Planning Inspectorate

Advice Note 10

Habitats Regulations Assessment

HRA Screening Matrices for the Abergelli Power Project

Potential Effects

Potential effects upon the European site(s)* which are considered within the submitted HRA report (AECOM, 2017) are provided in the table below.

Effects considered within the screening matrices

Designation	Effects described in submission information	Presented in screening matrices as
Carmarthen Bay SAC **Burry Inlet SPA and Ramsar**	• Increase in nutrient inputs	• Water quality
Crymlyn Bog SAC and Ramsar **Carmarthen Bay SAC** **Burry Inlet SPA and Ramsar**	• Increase in concentration of NOx • Increase in deposition of Nitrogen • Increase in deposition of Acid	• Air quality

* As defined in Advice Note 10.

STAGE 1: SCREENING MATRICES

The European sites included within the screening assessment are:

Crymlyn Bog SAC

Crymlyn Bog Ramsar

Carmarthen Bay SAC

Burry Inlet SPA

Burry Inlet Ramsar

Evidence for, or against, likely significant effects on the European site(s) and its qualifying feature(s) is detailed within the footnotes to the screening matrices below.

Matrix Key:

✓ = Likely significant effect **cannot** be excluded
✗ = Likely significant effect **can** be excluded

C = construction
O = operation
D = decommissioning

HRA Screening Matrix 1 Carmarthen Bay and Estuaries SAC

Name of European site and designation: Carmarthen Bay and Estuaries SAC												
EU Code: UK0020020												
Distance to NSIP: 7km												
European site features	**Likely effects of NSIP**											
Effect	*Water quality*			*Water quality In combination effects*			*Air quality*			*Air quality In combination effects*		
Stage of Development	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*
Estuaries	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Sandbanks which are slightly covered by sea water all the time;	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Mudflats and sandflats not covered by seawater at low tide;	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Large shallow inlets and bays	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Salicornia and other annuals colonizing mud and sand; and,	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**

Atlantic salt meadows (Glauco-Puccinellietalia maritimae).	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Twaite shad Alosa fallax	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Sea lamprey Petromyzon marinus	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
River lamprey Lampetra fluviatilis	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Allis shad Alosa alosa	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Otter Lutra lutra	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**

Evidence supporting conclusions:

a. Section 1.3.9 of the No Significant Effects Report states that the embedded mitigation for construction (to be secured under the Construction Environmental Management Plan (CEMP)) will include measures to control pollution, storage of potential pollutants, and precautionary measures will help to limit the likelihood and effects of pollution incidents and/or runoff in line with best practice and guidelines. The drainage strategy for the Project Site will include filter drains / swales or oil interceptors as necessary to remove pollutants and all necessary treatment will take place within the Project Site before it is discharged to the existing watercourses. There are deemed to be no Likely Significant Effects on the features as a result of pollution and/or runoff generated during construction.

b. Section 1.3.5 of the No Significant Effects Report states that during construction and operational maintenance temporary toilets with appropriate foul waste facility will be in place and all foul waste generated during this period will be taken off-site for disposal at appropriate facilities. No impact on water receptors is expected and there are deemed to be no Likely Significant Effects on the features as a result of wastewater generated during construction and operational maintenance.

c. There is a hydrological connection between the Project Site and Carmarthen Bay and Estuaries SAC via the Afon Llan. Leaving the Project Site, the Afon Llan flows for approximately 12 km before reaching the Afon Lliw and flowing into the Natura 2000 site.
Section 1.3.7 of the No Significant Effects Report state that the drainage strategy has considered the use of either septic

tanks within the site or a package sewage treatment plants for foul effluent. However, package treatment plants are the preferred option, subject to detailed design following completion of ground investigations.
Due to the small quantity of foul water generated during operation (Section 1.3.6), it is anticipated that treated water can be discharged via infiltration (soakaway) on site. The foul water drainage system will be positioned to minimise the risk of inundation by floodwaters.
Where there is an inadequate unsaturated zone beneath the site, the option of discharging to local watercourses will be adopted. As stated in Section 1.4.2, any discharges will be subject to the Environmental Permitting Regulations and will meet quality criteria set by NRW.
As stated in Section 1.3.8, Chapter 9 (Water Quality and Flood Risk) of the Environmental Statement (Abergelli Power Project Environmental Statement, AECOM, 2018) states that given the quantity of treated wastewater likely to be generated from the packaged sewage treatment plant and dilution properties of the receiving receptors, the magnitude of pollution impacts from discharges is considered to be Negligible.
There are deemed to be no Likely Significant Effects associated with wastewater discharges resulting from the operation of the Project on the designated site features (section 1.3.8).

