

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**

Record of a Habitats Regulations Assessment.....	3
1. Plan or Project Details	3
2. Determining the need for a Habitats Regulations Assessment.....	6
3. Considering the likelihood of a significant effect (LSE)	6
4. Appropriate assessment of the plan or project when considered alone	12
5. In combination assessment	15
6. Conclusion	18
7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice. ..	20
8. Countersignature	21
9. Appendix - Supporting information.....	Error! Bookmark not defined.

OGN 200 Form 1B

Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	Remedial works to the Western Cleddau Bascule Rail Bridge, Haverfordwest
HRA iteration/version	N/A

1. Plan or Project Details

Information about the plan or project		
1	Date application received	29/06/2026
2	Applicant details	M Group Transport (Rail & Aviation) 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 bridge requires remedial works to timber and metallic elements. Network Rail & MGroup Ltd engineers require access and a clear working area below the bridge deck, where a scaffolding can be erected to undertake the proposed maintenance activities. The works will include:

		- Removal of vegetation cover. - Install of safe work barriers. - Formalised access and egress routes - Compound creation at hard standing to the northeast. - Delivery and erection of scaffolding equipment. - Localised metallic Repairs and remedial items outlined in the scope of works.											
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009											
6	Location	Haverfordwest, Pembrokeshire: <table><tr><td>Lat</td><td>Long</td></tr><tr><td>51.798718</td><td>-4.963399</td></tr><tr><td>51.798727</td><td>-4.9630515</td></tr><tr><td>51.798318</td><td>-4.9632277</td></tr><tr><td>51.798363</td><td>-4.962868</td></tr></table>		Lat	Long	51.798718	-4.963399	51.798727	-4.9630515	51.798318	-4.9632277	51.798363	-4.962868
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		 0839 - Cleddau Bascule Bridge Key - MGroup Projects - MGroup South 0839 - Cleddau Bascule Bridge - Survey Area - Works Area - Watercourses - NRW Main Rivers - Network Rail - ELR Project Name: 0839 - Cleddau Bascule Bridge Drawing: Works Location Drawing Status: Rev1 EcoVIGOUR
		Figure 1: Map of Project Location.
7	Plan or project documents, including any application documents	CML2623 - Application Form CML2623 - Copy of Flood Risk Activity application form CML2623 - Appendix A - Western Cleddau (0839) - Biosecurity Management Plan Risk Assessment - 2026 - Rev 1 CML2623 - Copy of Western Cleddau (0839)- WNMP Signposting Document_Completed CML2623 - Western Cleddau (0839) - AA - HRA – 2026 CML2623 - Western Cleddau (0839) - WFD - 2026
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, 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	NO
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significant effects of renewals (see Part 2 of OGN200) without conducting a project-specific LSE test?	
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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] Cleddau Rivers/Afonydd Cleddau SAC [UK0030074]
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	N/A

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment			
Designated site feature	Relevant conservation objectives	Screening conclusion – ‘SCREEN OUT’, ‘SCREEN IN’ or ‘IN COMB’	Explanation
Pembrokeshire Marine/Sir Benfro Forol SAC			
Estuaries	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	There is a potential impact pathway in the form of direct habitat loss and physical damage. However, any disturbance would be highly localised and temporary and any

			effects would be anticipated to dissipate over one or a small number of tidal cycles
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	Habitat feature is not located near the proposed works
Coastal Lagoons	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Habitat feature is not located near the proposed works
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	Habitat feature is not located near the proposed works
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 otter to be disturbed through noise and

			visual disturbance throughout the duration of the works.
Allis shad <i>Alosa alosa</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Works will not occur within the watercourse.
Twaite shad <i>Alosa fallax</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Works will not occur within the watercourse.
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Works will not occur within the watercourse.
Sea lamprey <i>Petromyzon marinus</i>	NRW conservation objectives: conservation-advice-for-sir-benfro-forol-pembrokeshire-sac.pdf	Screen Out	Works will not occur within the watercourse.
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
Cleddau Rivers/Afonydd Cleddau SAC			
Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation	NRW conservation objectives: https://www.naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf	Screen Out	Works will not occur within the watercourse.
Active raised bogs	NRW conservation objectives: https://www.naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf	Screen Out	Habitat feature is not located near the proposed works
Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion</i>)	NRW conservation objectives: https://www.naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf	Screen Out	Habitat feature is not located near the proposed works

<i>incanae, Salicion albae)</i>			
River lamprey <i>Lampetra fluviatilis</i>	NRW conservation objectives: https://www.naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf	Screen Out	Works will not occur within the watercourse.
Brook lamprey <i>Lampetra planeri</i>	NRW conservation objectives: https://www.naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf	Screen Out	Works will not occur within the watercourse.
Otter <i>Lutra lutra</i>	NRW conservation objectives: https://www.naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf	Screen In	There is potential for otter to be disturbed through noise and visual disturbance throughout the duration of the works.
Bullhead <i>Cottus gobio</i>	NRW conservation objectives: https://www.naturalresources.wales/media/670822/Afonydd%20Cleddau%20plan%20English.pdf	Screen Out	Works will not occur within the watercourse.

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 through noise and visual disturbance throughout the duration of the works.	No signs of otters were observed during the ecological walkover; however, records of otter sightings and activity (eg. Spraints, footprints) were returned by the environmental data search within 100m of the proposed works site. The survey area is considered optimal for habitat for otters, providing high-quality resting, foraging and commuting habitat. Works shall be restricted to daylight hours when inland Otters are less active. Habitat impact is limited, and it is not anticipated that these works will have an impact on the wider population and Otter policy objectives of the Core Management Plan. No equipment or material will be left in such a manner that an animal could become snared and trapped within the working area.	Yes

		All equipment and materials will be removed from the riverbank at the end of each shift and all excavations will be backfilled. Should an Otter be encountered during works, personnel will temporarily stand down until the animal has vacated the immediate area under its own volition. Mirroring guidance in DMRB HA 88/91 is relevant: "It is important to recognise any water course, water body or wetland as a habitat and wildlife corridor and that all these areas have potential as otter habitat. It is also important not to create barriers to the re-colonisation of habitat by otter populations." A pre-works check by an experienced ecologist prior to the commencement of works will ensure the appropriate method of works are undertaken. In the unlikely event that a licensable feature is subsequently identified, the appropriate methodology and mitigations measures will be incorporated into the project methodology and, where necessary, a formal European Protected Species (EPS) license application will be submitted. With the implementation of the mitigation measures outlined above, <u>it is considered that the risk of disturbance is minimal.</u>	
European site name: Cleddau Rivers/Afonydd Cleddau SAC			
Otter <i>Lutra lutra</i>	As above	As above	As above

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
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(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

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 Date: 08/07/2026 Position: Senior Marine Licencing Officer	

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 & 4	03 August 2026	NRW TE were consulted and agreed with the conclusion of the HRA with no comments.

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: Natalie Muirhead-Davies (Marine Area Advice and Management Team)
SUBJECT: Habitats Regulations Assessment of CML2623 Remedial works to the Western Cleddau Bascule Rail Bridge, Haverfordwest Band 2

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

We agree with the conclusion of the above mentioned HRA, with respect to the marine features of the Pembrokeshire Marine/Sir Benfro Forol SAC.

We agree that the project has been taken to appropriate assessment and that sufficient consideration of alone or in-combination with other plans and projects has been taken, and it is established that that the project will not adversely affect the integrity of the above named Natura 2000 site.

Signed: *Natalie Muirhead-Davies*

Date: 03/08/2026

Signed: 

Siân Cuthbertson, Senior Marine Advisor

Date: 03/08/2026