

# Form

## Record of a Habitats Regulations Assessment of a project

### OGN 200 Form 1

Document owner: Protected Sites Team, EPP

#### Version History:

Document Version	Date Published	Summary of Changes
1.0	March 2016	Document created
1.1	30 November 2017	References to the 2010 Habitats Regulations updated to reflect new consolidated version of the regulations which entered into force on 30 <sup>th</sup> November 2017; References to KSP and National Services Directorates updated to EPP
1.2	28 June 2018	With marked up changes in light of ruling in CJEU case c-323/17 'People over Wind'.
1.3	27 June 2019	With marked up changes in light of ruling in CJEU case c-323/17 'People over Wind'.

Next review date: April 2019

## Record of a Habitats Regulations Assessment of a project

### 1. Project Details

1(a): Project details where an external party has applied to NRW for any form of authorisation	
<b>Application reference number (if applicable)</b>	EPR/BL5644IK/V006
<b>Date application received</b>	08/10/2022 (duly made as of 18/03/2022)
<b>Applicant details</b>	Sensient Flavors Limited
<b>Activity proposed</b>	<p>The Operator of permit number EPR/BL5644IK has applied to vary their permit to add a combined heat and power (CHP) combustion unit fuelled on liquefied petroleum gas (LPG)</p> <p>The purpose of the CHP will be to supply heat and power to the manufacturing process. It is proposed that the installation boundary will be expanded to add a small parcel of land where the CHP will be located.</p> <p>Currently, electricity is imported from the grid and LPG boilers are used to supply heat and steam to the manufacturing process. The CHP will reduce the operating load of the existing boilers and reduce electricity demand from the grid. This will improve overall efficiency of the site.</p> <p>Emissions from the CHP unit which have the potential to impact ecological receptors are emissions to air of oxides of nitrogen (NOx) and sulphur dioxide (SO<sub>2</sub>). Particulate matter emissions are considered negligible from combustion of this fuel type.</p> <p>There are no changes to emissions to ground and/or water as a result of this variation.</p> <p>As existing LPG storage will be utilized there is no increased risks of fugitive emissions.</p>
<b>Relevant legislation</b>	Environmental Permitting Regulations 2016

	Medium Combustion Plant Directive 2015 Specified Generator Regulations
<b>Location</b>	Address: Felinfach Food Flavours Factory, Felinfach, SA48 8AQ National Grid Reference (NGR): SN 51829 57590
<b>Application documents</b>	Please refer to <a href="#">DMS File</a>
<b>Environmental Statement</b>	N/A
<b>Pre-application correspondence</b>	NO
<b>NRW team responsible for drafting this HRA report, and name of lead officer</b>	Jennifer Pocock Senior Officer Installations and RSR Permitting

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

2.1 Is the whole of the project directly connected with or necessary to the management of one or more Natura 2000 sites, for the purposes of conserving the habitats or species for which the Natura 2000 site(s) is/are designated?	NO
2.2 Is there a possibility that the project could affect a different Natura 2000 site to the one(s) the project is intended to conserve?	N/A
2.3 Is it necessary to carry out an HRA?	YES