d. Sections 1.1.20 – 1.1.22 detail the decommissioning phase of the Project. Section 1.3.10 states that potential effects on water quality during decommissioning are likely to be the same as for construction and will be controlled similarly. There are considered to be no Likely Significant Effects associated with water quality resulting from the decommissioning phase of the Project.

e. Table 1-8 provides a list of projects that have the potential to act in combination with the Project. Table 1-12 provides the results of a screening exercise for each of the projects to demonstrate that the effects from the Project acting in-combination with the projects are not significant. Table 1-12 briefly summarises the level of data or information available in relation to each project, which in all cases is limited.

f. Section 1.5.3 of the No Significant Effects Report states that there are no inputs during construction in relation to water quality from the Project that can act in combination with other projects, this is likely the same for decommissioning.

g. Section 1.5.4 of the No Significant Effects Report states that the inputs from Project wastewater discharges during operation are likely to be so small as to be within the natural daily fluctuations of the nutrient levels within the Carmarthen Bay and Estuaries SAC and therefore immeasurable in-combination with other projects. There is considered to be no Likely Significant Effect as a result of wastewater discharges from the Project acting in-combination with wastewater discharges from other projects.

h. Section 1.3.11 states that there are no roads within 200 m of any Natura 2000 site that are forecast to receive anything other than a nominal short term change in vehicle flows as a result of the construction and operation of the Project. Transport related emissions are most relevant to sites within 200 m of a major road. The Design Manual for Roads and

Bridges (DMRB) identifies 200 m as the distance beyond which the contribution of traffic emissions to local pollutant concentrations is considered to be negligible. There are considered to be no Likely Significant Effects associated with traffic emissions related air quality as a result of the construction or operation phases of the Project.

i. Section 1.3.12 states that potential effects of traffic related emissions during decommissioning are likely to be the same as for construction. There are considered to be no Likely Significant Effects associated with traffic emission related air quality resulting from the decommissioning phase of the Project.

j. Sections 1.5.6 – 1.5.8 state there will be extremely low traffic flows expected as part of the construction and operation of the Project, and the operational traffic flows from the Project will not make a significant contribution to any in-combination effects and will be within the average daily variations of traffic flows. A number of projects are likely to contribute to local pollutant concentrations through traffic emissions - using M4 Junction 46 and the B4489. However, there are no Natura 2000 sites located within 200 m of these locations. This is likely to be the same for decommissioning. Section 1.5.8 states there is no opportunity for a Likely Significant Effect as a result of traffic emissions from the Project acting in-combination with traffic emissions from other projects.

k. Table 1-6, Table 1-7, Table 1-9, Table 1-10 and Table 1-11 of the No Significant Effects Report show the potential effects of NOx, nitrogen and nitrogen acidity on the most sensitive receptor of Carmarthen Bay and Estuaries SAC. Section 1.4.6 – 1.4.7 states that the process contributions are extremely small for nitrogen (<0.01kgN/ha/yr) and the current background levels for nitrogen are within the critical loads for the most sensitive receptor at the site the increase is concluded not to have a LSE on the site. Section 1.4.13 states that none of the receptors for the site are sensitive to nitrogen acidity deposition.

l. Table 1-8 and Sections 1.5.9 – 1.5.11 provide a summary of the projects and plans provided by the local authority for an in-combination assessment. One project that was refused planning has point source emissions; the promoter has stated they do not intend to resubmit the application or to appeal against the refusal. There is a point source emitter within the Local Development Plan; however there is no information on the plan since it is a preferred location only and as such it is not possible to obtain air quality data. It is concluded that there are no point source emitters that would contribute to an in-combination effect with the emissions from the proposed Project.

