Marine Licencing Officer	
Was this HRA conclusion an escalated decision? YES or NO	

7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Relevant section of the HRA report	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
3 & 4	10 September 2026	NRW TE were consulted and agreed with the conclusion of the HRA.

8. ANCB Advice (Form 3)

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

OGN 200 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: Adam Cooper, Marine Area Advice and Management Team
SUBJECT: Habitats Regulations Assessment of a Trenchless crossing (HDD Method) of Westfield Pill in Milford Haven Waterway..

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

We agree with the conclusion of the above mentioned HRA :
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.

Signed: *Adam Cooper* Senior Marine Advisor

Date: 10/09/2026