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

#### 3.1 Renewal of a permission on the same or more restrictive terms as the extant permission

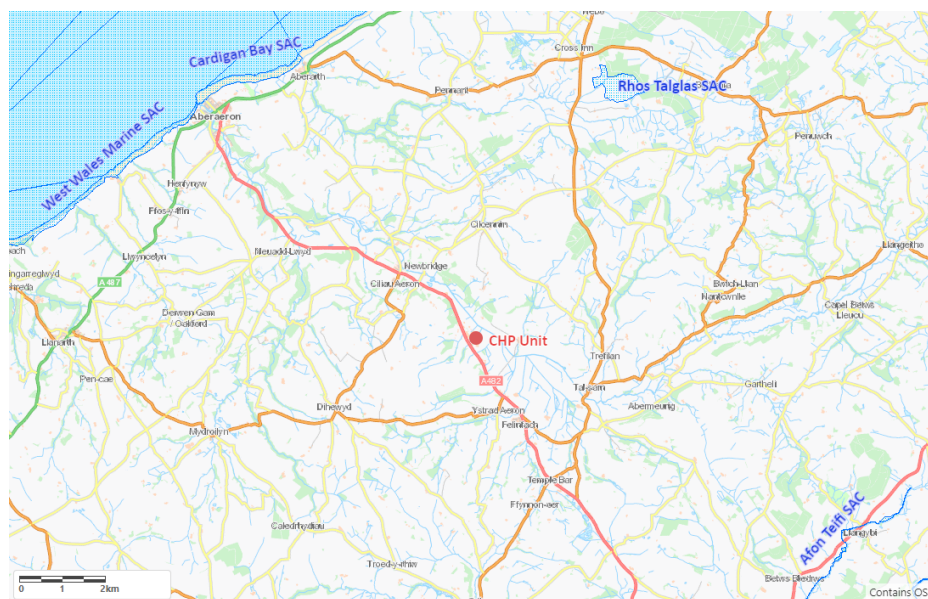
Is this project a renewal of a current permission which complies with NRW approved criteria for ruling out significant effects of renewals (see section 6.2A of OGN 200) without conducting a project-specific LSE test?	NO
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### 3.2 Likelihood of significant effects (LSE) test

#### 3.2.1 Which Natura 2000 sites might be affected by the proposal?

Based on the project specification or information provided in the application, it is considered that the following Natura 2000 sites have features which could be affected by the project:

**Rhos Talglas Special Area of Conservation (UK0030245)**  
**Cardigan Bay Special Area of Conservation (UK0012712)**  
**Afon Teifi Special Area of Conservation (UK0012670)**  
**West Wales Marine Special Area of Conservation (UK0030397)**



The potential for the project to affect the following Natura 2000 sites was also initially considered, but can be ruled out without further consideration:

N/A

<b>3.2.2 Screening assessment</b>		
	<b>Assessment of likelihood of significant effect</b>	
	<b>I Relevant conservation objectives</b>	<b>II Potential impact pathway</b>
<b>Rhos Talglas Special Area of Conservation (UK0030245)</b>		
Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia (EU Species Code: 1065)  <i>Vascular plants lower plants and invertebrates of wet habitats</i>	Please refer to <a href="#">CORE MANAGEMENT PLAN INCLUDING CONSERVATION OBJECTIVES FOR RHOS TALGLAS SPECIAL AREA OF CONSERVATION</a> , version 20 dated February 2017	All impact pathways listed are relevant to all features unless otherwise stated.
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) (EU Habitat Code: 6410)  <i>Fens &amp; wet habitats</i>		<p><b>Toxic Contamination</b> Due to the proposed CHP emitting NOx, there will be an increase in atmospheric concentrations of pollutants which may be harmful to the protected features of this site. Therefore, this is a relevant impact pathway and significant effects cannot be ruled out at this stage.</p> <p><b>Nutrient Enrichment</b> Due to the proposed CHP emitting NOx, there is a risk to the protected features of this site via deposition. Therefore, this is a relevant impact pathway and significant effects cannot be ruled out at this stage.</p> <p><b>Acidification (not relevant for Marsh fritillary butterfly)</b> Due to the proposed CHP emitting NOx and SO<sub>2</sub> and the associated deposition of these pollutants there is a risk to the sites protected features via changes in pH. Therefore, this is a relevant impact pathway and significant effects cannot be ruled out at this stage.</p> <p><b>Smothering</b> Please see above for impacts from acidification and nutrient enrichment which also mean smothering is a relevant impact pathway. Note that emissions of particulate matter are not expected to have significant impact on the SAC as the regulated facility is located sufficient distance from the SAC.</p>