HRA Screening Matrix 2 Crymlyn Bog SAC

Name of European site and designation: Crymlyn Bog SAC												
EU Code: UK0012885												
Distance to NSIP: 6.7km												
European site features	**Likely effects of NSIP**											
Effect	*Water quality*			*Water quality In combination effects*			*Air quality*			*Air quality In combination effects*		
Stage of Development	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*
Transition mires and quaking bogs	**×a**	**×a**	**×a**	**×a**	**×a**	**×a**	**×b**	**×b,e**	**×c**	**×d**	**×d,f**	**×d**
Calcareous fens with Cladium mariscus and species of the Caricion davallianae	**×a**	**×a**	**×a**	**×a**	**×a**	**×a**	**×b**	**×b,e**	**×c**	**×d**	**×d,f**	**×d**
Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)	**×a**	**×a**	**×a**	**×a**	**×a**	**×a**	**×b**	**×b,e**	**×c**	**×d**	**×d,f**	**×d**

Evidence supporting conclusions:

a. As stated in Section 1.3.3, Crymlyn Bog SAC is not hydrologically connected to the Project Site. As such effects associated with water quality have been scoped out of any further assessment.

b. Section 1.3.11 states that there are no roads within 200 m of any Natura 2000 site that are forecast to receive anything other than a nominal short term change in vehicle flows as a result of the construction and operation of the Project. Transport related emissions are most relevant to sites within 200 m of a major road. The Design Manual for Roads and Bridges (DMRB) identifies 200 m as the distance beyond which the contribution of traffic emissions to local pollutant concentrations is considered to be negligible. There are considered to be no Likely Significant Effects associated with traffic emissions related air quality as a result of the construction or operation phases of the Project.

c. As stated in Section 1.3.12, potential effects of traffic related emissions during decommissioning are likely to be the same as for construction. There are considered to be no Likely Significant Effects associated with traffic emission related air quality resulting from the decommissioning phase of the Project.

d. Sections 1.5.6 – 1.5.8 state there will be extremely low traffic flows expected as part of the construction and operation of the Project, and the operational traffic flows from the Project will not make a significant contribution to any in-combination effects and will be within the average daily variations of traffic flows. A number of projects are likely to contribute to local pollutant concentrations through traffic emissions - using M4 Junction 46 and the B4489. However, there are no Natura 2000 sites located within 200 m of these locations. This is likely to be the same for decommissioning. Section 1.5.8 states there is no opportunity for a Likely Significant Effect as a result of traffic emissions from the Project acting in-combination with traffic emissions from other projects.

e. Table 1-6, Table 1-7, Table 1-9, Table 1-10 and Table 1-11 of the No Significant Effects report show the potential effects of NOx, nitrogen and nitrogen acidity generated during operation of the Project on the most sensitive receptor of Crymlyn Bog SAC. Sections 1.4.6 and 1.4.8-1.4.12 states that the process contributions are extremely small for nitrogen (<0.01kgN/ha/yr) and the current background levels for nitrogen are in exceedance of the critical loads for the most sensitive receptor at the site the increase is concluded not to have a LSE on the site due to the extremely low level of increase. Section 1.4.14 states that the process contribution for nitrogen acidity deposition is effectively zero.

f. Table 1-8 and Sections 1.5.9 – 1.5.11 provide a summary of the projects and plans provided by the local authority for an in-combination assessment. One project that was refused planning has point source emissions; the promoter has stated they do not intend to resubmit the application or to appeal against the refusal. There is a point source emitter within the Local Development Plan; however there is no information on the plan since it is a preferred location only and as such it is not possible to obtain air quality data. It is concluded that there are no point source emitters that would contribute to an in-combination effect with the emissions from the proposed Project.

HRA Screening Matrix 3 Crymlyn Bog Ramsar

Name of European site and designation: Crymlyn Bog Ramsar												
Ramsar designation has no EU Code, [SAC] EU Code for this site is: UK0020020												
Distance to NSIP: 6.7km												
European site features	**Likely effects of NSIP**											
Effect	*Water quality*			*Water quality In combination effects*			*Air quality*			*Air quality In combination effects*		
Stage of Development	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*
Ramsar criterion 1 Valley floodplain topogenous mire and fen habitats	**×a**	**×a**	**×a**	**×a**	**×a**	**×a**	**×b**	**×b,e**	**×c**	**×d**	**×d,f**	**×d**
Ramsar criterion 2 Slender cotton-grass (Eriophorum gracile)and invertebrate assemblage, including fen raft spider (Dolomedes plantarius)	**×a**	**×a**	**×a**	**×a**	**×a**	**×a**	**×b**	**×b,e**	**×c**	**×d**	**×d,f**	**×d**
Ramsar criterion 2 Peatland	**×a**	**×a**	**×a**	**×a**	**×a**	**×a**	**×b**	**×b,e**	**×c**	**×d**	**×d,f**	**×d**
Ramsar criterion 3	**×a**	**×a**	**×a**	**×a**	**×a**	**×a**	**×b**	**×b,e**	**×c**	**×d**	**×d,f**	**×d**

Plant species assemblage												

Evidence supporting conclusions:

a. As stated in Section 1.3.3, Crymlyn Bog Ramsar is not hydrologically connected to the Project Site. As such effects associated with water quality have been scoped out of any further assessment.

b. Section 1.3.11 states that there are no roads within 200 m of any Natura 2000 site that are forecast to receive anything other than a nominal short term change in vehicle flows as a result of the construction and operation of the Project. Transport related emissions are most relevant to sites within 200 m of a major road. The Design Manual for Roads and Bridges (DMRB) identifies 200 m as the distance beyond which the contribution of traffic emissions to local pollutant concentrations is considered to be negligible. There are considered to be no Likely Significant Effects associated with traffic emissions related air quality as a result of the construction or operation phases of the Project.

c. As stated in Section 1.3.12, potential effects of traffic related emissions during decommissioning are likely to be the same as for construction. There are considered to be no Likely Significant Effects associated with traffic emission related air quality resulting from the decommissioning phase of the Project.

d. Sections 1.5.6 – 1.5.8 state there will be extremely low traffic flows expected as part of the construction and operation of the Project, and the operational traffic flows from the Project will not make a significant contribution to any in-combination effects and will be within the average daily variations of traffic flows. A number of projects are likely to contribute to local pollutant concentrations through traffic emissions - using M4 Junction 46 and the B4489. However, there are no Natura 2000 sites located within 200 m of these locations. This is likely to be the same for decommissioning. Section 1.5.8 states there is no opportunity for a Likely Significant Effect as a result of traffic emissions from the Project acting in-combination with traffic emissions from other projects.

e. Table 1-6, Table 1-7, Table 1-9, Table 1-10 and Table 1-11 of the No Significant Effects report show the potential effects of NOx, nitrogen and nitrogen acidity generated during operation of the Project on the most sensitive receptor or most sensitive habitat on which a receptor is reliant of Crymlyn Bog Ramsar. Section 1.4.6 and 1.4.8-1.4.12 states that the process contributions are extremely small for nitrogen (<0.01kgN/ha/yr) and the current background levels for nitrogen are in exceedance of the critical loads for the most sensitive receptor at the site the increase is concluded not to have a LSE on the site due to the extremely low level of increase. Section 1.4.14 states that the process contribution for nitrogen acidity deposition is effectively zero.

f. Table 1-8 and Sections 1.5.9 – 1.5.11 provide a summary of the projects and plans provided by the local authority for an in-combination assessment. One project that was refused planning has point source emissions; the promoter has stated they

do not intend to resubmit the application or to appeal against the refusal. There is a point source emitter within the Local Development Plan; however there is no information on the plan since it is a preferred location only and as such it is not possible to obtain air quality data. It is concluded that there are no point source emitters that would contribute to an in-combination effect with the emissions from the proposed Project.

HRA Screening Matrix 4 Burry Inlet SPA

Name of European site and designation: Burry Inlet SPA												
EU Code: UK9015011												
Distance to NSIP: 8.6km												
European site features	**Likely effects of NSIP**											
Effect	*Water quality*			*Water quality In combination effects*			*Air quality*			*Air quality In combination effects*		
Stage of Development	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*
Oystercatcher (Haematopus ostralegus)	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Pintail (Anas acuta)	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Overwinter waterfowl assemblage of international importance.	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**

Evidence supporting conclusions:

a. Section 1.3.9 of the No Significant Effects Report states that the embedded mitigation for construction (to be secured under the Construction Environmental Management Plan (CEMP)) will include measures to control pollution, storage of potential pollutants, and precautionary measures will help to limit the likelihood and effects of pollution incidents and/or runoff in line

with best practice and guidelines. The drainage strategy for the Project Site will include filter drains / swales or oil interceptors as necessary to remove pollutants and all necessary treatment will take place within the Project Site before it is discharged to the existing watercourses. There are deemed to be no Likely Significant Effects on the features as a result of pollution and/or runoff generated during construction.