		<p><b>Habitat Loss/Physical Damage</b> Impact pathway not relevant as proposed CHP is located a sufficient distance from the SAC boundaries</p> <p><b>Turbidity / Siltation / Changes in thermal regime / Changes in salinity regime (not relevant for marsh fritillary butterfly)</b> Impact pathway not relevant as there are no proposed changes to emissions to water as part of this variation</p>
<b>Cardigan Bay Special Area of Conservation (UK0012712)</b>		
<p>Sandbanks which are slightly covered by seawater all the time</p> <p><i>Estuarine &amp; intertidal habitats</i></p>	<p>Please refer to <a href="#">Cardigan Bay Special Area of Conservation: Advice provided by Natural Resources Wales in fulfilment of Regulation 37 of the Conservation of Habitats and Species Regulations 2017</a> dated March 2018.</p>	<p><b>Toxic Contamination</b> See above</p>
<p>Reefs</p> <p><i>Estuarine &amp; intertidal habitats</i></p>		<p><b>Nutrient Enrichment (not relevant for marine mammals)</b> See above</p>
<p>Submerged or partially submerged sea caves</p> <p><i>Submerged marine habitats</i></p>		<p><b>Acidification (not relevant for any estuarine &amp; intertidal habitats, submerged marine habitats, or marine mammals)</b> See above</p>
<p>Bottlenose dolphin <i>Tursiops truncatus</i></p> <p><i>Marine mammals</i></p>		<p><b>Smothering (not relevant for anadromous fish)</b> See above</p>
<p>Grey seal <i>Halichoerus grypus</i></p> <p><i>Marine mammals</i></p>		<p><b>Habitat Loss / Physical Damage</b> See above</p>
<p>River lamprey <i>Lampetra fluviatilis</i></p>		<p><b>Turbidity / Siltation / Changes in thermal regime / Changes in salinity regime</b> See above</p>
		<p><b>Entrapment (relevant for anadromous fish only)</b> The proposal does not involve any activity within waters. Therefore, for this impact pathway is not relevant.</p>
		<p><b>Disturbance (noise – relevant for marine mammals only)</b> There is no change in noise as a result of this proposal and therefore this impact pathway is not relevant.</p>



Anadromous fish		
Sea lamprey <i>Petromyzon marinus</i>		
Anadromous fish		
Afon Teifi Special Area of Conservation (UK0012670)		
Water courses of plain to montane levels with the Ranunculus fluitantis and Callitriche-Batrachion vegetation  Riverine habitats and running waters	There are numerous conservation objectives for the features associated with this site. Please refer to <a href="#">CORE MANAGEMENT PLAN INCLUDING CONSERVATION OBJECTIVES FOR AFON TEIFI SAC</a> version 2, dated April 2011)	Toxic Contamination See above
		Nutrient Enrichment See above
		Acidification See above
Brook lamprey <i>Lampetra planeri</i>  Non-migratory fish & invertebrates of rivers		Smothering (not relevant to riverine habitats and running waters, anadromous fish and mammals of riverine habitats) See above
		Habitat Loss / Physical Damage See above.
River lamprey <i>Lampetra fluviatilis</i>  Anadromous fish		Turbidity / Siltation /Changes in thermal regime / Changes in salinity regime See above.
Atlantic salmon <i>Salmo salar</i>  Anadromous fish		Entrapment (Relevant for non-migratory fish and invertebrates of rivers, anadromous fish and mammals of riverine habitats only) See above.
Bullhead <i>Cottus gobio</i>  Non-migratory fish and invertebrates of rivers		
European otter <i>Lutra lutra</i>		

Mammals of riverine habitats		
Floating water-plantain <i>Luronium natans</i>		
Vascular plants of aquatic habitats		
Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea		
Standing Waters (sensitive to acidification)		
Sea lamprey <i>Petromyzon marinus</i>		
Anadromous fish		
<b>West Wales Marine Special Area of Conservation (UK0030397)</b>		
Harbour Porpoise ( <i>Phocoena phocoena</i> )  Schedule 2 European protected species of animals	Please refer to <a href="#">Harbour Porpoise (Phocoena) Special Area of Conservation: West Wales Marine Conservation Objective and Advice on Operations</a> dated March 2019	<p><b>Toxic Contamination</b> See above</p> <p><b>Habitat Loss / Physical Damage</b> See above</p> <p><b>Turbidity / Changes in thermal regime / Changes in salinity regime</b> See above</p> <p><b>Disturbance (noise – relevant for marine mammals only)</b> See above</p>