b. Section 1.3.5 of the No Significant Effects Report states that during construction and operational maintenance temporary toilets with appropriate foul waste facility will be in place and all foul waste generated during this period will be taken off-site for disposal at appropriate facilities. No impact on water receptors is expected and there are deemed to be no Likely Significant Effects on the features as a result of wastewater generated during construction and operational maintenance.

c. There is a hydrological connection between the Project Site and Burry Inlet SPA via the Afon Llan. Leaving the Project Site, the Afon Llan flows for approximately 12 km before reaching the Afon Lliw and flowing into the Natura 2000 site.
Section 1.3.7 of the No Significant Effects Report state that the drainage strategy has considered the use of either septic tanks within the site or a package sewage treatment plants for foul effluent. However, package treatment plants are the preferred option, subject to detailed design following completion of ground investigations.
Due to the small quantity of foul water generated during operation, it is anticipated that treated water can be discharged via infiltration (soakaway) on site. The foul water drainage system will be positioned to minimise the risk of inundation by floodwaters.
Where there is an inadequate unsaturated zone beneath the site, the option of discharging to local watercourses will be adopted. As stated in Section 1.4.2, any discharges will be subject to the Environmental Permitting Regulations and will meet quality criteria set by NRW.
As stated in Section 1.3.8, Chapter 9 (Water Quality and Flood Risk) of the Environmental Statement (Abergelli Power Project Environmental Statement, AECOM, 2018) states that given the quantity of treated wastewater likely to be generated from the packaged sewage treatment plant and dilution properties of the receiving receptors, the magnitude of pollution impacts from discharges is considered to be Negligible.
There are deemed to be no Likely Significant Effects associated with wastewater discharges resulting from the operation of the Project on the designated site features (section 1.3.8).

d. Sections 1.1.20 – 1.1.22 detail the decommissioning phase of the Project. Section 1.3.10 states that potential effects on water quality during decommissioning are likely to be the same as for construction and will be controlled similarly. There are considered to be no Likely Significant Effects associated with water quality resulting from the decommissioning phase of the Project.

e. Table 1-8 provides a list of projects that have the potential to act in combination with the Project. Table 1-12 provides the results of a screening exercise for each of the projects to demonstrate that the effects from the Project acting in-

combination with the projects are not significant. Table 1-12 briefly summarises the level of data or information available in relation to each project, which in all cases is limited.

f. Section 1.5.3 of the No Significant Effects Report states that there are no inputs during construction in relation to water quality from the Project that can act in combination with other projects, this is likely the same for decommissioning.

g. Section 1.5.4 of the No Significant Effects Report states that the inputs from Project wastewater discharges during operation are likely to be so small as to be within the natural daily fluctuations of the nutrient levels within Burry Inlet SPA and therefore immeasurable in-combination with other projects. There is considered to be no Likely Significant Effect as a result of wastewater discharges from the Project acting in-combination with wastewater discharges from other projects.

h. Section 1.3.11 states that there are no roads within 200 m of any Natura 2000 site that are forecast to receive anything other than a nominal short term change in vehicle flows as a result of the construction and operation of the Project. Transport related emissions are most relevant to sites within 200 m of a major road. The Design Manual for Roads and Bridges (DMRB) identifies 200 m as the distance beyond which the contribution of traffic emissions to local pollutant concentrations is considered to be negligible. There are considered to be no Likely Significant Effects associated with traffic emissions related air quality as a result of the construction or operation phases of the Project.

i. Section 1.3.12 states that potential effects of traffic related emissions during decommissioning are likely to be the same as for construction. There are considered to be no Likely Significant Effects associated with traffic emission related air quality resulting from the decommissioning phase of the Project.

j. Sections 1.5.6 – 1.5.8 state there will be extremely low traffic flows expected as part of the construction and operation of the Project, and the operational traffic flows from the Project will not make a significant contribution to any in-combination effects and will be within the average daily variations of traffic flows. A number of projects are likely to contribute to local pollutant concentrations through traffic emissions - using M4 Junction 46 and the B4489. However, there are no Natura 2000 sites located within 200 m of these locations. This is likely to be the same for decommissioning. Section 1.5.8 states there is no opportunity for a Likely Significant Effect as a result of traffic emissions from the Project acting in-combination with traffic emissions from other projects.

k. Table 1-6, Table 1-7, Table 1-9, Table 1-10 and Table 1-11 of the No Significant Effects report show the potential effects of NOx, nitrogen and nitrogen acidity on the most sensitive habitat on which a receptor of Burry Inlet SPA is reliant. Section 1.4.6 – 1.4.7 states that the process contributions are extremely small for nitrogen (<0.01kgN/ha/yr) and the current background levels for nitrogen are within the critical loads for the most sensitive receptor at the site the increase is concluded not to have a LSE on the site. Section 1.4.15 states that the process contribution for nitrogen acidity deposition is so low (<0.01keqH+/ha/yr) that it will not cause an exceedance of the critical load for nitrogen acidity at the site.

l. Table 1-8 and Sections 1.5.9 – 1.5.11 provide a summary of the projects and plans provided by the local authority for an in-combination assessment. One project that was refused planning has point source emissions; the promoter has stated they

do not intend to resubmit the application or to appeal the refusal. There is a point source emitter within the Local Development Plan; however there is no information on the plan since it is a preferred location only and as such it is not possible to obtain air quality data. It is concluded that there are no point source emitters that would contribute to an in-combination effect with the emissions from the proposed Project.

HRA Screening Matrix 5 Burry Inlet Ramsar

Name of European site and designation: Burry Inlet Ramsar												
Ramsar designation has no EU Code, [SPA] EU Code for this site is: UK9015011												
Distance to NSIP: 8.6km												
European site features	**Likely effects of NSIP**											
Effect	*Water quality*			*Water quality In combination effects*			*Air quality*			*Air quality In combination effects*		
Stage of Development	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*	*C*	*O*	*D*
Ramsar criterion 5 Overwinter wildfowl assemblage of international importance	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Ramsar criterion 6 Common redshank (Tringa totanus totanus),	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Ramsar criterion 6 Pintail	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Ramsar criterion 6 Oystercatcher	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**
Ramsar criterion 6 Red knot (Calidris	**×a,b**	**×b,c**	**×d**	**×e,f**	**×e,g**	**×e,f**	**×h**	**×h,j**	**×i**	**×e,j**	**×e,j,k,l**	**×e,j**

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Evidence supporting conclusions:

a. Section 1.3.9 of the No Significant Effects Report states that the embedded mitigation for construction (to be secured under the Construction Environmental Management Plan (CEMP)) will include measures to control pollution, storage of potential pollutants, and precautionary measures will help to limit the likelihood and effects of pollution incidents and/or runoff in line with best practice and guidelines. The drainage strategy for the Project Site will include filter drains / swales or oil interceptors as necessary to remove pollutants and all necessary treatment will take place within the Project Site before it is discharged to the existing watercourses. There are deemed to be no Likely Significant Effects on the features as a result of pollution and/or runoff generated during construction.

b. Section 1.3.5 of the No Significant Effects Report states that during construction and operational maintenance temporary toilets with appropriate foul waste facility will be in place and all foul waste generated during this period will be taken off-site for disposal at appropriate facilities. No impact on water receptors is expected and there are deemed to be no Likely Significant Effects on the features as a result of wastewater generated during construction and operational maintenance.

c. There is a hydrological connection between the Project Site and Burry Inlet Ramsar via the Afon Llan. Leaving the Project Site, the Afon Llan flows for approximately 12 km before reaching the Afon Lliw and flowing into the Natura 2000 site. Section 1.3.7 of the No Significant Effects Report state that the drainage strategy has considered the use of either septic tanks within the site or a package sewage treatment plants for foul effluent. However, package treatment plants are the preferred option, subject to detailed design following completion of ground investigations.
Due to the small quantity of foul water generated during operation, it is anticipated that treated water can be discharged via infiltration (soakaway) on site. The foul water drainage system will be positioned to minimise the risk of inundation by floodwaters.
Where there is an inadequate unsaturated zone beneath the site, the option of discharging to local watercourses will be adopted. As stated in Section 1.4.2, any discharges will be subject to the Environmental Permitting Regulations and will meet quality criteria set by NRW.
As stated in Section 1.3.8, Chapter 9 (Water Quality and Flood Risk) of the Environmental Statement (Abergelli Power Project Environmental Statement, AECOM, 2018) states that given the quantity of treated wastewater likely to be generated from the packaged sewage treatment plant and dilution properties of the receiving receptors, the magnitude of pollution impacts from discharges is considered to be Negligible.
There are deemed to be no Likely Significant Effects associated with wastewater discharges resulting from the operation of the Project on the designated site features (section 1.3.8).