3.2.3 Screening decision of the project 'alone'	
(a) If ALL rows in column II of Table 3.2.2 are GREEN	The project is not likely to have a significant effect on any Natura 2000 site, because there is no impact pathway from the project to any Natura 2000 features, and no further consideration under the Habitats Directive/Regulations is required in order to determine the application.
(b) If there are NO rows coloured RED in column II of Table 3.2.2, and there are ANY rows which are BLUE	The project is not likely to have a significant effect on any Natura 2000 sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.
(c) If ANY rows in Column II of Table 3.2.2 are RED	The project is likely have a significant effect on one or more Natura 2000 sites and therefore an appropriate assessment is required.

## 4. Appropriate assessment of the project when considered alone

### 4.1 Assessment of project as currently defined

Natura 2000 site feature (from Table 3.2.2 – <b>RED</b> rows only)	Impact pathway(s) (from Table 3.2.2)	Description of impacts	Assessment in view of conservation objectives	Can adverse effect on site integrity be ruled out?
<b>Rhos Talglas Special Area of Conservation (UK0030245)</b>				
Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia (EU Species Code: 1065)  <i>Vascular plants lower plants and invertebrates of wet habitats</i>	<b>Toxic Contamination</b>  <b>Nutrient Enrichment</b>  <b>Acidification</b>  <b>Smothering</b>	<p>The primary emissions to air from the LGP CHP are oxides of nitrogen (NO<sub>x</sub>) and sulphur dioxide (SO<sub>2</sub>). The applicant has completed air dispersion modelling for these pollutants and has submitted an Air Quality Assessment assessing the impacts of the proposal (<a href="#">see DMS dated 08/10/2021</a>).</p> <p>The following 3 scenarios were considered:  1. "Operational Installation" – emissions from the current permitted installation  2. "Varied Installation" – emissions from the current installation plus the emissions from the new CHP  3. "CHP unit" – emissions from the CHP unit when considered alone</p> <p>For the purpose of this assessment, results for the "Varied Installation" will be used unless stated to give a conservative and worst case assessment,</p> <p>Note that modelling of the CHP has been completed assuming the CHP operates continuously (24hr/day, 365 days/year) at the Emission Limited Values (ELVS) as defined in the MCPD (190 mg/Nm<sup>3</sup> for NO<sub>x</sub> and 15 mg/Nm<sup>3</sup> for SO<sub>2</sub>). This is considered overly conservative as in practice, the CHP will not be running continuously and the technology provider for the proposed CHP unit has confirmed it will emit less than 50% of the NO<sub>x</sub> ELV and only a negligible amount of SO<sub>2</sub>.</p>	Air emissions from the installation with the addition of the CHP have been assessed to be insignificant – no further assessment required.	YES
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) (EU Habitat Code: 6410)  <i>Fens &amp; wet habitats</i>				

		<p>The applicant has used the results of the modelling and the relevant Air Emissions Guidance at time of writing<sup>1</sup> to determine if impacts to the identified Nature 2000 sites (at the closest point to the installation) from the emissions from CHP are significant.</p> <p>Please see below for discussion of results for Rhos Talgas SAC in regard to impacts of increased atmospheric concentrations of the identified pollutants.</p> <p><b>Toxic Contamination</b></p> <p><b>NO<sub>x</sub></b></p> <p>The assessment compares the maximum Process Contribution (PC) of NO<sub>x</sub> against the sites long term critical level of NO<sub>x</sub> of 30 µg/m<sup>3</sup> (annual) and short term critical level of NO<sub>x</sub> of 75 µg/m<sup>3</sup> (daily).</p> <p>The maximum long term PC of NO<sub>x</sub> (0.03 µg/m<sup>3</sup>) is &lt;1 % (0.09 %) of the long term critical level and therefore long-term impact from NO<sub>x</sub> emissions can be considered insignificant.</p> <p>The maximum short term PC (0.37 µg/m<sup>3</sup>) of NO<sub>x</sub> is &lt;10 % (0.50 %) of the short-term critical level, therefore the short term impact from NO<sub>x</sub> emissions can be considered insignificant.</p> <p><b>SO<sub>2</sub></b></p> <p>The assessment compares the maximum PC of SO<sub>2</sub> against the sites long-term critical level of SO<sub>2</sub> of 10 µg/m<sup>3</sup> (annual).</p> <p>The maximum long-term PC of SO<sub>2</sub> (0.01 µg/m<sup>3</sup>) is &lt;1 % (0.04 %) of the long term critical level and therefore the long-term impact from SO<sub>2</sub> emissions can be considered insignificant</p> <p><sup>1</sup> <a href="https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit">https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit</a></p>		
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		<p><b>Nutrient Enrichment</b> The modelling assessed the predicted deposition from nitrogen against a minimum critical load of 10 kgN/ha/yr. This represents the lower end of the critical load range for the sites most sensitive feature.</p> <p>The maximum nitrogen deposition process (0.012 kgN/ha/yr) is &lt;1 % (0.12 %) of the minimum critical load value, therefore impacts from nitrogen deposition can be considered insignificant.</p> <p><b>Acidification</b> The modelling assessed predicted Acid deposition against the sites critical load values of 0.438 keq/ha/yr (Min N), 1.011 keq/ha/yr (Max N) and 0.43 keq/ha/yr (Max S).</p> <p>The maximum total acid deposition process contribution is 0.001 keq N /ha/yr and 0.001 keq S/ha/yr which is &lt;1 % (0.19 %) of the critical load function. Therefore, acid deposition impacts can be considered insignificant.</p> <p><b>Smothering</b> See above for impacts regarding nutrient enrichment and acidification. Emissions of particulate matter are not expected to have significant impact on the SAC as the regulated facility is located sufficient distance from the SAC.</p>		
<b>Cardigan Bay Special Area of Conservation (UK0012712)</b>				
<p>Sandbanks which are slightly covered by seawater all the time</p> <p><i>Estuarine &amp; intertidal habitats</i></p>	<p><b>Toxic Contamination</b></p> <p><b>Nutrient Enrichment</b></p>	<p>Please see below for discussion of modelling results in relation to Cardigan Bay SAC.</p> <p><b>Toxic Contamination</b> <b>NOx</b> The assessment compares the maximum Process</p>	<p>Air emissions from the installation with the addition of the CHP have been assessed to be insignificant – no further assessment required..</p>	<b>YES</b>