d. Sections 1.1.20 – 1.1.22 detail the decommissioning phase of the Project. Section 1.3.10 states that potential effects on water quality during decommissioning are likely to be the same as for construction and will be controlled similarly. There are considered to be no Likely Significant Effects associated with water quality resulting from the decommissioning phase of the Project.

e. Table 1-8 provides a list of projects that have the potential to act in combination with the Project. Table 1-12 provides the results of a screening exercise for each of the projects to demonstrate that the effects from the Project acting in-combination with the projects are not significant. Table 1-12 briefly summarises the level of data or information available in relation to each project, which in all cases is limited.

f. Section 1.5.3 of the No Significant Effects Report states that there are no inputs during construction in relation to water quality from the Project that can act in combination with other projects, this is likely the same for decommissioning.

g. Section 1.5.4 of the No Significant Effects Report states that the inputs from Project wastewater discharges during operation are likely to be so small as to be within the natural daily fluctuations of the nutrient levels within Burry Inlet Ramsar and therefore immeasurable in-combination with other projects. There is considered to be no Likely Significant Effect as a result of wastewater discharges from the Project acting in-combination with wastewater discharges from other projects.

h. Section 1.3.11 states that there are no roads within 200 m of any Natura 2000 site that are forecast to receive anything other than a nominal short term change in vehicle flows as a result of the construction and operation of the Project. Transport related emissions are most relevant to sites within 200 m of a major road. The Design Manual for Roads and Bridges (DMRB) identifies 200 m as the distance beyond which the contribution of traffic emissions to local pollutant concentrations is considered to be negligible. There are considered to be no Likely Significant Effects associated with traffic emissions related air quality as a result of the construction or operation phases of the Project.

i. Section 1.3.12 states that potential effects of traffic related emissions during decommissioning are likely to be the same as for construction. There are considered to be no Likely Significant Effects associated with traffic emission related air quality resulting from the decommissioning phase of the Project.

j. Sections 1.5.6 – 1.5.8 state there will be extremely low traffic flows expected as part of the construction and operation of the Project, and the operational traffic flows from the Project will not make a significant contribution to any in-combination effects and will be within the average daily variations of traffic flows. A number of projects are likely to contribute to local pollutant concentrations through traffic emissions - using M4 Junction 46 and the B4489. However, there are no Natura 2000 sites located within 200 m of these locations. This is likely to be the same for decommissioning. Section 1.5.8 states there is no opportunity for a Likely Significant Effect as a result of traffic emissions from the Project acting in-combination with traffic emissions from other projects.

k. Table 1-6, Table 1-7, Table 1-9, Table 1-10 and Table 1-11 of the No Significant Effects report show the potential effects of NOx, nitrogen and nitrogen acidity on the most sensitive habitat on which a receptor of Burry Inlet Ramsar is reliant. Section

1.4.6 – 1.4.7 states that the process contributions are extremely small for nitrogen (<0.01kgN/ha/yr) and the current background levels for nitrogen are within the critical loads for the most sensitive receptor at the site the increase is concluded not to have a LSE on the site. Section 1.4.15 states that the process contribution for nitrogen acidity deposition is so low (<0.01keqH+/ha/yr) that it will not cause an exceedance of the critical load for nitrogen acidity at the site.

I. Table 1-8 and Sections 1.5.9 – 1.5.11 provide a summary of the projects and plans provided by the local authority for an in-combination assessment. One project that was refused planning has point source emissions; the promoter has stated they do not intend to resubmit the application or to appeal against the refusal. There is a point source emitter within the Local Development Plan; however there is no information on the plan since it is a preferred location only and as such it is not possible to obtain air quality data. It is concluded that there are no point source emitters that would contribute to an in-combination effect with the emissions from the proposed Project.