Reefs <i>Estuarine &amp; intertidal habitats</i>	<b>Acidification</b>  <b>Smothering</b>	Contribution (PC) of NO <sub>x</sub> against the sites long term critical level of NO <sub>x</sub> of 30 µg/m <sup>3</sup> (annual) and short term critical level of NO <sub>x</sub> of 75 µg/m <sup>3</sup> (daily).		
Submerged or partially submerged sea caves <i>Submerged marine habitats</i>		The maximum long term PC of NO <sub>x</sub> (0.05 µg/m <sup>3</sup> ) is <1 % (0.18 %) of the long term critical level and therefore long-term impact from NO <sub>x</sub> emissions can be considered insignificant.		
Bottlenose dolphin <i>Tursiops truncatus</i> <i>Marine mammals</i>		The maximum short term PC (0.77 µg/m <sup>3</sup> ) of NO <sub>x</sub> is <10 % (1.02 %) of the short-term critical level, therefore the short term impact from NO <sub>x</sub> emissions can be considered insignificant.		
Bottlenose dolphin <i>Tursiops truncatus</i> <i>Marine mammals</i>		<b>SO<sub>2</sub></b> The assessment compares the maximum PC of SO <sub>2</sub> against the sites long term critical level of SO <sub>2</sub> of 10 µg/m <sup>3</sup> (annual).  The maximum long term PC of SO <sub>2</sub> (0.02 µg/m <sup>3</sup> ) is <1 % (0.08 %) of the long term critical level and therefore the long-term impact from SO <sub>2</sub> emissions can be considered insignificant.		
Grey seal <i>Halichoerus grypus</i> <i>Marine mammals</i>		<b>Nutrient Enrichment</b> APIS does not define a critical load for this site as the site is not sensitive to nitrogen deposition. Therefore no further assessment is required.		
River lamprey <i>Lampetra fluviatilis</i> <i>Anadromous fish</i>		<b>Acidification</b> APIS does not define an acidity critical load for this site as the site is not sensitive acid deposition. Therefore no further assessment is required.		
Sea lamprey <i>Petromyzon marinus</i> <i>Anadromous fish</i>		<b>Smothering</b> See above for impacts regarding nutrient enrichment and acidification. Emissions of particulate matter are not expected to have significant impact on the SAC as the regulated facility is located sufficient distance from the SAC.		

Commented [PJC1]: Please could you advise if otherwise?

Commented [PJC2]: Please could you advise if otherwise?

Afon Teifi Special Area of Conservation (UK0012670)				
Water courses of plain to montane levels with the Ranunculus fluitans and Callitriche-Batrachion vegetation  <i>Riverine habitats and running waters</i>	<b>Toxic Contamination</b>  <b>Nutrient Enrichment</b>  <b>Acidification</b>	Please see below for discussion of modelling results in relation to Afon Teifi SAC.	Air emissions from the installation with the addition of the CHP have been assessed to be insignificant – no further assessment required.	<b>YES</b>
Brook lamprey <i>Lampetra planeri</i>  <i>Non-migratory fish &amp; invertebrates of rivers</i>		<b>Toxic Contamination</b> <b>NOx</b> The assessment compares the maximum Process Contribution (PC) of NOx against the sites long term critical level of NOx of 30 µg/m³ (annual) and short term critical level of NOx of 75 µg/m³ (daily).  The maximum long term PC of NOx (0.01 µg/m³) is <1 % (0.03 %) of the long term critical level and therefore long-term impact from NOx emissions can be considered insignificant.		
River lamprey <i>Lampetra fluviatilis</i>  <i>Anadromous fish</i>		The maximum short term PC (0.41 µg/m³) of NOx is <10 % (0.55 %) of the short-term critical level, therefore the short term impact from NOx emissions can be considered insignificant.		
Atlantic salmon <i>Salmo salar</i>  <i>Anadromous fish</i>		<b>SO<sub>2</sub></b> The assessment compares the maximum PC of SO <sub>2</sub> against the sites long term critical level of SO <sub>2</sub> of 10 µg/m³ (annual).  The maximum long term PC of SO <sub>2</sub> (<0.01 µg/m³) is <1 % (0.01 %) of the long term critical level and therefore the long-term impact from SO <sub>2</sub> emissions can be considered insignificant		
Bullhead <i>Cottus gobio</i>  <i>Non-migratory fish and invertebrates of rivers</i>		<b>Nutrient Enrichment</b> The modelling assessed the predicted deposition from nitrogen against a critical load of 3 kgN/ha/yr. This represents the lower end of the critical load range for the sites most sensitive feature.  The maximum nitrogen deposition process (0.004 kgN/ha/yr) is <1% (0.13 %) of the minimum critical load value, therefore impacts from nitrogen		
European otter <i>Lutra lutra</i>  <i>Mammals of riverine habitats</i>				
Floating water-plantain <i>Luronium natans</i>				



<i>Vascular plants of aquatic habitats</i>		deposition can be considered insignificant.		
Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea		<b>Acidification</b> APIS does not define an acidity critical load for this site as the site is not sensitive acid deposition. Therefore no further assessment is required.		
<i>Standing Waters (sensitive to acidification)</i>		<b>Smothering</b> See above for impacts regarding nutrient enrichment and acidification. Emissions of particulate matter are not expected to have significant impact on the SAC as the regulated facility is located sufficient distance from the SAC.		
Sea lamprey <i>Petromyzon marinus</i>				
<i>Anadromous fish</i>				
<b>West Wales Marine Special Area of Conservation (UK0030397)</b>				
Harbour Porpoise ( <i>Phocoena phocoena</i> )  <i>Schedule 2 European protected species of animals</i>	<b>Toxic Contamination</b>  <b>Nutrient Enrichment</b>  <b>Acidification</b>  <b>Smothering</b>	The Air Quality Assessment submitted did not specifically assess the impact upon this SAC. This has been justified as the site is co-located with the Cardigan Bay SAC (at points within 10 km of this installation) and so emissions from the proposal upon the West Wales Marine SAC have already been assessed. As that assessment (see above) concluded emissions were insignificant, and APIS does not define any Critical Levels or Loads for this site, impacts at this site are also considered insignificant.	Air emissions from the installation with the addition of the CHP have been assessed to be insignificant – no further assessment required.	<b>YES</b>

Commented [PJC3]: Please could you advise if otherwise?

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

(a) If the right hand column of Table 4.1 and Table 4.2 (if applicable) is 'YES' for all features	It has been ascertained that the proposal, when considered alone, will not adversely affect the integrity of any Natura 2000 sites.
(b) If there are any 'NO's in the right hand column of Table 4.1 that have not been resolved to 'YES' through mitigation measures identified in Table 4.2	<del>It has not been ascertained that the proposal, when considered alone, will not adversely affect the integrity of one or more Natura 2000 sites.</del>
(c) Are there any residual effects of the project (net of any mitigation measures identified) which, though insignificant on their own, could be significant if considered in combination with the effects of other plans or projects?	YES

## 5 In combination assessment

### 5.1 Identifying possible in combination effects

BLUE impact pathway from Table 3.2  and/or  Residual effect (from appropriate assessment in section 4)	Natura 2000 site feature(s) concerned	Other plans/projects with effects that might interact with the effects of the project to render its effects significant (if any)	Nature of the in-combination effect (if any)	Is there likely to be any significant in-combination effect, in view of the site's conservation objectives?

<b>Toxic contamination</b>  <b>Nutrient Enrichment</b>  <b>Acidification</b>  <b>Smothering</b>	<b>Rhos Talglas Special Area of Conservation (UK0030245)</b> Please refer to table 4.1 for full list of features	N/A - As part of this assessment, a 10 km search has been completed from the nearest point of this SAC to identify any other plans or projects which might interact with the effects of this project, which have been considered insignificant alone, and render them significant. No relevant plans/projects were identified.	None	<b>NO</b>
	<b>Cardigan Bay Special Area of Conservation (UK0012712)</b> Please refer to table 4.1 for full list of features	N/A - As part of this assessment, a 10 km search has been completed from the nearest point of this SAC to identify any other plans or projects which might interact with the effects of this project, which have been considered insignificant alone, and render them significant. No relevant plans/projects were identified.	None	<b>NO</b>

**Commented [PJC4]:** Fro info - note that the applicant did consider the emissions from the CHP in-combination with all emissions from Volac. We consider this overly conservative.

The only relevant emissions from Volac that would not already be considered part of background is from the recent (2020) addition of an MCP which is covered by Standard Rules (SR2018 No 7). The nature of a SR permit is low risk and as such we have not assessed the in-combination impacts as part of this HRA.

	<b>Afon Teifi Special Area of Conservation (UK0012670)</b> Please refer to table 4.1 for full list of features	N/A - As part of this assessment, a 10 km search has been completed from the nearest point of this SAC to identify any other plans or projects which might interact with the effects of this project, which have been considered insignificant alone, and render them significant. No relevant plans/projects were identified.	None	<b>NO</b>
	<b>West Wales Marine Special Area of Conservation (UK0030397)</b> Please refer to table 4.1 for full list of features	N/A - As discussed in section 4.1 this site is co-located with the Cardigan Bay SAC (at points within 10 km of this installation) – please see above.	None	<b>NO</b>
<b>(a) If the right hand column is 'NO' for all rows</b>		The 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 Natura 2000 site.		
<b>(b) If any rows in the right hand column are 'YES' or 'DON'T KNOW'</b>		The project is likely to have a significant effect in combination with other plans or projects.		

## 6. Conclusion

HRA is not required because the whole of the project is directly connected with or necessary to the management of one or more Natura 2000/Ramsar sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the project is not likely to have a significant effect on any other Natura 2000/Ramsar sites. (As documented in section 2.1 and 2.2 of this form)	
HRA is not required because there is no conceivable impact pathway to any Natura 2000/Ramsar site	

(As documented in section 2.3 of this form)	
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out 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 Natura 2000/Ramsar sites, either alone or in-combination with other plans and projects. (As documented in section 3.1 of this form)	
The project has been screened for likelihood of significant effects and, taking account of the advice received from protected sites advisors, is considered not likely to have a significant effect on any Natura 2000/Ramsar site (As documented in section 3.2 of this form, or section 5 if applicable)	
In light of the conclusions of an appropriate assessment, and taking account of the advice received from protected sites advisors, it has been established that the project will not adversely affect the integrity of any Natura 2000/Ramsar site, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans and projects. (As documented in section 4 of this form, and section 5 if applicable)	<b>X</b>
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the project will not adversely affect the integrity of any Natura 2000/Ramsar site, as documented in section 4 of this form, and section 5 is applicable.  Approval for the project <u>cannot</u> be given unless either: <ul style="list-style-type: none"> <li>the 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 report is prepared, or</li> <li>the project satisfies the requirements of Article 6(4) of the Habitats Directive, an Article 6(4) Statement of Case is prepared (OGN 200 Form 3) and submitted for consideration by the appropriate authority, normally Welsh Ministers</li> </ul>	
Signed: Jennifer Pocock Name: Jennifer Pocock Position: Senior Permitting Officer, Installations & RSR Permitting Team Date: 11/04/2022	

**7. Consultation with protected sites advisor(s) and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.**

<b>Relevant section of the HRA report</b>	<b>Date of correspondence* and any meeting(s) with protected sites advisor(s)</b>	<b>Description of how the comments from protected sites advisors have been taken into account</b>
3, 4 & 6	Consultation sent out 11/04/2022	Content and conclusions agreed with.  Form 2 provided.

**Protected sites advisor response to an internal consultation on the Habitats Regulations Assessment of a project**

**TO:** Jennifer Pocock, Senior Officer, Installations and RSR Permitting

**FROM:** Jon Turner, Senior Officer, Ceredigion Environment Team

**SUBJECT:** Habitats Regulation Assessment of an application for a permit variation to add a combined heat and power (CHP) combustion unit fuelled on liquefied petroleum gas (LPG) at Sentient Food Flavours Factory, Felinfach, Ceredigion SA48 8AG. NGR: SN 51829 57590.  
**Application ref:** PAN-015629 / EPR/BL5644IK/V006

Thank you for consulting me on the above project and sending me a copy of the Form 1 HRA report, consultation date 11<sup>th</sup> April 2022. My comments are as follows:

I have reviewed the assessment contained in the HRA report for the Rhos Talglas, Cardigan Bay, Afon Teifi and West Wales Marine SACs, and confirm that I agree with the content and conclusions of the HRA report.

My advice is that the project will not adversely affect the integrity of any Natura 2000 or Ramsar site, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans and projects.

Signed:  Jonathan Turner

Date: 28<sup>th</sup> April 2022